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Agenda

Meeting: Cabinet

Date: 22 September 2021

Time: **5.00 pm**

Place: Council Chamber - Civic Centre Folkestone

To: All members of the Cabinet

All Councillors for information

The cabinet will consider the matters listed below on the date and at the time and place shown above.

This meeting will be webcast live to the council's website at https://folkestone-hythe.public-i.tv/core/portal/home.

Although social distancing rules have been relaxed, for the safety of the public, elected members and staff, we will continue to seat members of the public approximately one metre apart. This means that there will be 13 seats available for members of the public, which will be reserved for those speaking or participating at the meeting. The remaining available seats will be given on a first come, first served basis.

All attendees at meetings are kindly asked to wear face coverings, unless they are addressing the meeting.

1. Apologies for Absence

2. Declarations of Interest (Pages 5 - 6)

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

- a) disclosable pecuniary interests (DPI);
- b) other significant interests (OSI);

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Email: committee@folkestone-hythe.gov.uk or download from our

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Date of Publication: Tuesday, 14 September 2021 Page 1 c) voluntary announcements of other interests.

3. Minutes (Pages 7 - 12)

To consider and approve, as a correct record, the minutes of the meeting held on 21 July 2021.

4. Treasury Management Annual Report 2020/21 (Pages 13 - 30)

This report reviews the Council's treasury management activities for 2020/21, including the actual treasury management indicators. The report meets the requirements of both the CIPFA Code of Practice on Treasury Management and the CIPFA Prudential Code for Capital Finance in Local Authorities. The Council is required to comply with both Codes through Regulations issued under the Local Government Act 2003.

5. Accelerating delivery of the council's Corporate Plan - use of Reserves (Pages 31 - 36)

This report proposes the use of Reserves into the current budget framework to accelerate delivery of the council's corporate plan agenda, specifically those actions relating to: (1) Regeneration and housing activities and; (2) those relating to the council's Climate Change activities.

6. Regulation of Investigatory Powers Act 2000 - Policy (Pages 37 - 72)

This report sets out the Council's policy on the use of directed surveillance and covert human intelligence sources under the Regulation of Investigatory Powers Act 2000.

7. Folkestone and Hythe Community Safety Partnership (CSP) Plan 2021-24 (Pages 73 - 96)

The District Council has a statutory duty to address Crime and Disorder and as a responsible authority participate in the activity of the Folkestone and Hythe Community Safety Partnership (CSP). The CSP is required to produce a CSP plan following a strategic assessment of crime trends and issues facing the District. The annual strategic assessment (SA) document is a restricted document but the CSP plan is a public facing document that sets out the work of the partnership, identified priorities and actions to focus on. This report presents the new three year (21-24) partnership plan (reviewed annually) to Cabinet for endorsement (OSC received the plan on 7th September 2021). The plan will also be presented to full Council on 29th September 2021 for approval.

8. Folkestone Town Centre Place plan (Pages 97 - 234)

This report presents the Folkestone Town Centre Place Plan for approval. The reports sets out an overview of the work undertaken to develop the plan and the key actions proposed as priorities for delivery. The report also seeks approval for the submission of an application to the Government's Levelling Up Fund.

9. Core Strategy Review - Inspectors' main modifications for public consultation (Pages 235 - 472)

This report is to update Cabinet on progress with the Core Strategy Review examination and seek approval to consult on the Main Modifications to the plan, as directed by the planning Inspectors.

10. Folca Redevelopment - New Health Centre Heads of Terms (Pages 473 - 480)

This report sets out the proposed Heads of Terms for the delivery of the Health Centre by the Premier Primary Care Ltd following a disposal to it from the Council on the basis of a ground lease.

11. Exclusion of the Public

To exclude the public for the following item of business on the grounds that it is likely to disclose exempt information, as defined in paragraph 3 of Part 1 of Schedule 12A to the Local Government Act 1972 –

'Information relating to the financial or business affairs of any particular person (including the authority holding that information). "Financial or business affairs" includes contemplated as well as current activities.'

Part 2 – Exempt Information Item

12. Folca Redevelopment - New Health Centre Heads of Terms - Appendix A and B (Exempt) (Pages 481 - 486)

This report sets out the proposed Heads of Terms for the delivery of the Health Centre by the Premier Primary Care Ltd following a disposal to it from the Council on the basis of a ground lease.



Agenda Item 2

Declarations of Interest

Disclosable Pecuniary Interest (DPI)

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

Other Significant Interest (OSI)

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

Voluntary Announcement of Other Interests (VAOI)

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

Note to the Code:

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





Minutes

Cabinet

Held at: Council Chamber - Civic Centre Folkestone

Date Wednesday, 21 July 2021

Present Councillors John Collier, Ray Field, David Godfrey,

Mrs Jennifer Hollingsbee (Vice-Chair), David Monk (Chairman), Stuart Peall, Tim Prater, Lesley Whybrow

and David Wimble

Apologies for Absence Councillor Wimble gave apologies for lateness.

Officers Present: Andy Blaszkowicz (Director of Housing and Operations),

Kate Clark (Case Officer - Committee Services), Gavin Edwards (Performance and Improvement Specialist), Adrian Hammond (Housing Lead Specialist), Katharine Harvey (Chief Economic Development Officer), Amandeep Khroud (Assistant Director), Susan Priest (Chief Executive), Adrian Tofts (Strategy, Policy & Performance Lead Specialist) and Jemma West

(Committee Service Specialist).

NOTE: All decisions are subject to call-in arrangements. The deadline for call-in is Friday 30 July 2021 at 5pm. Decisions not called in may be implemented on Monday 2 August 2021.

18. **Declarations of Interest**

There were no declarations of interest at the meeting.

19. Minutes

The minutes of the meeting held on 23 June 2021 were submitted, approved and signed by the Chairman.

20. District, Parish and Town Council Elections - Kent scale of election fees

The report set out the annual changes to the Kent scale of election fees of Folkestone & Hythe's Returning Officer to undertake the arrangements for managing and conducting district, parish and town council elections from 1 April 2021.

Proposed by Councillor Monk,

Seconded by Councillor Collier; and

RESOLVED:

1. That report C/21/18 be received and noted.

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

REASONS FOR DECISION:

The scale of fees enables a fair and reasonable recharge to be made by Folkestone & Hythe District Council to town and parish councils for their elections.

21. Performance Management Framework

The Council's Performance Management Framework was originally created and approved in 2014, with minor amendments being approved by Cabinet in 2017. The Performance Management Framework has been reviewed and simplified to make it more meaningful and useful for officers, elected members and all those who are engaged in the Council's performance management.

Proposed by Councillor Monk, Seconded by Councillor Mrs Hollingsbee; and

RESOLVED:

- 1. That report C/21/25 be received and noted.
- 2. That the revised Performance Management Framework (Appendix 1 to this report) be approved.

(Voting figures: 8 for, 0 against, 1 abstentions).

(Councillors Wimble and Peall arrived prior to the debate on this item).

REASONS FOR DECISION:

- a) Effective performance management is critical to the success of the Council.
- b) The Council is committed to managing its performance against corporate plan priorities to ensure progress and improvement is maintained.

22. Right to Build/Self-Build and Custom Housebuilding Register

The report summarised what is expected of the Local Authority under the Selfbuild and Custom Housebuilding Act 2015; the current number of people on the Council's Self-Build Register and how the need is identified in the base periods; the actions being taken to help to provide a supply of serviced sites to meet the district's need; the proposed changes to the Council's register; and information on the offer of a workshop from the Government's Right to Build Task Force.

Proposed by Councillor Wimble, Seconded by Councillor Godfrey; and

RESOLVED:

- 1. That report C/21/24 be received and noted.
- That the principle of introducing a local connection test (Part 1 and Part 2) for the Self-Build and Custom Housebuilding Register be approved.

(Voting figures: 9 for, 0 against, 0 abstentions).

REASONS FOR DECISION:

Cabinet was asked to agree the recommendations because:

- a) Guidance from the Right to Build Task Force could help to bring forward custom and self-build housing in the district.
- Introducing a local connection test to individuals registering on the Council's Self-Build and Custom Housebuilding list will enable local people to be prioritised.

23. Romney Marsh Business Hub grant scheme

The report sought agreement for Folkestone & Hythe District Council to make use of unallocated reserves from the Marsh Million Fund towards the development of a business grant scheme. This proposal will support the take-up of space within the Romney Marsh Business Hub and is to be launched in September 2021.

Proposed by Councillor Wimble, Seconded by Councillor Collier; and

RESOLVED:

- 1. That report C/21/23 be received and noted.
- 2. That unallocated reserves from the Marsh Million Fund be used to implement a business grant scheme to encourage take- up of space within the RMBH and also potentially for the take-up of the stage 2 development.
- 3. That decisions on applications for the RMBH grant scheme be delegated to a subgroup of the Romney Marsh Partnership Board which will chaired by the Folkestone & Hythe District Council's Lead Cabinet Member for the Local Economy.

(Voting figures: 9 for, 0 against, 0 abstentions).

REASONS FOR DECISION:

The completion of Romney Marsh Business Hub (RMBH) at Mountfield Road is due for completion in December 2021 and progress is going well. This will meet the needs of local businesses to help diversify the local economy and create new employment in New Romney. It is proposed that a business grant scheme

is implemented to attract businesses to take-up space within the hub and also, potentially later with the stage 2 development of the site in due course.

24. Housing Compensation Policy

The report sought approval for a new policy for the payment of compensation to Council tenants and leaseholders.

Proposed by Councillor Godfrey, Seconded by Councillor Mrs Hollingsbee; and

RESOLVED:

- 1. That report C/21/22 be received and noted.
- 2. That the Housing Compensation Policy be approved.
- That delegated authority be given to the Director of Housing and Operations, in consultation with the Cabinet Member for Housing, Transport and Special Projects, to approve minor amendments to Housing Compensation Policy in the future.

(Voting figures: 9 for, 0 against, 0 abstentions).

REASONS FOR DECISION:

The Housing Ombudsman requires social housing landlords to have and to publicise a compensation policy for their tenants and leaseholders. Folkestone and Hythe District Council (the Council) does not currently have a compensation policy specifically for the Housing service.

25. Community-Led Housing (CLH) Seed Funding Scheme

The report requested approval for a Council administered Community-Led Housing (CLH) Seed Funding Scheme of £100k. The funds for this would come from the £437,361 awarded to the Council by the Ministry for Housing, Communities and Local Government's (MHCLG) to promote and support CLH in the district.

Community-led housing can help to achieve several of FHDC's strategic priorities and constituents' aims and aspirations. The Seed Funding Scheme is intended to support CLH projects that will increase housing supply by potentially delivering additional, new affordable housing and turn empty properties into housing. It is designed to help community groups deliver housing schemes on land identified by the community, or made available by the local authority/local landowners through sale or long leases. The funding would be used by CLH groups to pursue any model of community-led development for the provision of affordable housing, including Community Land Trusts and Cohousing Projects.

Proposed by Councillor Godfrey, Seconded by Councillor Mrs Hollingsbee; and

RESOLVED:

- a) That report C/21 be received and noted.
- b) That the proposed CLH Seed Funding Scheme as detailed in this report and the required funding be approved.

- c) That delegated authority be given to the Strategic Housing Lead and the Cabinet Member for Housing to award funding to groups following a successful application.
- d) That the Cabinet Member for Housing be given delegated authority (in consultation with Head of Service) to make minor changes to the scheme as necessary and subject to any feedback from community groups applying to the scheme.

(Voting figures: 9 for, 0 against, 0 abstentions).

REASONS FOR DECISION:

The funding of £437,361 was awarded by central government, with the intention that a seed funding programme would be put in place, alongside other support provision, to enable community organisations to have access to an initial income stream, which will allow them to explore local housing needs, and later possibly pursue housing options/solutions for their community. The proposed Seed Funding Scheme is intended to support new CLH projects in the district.



This report will be made public on 14 September 2021



Report Number **C/21/27**

To: Cabinet

Date: 22 September 2021 Status: Non-Key Decision

Head of Service: Charlotte Spendley – Director of Corporate

Services

Cabinet Member: Councillor David Monk, Leader and Portfolio

Holder for Finance

SUBJECT: TREASURY MANAGEMENT ANNUAL REPORT

2020/21

SUMMARY: This report reviews the Council's treasury management activities for 2020/21, including the actual treasury management indicators. The report meets the requirements of both the CIPFA Code of Practice on Treasury Management and the CIPFA Prudential Code for Capital Finance in Local Authorities. The Council is required to comply with both Codes through Regulations issued under the Local Government Act 2003.

REASONS FOR RECOMMENDATION:

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

a) Both CIPFA's Code of Practice on Treasury Management in the Public Services and their Prudential Code for Capital Finance in Local Authorities, together with the Council's Financial Procedure Rules, require that an annual report on treasury management is received by the Council after the close of the financial year.

RECOMMENDATION:

1. To receive and note Report C/21/27.

1. INTRODUCTION

- 1.1 The annual treasury report is a requirement of the Council's reporting procedures. It covers the treasury activity for 2020/21 compared to the approved strategy for the year. It also summarises the actual treasury management indicators for 2020/21 compared to those approved for the year.
- 1.2 The report meets the requirements of both the CIPFA Code of Practice on Treasury Management and the CIPFA Prudential Code for Capital Finance in Local Authorities. The Council is required to comply with both Codes through Regulations issued under the Local Government Act 2003.
- 1.3 Cabinet approved the Treasury Management Strategy Statement for 2020-21, including treasury management indicators, on 22 January 2020 (minute 65 refers). The Capital Strategy for 2020/21 covering capital expenditure and financing, treasury management and non-treasury investments was due to be considered by Cabinet on 19 March 2020 and Council on 25 March 2020. However, the first national lockdown prevented this from happening and an officer decision to approve the Capital Strategy was taken by the Director of Corporate Services on 27 March 2020 (Decision Number 19/034 refers). Cabinet received an update on the Council's treasury management activity in 2020/21 on 20 January 2021 as part of the Treasury Management Strategy Statement 2021/22 and Treasury Management Monitoring Report 2020/21 (minute 66 refers).
- 1.4 The Council's formal treasury management reporting arrangements comply with the requirements of the CIPFA's Treasury Management Code and also provide the opportunity for proper scrutiny of its treasury management activities.

2. ECONOMIC COMMENTARY

(Based on commentary supplied by Arlingclose Ltd, the Council's Treasury Advisor)

2.1 Economic Background

- 2.1.1 The economic background has been dominated by the unprecedented impact of the Covid-19 pandemic. The key issues affecting the UK economy over the past year are:
 - i) **Growth** After contracting sharply in Q2 (Apr-Jun) 2020 by 19.8% quarter on quarter, growth in Q3 and Q4 bounced back by 15.5% and 1.3% respectively. However the re-imposition of the national lockdown from late December 2020 resulted in GDP falling by 1.3% in Q1 of 2021. At the end of March 2021 GDP was 8.8% below its prepandemic level.
 - ii) Inflation Inflation has remained low over the 12 month period. The annual headline rate of UK Consumer Price Inflation (CPI) rose slightly to 0.7% in March 2021, below expectations (0.8%) and still

well below the Bank of England's 2% target. The ONS' preferred measure of CPIH which includes owner-occupied housing was 1.0% in March 2021 (1.0% expected).

- iii) Wages and Employment Labour market data showed that in the three months to March 2021 the unemployment rate was 4.8%, in contrast to the 3.9% recorded for the same period 12 months ago. Wages rose 4.0% for total pay in nominal terms (4.6% for regular pay) and was up by 3.1% in real terms (3.6% for regular pay). Unemployment is still expected to increase as the various government job support schemes for the pandemic come to an end.
- iv) Global Economy The US economy suffered a contraction of 31.4% in Q2 of 2020 before rebounding by 33.4% in Q3, a further 4.3% in Q4 and 6.4% in Q1 of 2021. The recovery has been fuelled by three major pandemic relief stimulus packages totaling over \$5 trillion. The Federal Reserve had already cut its main interest rate to between 0% and 0.25% in March 2020 in response to the pandemic and it has remained at the same level. The European Central Bank maintained its base rate at 0% and deposit rate at -0.5% but in December 2020 increased the size of its asset purchase scheme to €1.85 trillion and extended it until March 2022.
- v) Bank Base Rate The Bank of England (BoE) held the Bank Rate at 0.1% throughout the year but extended its Quantitative Easing programme by £150 billion to £895 billion at its November 2020 meeting. In its March 2021 interest rate announcement, the BoE noted that while GDP would remain low in the near-term due to Covid-19 lockdown restrictions, the easing of these measures means growth is expected to recover strongly later in the year. Inflation is forecast to increase in the near-term and while the economic outlook has improved there are downside risks to the forecast, including from unemployment which is still predicted to rise when the furlough scheme is eventually withdrawn.

2.2 Financial Markets

- 2.2.1 Gilt yields, which regulate borrowing rates through the Public Works Loan Board (PWLB), increased over the year albeit still at historically low levels. However, there were periods of volatility due in part to the ongoing impact of the pandemic and also the negotiations to agree the Brexit trade deal which was agreed in late December 2020. The 5-year UK benchmark gilt yield began the financial year at 0.18% before declining to -0.03% at the end of 2020 and then rising strongly to 0.39% by the end of the financial year. Over the same period the 10-year gilt yield fell from 0.31% to 0.19% before rising to 0.84%. The 20-year gilt declined slightly from 0.70% to 0.68% before increasing to 1.36%.
- 2.2.2 The 1-month, 3-month and 12-month SONIA money market bid rates, used as a benchmark for short term cash deposits, averaged 0.01%, 0.10% and 0.23% respectively over the year.

2.2.3 Monetary and fiscal stimulus helped provide support for equity markets which rose over the period, with the Dow Jones beating its pre-crisis peak on the back of outperformance by a small number of technology stocks. The FTSE indices performed reasonably well during the period April to November, before being buoyed in December by both the vaccine approval and Brexit deal, which helped give a boost to both the more internationally focused FTSE 100 and the more UK-focused FTSE 250, however they remain lower than their pre-pandemic levels.

2.3 Credit Background

- 2.3.1 Credit Default Swap spreads (the premium banks pay to guarantee liquidity for borrowing) spiked in March 2020 due to concerns over the initial impact of the pandemic on the banking sector but declined over the year to broadly pre-pandemic levels. Arlingclose, the council's treasury management advisor, maintained their recommended duration for unsecured investments with both UK and Non-UK banks to a maximum of 35 days throughout the year. This has had no impact on the Council's investment position.
- 2.3.2 The credit ratings for many UK institutions were downgraded on the back of downgrades to the sovereign rating. Credit conditions more generally though in banks and building societies have tended to be relatively benign, despite the impact of the pandemic. This has had no impact on the Council's investment position.

3. TREASURY POSITION AT 31 MARCH 2021

3.1 On 31 March 2021, the Council had net investments of £18.8m arising from its revenue and capital income and expenditure, a decrease on 2020 of £10.9m. The underlying need to borrow for capital purposes is measured by the Capital Financing Requirement (CFR), while usable reserves and working capital are the underlying resources available for investment. These factors and the year-on-year change are summarised in table 1 below.

Table 1: Balance Sheet Summary

	31.3.20 Actual £m	2020/21 Movement £m	31.3.21 Actual £m
General Fund CFR	70.0	9.5	79.5
HRA CFR	47.4	-	47.4
Total CFR	117.4	9.5	126.9
Less, External Borrowing	90.3	11.3	79.0
Internal Borrowing	27.1	20.8	47.9
Less: Usable reserves	(53.5)	(2.8)	(56.3)
Less: Working capital	(3.3)	(7.1)	(10.4)
Net Investments	(29.7)	10.9	(18.8)

- 3.2 The net increase in the Council's CFR of £9.5m was reported to Cabinet on 23 June 2021 in the General Fund Capital Programme Outturn 2020/21 report (minute 12 refers). Notably, capital expenditure in 2020/21 on the Otterpool Park Garden Town development (£5.4m), the acquisition of vehicles for the new waste contract (£2.3m) and funding to support Oportunitas Limited for its property investment programme (£2.1m) was met from prudential borrowing.
- 3.3 The Council's current strategy is to maintain borrowing and investments below their underlying levels, sometimes known as internal borrowing, in order to reduce risk and keep interest costs low. The treasury management position as at 31 March 2021 and the year-on-year change in show in table 2 below.

Table 2: Treasury Management Summary

	31.3.20 Balance £m	2020/21 Movement £m	31.3.21 Balance £m
Long-term borrowing	58.5	13.7	72.2
Short-term borrowing	31.8	(25.0)	6.8
Total borrowing	90.3	(11.3)	79.0
Long-term investments	(14.1)	(1.1)	(15.2)
Short-term investments	(3.5)	3.5	-
Cash and cash equivalents	(12.1)	8.5	(3.6)
Total investments	(29.7)	10.9	(18.8)
Net borrowing	60.6	(0.4)	60.2

Note: the figures in the table are from the balance sheet in the authority's statement of accounts, but adjusted to exclude operational cash, accrued interest and other accounting adjustments.

3.4 Although the CFR increased during 2020/21, the Council was able to marginally reduce its net borrowing over the year by £0.4m. This was possible by increasing internal borrowing from having higher than anticipated cash reserves and balances to utilise. Moving forward it is expected some of this internal borrowing will be replaced with new external borrowing as the cash reserves and balances are applied towards their intended use.

4. BORROWING 2020/21

4.1 **Borrowing Update**

4.1.1 In November 2020 the Public Works Loan Board (PWLB) published its revised lending terms to local authorities and this was outlined to Cabinet on 20 January 2021 as part of the Treasury Management Strategy Statement 2021/22 and Treasury Management Monitoring Report 2020/21 (minute 66 refers). In summary, the revised lending arrangements now prevent local authorities from accessing PWLB borrowing where they plan to purchase

'investment assets primarily for yield' as part of their approved capital programme. At the same time the PWLB has reduced the cost of new loans to local authorities by 1%.

4.1.2 The Council is not planning to purchase any investment assets primarily for yield within the next three years and so is able to take advantage of the reduction in the PWLB borrowing rate.

4.2 Borrowing Activity 2020/21

4.2.1 At 31 March 2021, the Council held £79.0m of loans, a reduction of 11.3m on the previous year, as part of its strategy for funding previous and current years' capital programmes. Following the introduction of the Housing Revenue Account (HRA) Self-Financing regime in 2012 the Council operates a two pool debt approach allocating its loans between the General Fund and HRA. The year-end borrowing position and the year-on-year change is shown in table 3 below. A full list of the loans held at 31 March 2021 is shown in appendix 1 to this report

Table 3: Borrowing Position – Two Pool Debt Approach

	31.3.20 Balance £m	2020/21 Movement £m	31.3.21 Balance £m	31.3.21 Rate %
General Fund				
Public Works Loan Board	7.2	-	7.2	4.69%
Local Authorities	35.5	(10.0)	25.5	1.16%
Total General Fund borrowing	42.7	(10.0)	32.7	2.78%
Housing Revenue Account Public Works Loan Board	47.6	(1.3)	46.3	3.25%
Total HRA borrowing Total borrowing	47.6	(1.3)	46.3 79.0	3.25% 3.14%

- 4.2.2 The weighted average maturity of the overall loans portfolio at 31 March 2021 is 8.4 years.
- 4.2.3 The Council's chief objective when borrowing has been to strike an appropriately low risk balance between securing low interest costs and achieving cost certainty over the period for which funds are required, with flexibility to renegotiate loans should the authority's long-term plans change being a secondary objective.
- 4.2.4 With short-term interest rates remaining much lower than long-term rates, it was considered to be more cost effective in the near term to use mainly

- short-term loans borrowed from other local authorities and also to continue using internal resources to meet the increase in the CFR. The movement in these loans is shown in table 3, above.
- 4.2.5 The Council's borrowing decisions are not predicated on any one outcome for interest rates and a balanced portfolio of short and long-term borrowing is in place to provide flexibility for future decisions.

5. INVESTMENT ACTIVITY 2020/21

- 5.1 The Council holds significant invested funds, representing income received in advance of expenditure plus balances and reserves held. During 2020/21, the Council's investment balance ranged between £19 million and £63 million due to timing differences between income and expenditure. This range of investment balances was significantly greater than originally anticipated for the year.
- 5.2 As reported to Cabinet on 20 January 2021, on 1 April 2020 the Council received £28.8m in central government funding to support small and medium businesses during the pandemic through grant schemes and, largely, this explains the significant variation in investment balances held in 2020/21. Approximately £21.5m of this funding was paid out to local businesses by the end of April 2021 increasing to £25.3m by the end of September. Further smaller tranches of central government support for businesses were received and distributed during the year.
- 5.3 The Council had an average investment balance of £31.8m during 2020/21 generating a return, net of fees, of 2.00% for the year. The year-end investment position and the year-on-year change are shown in table 4 below. A list of the individual investments held at 31 March 2020 is shown in appendix 2 to this report.

Table 4: Investment Position

	31.3.20 Balance £m	Net Movement £m	31.3.21 Balance £m	Average Return
Banks & building societies (unsecured)	0.2	(0.2)	-	0.01%
Covered bonds (secured)	3.5	(3.5)	-	1.03%
Money Market Funds	11.9	(8.3)	3.6	0.12%
Property Pooled Fund Multi-Asset Income Funds	5.3 8.8	- 1.1	5.3 9.9	4.35% 4.17%
Total investments	29.7	(10.9)	18.8	2.00%

- 5.4 The weighted average maturity of the investment portfolio at 31 March 2021 was 19 days.
- 5.5 Both the CIPFA Code and government guidance require the Council to invest its funds prudently, and to have regard to the security and liquidity of its

- investments before seeking the highest rate of return, or yield. The Council's objective when investing money is to strike an appropriate balance between risk and return, minimising the risk of incurring losses from defaults and the risk of receiving unsuitably low investment income.
- 5.6 Continued downward pressure on short-dated cash rate brought net returns on sterling low volatility net asset value money market funds (MMFs) close to zero even after some managers have temporarily lowered their fees. At this stage net negative returns are not the central case of most MMF managers over the short-term, and fee waivers should maintain positive net yields, but the possibility cannot be ruled out.
- 5.7 Deposit rates with the Debt Management Account Deposit Facility (DMADF) have continued to fall and are now largely around zero.
- 5.8 The net return on Money Market Funds net of fees, which had fallen after Bank Rate was cut to 0.1% in March, are now at or very close to zero; fund management companies have temporarily lowered or waived fees to avoid negative net returns
- 5.9 The Council met its investment objectives and strategy for 2020/21. As previously outlined in sections 3 and 4 of this report, the Council has been able to use short term liquid cash to meet its underlying borrowing need through internal borrowing, reducing its exposure to credit risk. Secondly, the return from the strategic investments in pooled funds have continued to provide cash returns in excess of inflation. The performance of these pooled funds is considered in more detail below.
- 5.10 Externally Managed Pooled Funds The Council has £15m invested in externally managed multi-asset and property funds, representing the authority's forecast minimum level of cash reserves and balances over the medium term. These pooled funds aim to provide returns in excess of inflation and, over time, provide the opportunity for some limited capital growth. The sudden economic impact of the pandemic had a negative impact on the value of these funds at 31 March 2020. However, the position has significantly improved over the year to 31 March 2021 with the diversified income funds recovering most of their capital value.
- 5.11 A summary of the pooled funds value and performance for the past two financial years is shown in table 5 below.

Table 5 – Pooled Funds Summary

Fund	Value at 01/04/19	Value at 31/03/20	Value 31/03/21	Valuation change 2020/21	Dividend Return 2019/20	Dividend Return 2020/21
	£m	£m	£m	£m	£'000	£'000
CCLA Local Authorities Property Fund	5.52	5.32	5.28	(0.04)	238.6	231.0
CCLA Diversified Income Fund	1.97	1.80	1.94	0.14	64.8	61.8
Aegon Diversified Monthly Income Fund	3.52	2.96	3.52	0.56	173.9	149.6
Ninety-One Diversified Income Fund	3.52	3.19	3.51	0.32	145.2	132.1
UBS Multi-Asset Income Fund	0.98	0.86	0.95	0.09	45.9	46.5
Total	15.51	14.13	15.20	1.07	668.4	621.0
Return %					4.32%	4.17%

- 5.12 The sudden economic impact of the pandemic had a negative impact on the value of these funds at 31 March 2020 and this was reported to Cabinet on 21 October 2020 as part of the Treasury Management Outturn report for 2019/20. However, the position has significantly improved over the year to 31 March 2021 with the diversified income funds recovering most of their capital value and is largely due to the recovery in the equity markets where this class of asset typically accounts for about one third of the investment portfolio. The CCLA Local Authorities Property Fund (LAPF), which invests in a range of commercial property, has seen its value broadly stabilise during 2020/21. Encouragingly there have been further gains in the capital value of all the pooled funds held to the 30 June 2021 and these are now approximately at their pre-pandemic values.
- 5.13 Similar to many other property funds, dealing (i.e. buying or selling units) in the CCLA LAPF was suspended by the fund in March 2020 and lifted in September. There was also a change to redemption terms for the CCLA LAPF from September 2020 requiring investors to now give at least 90 calendar days' notice for redemptions.
- 5.14 The dividend yields across the pooled funds in percentage terms, based on the net asset value of the units in the funds, are marginally lower than those received last year. However, the cash value of the dividends for 2020/21 is about 7% lower in total over the year compared to 2019/20 because of the overall impact of the reduction in the net asset value of the units held over the financial year. Nevertheless, the cash returns from the pooled funds remains significantly above inflation, helping to meet the council's investment objectives.

- 5.15 Because the pooled funds have no defined maturity date, but are available for withdrawal after a notice period, their performance and continued suitability in meeting the Council's investment objectives is regularly reviewed. Strategic fund investments are made in the knowledge that capital values will move both up and down on months, quarters and even years; but with the confidence that over a three to five-year period total returns will exceed cash interest rates.
- 5.16 The progression of risk and return metrics are shown in the extracts from Arlingclose's quarterly investment benchmarking in table 6 below.

Table 6: Investment Benchmarking – Treasury investments managed in-house only

	Credit Score	Credit Rating	Bail-in Exposure	WAM (days)	Income Return
<u>FHDC</u>					
31.03.2020	3.44	AA-	78%	11	0.77%
31.03.2021	4.01	AA-	100%	1	0.01%
Similar LAs	4.63	A +	65%	40	0.13%
All LAs	4.63	A+	63%	14	0.15%

5.17 The investment benchmarking, which is a snapshot at the end of each quarter and only covers in-house managed investments, demonstrates the council had a marginally lower risk and return profile compared to both its peer group and the wider local authority population as at 31 March 2021 (measured against other Arlingclose clients only).

6. FINANCIAL SUMMARY

6.1 The following table summarises the Council's net interest cost for its treasury management activities in 2020/21 and shows the outturn to the General Fund is lower than the approved estimate, subject to audit:

Table 7: Net Interest Cost

	2019/20 Actual	2020/21 Estimate	2020/21 Actual	2020/21 Variance Estimate to Actual
	£'000	£'000	£'000	£'000
Interest Paid	1,960	1,945	2,188	243
Interest	(807)	(635)	(664)	(29)
Received(net of fees) Net Interest	1,153	1,310	1,524	214
Net Impact				
General Fund	(389)	(187)	(238)	(51)
H.R.A	1,498	1,497	1,535	38
Capitalised Interest	44	, -	227	227
· -	1,153	1,310	1,524	214

- 6.2 The reduction in the net borrowing cost to the General Fund of £51k is mainly due to higher than anticipated investment income received (£29k) and an increase in the net interest cost required to be charged to the Housing Revenue Account under statutory provisions (£38k).
- 6.3 The increase in interest paid of £243k is due to new loans taken up during the year to help meet capital expenditure incurred being met from prudential borrowing. The Council changed its Accounting Policy from 2019/20 to allow it to capitalise interest incurred on qualifying capital projects that are expected to take a number of years to be delivered. This has enabled the capitalisation of interest on borrowing to purchase the property from Cozumel Estates and other property for the Otterpool Park development acquired since 1 April 2019.

7. OTHER NON-TREASURY HOLDINGS AND ACTIVITY

7.1 The definition of investments in CIPFA's revised Treasury Management Code now covers all the financial assets of the Council as well as other non-financial assets which it holds primarily for financial return. This is replicated in MHCLG's Investment Guidance, in which the definition of investments is further broadened to also include all such assets held partially for financial return. The assets are summarised in the table below:

Table 8: Non-Treasury Holdings and Returns

Investment Type	Value 31/03/20	Value 31/03/21	Net Income 2020/21	Rate of Return
	£m	£m	£'000	%
Investment Property				
Otterpool Property	55.9	64.9	(101)	0.16
Offices	17.0	17.4	(419)	2.41
Commercial Land	0.8	0.7	-	-
Commercial Units	1.6	1.8	(131)	5.15
Retail	-	2.2	134	-
Assets Under Construction	0.6	0.2	-	-
Total Investment Property	75.9	87.2	(517)	0.59
Subsidiary Companies				
Oportunitas loan	4.3	4.3	(209)	4.88
Oportunitas equity	1.3	3.5	(21)	0.61
Oportunitas - Total	5.6	7.8	(230)	2.97
Otterpool Park LLP equity	_	1.2	-	
Total Subsidiaries	5.6	9.0	(230)	2.97
Total	81.5	96.2	(747)	0.78

7.2 The net income and rate of return excludes the impact of any unrealised property valuation gains or losses. Ordinarily the rate of return on non-treasury investment assets would be expected to be higher than that earned on treasury investments reflecting the additional risks to the council of holding such investments. This is demonstrated with the return on the commercial units and Oportunitas. However the return on the investment property portfolio for 2020/21 is significantly distorted because of the land acquisitions taking place for the Otterpool Park project in particular. The Council is receiving rental streams from some of the property being acquired in the short to medium term.

8. COMPLIANCE WITH INVESTMENT LIMITS AND TREASURY INDICATORS

8.1 The Director of Corporate Services reports that the treasury management activities undertaken during 2020/21, with one exception, complied with the CIPFA Code of Practice and the council's approved Treasury Management Strategy. The Liquidity Indicator, which measures liquidity risk in the form of cash available to meet unexpected payments within a three month rolling period, was at £3.6m on 31 March 2021, below the target of £5m. This was due to a significant cash outflow in the late March and the position was rectified from 1 April 2021. Further information regarding compliance with the specific investment and Treasury indicators is demonstrated in appendix 3 to this report.

9. LEGAL/FINANCIAL AND OTHER CONTROLS/POLICY MATTERS

9.1 Legal Officer's Comments (NM)

There are no significant legal implications as a result of the recommendations in this report which are not covered in the body of the report. Compliance with the CIPFA Code of Practice for Treasury Management in the Public Services and the CIPFA Prudential Code for Capital Finance in Local Authorities issued under the Local Government Act 2003 provides assurance that the council's investments are, and will continue to be, within its legal powers.

9.2 Finance Officer's Comments (LW)

This report has been prepared by the Finance Specialist Team and relevant financial implications are included within it.

9.3 Diversities and Equalities Implications

The report does not cover a new service or policy or a revision of either and therefore does not require an Equality Impact Assessment.

10. CONTACT OFFICER AND BACKGROUND DOCUMENTS

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

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

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

Arlingclose Ltd – Model Treasury Management Annual Report Template

Appendices:

Appendix 1 – Borrowing, loans held at 31 March 2021

Appendix 2 – Investments held at 31 March 2021

Appendix 3 – Compliance with specific investment and borrowing limits and Treasury Indicators

APPENDIX 1 – BORROWING, LOANS HELD AT 31 MARCH 2021

					Principal	
					Outstanding	Interest
Lender	Loan No	Loan Type	Start Date	Maturity Date	31/03/2021	Rate
		7,			£	%
Public Works Loan Board	430141	Annuity	09/11/1973	01/11/2033	3,776.27	11.38
Public Works Loan Board	480111	Fixed	14/10/1997		1,000,000.00	6.63
Public Works Loan Board	488942	Fixed	12/08/2004	07/08/2034	2,000,000.00	4.80
Public Works Loan Board	492233	Fixed	28/09/2006	15/03/2054	2,000,000.00	4.05
Public Works Loan Board	493698	Fixed	10/08/2007	07/08/2055	2,500,000.00	4.55
Public Works Loan Board	493914	Fixed	10/09/2007	07/02/2053	2,500,000.00	4.55
Public Works Loan Board	494027	Fixed	31/10/2007	15/03/2044	2,000,000.00	4.65
Public Works Loan Board	494028	Fixed	31/10/2007	15/03/2045	2,000,000.00	4.65
Public Works Loan Board	494029	Fixed	31/10/2007	15/03/2046	2,141,190.00	4.65
Public Works Loan Board	500536	Fixed	28/03/2012	28/03/2023	4,000,000.00	2.56
Public Works Loan Board	500537	Fixed	28/03/2012	28/03/2031	4,010,000.00	3.26
Public Works Loan Board	500538	Fixed	28/03/2012	28/03/2028	4,000,000.00	3.08
Public Works Loan Board	500540	Fixed	28/03/2012	28/03/2025	4,000,000.00	2.82
Public Works Loan Board	500541	Fixed	28/03/2012	28/03/2029	4,000,000.00	3.15
Public Works Loan Board	500542	Fixed	28/03/2012	28/03/2030	4,000,000.00	3.21
Public Works Loan Board	500543	Fixed	28/03/2012	28/03/2027	4,000,000.00	3.01
Public Works Loan Board	500545	Fixed	28/03/2012	28/03/2022	1,300,000.00	2.40
Public Works Loan Board	500546	Fixed	28/03/2012	28/03/2024	4,000,000.00	2.70
Public Works Loan Board	500548	Fixed	28/03/2012	28/03/2026	4,000,000.00	2.92
Total - Public Works Loan Board					53,454,966.27	
London Borough of Barking and						
Dagenham	n/a	Fixed	31/01/2020	31/01/2022	5,000,000.00	1.60
London Borough of						
Wandsworth	n/a	Fixed	29/01/2021	31/01/2023	10,000,000.00	0.60
Durham County Council	n/a	Fixed	01/02/2021	03/10/2022	5,000,000.00	0.55
Leicester City Council	n/a	Fixed	01/03/2021	01/03/2023	5,000,000.00	0.65
		Variable - 2	Various May			
Folkestone Town Council	n/a	day call notice	2018	02/04/2021	500,000.00	0.00
Total - Borrowing at 31/03/2021					78,954,966.27	

APPENDIX 2 – INVESTMENTS HELD AT 31 MARCH 2020

Category and Counterparty	Amount or Value £	Terms	Indicative Interest Rate or Yield %
Banks & Building Societies (unsecu	ıred)		
NatWest - Business Reserve	0	No notice instant access	0.01
Money Market Funds			
Aberdeen Standard MMF	3,620,000	No notice instant access	0.01
Other Pooled Funds			
Commercial Brownsty Funds			
Commercial Property Funds	E 000 E07		4.04
CCLA Property Fund	5,282,587		4.91
Multi-Asset Income Funds			
CCLA Diversified Income Fund	1,946,036		2.35
	, ,		
UBS Multi-Asset Income Fund	949,602		3.61
Aegon Asset Management Diversified Monthly Income Fund	3,519,652		4.67
Ninety-One Diversified Income Fund	3,506,271		2.86
Total Investments	18,824,148		3.21

^{*} Net of Fees

APPENDIX 3 – COMPLIANCE WITH SPECIFIC INVESTMENT AND TREASURY INDICATORS

Compliance with specific investment limits is demonstrated in table 1 below.

Table 1: Specific Investment Limits

	Maximum to 31.3.21	31.3.21 Actual	2020/21 Limit	Complied
Any single organisation, except UK Government	£5m	nil	£5m each	✓
UK Central Government	£ 22.7m	nil	Unlimited	✓
Any group of funds under the same management	nil	nil	£5m per group	✓
Negotiable instruments held in a broker's nominee account	£3.5m	nil	£10m per broker	✓
Foreign countries	nil	nil	£5m per country	✓
Registered Providers	nil	nil	£10m in total	✓
Unsecured investments with Building Societies	nil	nil	£5m in total	✓
Loans to unrated corporates	nil	nil	£5m in total	√
Money Market Funds	£20.0m	£3.6m	£25m in total	✓
Any group of pooled funds under the same management	£7.5m	£7.2m	£10m per manager	✓
Real estate investment trusts	nil	nil	£10m in total	✓

Treasury Management Indicators

The council measures and manages its exposures to treasury management risks using the following indicators.

Security: The council has adopted a voluntary measure of its exposure to credit risk by monitoring the value-weighted average credit rating of its investment portfolio. This is calculated by applying a score to each investment (AAA=1, AA+=2, etc.) and taking the arithmetic average, weighted by the size of each investment. Unrated investments are assigned a score based on their perceived risk.

	31.3.21 Actual	2020/21 Target	Complied
Portfolio average credit rating	AA-	Α	\checkmark

Liquidity: The council has adopted a voluntary measure of its exposure to liquidity risk by monitoring the amount of cash available to meet unexpected payments within a rolling three-month period, without additional borrowing

Total cash available within 3 months

31.3.21 2020/21
Actual Target

£3.6m £5m ×

The Council had a significant cash outflow in the last week of the financial year resulting in this indicator being below the target at 31 March 2021. However, the position was very short term with the target being met again from 1 April 2021.

Interest Rate Exposures: This indicator is set to control the council's exposure to interest rate risk. The upper limits on fixed and variable rate interest rate exposures, expressed as the amount of net principal borrowed is shown in table 3 below:

Table 3: Interest Rate Exposures

	31.3.21 Actual	2020/21 Limit	Complied
Upper limit on one-year revenue impact of a 1% rise in interest rates	£208,255	£290,000	✓
Upper limit on one-year revenue impact of a 1% fall in interest rates	£289,625	£310,000	✓

The impact of a change in interest rates is calculated on the assumption that maturing loans and investment will be replaced at current rates.

Maturity Structure of Borrowing: This indicator is set to control the council's exposure to refinancing risk. Compliance with the upper and lower limits on the maturity structure of fixed rate borrowing is shown in table 4 below:

Table 4: Maturity Structure of Borrowing

	31.3.21 Actual	Upper Limit	Lower Limit	Complied
Under 12 months	8.6%	30%	0%	✓
12 months and within 24 months	31.7%	40%	0%	✓
24 months and within 5 years	15.2%	50%	0%	✓
5 years and within 10 years	25.3%	80%	0%	✓
10 years and above	19.2%	100%	0%	✓

Time periods start on the first day of each financial year. The maturity date of borrowing is the earliest date on which the lender can demand repayment.

Principal Sums Invested for Periods Longer than 364 days: The purpose of this indicator is to control the council's exposure to the risk of incurring losses by seeking early repayment of its investments. Compliance with the limits on the long-term principal sum invested to final maturities beyond the period end is shown in table 5 below:

Table 5: Principal Sums Invested for Periods Longer than 364 days

At 31.3.21	2020/21	2021/22	2022/23
Actual principal invested for longer than 364 days	-	-	-
Limit on principal invested beyond 364 days	£15m	£5m	£5m
Complied	✓	✓	✓

Although the council's investments in the pooled funds of £15.2m are accounted for as non-current (long term) assets, based on the intention to continue to hold them for longer than 12 months, they do not have a fixed maturity date and can be redeemed within a short notice period if required so do not feature in this indicator.

Agenda Item 5

This Report will be made public on 14 September 2021



Report Number **C/21/32**

To: Cabinet

Date: 22nd September 2021

Status: Key Decision

Responsible Officer: Charlotte Spendley, Director Corporate Services

Cabinet Member: Cllr David Monk, Leader of the Council

SUBJECT: ACCELERATING DELIVERY OF THE COUNCIL'S

CORPORATE PLAN - USE OF RESERVES

SUMMARY: This report proposes the use of Reserves into the current budget framework to accelerate delivery of the council's corporate plan agenda, specifically those actions relating to: (1) Regeneration and housing activities and; (2) those relating to the council's Climate Change activities.

REASONS FOR RECOMMENDATIONS:

Cabinet is asked to support the recommendations which, if supported, will be put before Full Council for agreement.

RECOMMENDATIONS:

- 1. To receive and note report C/21/32.
- 2. To support the use of reserves as outlined in paragraph 2.1a to accelerate delivery of the Council's regeneration and housing agenda;
- 3. To support the use of reserves as outlined in paragraph 2.1b to allow for environmental enhancements to be made in council activities that support delivery of the Corporate Plan, specifically those of the Climate Change Action Plan;
- 4. To support the use of the capacity funding as outlined in paragraph 2.1a to support the levelling up fund bid submission
- 5. To recommend to Council use of funding and the reserves as outlined in this report for inclusion in the budget framework;
- 6. To note that should Full Council support be given, to agree the use of these funds be delegated to the Chief Executive, in consultation with the Leader of the Council, and be reported as part of the regular budget monitoring reports to Cabinet.

1. BACKGROUND

- 1.1 The council has an ambitious corporate plan (Report A/20/10). Delivering quality homes and infrastructure, a vibrant economy and a thriving environment are three of the four service ambitions, with positive community leadership completing the set.
- 1.2 The Overview and Scrutiny Committee will consider the draft Corporate Action Plan on 7 September, with Cabinet considering the proposed plan shortly afterwards. The Corporate Action Plan identifies the key projects and actions over the three year period to 2024 across the all Corporate Plan priority areas.
- 1.3 Detailed work is being delivered by all council teams across the various service areas and beyond the immediate day-to-day demands for high quality council services and recovery across the district from COVID-19, the focus for the coming years will largely be on delivering key, large scale place-making projects including the following:
 - Biggins Wood 77 new homes and 5,800 sqm new employment space;
 - Council housing renewal a capital enhancement programme following the stock condition survey to deliver a robust asset management approach covering the estate of some 3,500 homes;
 - Folkestone Town Centre renewal, including a health centre at FOLCA with significant place-making activities to enhance residential and employment opportunities;
 - A significant expansion in the number of new affordable homes into our Housing Revenue Account;
 - Mountfield Road 5,092 sq.ft of employment space at the Romney Marsh Business Hub and a further 156,000 sq.ft floor space capacity from stage 2 land:
 - Princes Parade a new leisure facility, open parkland and 150 new homes;
 - Ship Street up to 100 new homes and employment space; and
 - Continued investment to support the council's climate change agenda and relevant activities in the Corporate Plan, and specifically the Carbon Action Plan.
- 1.4 The council has made a number of critical decisions that signal strong support for the delivery of these major projects however, with the secondment of some council resources to deliver Otterpool Park, and with the number of projects now providing a critical mass, there are resource shortages which is currently preventing delivery at the pace members understandably wish to see.
- 1.5 In addition, new environmental carbon reduction related activities are being taken forward to deliver Corporate Plan ambitions and a modest budget to support these activities is now necessary and appropriate to enhance projects and activities being delivered.
- 1.6 The rest of this report details the proposal to use reserves to accelerate delivery of these, and associated, projects. It expands on the matters

outlined by the Chief Executive in her report to Personnel Committee (Report P/21/04), and should these be supported by Cabinet, the next step would be to submit the proposal to Full Council for decision and immediate inclusion in the budget framework.

2. PROPOSAL – USE OF RESERVES

- 2.1 The proposal is made of two parts:
 - a. Funding to provide capacity to accelerate delivery of regeneration and housing activities. As detailed in paragraph 1.3, the activities are wide ranging across a number of projects that demand a wide range of specialisms to undertake various roles including, for example, scoping, commissioning design and feasibility work, preparing detailed technical business cases for bids and investment, leading negotiations, procuring and appointing development partners, leading project teams, providing project management and reporting expertise, providing an enhanced economic development function.

The proposal is to make available £896,000 across the General Fund and Housing Revenue Account over a two year period. These funds will be deployed as a budget to provide the necessary capacity, skills and expertise needed in the staffing base to deliver the projects. These staffing resources may be full or part time or contracted to the council, subject to the precise needs of the projects, capacity available and expertise required.

The funds required have been identified as £610,000 from the General Fund and £286,000 from the Housing Revenue Account, based on the anticipated allocation of work. The Council has been allocated capacity funding of £125,000 to progress its work towards a levelling up fund bid, and it is proposed we utilise £50,000 of this grant for additional resource capacity and the remaining £75,000 for external technical business case drafting. In addition it is proposed to earmark £196,000 from the Economic Development Reserve; £250,000 from the High Streets Regeneration Reserve and £114,000 from the General Reserve. The £286,000 required from the HRA are proposed to be met from the HRA Reserve. The funds will be drawn from the reserves in the financial year in which they fall, over the next two years (so could potentially span financial years 2021/22, 2022/23 and 2023/24), and are felt to be appropriate with sufficient earmarked and general reserves remaining in place after their use.

Beyond the funding allocated for the two year period, it is anticipated that any ongoing provision of resources will need to be incorporated in the future Medium Term Capital Programme.

b. Funding to support delivery of the Climate Change agenda and Carbon Action Plan. As council projects are brought forward, environmental improvements can be made to enhance the projects and a modest budget to support this, drawn from the Climate Change Reserve, would assist. The types of activities supported might include environmental

enhancements on, for example, the Coastal Park kiosk, the toilet refurbishment programme, Coastal Drive Beach Huts proposal, and interim capacity and expertise to guide our carbon reduction activities. Larger scale investments that need to draw more heavily in their own right from the Climate Change Reserve will also be brought forward separately for decisions as proposals are developed.

The proposal is to make available a sum of £250,000 drawn from the £4.6m Climate Change Reserve to create a budget that can be used to deliver environmental enhancements to relevant projects contained within the Corporate Plan, specifically the Carbon Action Plan.

2.2 The decision to use these funds once in the budget framework will be made by the Chief Executive, in consultation with the Leader of the Council with monitoring reports provided to Cabinet as part of the regular monitoring framework. The Portfolio Holders for Housing, Estates & Asset Management, the Local Economy, and the Environment will all be advised as these decisions are contemplated.

3. RISK MANAGEMENT ISSUES

3.1 The following risks are considered in this matter:

Perceived risk	Seriousness	Likelihood	Preventative action
Lack of resources to deliver Members' wishes at pace as outlined in the Corporate Plan, Corporate Action Plan and Carbon Action Plan.	High	High	Proposals have been outlined to secure additional resources drawn from available Reserves for inclusion in the budget framework.
Inability to secure the necessary expertise and skills to deliver the complex and challenging agenda.	High	Medium	Recruitment expertise and support will be used to identify and secure the necessary resources.

7. LEGAL/FINANCIAL AND OTHER CONTROLS/POLICY MATTERS

7.1 Legal Officer's Comments (AK)

No direct legal implications to consider.

7.2 Finance Officer's Comments (CS)

The financial implications of the proposals are embedded within this report in section 2 of the report. The proposed use of reserves over a two year period reflect the importance and significance of the need for the additional resources to enable effective preparation and delivery of the councils priorities and ambitions through housing, regeneration and climate change activities. The proposed use of reserves is felt to be appropriate and prudent. The level of reserve remaining after these and existing commitments leave £3.7 million of General Reserves and £11.6m of Earmarked Reserves remaining. It is not proposed to utilise reserves beyond the 2 year period of funding earmarked through this report, capital projects will need to consider their resource requirements over the medium term.

7.3 Diversities and Equalities Implications (CS)

There are no direct diversities and equalities implications to this report.

7.4 Climate Change Implications (CS) [Pilot reporting period]

This report directly seeks to enhance and progress the of the climate change agenda, through the release of the reserve.

8. CONTACT OFFICERS AND BACKGROUND DOCUMENTS

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

Charlotte Spendley

Telephone: 01303 853315

Email: charlotte.spendley@folkestone-hythe.gov.uk

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

None



Agenda Item 6

This Report will be made public on 14 September



Report Number **C/21/29**

To: Cabinet

Date: 22 September 2021 Status: Non key decision

Responsible Officer: Amandeep Khroud – Assistant Director –

Governance, Law and Regulatory Services

Cabinet Member: Councillor Ray Field - Cabinet Member for Digital

Transformation

SUBJECT: REGULATION OF INVESTIGATORY POWERS ACT 2000 – POLICY

SUMMARY: This report sets out the Council's policy on the use of directed surveillance and covert human intelligence sources under the Regulation of Investigatory Powers Act 2000.

REASON FOR RECOMMENDATIONS:

The Cabinet is asked to agree the recommendations set out below to endorse the policy.

RECOMMENDATIONS:

- 1. To receive and note report C/21/29.
- 2. To endorse the RIPA policy and procedure in appendix 1 to this report.

1. INTRODUCTION

- 1.1 Part II of the Regulation of Investigatory Powers Act 2000 (RIPA) puts covert surveillance on a statutory basis enabling public authorities identified in the legislation to carry out surveillance operations without breaching the Human Rights Act 1998.
- 1.2 A number of statutory instruments and codes of practice published by the Home Office govern the operation of RIPA; the most recent came into effect in October 2012.
- 1.3 Organisations using RIPA are subject to regular inspection by the Investigatory Powers Commissioner's Office. Previously this was undertaken by the Office of Surveillance Commissioners (OSC) however on 1 September 2017 the OSC were merged with the Interception of Communications, and Intelligence Services Commissioners to form the new regulator.
- 1.4 A recent desk top inspection was carried out on 29 April 2020 which demonstrated that Folkestone and Hythe District Council was compliant with the requirements of RIPA legislation.

2. REPORTING REQUIREMENTS

2.1 The guidance states:

"elected members of a local authority should review the authority's use of the 2000 Act and set the policy at least once a year. They should also consider internal reports on the use of the 2000 Act on at least a quarterly basis to ensure that it is being used consistently with the local authority's policy and that the policy remains fit for purpose. They should not, however, be involved in making decisions on specific authorisations."

2.2 This report sets out the policy and seeks cabinet's endorsement of it.

3. BRIEF OVERVIEW OF RIPA

- 3.1 The Act enables senior officers within public authorities to authorise Directed Surveillance and the use of Covert Human Intelligence Sources (CHIS). These authorisations can however only take effect once approved by a Magistrate.
- 3.2 The following sections give a brief overview of the types of surveillance:
 - a) Directed Surveillance

RIPA defines Directed Surveillance as surveillance that is covert but not intrusive. Directed Surveillance must relate to a specific investigation or operation and is surveillance that is likely to result in obtaining private information about someone, including the target of the investigation or operation. Private information includes any aspect of a person's private or

personal relationships with others, including family and professional/business relationships.

Directed Surveillance is usually planned surveillance. There is provision, in urgent cases, for an authorisation to be applied for and granted in exceptional circumstances (i.e. where the time taken to apply in writing would, in the judgment of the Authorising Officer, be likely to jeopardise the operation). In such circumstances unless renewed, the authorisation will cease to have effect after seventy-two hours.

b) Covert Human Intelligence Sources (CHIS).

RIPA defines a Covert Human Intelligence Source (CHIS) as a person (source) who establishes and/or maintains a personal or other relationship with a person for the purpose of: covertly using the relationship to obtain information or to provide another person with access to information or, covertly disclosing information obtained through the relationship. A CHIS is deployed in a manner intended to ensure that the target is unaware of the investigation or the purpose of the relationship between the source and the target.

The Council has never sought to make use of the CHIS provision. The Policy requires that if the use of CHIS is being contemplated, the officers concerned should seek the appropriate advice from other organisations that more commonly use CHIS surveillance, such as the Police.

- 3.3 The council can only grant an authorisation under RIPA for the use of directed surveillance where the local authority is investigating particular types of criminal offences. These are criminal offences which attract a maximum custodial sentence of six months or more or criminal offences relating to the underage sale of alcohol or tobacco. These latter offences would, in any event, be matters for Kent County Council trading standards.
- 3.4 The Council may only authorise directed surveillance where it is both necessary and proportionate to the investigation or operation being undertaken and to what is being sought to achieve in terms of evidence gathering. The Authorising Officers have a key role in carefully scrutinising all applications for the use of RIPA powers under a specific authorisation. Authorising Officers must ensure that authorisations are granted only in appropriate cases and that the extent of all authorisations are clearly set out.
- 3.5 The last authorisation for directed surveillance was granted on 1 June 2012.

4. THE POLICY

4.1 The policy as amended is attached (1) for endorsement by cabinet. This is essentially the same as the policy endorsed by cabinet last year.

5. LEGAL/FINANCIAL AND OTHER CONTROLS/POLICY MATTERS

5.1 Legal Officer's Comments

The RIPA codes of practice advises that the elected members of a local authority should set the RIPA policy at least once a year. This is reflected in the council's RIPA policy.

5. 2 Finance Officer's Comments (CS)

There are no direct financial implications arising from this report

5.3 Diversities and Equalities Implications

No implications arising directly from this report.

6. CONTACT OFFICER AND BACKGROUND DOCUMENTS

Councillors with any questions arising from this report should contact the following officer prior to the meeting:

Amandeep Khroud – Assistant Director – Governance, Law and Regulatory Services

Telephone: 01303 853253

E-mail:Amandeep.khroudl@folkestone-hythe.gov.uk

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

None

Appendices:

Appendix 1: RIPA Policy and Procedure



Regulation of Investigatory Powers Act 2000 (RIPA)

RIPA Policy and Procedures

Issue 14

Assistant Director (Governance, Law and Regulatory Services)
The Civic Centre
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Folkestone
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Contents

1	Introduction	3	
2	Policy Statement	3	
3	Roles and Responsibilities of Directors, Heads of Service,	3	
	Senior Authorising Officers, Authorising Officers, the RIPA		
	Monitoring Officer and the Senior Responsible Officer		
4	General Information on RIPA	7	
5	When is RIPA authorisation available?	7	
6	What RIPA Does and Does Not Do	8	
7	Types of Surveillance	8	
8	Conduct and CHIS	13	
9	Acquisition of Communications Data	15	
10	Authorisation Procedure	15	
11	Working With / Through Other Agencies	19	
12	Record Management	20	
13	Reporting Arrangements	20	
14	Concluding Remarks	20	
	Appendix 1 – list of senior/authorising officers and the RIPA	22	
	management structure	22	
	Appendix 2 – flow chart for directed surveillance and CHIS	25	
	Appendix 3 – notes for the use and management of CHIS	26	
	Appendix 4 – CHIS awareness diagram	27	
	Appendix 5 – codes of practice	28	
	Appendix 6 – directed surveillance forms	28	
	Appendix 7 – CHIS forms	28	
	Appendix 8 – Judicial approval protocol	28	

1. Introduction

This Policy is the framework on which the Council applies the provisions of the Regulation of Investigatory Powers Act 2000 (RIPA) as it relates to covert surveillance. Certain covert powers under RIPA and the Investigatory Powers Act 2016 (IPA) are available to local authorities and can be used in appropriate circumstances in accordance with the requirements of the legislation to support the delivery of their functions. The Investigatory Powers Commissioner's Office (IPCO) oversees the use of covert powers under RIPA by local authorities.

This Policy must be read in conjunction with the Home Office Codes of Practice on Covert Surveillance and Property Interference and Covert Human Intelligence Sources. Covert surveillance should be used only rarely and in exceptional circumstances. Copies of the Home Office Codes of Practice are available on their website. The Home Office website should be consulted regularly from time to time to ensure that the correct versions of the Codes of Practice are being used.

RIPA and this Policy are important for the effective and efficient operation of the Council's actions with regard to covert surveillance and Covert Human Intelligence Sources. The RIPA Monitoring Officer will therefore keep this Policy under annual review.

The RIPA Monitoring Officer is responsible for keeping the RIPA forms up to date and for checking the Home Office website and Codes of Practice. The RIPA Monitoring Officer will also be responsible for submitting a report on a three monthly basis to the Cabinet on the Council's use of RIPA if the Council has used RIPA during the previous three months. The RIPA Monitoring Officer is also responsible for submitting an annual report to Cabinet on this Policy and, if relevant, the Council's use of RIPA.

Authorising Officers must bring any suggestions for continuous improvement of this Policy to the attention of the RIPA Monitoring Officer at the earliest possible opportunity. If any of the Home Office Codes of Practice change, this Policy will be amended accordingly.

2. Policy Statement

The Council takes seriously its statutory responsibilities and will, at all times, act in accordance with the law and take necessary and proportionate action in these types of matters. In that regard, the Corporate Leadership Team is duly authorised by the Council to keep this Policy up to date and to amend, delete, add or substitute relevant provisions as necessary. The Cabinet will, if the Council has used RIPA, receive the RIPA Monitoring Officer's report every three months. The report will set out the surveillance carried out (though without revealing details of specific operations) and, if appropriate, reporting alterations to this Policy. An annual report will be submitted to Cabinet on this Policy setting out any alterations since the last report.

It is the policy of the Council that where RIPA applies (see below) surveillance should only be carried out in accordance with this Policy. This Policy covers the use of directed surveillance, intrusive surveillance and the deployment of Covert Human Intelligence Sources by the Council. These types of surveillance are set out in greater detail in paragraph 7 (Types of Surveillance) below.

Where RIPA does not apply, surveillance may properly be carried out provided that the

appropriate rules and procedures are followed. For example, surveillance connected with an employment issue will have to be carried out in accordance with the Data Protection Act 2018 and the various HR policies. The Council has also adopted a Non-RIPA Authorisation Policy¹ which Officers must follow for surveillance which falls outside of RIPA. Advice on non–RIPA surveillance should be sought from legal services or HR as appropriate.

Roles and Responsibilities of Directors, Assistant Directors, Chief Service Officers, Senior Authorising Officers, Authorising Officers, Senior Responsible Officer and the RIPA Monitoring Officer

This section sets out the various roles and responsibilities in relation to the use of RIPA.

It is essential that Directors, Assistant Directors, Chief Service Officers and Authorising Officers take personal responsibility for the effective and efficient operation of this Policy and the implementation of RIPA in their departments.

Roles

Authorising Officer

An Authorising Officer is a person who considers whether or not to grant an application to use directed surveillance. He/she must believe the activities to be authorised are necessary for the purposes of preventing or detecting crime and that they are proportionate to what is sought to be achieved by carrying them out. The authorisation is then subject to judicial approval.

An Authorising Officer may not, except in case of urgency, consider an application to use directed surveillance if the Applying Officer is an Officer in his/her service area or the Authorising Officer has direct involvement with the operation.

Senior Authorising Officer

A Senior Authorising Officer is a person responsible for considering whether or not to grant an authorisation where confidential information is likely to be obtained or for use of a CHIS.

Senior Responsible Officer

The Senior Responsible Officer has overall responsibility for the use and operation of RIPA within the Council, and oversees the competence of Authorising Officers and the processes in use in the Council. The Senior Responsible Officer is not an Authorising Officer as it would be inappropriate to oversee his / her own authorisations. The Senior Responsible Officer should be a member of the Corporate Leadership Team.

Specifically the Senior Responsible Officer will be responsible for:

 The integrity of the processes in place within the Council for the management of CHIS and directed surveillance;

- Compliance with the statutory provisions and Codes of Practice;
- Training or arranging training for Authorising Officers, together with the RIPA Monitoring Officer;
- Ensuring Officers generally understand provisions relating to covert surveillance and Covert Human Intelligence Sources;
- Engagement with the IPCO inspectors when they conduct their inspections;
- Overseeing the implementation of any post-inspection action plans approved by the relevant oversight Commissioner;
- Ensuring that all Authorising Officers are of an appropriate standard in light of any recommendations in IPCO inspection reports; and
- Addressing any concerns raised within an IPCO inspection report.

RIPA Monitoring Officer

The RIPA Monitoring Officer has:

- The duty to maintain the list of Authorising Officers;
- The power to suspend from the list of Authorising Officers any Authorising Officer who does not follow the procedure or who does not attend training sessions; and
- The power to cancel any authorisation that is manifestly wrong.

Responsibilities

Assistant Directors and Chief Service Officers are responsible for ensuring their relevant members of staff are suitably trained as 'Applying Officers' so as to avoid common mistakes appearing on forms for RIPA authorisations.

Assistant Directors and Chief Service Officers will also ensure that staff who report to them follow this Policy and do not undertake or carry out any form of surveillance governed by RIPA without first obtaining the relevant authorisations in compliance with this Policy. Wilful failure to follow this Policy will constitute gross misconduct under the Council's HR policies.

Directors, Assistant Directors, Chief Service Officers, Senior Authorising Officers and Authorising Officers must also pay particular attention to health and safety issues that may be raised by any proposed surveillance activity. Under no circumstances should Assistant Directors or Chief Service Officers permit an application to be made unless, and until, s/he is satisfied that the health and safety of Council employees/agents is suitably addressed and/or risks minimised, so far as is possible, and proportionate to/with the surveillance being proposed. It is the responsibility of the Applying Officer (i.e. the person who applies to the Authorising Officer to use the Council's RIPA powers) to carry out any risk assessment and complete a written risk assessment if necessary. If a Head of Service is in any doubt s/he should obtain prior guidance on the same from a Director, the Council's Health & Safety Officer or the RIPA Monitoring Officer.

Authorising Officers must acquaint themselves with the relevant Codes of Practice issued by the Home Office regarding RIPA. Any failure to comply exposes the Council to unnecessary legal risks and criticism from the IPCO. All stages of the process (application, review, renewal and cancellation) must be promptly dealt with.

Coming across **confidential information** during surveillance must be given prior thought before any applications are made or authorised, as failure to do so may invalidate the admissibility of any evidence obtained. Furthermore, thought must be given before any forms are signed to the retention and disposal of any material obtained under a RIPA

authorisation. Where confidential information is likely to be obtained through covert surveillance, the application must be authorised by a Senior Authorising Officer.

The Authorising Officer must ensure proper regard has been given to **necessity and proportionality** before any applications are authorised. 'Stock phrases' or cut and paste narrative must be avoided at all times as the use of the same may suggest that insufficient detail had been given to the particular circumstances of any person likely to be the subject of the surveillance. Any **equipment** to be used in any approved surveillance must also be properly controlled, recorded and maintained for audit purposes.

Authorising Officers must ensure that reviews are conducted in a timely manner and that cancellations and renewals are effected before the authorisation ceases to have effect. Best practice for Directed Surveillance is that a review should be carried out no more than 4 weeks after the grant of authorisation.

The RIPA Monitoring Officer shall have responsibility for maintaining, updating and enforcing this Policy. S/he, in conjunction with the Senior Responsible Officer, shall also be responsible for the provision of adequate training to Authorising Officers and Applying Officers and for ensuring that no authorisations shall be granted unless the Authorising Officer has received such training.

The RIPA Monitoring Officer shall also ensure that adequate records are maintained in accordance with the relevant and current Codes of Practice and also to check that reviews are conducted in a timely manner and that cancellations and renewals are effected before the authorisation ceases to have effect.

The RIPA Monitoring Officer's contact details are set out in Appendix 1 of this Policy.

4. RIPA - General Information

The Human Rights Act 1998 (which brought much of the European Convention on Human Rights and Fundamental Freedoms 1950 into UK domestic law) requires the Council, and organisations working on its behalf, pursuant to Article 8 of the European Convention, to respect the private and family life of citizens, his/her home and his/her correspondence.

The European Convention did not, however, make this an absolute right, but a qualified right. Accordingly, in certain circumstances, the Council **may** interfere in the citizen's right mentioned above, **if** such interference is:

- (a) In accordance with the law;
- (b) Necessary (see below); and
- (c) Proportionate (see below).

RIPA provides a statutory mechanism (i.e. in accordance with the law) for authorising covert surveillance and the use of a 'Covert Human Intelligence Source' (CHIS) e.g. undercover agents. It now also permits public authorities to compel telecommunications and postal companies to obtain and release communications data to themselves in certain circumstances. It works to ensure that **any** interference with an individual's right under Article 8 of the European Convention is **necessary** and **proportionate**. In doing so, RIPA seeks to ensure both the public interest and the human rights of individuals are suitably balanced.

Directly employed Council staff and external agencies working for the Council are covered

by RIPA while they are working for the Council. All external agencies must therefore comply with RIPA and the work carried out by agencies on the Council's behalf must be properly authorised by one of the **Council's Authorising Officers**. It is the responsibility of the contracts manger to ensure that external agencies comply with this Policy. Authorising Officers are listed in **Appendix 1** to this Policy.

If the correct procedures are **not** followed, the courts may disallow evidence; a complaint of maladministration could be made to the Ombudsman; the Council could be the subject of an adverse report made by the IPCO; and the Human Rights Act 1998 provides a cause of action for damages and/or an injunction against the Council should it be proven that the Council's actions amount to an unwarranted interference with human rights. Such action would not, of course, promote the good reputation of the Council and will, undoubtedly, be the subject of adverse press and media interest. In addition wilful failure to follow this Policy could constitute gross misconduct under the Council's HR policies. **It is essential, therefore, that all involved with RIPA comply with this Policy and any further guidance that may be issued.**

Flowcharts of the procedures to be followed appear at **Appendix 2** for Directed Surveillance and for CHIS.

5. When is RIPA authorisation available?

RIPA authorisation is only appropriate for surveillance which relates to the "core functions" of the Council and is for the purpose of preventing or detecting crime.

The core functions of the Council are defined as its "specific public functions" as opposed to its "ordinary functions". The ordinary functions are those functions which any public authority carries out e.g. employment of staff or entering into contractual agreements.

Surveillance, whether overt or covert, related to ordinary functions is not governed by RIPA and RIPA does not prohibit such activity. The Council has adopted a policy covering the authorisation of surveillance which is not covered by RIPA. The policy can be found here. Advice on such surveillance should be sought from Legal Services and HR as appropriate.

Authorisations for both directed surveillance and CHIS are also subject to judicial approval, meaning that the Council must obtain the approval of the Magistrates' Court for any grant or renewal of a RIPA authorisation. The Magistrates' Court will only approve an authorisation where satisfied that the statutory tests have been met, and that the use of the technique is necessary and proportionate. Surveillance cannot commence until this approval has been obtained (see paragraph 10 below for further detail).

Through the application of authorisation procedures and Magistrates' Court approval, RIPA ensures that a balance is maintained between the public interest and the human rights of individuals.

6. What RIPA does and does not do:

RIPA does:

- require prior authorisation of directed surveillance;
- prohibit the Council from carrying out intrusive surveillance;

- compel disclosure of communications data from telecom and postal service providers;
- require authorisation of the conduct and use of a CHIS;
- require safeguards for the conduct and use of a CHIS; and
- permit the Council to obtain communications records from communications service providers.

RIPA does not

- make anything unlawful which is otherwise lawful; or
- prejudice or dis-apply any existing powers available to the Council to obtain information by any means not involving conduct that may be authorised under the Act. For example, it does not affect the Council's current powers to obtain information via the DVLA or to get information from the Land Registry as to the ownership of a property.

If the Authorising Officer or any Applying Officer is in any doubt, s/he should ask the RIPA Monitoring Officer BEFORE any directed surveillance and/or CHIS is authorised, renewed, cancelled or rejected.

7. Types of Surveillance

'Surveillance' includes:

- Monitoring, observing, listening to persons, watching or following their movements, listening to their conversations and other such activities or communications.
- Recording anything mentioned above in the course of authorised surveillance.
- Surveillance, by or with, the assistance of appropriate surveillance device(s).

Surveillance can be overt or covert.

Overt Surveillance

Most of the surveillance carried out by the Council will be done overtly; there will be nothing secretive, clandestine or hidden about it. In many cases, officers will be behaving in the same way as a normal member of the public (e.g. in the case of most test purchases), and/or will be going about Council business openly (e.g. a market inspector walking through markets).

Similarly, surveillance will be overt if the subject has been **told** it will happen, for example where a noisemaker is warned, (preferably in writing) that noise will be recorded if the noise continues or where an entertainment licence is issued subject to conditions and the licensee is told that officers may visit without notice or identifying themselves to the owner/proprietor to check that the conditions are being met.

Covert Surveillance

Covert surveillance is carried out in a manner calculated to ensure that the person subject to the surveillance is unaware of it taking place (section 26(9) (a) of RIPA). Generally covert surveillance cannot be used if there is reasonably available an overt means of finding out the information desired. However if those overt means might seriously undermine the conduct of any investigation or put innocent persons at risk then covert

surveillance can be used.

RIPA regulates two types of covert surveillance, (directed surveillance and intrusive surveillance) and the use of Covert Human Intelligence Sources (CHIS)).

Directed Surveillance

Directed surveillance is surveillance which:

- is covert, but not intrusive surveillance:
- is conducted for the purposes of a specific investigation or operation;
- is likely to result in the obtaining of private information about a person (whether or not one specifically identified for the purposes of the investigation or operation);
- is conducted otherwise than by way of an immediate response to events or circumstances the nature of which is such that it would not be reasonably practicable to seek authorisation under the Act

Intrusive Surveillance

Intrusive surveillance is surveillance which:

- Is covert;
- Relates to residential premises and/or private vehicles; and
- Involves the presence of a person in the premises or in the vehicle or is carried
 out by a surveillance device in the premises/vehicle. Surveillance equipment
 mounted outside the premises will not be intrusive, unless the device consistently
 provides information of the same quality and detail as might be expected if they
 were in the premises/vehicle.

"Residential premises" means any premises occupied or used, however temporarily, for residential purposes or otherwise as living accommodation. This includes a hotel room or prison accommodation that is occupied or used for residential purposes, but does not include common areas that a person has access to in common with others and in connection with their use of accommodation.

The 2010 Legal Consultations Order also provides that any directed surveillance that is carried out on premises ordinarily used for legal consultations, at a time when they are being so used, is to be treated as intrusive surveillance.

Intrusive Surveillance cannot be authorised under RIPA for the Council. Only the police and other law enforcement agencies can use RIPA to authorise intrusive surveillance. Likewise, the Council has no statutory powers to interfere with private property.

Covert Human Intelligence Source

A Covert Human Intelligence Source ("CHIS") is someone who establishes or maintains a personal or other relationship for the covert purpose of using the relationship to obtain or disclose information (see below).

Private Information in relation to a person includes any information relating to his/her private or family life. Private information is generally taken to include any aspect of a

person's private or personal relationship with others including family and professional or business relationships. The fact that covert surveillance occurs in a public place or on business premises does not mean that it cannot result in the obtaining of private information about a person. Prolonged surveillance targeted on a single person will undoubtedly result in the obtaining of private information about him/her **and others** that s/he comes into contact or associates with.

To take an example: although overt town centre CCTV cameras do not normally require authorisation, if the camera(s) are to be directed for a specific purpose to observe particular individual(s), authorisation will be required. The way a person runs his/her business may also reveal information about his or her private life and the private lives of others. This example does not apply in Folkestone & Hythe as the Council no longer owns nor manages a town / city CCTV system.

Social media

Social media can provide useful information as part of an investigation. However, Council Officers must consider if a RIPA authorisation is required if they are accessing social media for this purpose before undertaking any monitoring of a site.

Whilst initial research of social media to establish a fact or collate an intelligence picture is unlikely to require an authorisation for directed surveillance, repeat viewing of 'open source' sites may constitute directed surveillance on a case by case basis. This should be borne in mind e.g. if someone is being monitored through, for example, their Facebook profile for a period of time and a record of the information is kept for later analysis, this is likely to require a RIPA authorisation for directed surveillance. The key consideration is whether there is a repeated and systematic collection of personal information.

Where it is intended to access a social media or other online account to which the Council has been given access with the consent of the owner, the Council will still need to consider whether the account(s) may contain information about others who have not given their consent. If there is a likelihood of obtaining private information about others, the need for a directed surveillance authorisation should be considered, particularly (though not exclusively) where it is intended to monitor the account going forward.

In addition, Council Officers must be aware that the fact that digital investigation is routine or easy to conduct does not reduce the need for authorisation. Care must be taken to understand how the social networking site being used works. Authorising Officers must not assume that one service provider is the same as another or that the services provided by a single provider are the same. Whilst it is the responsibility of an individual to set privacy settings to protect against unsolicited access to private information, and even though data may be deemed published and no longer under the control of the author, it is unwise to regard it as 'open source' or publicly available.

The author has a reasonable expectation of privacy if access controls are applied. In some cases, data may be deemed private communication still in transmission (instant messages for example). Where privacy settings are available but not applied the data may be considered 'open source' and an authorisation is not usually required.

If it is necessary and proportionate for the Council to covertly breach access controls, an authorisation for directed surveillance is required. An authorisation for the use and conduct of a CHIS is necessary if a relationship is established or maintained by a Council Officer or

by a person acting on the Council's behalf (i.e. the activity is more than mere reading of the site's content). It is not unlawful for a Council Officer to set up a false persona, but this must not be done for a covert purpose without authorisation. Using photographs of other persons without their permission to support the false identity infringes other laws and such photographs must not be used.

In order to determine whether an authorisation should be sought for accessing information on a website as part of a covert investigation or operation, it is necessary to look at the intended purpose and scope of the online activity it is proposed to undertake. Factors that should be considered in establishing whether a directed surveillance authorisation is required include:

- Whether the investigation or research is directed towards an individual or organisation;
- Whether it is likely to result in obtaining private information about a person or group of people;
- Whether it is likely to involve visiting internet sites to build up an intelligence picture or profile;
- Whether the information obtained will be recorded and retained:
- Whether the information is likely to provide an observer with a pattern of lifestyle;
- Whether the information is being combined with other sources of information or intelligence, which amounts to information relating to a person's private life;
- Whether the investigation or research is part of an ongoing piece of work involving repeated viewing of the subject(s);
- Whether it is likely to involve identifying and recording information about third
 parties, such as friends and family members of the subject of interest, or information
 posted by third parties, that may include private information and therefore constitute
 collateral intrusion into the privacy of these third parties.

To avoid the potential for inadvertent or inappropriate use of social network sites in investigative and enforcement roles, Council Officers should be mindful of the following:

- do not create a false identity in order to 'befriend' individuals on social networks without authorisation under RIPA;
- when viewing an individual's public profile on a social network, do so only to the minimum degree that is necessary and proportionate in order to obtain evidence to support or refute an investigation;
- repeated viewing of open profiles on social networks to gather evidence or to monitor an individual's status must only take place under a RIPA authorisation;
- be aware that it may not be possible to verify the accuracy of information on social networks and if such information is to be used as evidence, take reasonable steps to ensure its validity.

For the avoidance of doubt, only those Officers designated <u>and</u> certified to be Authorising Officers for the purpose of RIPA can authorise directed surveillance IF, AND ONLY IF, the RIPA authorisation procedures detailed in this Policy are

followed. Authorisation for directed surveillance can only be granted if it is for the purpose of preventing or detecting crime and the criminal offence is punishable by at least six months' imprisonment or it is an offence under sections 146, 147, 147A of the Licensing Act 2003 or section 7 of the Children and Young Persons Act 1933 (sale of alcohol and tobacco to underage children).

The <u>Home Office Codes of Practice</u> on covert surveillance and CHIS contain essential guidance in relation to online covert activity and must be consulted.

If you are in doubt as to whether or not you can use directed surveillance for the crime you are investigating, you should contact Legal Services for advice to ensure that no unauthorised online covert activity takes place within the Council.

Proportionality

The authorised conduct will not be proportionate if it is excessive in the overall circumstances of the case. Each authorised action should bring an expected benefit to the investigation or operation and should not be disproportionate or arbitrary. No activity should be considered proportionate if the information which is sought could reasonably be obtained by other less intrusive means.

The following elements of proportionality should therefore be considered:

- balancing the size and scope of the proposed activity against the gravity and extent of the perceived crime or offence;
- explaining how and why the methods to be adopted will cause the least possible intrusion on the subject and others;
- considering whether the activity is an appropriate use of the legislation and a reasonable way, having considered all reasonable alternatives, of obtaining the necessary result;
- evidencing, as far as reasonably practicable, what other methods had been considered and why they were not implemented.

In other words, this means balancing the intrusiveness of the activity on the target subject and others who might be affected by it against the need for the activity in operational terms. The activity will not be proportionate if it is excessive in the circumstances - each case will be unique and will be judged on its merits - or if the information that is sought could reasonably be obtained by other less intrusive means. All such activity must be carefully managed to meet the objective in question and must not be arbitrary or unfair. Extra care should also be taken over any publication of the product of the surveillance.

Put very simply, it means not using a sledgehammer to crack a nut.

As well as being proportionate, the covert surveillance must be necessary in all the circumstances.

Examples of different types of Surveillance

T (0 '''	F 1
Type of Surveillance	Examples

Overt	 Police Officer or Environmental Enforcement Officer on patrol Signposted town centre CCTV cameras (in normal use) Recording noise coming from outside the premises after the occupier has been warned that this will occur if the noise persists. Most test purchases (where the officer behaves no differently from a normal member of the public).
Covert but not requiring prior authorisation	CCTV cameras providing general traffic, crime or public safety information.
Directed surveillance (must be RIPA authorised)	 Officers follow an individual or individuals over a period, to establish whether s/he is working when claiming benefit or off long term sick from employment. Test purchases where the officer has a hidden camera or other recording device to record information which might include information about the private life of a shop-owner, e.g. where s/he is suspected of running his business in an unlawful manner.
Intrusive surveillance or interfering with private property – Note: The Council cannot use RIPA to authorise this	- Planting a listening or other electronic device (bug) or camera in a person's home or in/on their private vehicle/person.

Further Information

Further guidance on surveillance which can be found in the Home Office Codes of Practice is set out in Appendix 5.

Confidential Information

Special safeguards apply with regard to confidential information relating to:

- confidential personal information;
- · confidential constituent information; and
- confidential journalistic material.

The Authorising Officer for directed surveillance where confidential information is likely to be obtained or for the use of a CHIS must be a Senior Authorising Officer. Further guidance is available in the Home Office Codes of Practice.

Legal Privilege

Surveillance that is intended to result in knowledge of matters subject to legal privilege CANNOT be authorised. Where surveillance is not intended to result in knowledge of matters subject to legal privilege, but acquisition of such matters is likely, then the Authorising Officer must consider carefully whether such surveillance is appropriate. In particular, such surveillance can only be authorised to prevent or detect serious crime. The Authorising Officer in these circumstances must be a Senior Authorising Officer. Further guidance is available in the Home Office Codes of Practice.

Collateral Intrusion

Before authorising surveillance the Authorising Officer should also take into account the risk of intrusion into the privacy of persons other than those who are directly the subjects of the investigation or operation (collateral intrusion). Measures should be taken, wherever practicable, to avoid or minimise unnecessary intrusion into the lives of those not directly connected with the investigation or operation.

Those carrying out the surveillance should inform the Authorising Officer if the investigation or operation unexpectedly interferes with the privacy of individuals who are not covered by the authorisation. When the original authorisation may not be sufficient, consideration should be given to whether the authorisation needs to be amended and re-authorised or a new authorisation is required.

Further guidance is available in the Home Office Codes of Practice.

Retention and Destruction of Products of Surveillance

Where the product of surveillance could be relevant to pending or future criminal or civil proceedings, it should be retained in accordance with established disclosure requirements for a suitable period and subject to review. Authorising Officers must make sure that they have regard to the Code of Practice (2015 edition) made under S23 Criminal Procedure and Investigations Act 1996.

There is nothing in RIPA that prevents material obtained from properly authorised surveillance from being used in other investigations. Authorising Officers must ensure, therefore, that arrangements are in place for the handling, storage and destruction of material obtained through the use of covert surveillance. Authorising Officers must also ensure compliance with the appropriate data protection requirements and any relevant codes of practice produced by individual authorities relating to the handling and storage of material.

8. Conduct and Use of a Covert Human Intelligence Source (CHIS)

Who is a CHIS?

A CHIS is someone who establishes or maintains a personal or other relationship for the covert purpose of using the relationship to obtain information.

Members of the public who volunteer information to the Council and those engaged by the Council to carry out test purchases in the ordinary course of business (i.e. they do not develop a relationship with the shop attendant and do not use covert recording devices) are not CHIS and do not require RIPA authorisation.

However, there may be instances where an individual covertly discloses information obtained by the use of such a relationship, or as a consequence of the existence of such a relationship. In such circumstances where a member of the public, though not asked to do so, gives information (or repeated information) about a suspect, then serious consideration should be given to designating the individual as a CHIS, particularly if the Council intends to act upon the information received.

It is possible therefore that a person could become engaged in the conduct of a CHIS without the Council inducing, asking or assisting the person to engage in that conduct (i.e. "Tasking" – see Appendix 3 for further detail on the use and management of CHIS). As stated in paragraph 2.25 the Home Office CHIS Code of Practice the tasking of a person should not be used as the sole benchmark in seeking a CHIS authorisation, and it is possible that a person will become engaged in the conduct of a CHIS without a local authority inducing, asking or assisting the person to engage in this conduct. it is recommended that legal advice is sought in any such circumstances.

What must be authorised?

The conduct or use of a CHIS requires **prior authorisation**:

- Conduct of a CHIS = Establishing or maintaining a personal or other relationship with a person for the covert purpose of (or is incidental to) obtaining and passing on information
- **Use** of a CHIS = Actions inducing, asking or assisting a person to act as a CHIS and the decision to use a CHIS in the first place.

Most CHIS authorisations will be for both use and conduct. This is because public authorities usually take action in connection with the CHIS, such as tasking the CHIS to undertake covert action, and because the CHIS will be expected to take action in relation to the public authority, such as responding to particular tasking.

Authorisations are also subject to judicial approval and cannot commence until this has been obtained.

Detailed records must be kept relating to each source.

The Council can only authorise CHIS under RIPA IF, AND ONLY IF, the procedures, as detailed in this Policy, are followed. Authorisation for CHIS can only be granted if it is for the purposes of preventing or detecting crime.

Juveniles and Vulnerable Individuals

Special safeguards apply to the use or conduct of juvenile sources (i.e. those under 18 years old). On no occasion can a child under 16 years of age be authorised to give information against his or her parents.

A vulnerable individual is a person who is or may be in need of community care services by reason of mental or other disability, age or illness and who is or may be unable to take care of himself or herself, or unable to protect himself or herself against significant harm or exploitation.

Vulnerable individuals and juveniles will only be authorised to act as a CHIS in very exceptional circumstances and a Senior Authorising Officer MUST give the authorisation for their use.

Test Purchases

Carrying out test purchases will not usually (as highlighted above) require the purchaser to establish a relationship with the supplier with the covert purpose of obtaining information and, therefore, the purchaser will not normally be a CHIS. However, using mobile hidden recording devices or CCTV cameras to record what is going on in the shop will require **authorisation** as **directed surveillance**. A combined authorisation can be given for a **CHIS** and also **directed surveillance**.

Anti-Social Behaviour Activities (e.g. noise, violence, race abuse, etc.)

Persons who complain about anti-social behaviour, and are asked to keep a diary will **not** normally be a **CHIS**, as they are not required to establish or maintain a relationship for a covert purpose. Recording the level of noise (e.g. the decibel level) will not normally capture private information and, therefore, does **not** require authorisation.

Recording sound (with a DAT recorder) on private premises could constitute **intrusive surveillance**, unless it is done overtly. For example, it will be possible to record if the noisemaker is warned that this will occur if the level of noise continues.

Covert recording of noise where the recording is of decibels only or constitutes non-verbal noise (such as music, machinery or an alarm), or the recording of verbal content which is made at a level that does not exceed that which can be heard from the street outside or adjoining property with the naked ear, are unlikely to constitute either direct or intrusive surveillance. In the latter circumstance, the perpetrator would normally be regarded as having forfeited any claim to privacy. Placing a covert stationary or mobile video camera outside a building to record anti-social behaviour on residential estates will require prior authorisation.

Use and Management of a CHIS

Particular requirements apply to the management and use of a CHIS. This is particularly important when considering that the CHIS may be putting themselves in some jeopardy by performing as a CHIS. Details of those arrangements are contained within **Appendix 3**.

The Senior Authorising Officer must be satisfied that these arrangements are in place before authorising a request. The overriding duty is to the safety of and duty of care towards the CHIS.

Further Information

Further guidance on CHIS can be found in the Home Office's Codes of Practice on surveillance listed in **Appendix 5**.

9. Acquisition of Communications Data

What is Communications Data?

Communication data means any traffic or any information that is or has been sent by over a telecommunications system or postal system, together with information about the use of the system made by any person.

Procedure

There are powers granted by S22 RIPA in respect of the acquisition of Communications Data from telecommunications and postal companies. These issues are beyond the scope of this Policy. Where an Authorised Officer considers that such data is required, the advice of the RIPA Monitoring Officer should be sought.

10. Authorisation Procedures

Directed surveillance and the use of a **CHIS** can only gain the protection under RIPA if properly authorised, and conducted in strict accordance with the terms of the authorisation. **Appendix 2** provides flow charts of processes from application / consideration to recording of information and the storage / retention of data obtained.

Authorising Officers

Forms can only be signed by Authorising Officers who have the necessary authority from the Council. Authorised officers are listed in **Appendix 1**. It is the person that is authorised rather than his/her post. This Appendix will be kept up to date by the RIPA Monitoring Officer and added to as needs require. If it is felt that a post should be removed or added, the RIPA Monitoring Officer will request a resolution from the Cabinet. The RIPA Monitoring Officer is however able to suspend an Authorising Officer from the list as detailed above.

All RIPA authorisations must be for specific investigations only and must be reviewed, renewed or cancelled once the specific surveillance is complete or about to expire. The authorisations for directed surveillance last for three months and for CHIS 12 months (four months for a juvenile CHIS); however they must also be cancelled as soon as the need for them no longer exists.

Training Records

All Council staff who may be involved in the application, authorisation and management of covert activity will receive refresher training as appropriate in the issues to take into account, including in relation to online covert activity. The RIPA Monitoring Officer will keep a record of those receiving training and will work with Human Resources to ensure that training is carried out as appropriate to account for staff turnover, legislative changes etc. Periodic written tests will be conducted to ensure that the Authorising Officers and Applying Officers retain the knowledge.

The training and testing regime will be documented in sufficient detail to enable assessment of its quality and competence.

Application Forms

Only the RIPA forms set out in this Policy are permitted to be used. **The Authorising Officer and/or the RIPA Monitoring Officer will reject any other forms used.** All forms are available on the Intranet.

'A Forms' (Directed Surveillance) -see Appendix 6

Form A1 Application for Authority for Directed Surveillance
Form A2 Review of Directed Surveillance Authority

Form A3 Renewal of Directed Surveillance Authority

Form A4 **Cancellation** of Directed Surveillance

Form A5 **Judicial approval** for Directed Surveillance

Page 57 17

'B Forms' (CHIS) -see Appendix 7

- Form B1 Application for Authority for Conduct and Use of a CHIS
- Form B2 Review of Conduct and Use of a CHIS
- Form B3 Renewal of Conduct and Use of a CHIS
- Form B4 Cancellation of Conduct and Use of a CHIS
- Form B5 Judicial approval for the use of a CHIS

Grounds for Authorisation

Directed Surveillance (A Forms) and the Conduct and Use of the CHIS (B Forms) can be authorised by the Council only on the grounds of preventing or detecting crime. NO other grounds are available to local authorities.

Assessing the Application Form

Before an Authorising Officer signs a Form, s/he must:

- (a) Be mindful of this Policy, the training provided and any other guidance issued, from time to time, by the RIPA Monitoring Officer on such matters;
- (b) Be clear on what is being authorised and make sure that there are no ambiguities in either the application or the authorisation;
- (c) Ensure that his/her statement as the Authorising Officer is completed spelling out the "5Ws" who, what, where, when, why and how. In addition the Authorising Officer must ensure that the proposed operation is both necessary and proportionate;
- (d) Satisfy his/herself that the RIPA authorisation is:
 - (i) In accordance with the law;
 - (ii) **Necessary** in the circumstances of the particular case on the grounds mentioned above; **and**
 - (iii) **Proportionate** to what it seeks to achieve;
- (e) In assessing whether or not the proposed surveillance is necessary, consideration should be given to whether it is necessary to use covert surveillance in all the circumstances. Consideration must be given as to whether the information could be obtained by other means;
- (f) In assessing whether or not the proposed surveillance is proportionate, consider whether there are any other non-intrusive methods available and, if there are none, whether the proposed surveillance is no more than necessary to achieve the objective, as the least intrusive method will be considered proportionate by the courts. Guidance on proportionality is given above;
- (g) Take into account the risk of intrusion into the privacy of persons other than the specified subject of the surveillance (**Collateral Intrusion**) and the Applying Officer's plan to minimise that intrusion. Measures must be taken wherever practicable to avoid or minimise (so far as is possible) collateral intrusion. When considering proportionality the right to privacy of both third parties and the intended subject of the investigation must be considered against the seriousness of the offence and harm likely to be caused;

- (h) Allocate a Unique Reference Number (URN) for each form;
- (i) Set a date for **review** of the authorisation and review the authorisation on that date using the relevant form. The Authorising Officer should take account of how long authorisations for directed surveillance may last for (three months). The review date must be appropriate for the type of surveillance sought. At a review the Authorising Officer should be satisfied that the criteria for granting the authorisation still exists. They may also amend the authorisation;
- (j) Make sure that the authorisation expiry date and time are inserted;
- (k) Ensure that any RIPA Departmental Register is duly completed, and that a copy of the RIPA Forms (and any review / renewal / cancellation of the same) is forwarded to the RIPA Monitoring Officer's Central Register, within 2 working days of the relevant authorisation, review, renewal, cancellation or rejection. The original should be kept on the departmental register; and
- (I) If unsure on any matter, obtain advice from the RIPA Monitoring Officer **before** signing any forms.

The authorisation section of the form should be completed in the Authorising Officer's own handwriting and in his/her own words. The Authorising Officer must be prepared to justify his/her authorisation in a court of law and must be able to answer for his/her decision.

Additional Safeguards when Authorising a CHIS

When authorising the conduct or use of a CHIS, the Authorising Officer **must also**:

- (a) Be satisfied that the **conduct** and/or **use** of the CHIS is **proportionate** to what is sought to be achieved;
- (b) Be satisfied that **appropriate arrangements** are in place for the management and oversight of the CHIS and this must address health and safety issues through a written risk assessment (**see Appendix 3**);
- (c) Consider the likely degree of intrusion of all those potentially affected;
- (d) Consider any adverse impact on community confidence that may result from the use or conduct or the information obtained;
- (e) Ensure **records** contain particulars and are not available except on a need to know basis; and
- (f) If unsure on any matter, obtain the advice from the RIPA Monitoring Officer **before** signing any forms.

Judicial Approval

After an Authorising Officer has authorised directed surveillance or the Senior Authorising Officer has approved the use of a CHIS, the Council **must** make an application to the Magistrates' Court for approval of the authorisation. This applies to all authorisations and renewals. The activity permitted by the authorisation **cannot** be carried out until the court has approved the authorisation.

After the Authorising Officer has approved the application, the Applying Officer (or the Authorising Officer in appropriate cases) must complete the first part of the approval form found at Appendix 6 and Appendix 7. Two copies of the approval form, the original authorisation and a copy must be taken to court for the Magistrate to consider.

The court will consider:

- (a) if the Authorising Officer was at the correct grade; and
- (b) whether the activity proposed is necessary and proportionate.

The authorisation and the approval form must be detailed enough for the court to consider the application. Whilst the court may ask the Officer attending court to clarify the application, oral evidence is not a substitute for a full and reasoned written application.

The court can either approve or quash the authorisation or renewal. Any application for renewal must take place before the expiry of the authorisation. The Applying Officer must ensure that any application to renew is made in good time so that the Authorising Officer and the court have enough time to consider the application.

The original authorisation must be retained by the Council. A copy of the approval or rejection by the Magistrates must be placed on the department's register and a further copy given to the RIPA Monitoring Officer for his/her Central Register.

Any Officer attending court to obtain judicial approval must be authorised by the Council under section 223 of the Local Government Act 1972 to conduct legal proceedings on the Council's behalf.

Further information about the procedure for obtaining judicial approval can be found at Appendix 8.

Duration

The form **must be reviewed in the time stated, renewed and/or cancelled** once it is no longer needed. The authorisation to carry out/conduct the surveillance lasts for three months (from authorisation) for Directed Surveillance, and 12 months (from authorisation) for a CHIS and four months for a juvenile CHIS. However, whether the surveillance is carried out/conducted or not, in the relevant period, does <u>not</u> mean the authorisation is 'spent'. In other words, **the forms do not expire.** The forms have to be **reviewed, renewed and/or cancelled** (once they are no longer required).

Authorisations can be renewed in writing before the maximum period in the Authorisation has expired. The Authorising Officer must **consider the matter afresh** including taking into account the benefits of the surveillance to date and any collateral intrusion that has occurred. An Authorisation cannot be renewed after it has expired. In such event, a fresh Authorisation will be necessary.

The renewal will begin on the day when the Authorisation would have expired.

11. Working With/Through Other Agencies

When some other agency has been instructed on behalf of the Council to undertake any action under RIPA, this Policy and the forms in it must be used (as per normal procedure) and the agency advised or kept informed, as necessary, of the various requirements. They must be made aware explicitly what they are authorised to do.

When some other agency (e.g. Police, HM Revenue & Customs, Department for Work and Pensions etc.):

- (a) Wishes to use the Council's resources, that agency must use its own RIPA procedures **and**, before any Officer agrees to allow the Council's resources to be used for the other agency's purposes, s/he **must obtain** a copy of that agency's RIPA form for the record (a copy of which must be passed to the RIPA Monitoring Officer for the Central Register) or relevant extracts from the same which are sufficient for the purposes of protecting the Council and the use of its resources; or
- (b) Wishes to use the Council's premises for their own RIPA action and is expressly seeking assistance from the Council, the Officer should normally co-operate with the same unless there are security or other good operational or managerial reasons as to why the Council's premises should not be used for the agency's activities. Suitable insurance or other appropriate indemnities may be sought, if necessary, from the other agency for the Council's co-operation in the agency's RIPA operation. In such cases, however, the Council's own RIPA forms should **not** be used, as the Council is only 'assisting' not being 'involved' in the RIPA activity of the external agency.

If the Police or other agency wish to use Council resources for general surveillance, as opposed to specific RIPA operations, an appropriate letter requesting the proposed use, extent of remit, duration, who will be undertaking the general surveillance and the purpose of it must be obtained from the Police or other agency **before** any Council resources are made available for the proposed use. The appropriate head of service will be responsible for agreeing to the proposed use.

Joint operations

Where the Council is conducting an investigation jointly with another agency and that investigation involves directed surveillance or use of a CHIS only one authorisation under RIPA is needed. Duplicate authorisations therefore should be avoided. At the start of the joint operation the relevant Assistant Directors or Chief Service Officers should agree with his/her opposite number in the other agency who the lead body should be. The lead body will be responsible for RIPA authorisations.

If in doubt, please consult with the RIPA Monitoring Officer at the earliest opportunity.

12. Record Management

The Council must keep a detailed record of all Authorisations, Reviews, Renewals, Cancellations and rejections in Departments and a Central Register of all Authorisation Forms will be maintained and monitored by the RIPA Monitoring Officer.

Records Maintained in the Department

The Council will retain records for a period of at least three years from the ending of the Authorisation. The Investigatory Power Commissioner's Office (IPCO) can audit/review the Council's policies and procedures and individual Authorisations, Reviews, Renewals, Cancellations and rejections.

Central Register Maintained by the RIPA Monitoring Officer

Authorising Officers must send a copy of any authorisation, cancellation, renewal or

review to the RIPA Monitoring Officer within 2 working days of the issue. Whilst the RIPA Monitoring Officer is responsible for oversight and review of the records, the Authorising Officers are responsible for their own records.

13. Reporting Arrangements

Where there has been an application for the use of powers under RIPA, a report on the use of the powers shall, within three months of the application, be provided to Cabinet.

14. Concluding Remarks

Where there is an interference with the right to respect for private life and family guaranteed under Article 8 of the European Convention on Human Rights, and where there is no other source of lawful authority for the interference, or if it is held not to be necessary or proportionate to the circumstances, the consequences of not obtaining or following the correct authorisation procedure set out in RIPA and this Policy, may be that the action (and the evidence obtained) will be held to be unlawful by the courts pursuant to Section 6 of the Human Rights Act 1998.

Obtaining an authorisation under RIPA and following this Policy will ensure therefore, that the action is carried out in accordance with this law and subject to stringent safeguards against abuse of anyone's human rights.

Authorising Officers MUST exercise their minds every time they are asked to consider a form. They must NEVER sign or rubber stamp form(s) without thinking about their own personal and the Council's responsibilities. They should also report refusals to the RIPA Monitoring Officer. The RIPA Monitoring Officer will be able to assess whether the refusals were reasonable and this will also be reported to Cabinet.

Any boxes not needed on the form(s) must be clearly marked as being 'NOT APPLICABLE', 'N/A' or a line put through the same. Great care must also be taken to ensure accurate information is used and is inserted in the correct boxes. Reasons for any refusal of an application must also be kept on the form and the form retained for future audits.

For further advice and assistance on any aspect of RIPA, please contact the Council's RIPA Monitoring Officer; contact details are set out in Appendix 1.

Appendix 1 – List of Senior Authorising Officers Authorising Officers, Senior Responsible Officer and RIPA Monitoring Officer

Post Title	Current Post Holder	RIPA post	Contact Details
Chief Executive	Susan Priest	Senior Authorising Officer / Senior Responsibl e Officer	Civic Centre, Castle Hill Avenue, Folkestone CT20 2QY 01303 853315 susan.priest@folkestone-hythe.gov.uk
Director of Transformation and Transition	Tim Madden	Authorising Officer – Senior Authorising Officer in the absence of the Chief Executive Service	Civic Centre, Castle Hill Avenue, Folkestone CT20 2QY 01303 853371 tim.madden@folkestone-hythe.gov.uk
Director of Corporate Services	Charlotte Spendley	Authorising Officer	Civic Centre, Castle Hill Avenue, Folkestone CT20 2QY 01303 853263 Charlotte.spendley@folkestone- hythe.gov.uk
Assistant Director (Governance, Law and Regulatory Services)	Amandeep Khroud	RIPA Monitoring Officer	Civic Centre, Castle Hill Avenue, Folkestone CT20 2QY 01303 853253 amandeep.khroud@folkestone- hythe.gov.uk
Director of Housing & Operations	Andy Blaszkowicz	Authorising Officer	Civic Centre, Castle Hill Avenue, Folkestone CT20 2QY 01303 853315 andrew.blaszkowicz@folkestone- hythe.gov.uk

RIPA MANAGEMENT STRUCTURE

Directed Surveillance

Court



Authorising Officers

Susan Priest
Chief Executive

Tim Madden

Director of Transformation and Transition

Charlotte SpendleyDirector of Corporate Services

Andrew BlaszkowiczDirector of Housing & Operations

Applying Officer

Amandeep Khroud

Assistant Director (Governance, Law and Regulatory Services) CHIS

Court



Susan Priest

Chief Executive

Or

Tim Madden

Director of Transformation and Transition



Applying Officer

Appendix 2 – Flow Chart for Directed Surveillance and CHIS

Applying officer must:

- Read this policy and the codes of practice
- Consider whether the authorisation is in accordance with the law and necessary
- Consider whether the surveillance is proportionate



Directed surveillance

If authorisation is necessary and proportionate, prepare and submit Form A1 to the authorising officer

If a less intrusive option is available, take it

CHIS

If authorisation is necessary for the use of a CHIS, prepare and submit for B1 to the senior authorising officer

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Senior/authorising officer must:

- Consider this policy and the codes of practice
- Consider whether the surveillance is in accordance with the law, is necessary and proportionate
- Authorise only if an overt or less intrusive option is not practicable
- Set an appropriate review date of up to three months after the authorisation
- Best practice is for the same authorising officer to conduct the review



Copies of all forms must be sent to the RIPA monitoring officer for entry into the central database within 2 working days of completion



Applying officer must:

Apply to the magistrates' court for approval of the authorisation or renewal



Applying officer must:

- Review the authorisation by the review date set by the authorising officer and either:
- · Ask for a further authorisation from the authorising officer; or
- Cancel the authorisation and submit to the authorising officer



Authorising officer must:

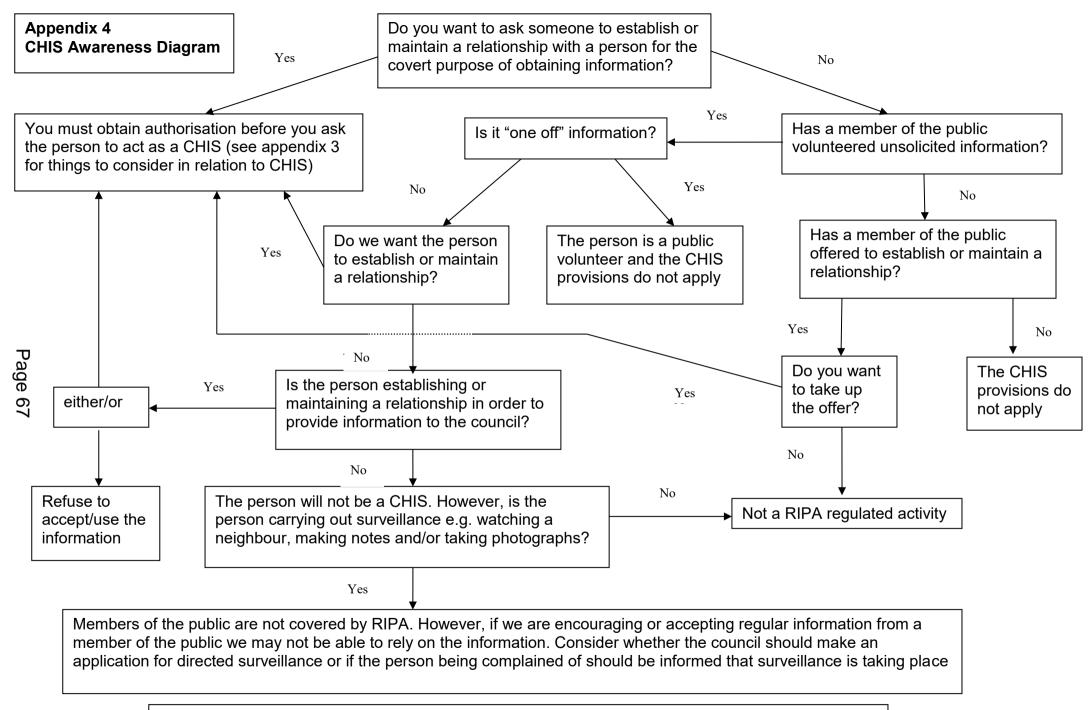
- Renew the authorisation if still necessary and proportionate and set a further review date; or
- Cancel the authorisation

Applying officer – the person who makes a request to use RIPA powers; Authorising officer – the person who considers whether or not to grant an authorisation; Senior authorising officer – the senior person who considers whether or not to grant an authorisation for the use of a CHIS Page 65

Appendix 3 – Additional Notes for the Use and Management of a CHIS

Tasking

- "Tasking" is the assignment given to the CHIS by the persons defined in sections 29(5) (a) and (b) of RIPA, asking him/her to obtain information, provide access to information or to otherwise act incidentally, for the benefit of the relevant public authority.
- Authorisation for the use or conduct of a CHIS must be obtained prior to any tasking where such tasking requires the CHIS to establish or maintain a personal or other relationship for a covert purpose.
- The person referred to in section 29(5) (a) of RIPA will have day to day responsibility for:
 - Dealing with the CHIS on behalf of the Council
 - Directing the day to day activities of the CHIS
 - · Recording the information supplied by the CHIS, and
 - Monitoring the CHIS's security and welfare
- The person referred to in section 29(5) (b) of the 2000 Act will be responsible for the general oversight of the use of the CHIS.
- The authorisation should not be drawn so narrowly that a separate authorisation is required each time the CHIS is tasked. The authorisation could cover the broad terms of the CHIS's task.
- The persons mentioned in paragraphs 3 and 4 above must take great care to ensure that actions are recorded in writing and must also keep the authorisation under review to ensure that it covers what the CHIS is actually doing. During the course of a task, unforeseen events may occur which mean that the authorisation may need to be cancelled and applied for again.
- The Chief Executive as Head of Paid Service of the Council has the power to appoint officers to act under s29(5)(a) and (b) of RIPA.
- In relation to health and safety, before tasking a CHIS, the relevant Officers will ensure that a risk assessment is carried out which determines the risk to the CHIS and to others in carrying out the task. The ongoing security and welfare of the CHIS after the task has been completed should also be considered.
- 9 Further advice on good practice is contained within the CHIS Code of Practice.



This flowchart cannot answer every scenario an officer may encounter. If you are unsure whether or not you authorisation speak to Legal Services or the RIPA monitoring officer

Appendix 5 – Codes of Good Practice

RIPA Codes of Practice can be accessed at:

Codes of Practice

Page 68 28

Appendix 6 – Directed Surveillance Forms

Directed surveillance application form

Directed surveillance renewal form

<u>Directed surveillance review form</u>

Directed surveillance cancellation form

Judicial approval form

Page 69 29

Appendix 7 - CHIS Forms

Application to authorise a CHIS

CHIS cancellation form

CHIS renewal form

CHIS review form

Judicial approval form

Page 70 30

Appendix 8 – Judicial approval protocol

In order to obtain judicial approval for your RIPA authorisation you will need to book an appointment to attend court. You must not turn up to court without an appointment. This step must not be taken unless an Authorised Officer has first authorised the application.

To book an appointment, contact the court administration centre on 01304 218600 option 6. There may be a delay between you making the appointment and attending court so make sure you factor this in when thinking about your timetable and the start date.

Your application may be heard at Folkestone or Canterbury Magistrates' Court. You will generally be asked to attend court at 9.30am before the court starts sitting although you may be given an alternative time to attend.

You will need to take two copies of the approval form with the first part completed and the original authorisation to court as well as a copy. Ensure that you retain the original authorisation and a signed approval form.



Agenda Item 7

This Report will be made public on 14 September 2021



Report Number **C/21/30**

To: CABINET

Date: 22 September 2021 Status: Non key decision

Responsible Officer: Jyotsna Leney/ Karen Weller

Cabinet Member: Cllr Jennifer Hollingsbee, Cabinet Member for

Communities, Lifeline, Area Officers & Street

Homeless

SUBJECT: Folkestone and Hythe Community Safety

Partnership (CSP) Plan 2021-24

SUMMARY: The District Council has a statutory duty to address Crime and Disorder and as a responsible authority participate in the activity of the Folkestone and Hythe Community Safety Partnership (CSP). The CSP is required to produce a CSP plan following a strategic assessment of crime trends and issues facing the District. The annual strategic assessment (SA) document is a restricted document but the CSP plan is a public facing document that sets out the work of the partnership, identified priorities and actions to focus on. This report presents the new three year (21-24) partnership plan (reviewed annually) to Cabinet for endorsement (OSC received the plan on 7th September 2021). The plan will also be presented to full Council on 29th September 2021 for approval.

REASONS FOR RECOMMENDATIONS:

Cabinet is asked to endorse the new Folkestone & Hythe CSP plan for 21-24 as it is a statutory requirement for the Council being a responsible authority to address Crime and Disorder and participate in the activities of the CSP.

RECOMMENDATIONS:

- 1. To receive and note report C/21/30.
- 2. To endorse the new 2021-24 Community Safety Partnership plan and recommend to Full Council for approval.

1. BACKGROUND

- 1.1 The Folkestone and Hythe Community Safety Partnership (CSP) have produced a three year partnership plan covering the period 2021-24. The plan contains an overview of the work of the partnership, how it is structured e.g. its sub groups and cites key supporting legislation.
- 1.2 The plan also reflects on issues impacting the work of the partnership including Covid 19 recovery, new legislation such as the violence reduction bill and Domestic Abuse Act 2021.
- 1.3 The CSP have also carried out a strategic assessment of crime trends using data from many sources and this restricted document has helped in shaping the priorities of the CSP which are set out together with activities to be carried out by the sub groups. This includes review of the current PSPO.
- 1.4 Practical examples of projects delivered eg from Police and Crime Commissioner funding (PCC) funding are also set out. The plan has been kept deliberately succinct and will be reviewed annually.
- 1.5 The key priorities of the partnership are set out on page 10 of the plan and are split across the 3 sub-groups, across all of these priorities the following cross cutting themes feature:
 - Violence reduction
 - Covid recovery
 - Reducing offending
- 1.6 The Folkestone & Hythe CSP does have regard to the KCC County Community Safety Agreement (CSA) and they in turn have regard to the priorities contained within District CSP plans. The plan contains some information relating to the county CSA which is also a statutory requirement.

2. AGREEMENT OF THE PLAN

- 2.1 Cabinet are asked to endorse the plan and work of the CSP which was also presented to OSC on 7th September 2021.
- 2.2 There is a statutory requirement for the work of the CSP to be scrutinised on an annual basis by OSC. The OSC acts as the Crime & Disorder Committee once a year and this is stated in legislation (The Police and Justice Act 2006 and The Crime and Disorder (Overview and Scrutiny) Regulations 2009) and set out in the Councils constitution.
- 2.3 Partners attended OSC to demonstrate the strong partnership working and the role they play on the CSP and sub group leads gave presentations to OSC after an introduction to the CSP and its work.
- 2.4 Full Council will receive a copy of the plan for approval on 29 September 2021.

3. RISK MANAGEMENT ISSUES

3.1 There is not a great deal of risk management involved in this issue.

Perceived risk	Seriousness	Likelihood	Preventative action
Report not received and statutory duty to compile a CSP Plan compromised	Medium	Low	To note the Plan

4. LEGAL/FINANCIAL AND OTHER CONTROLS/POLICY MATTERS

4.1 Legal Officer's Comments (NM)

As detailed in the report the Community Safety Partnership Plan is required by the Crime and Disorder Act 1998. By adopting the Plan the Council is complying with its statutory obligations

4.2 Finance Officer's Comments (DH)

There are no financial implications arising from this report as expenditure is offset by funding provided by PPC. Any funding the Council may wish to add to will come from existing base budgets already allocated to Crime and Disorder cost area

4.3 Equalities and Diversities comments (JL)

There are no equality and diversity implications directly arising from this report.

4.4 Climate Change Implications (AT/OF)

There are no Climate Change Implications arising directly from the production of this report.

5. CONTACT OFFICERS AND BACKGROUND DOCUMENTS

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

Jyotsna Leney, Health Wellbeing and Partnerships Senior Specialist Telephone: 01303 853460

Email: Jyotsna.leney@folkestone-hythe.gov.uk

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

Appendices:

Appendix 1: Folkestone & Hythe Community Safety Partnership Plan

2021-24



FOLKESTONE & HYTHE DISTRICT COMMUNITY SAFETY PARTNERSHIP PLAN

1 April 2021 - 31 March 2024





Introduction

Folkestone & Hythe Community Safety Partnership (CSP) is a statutory body bringing together a number of public sector agencies to tackle crime, disorder, anti-social behaviour, substance misuse and reduce re-offending.

The Community Safety Partnership is overseen by an executive group, comprising senior personnel from the responsible authorities and other agencies, including the voluntary and community sector. Sub-groups, addressing the agreed directions of action, have been set up to deal with priorities of the CSP. Each sub-group has an action plan to address the objectives set by the Community Safety Partnership Executive. Additionally the CSP utilises its multi-agency Community Safety Unit – CSU (co-ordinated by Folkestone & Hythe District Council) to carry out operational delivery.

This plan has in the past been renewed on a yearly basis, however the CSP is now moving to a three yearly partnership plan but with an annual review. The plan is informed by an annual strategic assessment process (statutory requirement and a restricted document).

The purpose of a Strategic Assessment (SA) is to provide knowledge and understanding of community safety issues to partners of the CSP, support development of the plan and help identify key priorities for the CSP. This is done through intelligence analysis to identify the emerging priorities by considering the patterns, trends and shifts relating to community safety. The yearly SA process will help identify any revisions required to the plan over its three year life span (the time span for data is October – September i.e. for this year 1 October 2019 to 30 September 2020).

The CSP also works closely with other relevant agencies, the voluntary and community sector, the business sector and local residents.

In addition the Kent wide CSP also influences activity and the County Community Safety Agreement (CSA) produced by Kent County Council (statutory requirement) requires local CSPs to have regard to the activity contained within the CSA. KCC also takes into account the priorities of District CSPs in Kent when formulating the CSA.

The current global pandemic and the introduction of the Health Protection (Coronavirus, Restrictions) (England) Regulations 2020 will have had an impact on activity in the last year and will have an ongoing impact within the district.

The full effect of Brexit on Kent and its businesses is still largely unknown at the time this plan was produced. Finally, consideration must be given to issues such as the Prevent strategy, which focuses on safeguarding people and communities from extremism and radicalisation, modern day slavery and other vulnerabilities that our communities face.

Background

The latest population figures from the 2019 mid-year population estimates show that there are 113,000 people living in the Folkestone & Hythe district. This population size ranks Folkestone & Hythe as the third smallest Kent local authority district area. 63% of the district's population live in urban areas with the remaining 37% living in the surrounding rural area.

The Folkestone urban area is home to 48% of the total population whilst 16% of the district's residents live in the Hythe urban area. The age profile of the Folkestone & Hythe population shows that the district has an older age profile compared to the county average, with a greater proportion of people aged over 50 than the average for the Kent County Council (KCC) area.

In terms of crime, the area has one of the lowest rates in Kent for vehicle offences, shoplifting and some theft offences, public order offences and violence with injury. However it has a higher rate than some other districts for violence without injury, violence against the person and victim based crime. (For further information see appendix 1 to this plan.)

Key issues facing the area include the necessary adjustments from leaving the EU and changes to legislation including the new Domestic Abuse Bill, the Policing Bill and Violence Reduction Bill and the resulting impact on partnership activity.

Other tensions may impact from time to around national and international issues such as Black Lives Matter, wider inequalities and recovery from the COVID-19 pandemic.

The impacts of COVID-19 will bring about its own challenges as the area recovers. However support continues to be provided to communities e.g. through the community hubs and keeping people safe is a priority as restrictions are eased.

Ongoing education and advice on any current or new guidance around minimising COVID spread, as well as preparedness for any major increases in infection level, will continue as areas of work. More information is available at: folkestone-hythe.gov.uk/community-hub



Legislation

The Crime and Disorder Act 1998 gave statutory responsibility to local authorities, the police, and key partners to reduce crime and disorder in their communities. Under this legislation the responsible authorities commonly referred to now as Community Safety Partnerships (CSPs), were required to carry out three yearly audits and to implement crime reduction strategies.

The Police and Justice Act 2006 introduced scrutiny arrangements in the form of the Crime and Disorder Scrutiny Committee, as well as introducing a number of amendments to the 1998 Act including the addition of anti-social behaviour (ASB) and substance misuse within the remit of the CSP strategies. Reducing reoffending was subsequently added by the Policing and Crime Act 2009.

The Crime and Disorder (Formulation and Implementation of Strategy) Regulations 2007 set out further revisions to the 1998 Act, the most notable of which at district/borough level included the requirement for producing annual strategic assessments and triennial partnership plans. For two tier authorities such as Kent, the statutory Community Safety Agreement was introduced.

The Police Reform and Social Responsibility Act 2011 introduced directly elected Police and Crime Commissioners (PCCs) to replace Police Authorities in England and Wales. This brought with it a requirement for the PCC to have regard to the priorities of the responsible authorities making up the CSPs and for those authorities to have regard to the police and crime objectives set out in the Police and Crime Plan. The legislation also brought with it a mutual duty for the PCC and the responsible authorities to act in co-operation

with each other in exercising their respective functions. The Kent and Medway Police Panel meets on a quarterly basis and is attended by a Cabinet councillor from Folkestone & Hythe District Council.

The requirement for Community Safety Partnerships (CSPs) to conduct Domestic Homicide Reviews (DHR) came into effect on 13th April 2011 as a result of the Domestic Violence, Crime and Victims Act (2004). In Kent and Medway it was agreed that these would be commissioned by the Kent Community Safety Partnership (KCSP) utilising pooled funding on behalf of the local CSPs including Medway. The DHR process has been developed and enhanced since its introduction including the implementation of updated statutory guidance from the Home Office.

All CSP partners will have other duties around enforcing key legislation such as the Modern Day Slavery Act 2015, Anti-Social Behaviour Act 2014, Prevent Duty, safeguarding legislation etc. and this features in some of the activities that the CSP carries out.

Work of the Community Safety Partnership (CSP)

Strategic assessment

It is a statutory requirement to analyse crime and other trends and to use this data in defining priorities. This analysis is collated in a document (SA) and will include school exclusions, hospital admissions from substance misuse, self-harm etc as well as key crime data and levels of anti-social behaviour. The SA is a restricted document and contains further analytical data to support the production of this plan and helps partners to assess which areas of work to prioritise.

Folkestone & Hythe Community Safety Partnership

The statutory CSP meets quarterly and has a number of sub groups with links across to many other key partnerships and plans. The CSP ensures activity to address priorities and that other emerging trends are dealt with appropriately. The CSP has many statutory functions that it discharges and these include addressing counter terrorism through Prevent and tackling issues such as modern day slavery, domestic homicide, gangs and county lines via violence reduction initiatives and drugs and alcohol misuse strategies. The sub groups of the CSP are shown in the chart below and their activity later in the plan.

Structure of the F&H CSP

Task & Finish groups and other key meetings e.g. DCSMs, DVP

Folkestone & Hythe Community Safety Partnership (CSP)

Rotating chair (Statutory)

Safeguarding and Domestic Abuse Sub-Group

Led by KCC

Community Safety Unit Led by FHDC

Crime and Community Resilience

Led by Kent Police

Kent CSP

County CSA

Community Safety Partnership priorities - 2021-24

Safeguarding & Domestic Abuse Subgroup

- Domestic abuse
- Mental health
- Drugs and alcohol
- Safeguarding children and adults
- District Contextual Safeguarding

Meeting (DCSM) - Children

Missing children

Cross Cutting Themes

- Violence reduction
- COVID Recovery
- Reducing offending

Crime & Community Resilience

- Modern slavery and human trafficking
- Cuckooing, gangs, county lines and criminal exploitation
- Fraud
- Financial and acquisitive crime
- Drug dealing
- Integrated Offender Management
- Hate/mate crime
- Prevent strategy
- Violence reduction
- Serious and organised crime (SOC)
 and Organised crime groups (OCGs)
- District Vulnerabilities Panel (DVP)
- adults

Delivery of some of the activities that the CSP is responsible for occurs through a range of multi-agency meetings and task and finish groups.

Community Safety Unit

- Anti-social behaviour
- Public Spaces Protection Order
- Environmental crime/environmental health
- Town centres
- Licensing
- Events
- Hotspot locations
- Substance misuse
- Diversionary activities
- Housing
- Homeless
- High risk adults and young people
- Community triggers
- Prison releases
- Community protection warnings and community penalty notices
- Unauthorised encampments

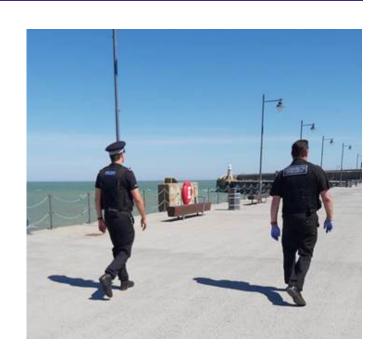
Working on issues that matter to residents

During 2019-20 local engagement meetings were held to enable the community to raise issues with agencies and councillors. Potential resolutions to local problems, such as anti-social behaviour and criminal damage, were addressed as well as the need for patrolling hot spot areas.

Joint patrols were carried out in areas where anti-social behaviour was a problem. Work was also undertaken with those who were homeless and with vulnerable people to ensure they could be housed safely through the pandemic. The patrolling enabled engagement with the community to support education and adherence to COVID-19 regulations to minimise spread of the virus.

Prior to the pandemic multi-agency patrols (Op Ariel) were a way of engaging with communities and listening to their issues.

The operation enabled a very localised and immediate response to particular issues including taking direct enforcement action if a breach of legislation was witnessed during the operation. These, as well as other multi agency operations, will be continued as resources allow.



Community Safety Unit

The multi-agency weekly meeting of the Community Safety Unit (CSU) provides an essential operational delivery arm for the CSP. Attended by over 40 partners including Kent Police, Kent County Council Social Services, the National Probation Service, Kent Fire and Rescue Service, Folkestone & Hythe District Council and the voluntary sector including Porchlight and the Rainbow Centre. The CSU addresses issues ranging from anti-social behaviour to serious mental health issues in vulnerable people impacting the community and street homelessness. It acts as a sub group of the CSP and details of its activity are shown later in the plan.

Police & Crime Commissioner (PCC) funding

Each year the CSP receives PCC funding.

This funding enables projects to be delivered that help meet the priorities of the PCC as well as the priorities of the CSP.

For 2021 examples of projects to be funded include:

- Urban Pastors to address hot spot anti-social areas and engage with people during the night time economy to keep people safe as well as engagement and intervention with vulnerable groups.
- Kent Community Domestic Abuse (DA) Programme a support programme to change behaviours (for perpetrators of DA) and the One Stop Shop Clinic to support victims of abuse.
- Youth Safeguarding Conference interactive programme with schools on a range of safeguarding issues to tackle abuse, exploitation, violence and organised crime and gangs.

Delivery of priorities

Safeguarding and domestic abuse subgroup

Led by Kent County Council • Meets every six weeks

Example activities to tackle the issues

- A Safeguarding Adult Awareness week is carried out each October and plans for October 2021 are underway to raise awareness within the wider community on all aspects of adult abuse.
- A 'Toxic Trio' conference, delayed due to COVID-19, will be carried out to raise awareness and develop strategies to work with families where there are issues of domestic abuse, mental health and alcohol and substance misuse. This will look at the impact of living with these issues and how those with adverse childhood experiences can move into their adult lives.
- Raising awareness about staying safe online.
- Continuing to provide training and raise awareness around all aspects of safeguarding and supporting vulnerable people. This will include work towards a safeguarding conference for young people
- Addressing the implications of the new Domestic Abuse Act 2021.
- Ensuring efficiency of One Stop Shop clinics and weekly attendance by partner agencies.
- The group will be a key contributor to the community safety meetings and District Vulnerabilities Panel meetings.

Crime and Community Resilience

Led by Kent Police • Monthly sub-group

Example activities to tackle the issues

- The Crime and Community Resilience Sub-Group will focus on the delivery of a partnership approach to tackling crime and anti-social behaviour.
- Focus areas will be in line with the Kent Police Control Strategy.
- The Serious and Organised Crime Panel will continue to meet regularly to agree priorities and actions for dealing with most serious crimes (such as burglary and robbery), Organised Crime Groups, recidivist offenders, and crime series/clusters.
- Joint work and operations with specialist Kent Police teams will focus on county lines drug dealing, gangs/ young criminal groups and criminal exploitation of the vulnerable.
- The Violence Reduction Unit will support local delivery of education and awareness training on knife crime and gang culture, providing opportunities for diversion and intervention. Work with partners to identify the most vulnerable and prosecute those that exploit them will continue. Implications of the new Violence Reduction Bill and requirements on CSPs including funded projects will be led by this group. Op Finnish, is the local response to Violence Against Women and Girls (VAWG). The "Ask Angela" initiative is to be explored together with focused work with taxis and the more problem night time locations.
- The group will support the production of an updated Prevent action plan.
- The Kent and Medway Gangs strategy aims will be a key document to help drive activity.

- Hate crime will remain a focus for enforcement and investigative activity. Working with our hate crime investigation team to support victims and target offenders and those that display intolerant or bigoted attitudes and behaviours.
- A positive and proactive approach to domestic violence, providing support, protection and guidance to victims while pursuing all opportunities to put offenders before the courts will be taken.

Community Safety Unit

Led by Folkestone & Hythe District Council • Weekly sub-group

Example activities to tackle the issues

The multi-agency weekly meeting of the CSU (Community Safety Unit) provides an essential operational delivery arm for the CSP.

- The CSU is well established and seeks to support higher risk victims of anti- social behaviour (ASB) and to tackle ASB in hotspot locations. Enforcement action is led by the CSU. The CSU also focuses on tackling youth related ASB and seeks to engage young people in services and diversionary activities.
- The CSU will continue to support a number of vulnerable individuals who may be exploited through cuckooing or other means.
- The CSU will concentrate work on areas where there is a high level of crime and ASB. We will seek to increase engagement and reporting from residents so that all issues can be understood and tackled.
- There will be the continuation of multi-agency operations as resources allow.
- The Community Trigger process will be managed for the CSP through the CSU. This process allows victims of ASB to raise concerns about the way in which their reports of ASB have been handled by partner agencies.
- One of the main aims of this community safety sub group is for the district to not only be a safe place but an environmentally friendly one where people want to live, work and visit.

- This sub group will develop preventative and diversionary activities to reduce incidents. Tackling ASB by focussing on its prevention, taking positive action and protecting victims and witnesses.
- The weekly multi-agency CSU meetings will continue to take place every Tuesday, hosted by Folkestone & Hythe District Council, to deal with issues of ASB and other crime eg criminal damage. When required 'task and finish' groups will be set up from these meetings to deal with a specific issue that requires a multi-agency targeted approach.
- The CSU sub group will set up a task and finish group for emerging town issues and Public Spaces Protection Order (PSPO) enforcement and where necessary will address wider issues.
- The CSU will collate data around the PSPO.

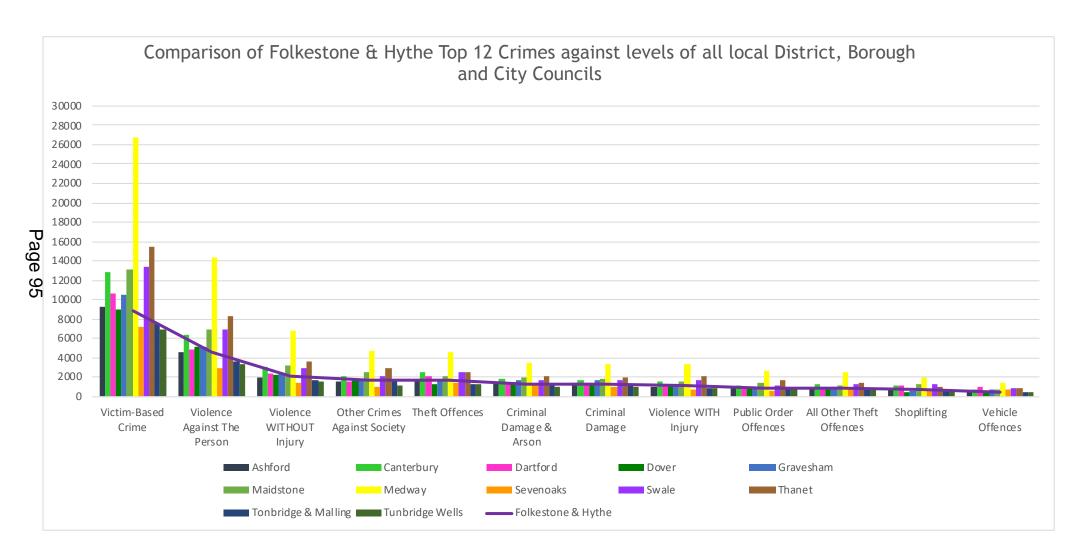


Appendix 1

Table 1 Table showing how the Folkestone & Hythe Community Safety Partnership compares with Kent as a whole on different crime types

Crimo Tuno	Folkestone & Hy	Kent		
Crime Type	Nov 19 - Oct 20	Rank	Nov 19 - Oct 20	Rank
Victim-Based Crime	8826	1st	151743	1st
Violence Against The Person	4629	2nd	77293	2nd
Violence WITHOUT Injury	2062	3rd	34714	3rd
Other Crimes Against Society	1691	4th	26207	5th
Theft Offences	1650	5th	26823	4th
Criminal Damage & Arson	1251	6th	21266	6th
Criminal Damage	1214	7th	20563	7th
Violence WITH Injury	1125	8th	18088	8th
Public Order Offences	860	9th	14639	9th
All Other Theft Offences	801	10th	14174	10th
Shoplifting	756	11th	11354	11th
Vehicle Offences	398	12th	8954	12th

Table 2 Table showing how the Folkestone & Hythe Community Safety Partnership compares with Kent as a whole on different crime types



FOLKESTONE & HYTHE DISTRICT COMMUNITY SAFETY PARTNERSHIP PLAN

1 April 2021 - 31 March 2024

Contributing Statutory Partners



















Agenda Item 8

This report will be made public on 14 September 2021



Report Number

C/21/34

To: Cabinet

Date: 22 September 2021 Status: Non-Executive Decision

Responsible Officer: Ewan Green - Director of Place

Cabinet Member: Councillor David Monk, Leader of the Council

Councillor David Wimble, Cabinet Member for the

District Economy

SUBJECT: FOLKESTONE TOWN CENTRE PLACE PLAN

SUMMARY: This report presents the Folkestone Town Centre Place Plan for approval. The report sets out an overview of the work undertaken to develop the plan and the key actions proposed as priorities for delivery. The report also seeks approval for the submission of an application to the Government's Levelling Up Fund.

RECOMMENDATIONS:

- 1. To receive and note report C/21/34.
- 2. To approve the Folkestone Town Centre Place Plan.
- 3. Agree the projects prioritised for further development in support of a Levelling Up Fund application.
- 4. To authorise the Director of Place, in consultation with the Leader, to submit an application for funding to the Government's Levelling Up Fund.
- 5. Note that consideration will be given to partnership and stakeholder structures required to support ongoing delivery of the plan.

1. BACKGROUND

1.1 The role of town centres is changing and the Place Plan takes a holistic view of the way in which Folkestone Town Centre can continue to harness the natural potential of the area. With a fantastic coastline, great transport links, a thriving culture and leisure offer, investment in new homes and businesses and growing communities, Folkestone has much to celebrate already.

However there is also much that needs to be done to build on this and ensure the town centre continues to adapt and diversify moving forward to meet the changing role of town centres.

- 1.2 There are key strategic drivers which set the context for the development of a plan for Folkestone town centre.
- 1.3 The Council's **Corporate Plan 2021-30 'Creating Together Tomorrow'** recognises the need to reinvigorate all district town centres, particularly investing in Folkestone town centre.

Ambition 3: A Vibrant Economy sets out priority actions to reinvigorate high streets through investigating opportunities for diversification, attracting investment into non-retail uses, such as creative workspace, leisure, housing, cultural and heritage-related activities. A key action in the corporate plan is the completion of the Place Plan.

- 1.4 The Place Plan also aligns strongly with, and supports the aims of, the corporate plan Ambitions in relation to positive community leadership, a thriving environment and quality homes and infrastructure. Sustainability is an underpinning theme throughout the Place Plan and this responds positively to the council's declaration of a climate emergency.
- 1.5 The **Folkestone and Hythe Core Strategy Review 2020** identifies the following strategic considerations for town centres:
 - The challenge to improve employment, education attainment and economic performance
 - The challenge to enhance maintenance and management of natural and historic assets
 - The challenge to improve the quality of life and sense of place, vibrant and social mix in neighborhoods, particularly where this minimises disparities
 - The challenge to plan for strategic development which fosters high quality place making with an emphasis on sustainable movement, buildings and green space.
- 1.6 To address these challenges the Council has worked with partners and communities to develop a Folkestone Place Plan which sets a vision and direction for the town centre including necessary infrastructure investment required to achieve sustainable change.

The development of the Place Plan takes a holistic view of the way in which Folkestone Town Centre can continue to harness the natural potential of the area.

Urbanists, We Made That (and their specialist consultant team), developed the plan on behalf of the Council following extensive engagement with a wide range of stakeholders which was a key activity in identifying opportunities, creating a vision for the future and setting out the way in which this can be delivered.

2 Development of the Place Plan

- 2.1 The Place Plan has been developed through a series of different research and engagement activities.
- 2.2 An urban appraisal was completed which formed the initial basis for the development of proposals within the Place Plan. The appraisal includes findings from desktop research of previous studies and consultation, as well as additional specific research aimed at better understanding the history, use and operation of Folkestone Town Centre. On the ground observational analysis also formed a vital part of the appraisal, as it revealed more nuanced behavioural and qualitative aspects that are otherwise hard to capture.

The urban appraisal can be viewed via the following link: <a href="https://www.folkestone-hythe.gov.uk/media/3772/Folkestone-Place-Plan-urban-appraisal-draft-/pdf/We_Made_That_219_Folkestone_Place_Plan_Appendix_1_Urban_Appraisal_RevB_compressed.pdf?m=637641272164970000

2.3 The engagement process for the plan made a commitment to listening to the full spectrum of Folkestone's communities, to ensure that the Place Plan was guided by the views and priorities of strategic and delivery partners, businesses, community stakeholders as well as the wider public, residents and visitors.

We Made That held a variety of events and used a range of communication methods to ensure that a wide range of opinions and voices were encouraged, captured and presented. Focused workshops, one-to-one conversations, stakeholder meetings, a dedicated website and two well-attended public webinars were organised throughout the course of the Place Plan's development.

The engagement approach was designed to provide multiple opportunities for interested parties to have their say in shaping the Place Plan, making sure that the team fed back how suggestions had been incorporated as the Place Plan developed.

More specifically, the webpage was held on our corporate site and provided detail of scheduled activity with access to recordings of the webinar and project output as the project progressed. Members of the public and stakeholders were able to engage directly via an FHDC email option.

As well as promoting all events digitally, press releases were issued and an article was included in the most recent Your District Today to reach all residents and posters put up in key locations (local supermarkets and notice boards). Members of the public who did not have digital access were able to request a hard copy of the webinar slides and associated surveys and were encouraged to give their feedback.

The engagement plan can be viewed via the following link: <a href="https://www.folkestone-hythe.gov.uk/media/3771/Folkestone-Place-Planengagement-report-draft-/pdf/We_Made_That_219_Folkestone_Place_Plan_Appendix_2_Engagement_Report_RevA.pdf?m=637641272484130000

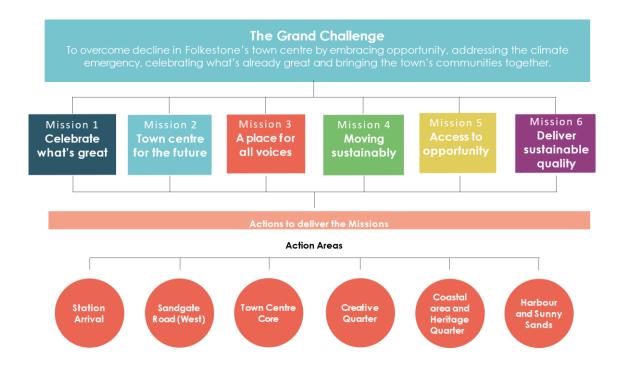
- 2.4 A final round of engagement was held in August 2021 seeking feedback on the final draft plan, with particular focus on the actions and interventions proposed. A summary of this feedback has been collated and is attached as Appendix 1.
- 2.5 To help inform the Place Plan, specialist consultants performed specific technical appraisals relating to: (1) transport and movement in the town centre; and (2) a review of opportunity sites, how they could be re-purposed or developed in the future should the opportunity arise.
- 2.6 Overview and Scrutiny Committee reviewed the initial scope of the place plan brief and engagement proposals and views from Members were incorporated into the work of the consultant team.
 - Folkestone Town Centre Working Group reviewed the scope of the place plan brief and were consulted at various stages of the plan's development.
- 2.7 All Members have had sight of the Place Plan and the opportunity to feedback comments on the draft document.
- 3 Folkestone Town Centre Place Plan (please refer to Appendix 2)
- 3.1 The Place Plan is structured around addressing the 'grand challenge' of overcoming decline in the town centre to ensure it has a sustainable and vibrant future.
- 3.2 The plan sets clear 'missions' and proposes specific actions to help shape the future of the town centre. These have been developed based on the opinions gathered during the engagement process and findings from the urban appraisal.

The 'Grand Challenge' sets a bold and overarching target for the future of the town centre. To address this cross-cutting aim, six 'missions' have been developed. These respond directly to specific issues from the appraisal process, and correspond with specific proposed actions and interventions, and clear, targeted impacts.

The actions to deliver the missions are grouped according to geographic areas of the town centre. This mission-oriented approach is intended to

create a clear pathway to attain sustainable and inclusive growth led by both public, private and voluntary sectors.

3.3 The structure of the plan is shown below:



- 3.4 The plan sets out a range of actions which are aimed at delivering outcomes in support of all 6 'missions'. It is important to recognise that some of the actions, in particular those with a longer timescale, are highly aspirational and not necessarily within the control of the Council.
- 3.5 The plan is not a planning policy adopted by the Council but presents an overall direction for development and investment in the town centre which will be a material consideration in relation to planning processes for built development projects in the town centre.

4 Delivering the Place Plan

- 4.1 It is recognised that the actions outlined in the plan are not solely the responsibility of the Council to deliver. There is however a clear leadership role for the Council to ensure that the overall ambition in the plan is pursued vigorously.
- 4.2 In line with the ethos of, and priorities within, the Corporate Plan 2021-30 the Council leadership role will be to:
 - Promote the plan to communities, partners, investors and government.
 - Lead delivery of a range of actions across short, medium and longer timeframes.

- Support delivery of actions by partners in the public, private and community sectors.
- Co-ordinate and report on overall delivery of the plan.
- Continue to engage across all stakeholders and communities as part of the development of projects.
- 4.3 Consideration will be given to partnership and stakeholder structures required to support ongoing delivery of the plan. This will include reviewing the role of the Accelerated Delivery Board which was established to facilitate major projects across the district.

5 Levelling Up Fund

5.1 The Government's Levelling Up Fund (LUF) was announced at the 2020 Spending Review and will focus on capital investment in local infrastructure thereby building on and consolidating prior programmes such as the Local Growth Fund and Towns Fund. In doing so, it will also create opportunity across the country, prioritizing bids that invest in regeneration and growth in places in need and areas of low productivity and connectivity.

The focus of the LUF is investment for infrastructure which has 'a visible impact on people and their communities'. The investment priorities for the LUF are investments in transport, regeneration and town centres and culture and there is a requirement that projects support the government's carbon net zero goals and have minimum impact on nature and our natural assets.

LUF bids must demonstrate that they will have visible, tangible impact on people and places, and support economic recovery. The application process includes the requirement for a full Treasury Green Book Appraisal.

5.2 The government has prioritised districts according to need and Folkestone & Hythe is in the highest level of need category (category 1) which means that preference will be given to bids from our area.

All district councils can bid for up to £20m either for a single project or a package of multiple projects which are cohesively and coherently related. Each district and LPA is limited to funding for a single project, with all government funding required to be spent by 31 March 2024 (or March 2025 in exceptional circumstances).

The launch of the fund in February 2021 invited round 1 applications to be submitted in June 2021 for those with projects that were able to commence delivery in 2021-22. For districts intending to submit projects in later rounds (with round 2 expected to be announced in 2022), £125,000 capacity funding has been provided to councils in category 1 (such as FHDC) to prepare for application. It is proposed that the £125,000 is utilised during 2021/22 with any balance being carried forward to 2022/23, and will contribute towards the costs of both the internal resource to accelerate delivery of Corporate Plan ambitions and external technical support to develop the application process.

- 5.3 There is no specific requirement that the Council provides match funding as part of the application. It should be noted however that projects included in the application require to be developed to a detailed design and costing stage and be subject to a Treasury Green Book Appraisal.
- 5.4 It is proposed that an application to the Levelling Up Fund is progressed and that external technical support will be commissioned to support the development of the detail required of the application process.
- 5.5 It is proposed that the following projects, identified as priorities within Section 7 of the Place Plan, are developed to a level of readiness for potential inclusion in a LUF application:
 - Station Arrival and Town Centre Connections
 - Improved Gateway to the Town Centre and Bouverie Square
 - Sandgate Road and Town Centre Public Realm
 - F51 Environs and Payers Park
 - Harbour Line & Tram Road
 - Sunny Sands
- 5.6 The development of the above projects will require specialist transportation input to investigate in more detail roads, infrastructure and car parking implications.
- 5.7 Funding to support the development of the LUF application is available within existing budgets and through utilisation of the Government capacity grant.
- 5.8 It is important to note that it is not realistic to expect that all of the above will be included in a deliverable LUF application (i.e. projects required to complete LUF spend by 31st March 2024). The further development of the various projects (and their component parts) will establish robust delivery programmes and this will be used to determine the scale and nature of the application.

6. IMPLICATIONS

6.1 Legal Officer's Comments (NM)

There are no legal implications arising from the report.

6.2 Finance Officer's Comments (CS)

As outlined within 5.2 the Council has been awarded £125,000 capacity funding. It is anticipated this will be largely utilised in 2021/22 but any residual sum will be carried forward for use in 2022/23. The sum will as outlined above be provisionally allocated £50,000 to support the additional capacity for the accelerated delivery resource and the remaining £75,000 for external technical support in developing the bid itself.

Clearly there will be financial implications of any resulting project from the Levelling Up bid. Those implications will need to be evaluated, approved and incorporated in a future Medium Term Capital programme once known.

6.3 Diversities and Equalities Implications (GE)

There are no negative equality and diversity implications directly arising from this report. The development of the Place Plan has been subject to a range of public engagement activities that has allowed members of the public, local businesses, strategic partners and community interest groups the opportunity to get involved and help shape the final draft of the plan.

The Place Plan considers the needs of all residents regardless of whether or not they have a protected characteristic. The differing needs of people, including those with different protected characteristics, will be further considered as projects and interventions are developed further.

6.4 Climate Change Implications (OF)

There are no direct Climate Change Implications arising from producing this report. The Folkestone Town Centre Place Plan sits within the Council's wider objective to secure regeneration of Folkestone town centre which if properly managed will help minimise associated carbon emissions. As stated earlier in the report, investments priorities for the LUF has a requirement to support net zero goals and have minimum impact on nature and natural assets. As a result, Folkestone Town Centre Place Plan can provide opportunity to incorporate climate resilience and adaptation measures to ensure sustainable change.

7. APPENDICES

Appendix 1 - Final Consultation Feedback
Appendix 2 - Folkestone Town Centre Place Plan

8. CONTACT OFFICERS AND BACKGROUND DOCUMENTS

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

Ewan Green, Director, Place Telephone: 07783659864

E-mail: ewan.green@folkestone-hythe.gov.uk

Background documents:

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

Appendix 1
Place Plan Consultation Feedback Summary

Document	Raised By	Summary of Feedback	Mission	Action Item	Next steps
Place Plan	Local Resident	Comment on the disrepair and issues in Muddles Passage. I note this is shown as a cycle path or intended cycle path to join the route from the station. This would appear to be a very sensible route and one I try to use now when cycling. I would however request that this passage be maintained, by better road surface, removal of regular graffiti, CCTV to deter anti social behaviour and regular street cleaning. As this would be one of the first cycle routes from the train before coming into Bouverie Road some investment here would in my opinion be beneficial.	Moving sustainably	4.3	Future individual project activity should consider observations and feedback provided in addition to ongoing engagement. Raise maintenance element with relevant council teams
Place Plan	KCC Transport	Transport and Movement (Page 13) – The County Council is not currently forming a revised transport strategy so the last sentence should be removed.	Transport & Movement	N/A	Remove sentence from page 13 of place plan
Place Plan	KCC Transport	6.3 Actions: Town Centre Core (Page 44) – Stagecoach East Kent need to be consulted upon from the outset with any proposed changes to Bouverie Square	Moving sustainably	4.1	Stagecoach have been consulted and will continue to develop the scheme with us and other partners.
Place Plan	Local resident	Please please include a proper changing places toilet space within the plans. It is vital that our disabled community have space to change and toilet safety. It's impossible for me to change my son (4, in a wheelchair whilst we are out) because there are no adequate disabled toilets in the whole of town. The ones at the bus station are not suitable and are often in a disgusting state. There is a changing places fund, that you need to apply for that can cover some of the costs. It can be found here https://www.gov.uk/government/news/share-of-30m-changing-places-toilets-fund-now-open-for-applications	A place for all voices	3.3	Future individual project activity should consider observations and feedback provided.
Place Plan	Local Resident via Cllr Whybrow	My idea for a big imprvement for Folkestone, would be to install a modern glass lift, to link the lower coastal road with the shopping area above. This could be done in the area of the old water lift. I believe this would be of great benefit to the people of the town, as well as to tourists and visitors. I have seen this idea many times in Europe, for example Germany and France, where it works most successfully.	Moving sustainably	4.2	Proposal for additional lift already captured in Place Plan
Place Plan	Local Resident via Cllr Whybrow	I've been contacted by a resident who feels strongly that it would not be a good idea to move the bus station further from the town centre and I have to say I agree with her. Nice as it would be to make the bus station a green square again, if we want to encourage people to use public transport we must make it as convenient as possible for them. We must consider the needs of the elderly and disabled. It is also extremely important that the bus terminus wherever it is located has	Moving sustainably	4.1	Future individual project activity should consider observations and feedback provided in addition to ongoing engagement requirements.
Urban Appraisal	Town Clerk	 public toilets as well as facilities for the bus drivers. You list the town hall as housing the museum and cinema but on page 25 it is shown as yellow for disposal The town hall belongs to FTC but this is not listed The town hall houses the town council administration providing civic functions 	Planning & Policy Dev - Land Ownership		Update Urban Appraisal document

		in the centre of town that supports all three tiers of local government but this is not shown on page 41 • The town hall also has a tourist information office			Future individual project activity
General comment	Local resident	I am dismayed (and so is everyone I have spoken to about it) about the suggestion of moving the bus station and hopefully this idea has been 'scrapped'. Absolutely ludicrous idea. I hope, also that more will be done for the visually impaired for mobility issues.	N/A	N/A	Future individual project activity should consider observations and feedback provided in addition to ongoing engagement requirements.
Place Plan	Local resident	I understand that you have recognised the importance and history of the Parish Church of St Mary and St Eanswythe. Indeed in 6.5 you suggest improved connections and better visibility of the Parish Church. Currently, there are tour buses coming into Folkestone and an increased number of visitors to the church. It is envisaged that the number of visitors will grow as the church also facilitates many concerts. One group expressed concern at getting a bus anywhere near the church as The Bayle is the prescribed route on Google but is notoriously difficult. The other way is to approach via the roundabout at the top of The Road of Remembrance and The Leas. This will take you into Pound Way but due to the number of cars parked is a nightmare for a car to get through and impossible for a bus to get down Pound Way and then into West Cliff Gardens which is also parked up. The only possible way is to close off some parking spaces on Pound Way and create a space large enough for a coach on West Cliff Gardens. It is therefore suggested that there needs to be dedicated parking for visitors in West Cliff Gardens. Let us not forget that many visitors to the church are elderly and/or disabled.	Moving sustainably	4.14, 4.15	Update Place Plan and ensure future transport brief covers the Heritage Area of the town centre for accessibility of transport
General comment	Local resident	My experience of the placeplan team is one of jargon and misunderstanding - to put it kindly! As you will be aware when the first draft of the plan was published, the boundary had been carefully drawn to EXCLUDE the church and The Bayle area - both at the heart of this town's tangible history. There will be no solution to the town's car parking challenge until the number of District Councilors from the areas of concern increases and officers actually live in the town and/or take the trouble to visit areas of concern (like the one you have highlighted), talk with residents AND more importantly, listen to what they have to say.	N/A	N/A	Future individual project activity should consider observations and feedback provided in addition to ongoing engagement requirements.
Place Plan	Local resident	The main concern for everyone I have spoken to is the proposed moving of the bus stateion. THIS IS A LUDICROUS IDEA. It is perfect where it is. 1. It is convenient for shoppers i.e. Asda, Sainsbury, Iceland etc with heavy bags, it would be a nightmare having tocarry them down to Shellons Street, especially for the elderly and disabled. 2. Where would the drivers rest room and facilities along with their office go!!!! Shellons street is too narrow for buses to be parked alongside normal traffic. I'm sure Stagecoach must feel the same way.	A place for all voices	N/A	Future individual project activity should consider observations and feedback provided in addition to ongoing engagement requirements. Raise Highway experience with relevant council teams.

		LEAVE IT ALONE The idea for the old rail track down Tram Road making it a cycle and walking/running path is a good one, as it is just an eyesore at the moment. or it could be taken up and the road widened as now the buses go both ways it is very congested. NO to flats on the harbour arm car park NO MORE FLATS on the seafront – that is where the Skateboard park should have gone – more leisure facilities. The car park at the end of Tontine Street could be made into a multi storey enabling easier parking for visitors to the harbour area. YES to the Leas Lift repair. The Saga building should become the Council Offices, along with other public offices such as Job Centre, Social Services, Tourist nformation. Licencing Department etc. If gardens are wanted – move all shops in Guildhall Street into Sandgate Road, and make Guildhall Street gardens and leisure cafes etc. Debenhams to be made into individual 'market' style shops for start up businesses. Easier access throughout the town for the blind/visually impaired – all bollards painted white, no 'A' boards etc. I hope my comments are considred along with many others I'm sure you have received. Folkestone needs an indoor 10 pin bowling complex. Also, seafront amusements			
Place Plan	Local resident	for family fun. Much has been done on eating/drinking places, but there's not much for families to do, especially indoors and/or during unfavourable weather. The Rotunda amusements are still a great loss especially now the rest of the harbour is being regenerated. The Leas Lift would obviously bring people down to the lower seafront and new features.	Town Centre for the future	N/A	Future individual project activity should consider observations and feedback provided in addition to ongoing engagement requirements.
Place Plan	Local resident	If I have understood the plan correctly one of the proposals is to pedestrianise the Road of Remembrance. I haven't seen anything in the plan to compensate for this reduction in vehicular access to the harbour Access to the harbour area, lower leas coastal park etc appears to be limited to a rather tortuous, unattractive and congested Tram road. With the increase traffic to the harbour area due to the seafront development, I would suggest this needs to be addressed. The Folkestone Roads Review Group tried to make sense of the roads system and produced the attached paper which I sent to you in February. I feel the options proposed herein would enable the flow of traffic in the town and harbour area to be improved. Tram Road is a nightmare if there are any events here. I think a further look at the roads system overall is warranted	Moving sustainably	1.13, 1.14	Future individual project activity should consider observations and feedback provided in addition to ongoing engagement requirements. Provided insight to be made available when Transport/Parking Brief and associatedproject starts.
Place Plan	Local resident	Folkestone Bus Station Never heard anything so ridiculous!! Where are the drivers going to have their break and changeovers? Yet another daft idea of the council's along with the two way traffic of Tontine Street & Tram Road.	Moving sustainably	4.1	Future individual project activity should consider observations and feedback provided in addition to ongoing engagement requirements. Stagecoach have been consulted and will continue to develop the scheme with us and other partners.

Place Plan	Local resident	For Town Centre mulitiple endorsements for proposals within PlacePlan Supportive of civic squares, greening recommendations for creative quarter, pedestrianisation of Road of Remembrance and improvements, Harbour & Sunny sands proposed interventions. Noted issues with underused parking in Harbour & Sunny Sands area, maintenance of Bakers Gap and East Cliff. As well as recommendations below suggests replacing street planters with trees for longevity and biodoversity. Making more bins with recycling capacity and seagull proof. Include restoration and reinstatement of old paths for better access to Seafront. Include mention of opportunities to redesign Bouverie Place frontage on Shelleons St. 1) town centre proposals All of Sandgate Road narrowed by removing most on-street parking, keep two way and introduce a bus route to go through the town centre. Keeping the layout uniform will unify this road. Retain some on-road parking for loading/disabled badge holders and encourage car park use with affordable pricing. Improve the car parks to make them feel like a safe environment to use. A permanent market and mini green squares and rain gardens outside FOLCA building An additional square for dining in the "Bouverie village" area to help businesses. Additional roads made two-way such as Manor Road, Middleburg Square (north), Cheriton Road, and the town end of Sandgate Road. Make most of the area a 20mph zone with plenty of pedestrian crossings, and less traffic lights – Keeping traffic moving, but slowly to make it easier for pedestrians. Carefully masterplan Middleburg Square/former Saga building and bus station area to ensure there is sufficient space for buses and the proposed improvements are possible. Redevelopment opportunities could be re-using buildings are building new ones. Emphasis should be on blending in with the Victorian character of the town whilst providing a greener, more sustainable environment.	All	All	Future individual project activity should consider observations and feedback provided (including attachments) in addition to ongoing engagement requirements.
General comment	Local resident	It's easily seen that especially the centre of town has been neglected for a long time. Maintenance of brickwork on the pedestrian areas (repaired with bits of tarmac), and the pavements, collection of rubbish, removal of gum, graffiti, spillage of drinks and other unmentionable substances, is ignored. If people are not inspired by the cleanliness of their surroundings there is no incentive to act responsibility. It is no use spending inordinate sums of money on grand ideas if the council then fails to carry out regular maintenance, probably patrolling every day, and things slip into neglect as they have now. I'm sure the pedestrianised area originally was very smart and pleasant to be in, but now it is a place I do not like to be. Everywhere looks dirty neglected and uninspiring.			Future individual project activity should consider observations and feedback provided in addition to ongoing engagement requirements. Raise maintenance element with relevant council teams
General comment	AFRA (Alliance of Folkestone	Please note the attached detailed AFRA analysis and commentary on the three associated elements of the published 'final' draft for The Place Plan • Urban Appraisal	N/A	N/A	Future individual project activity should consider observations and feedback provided in addition to

Residents Associations)	Consultation report Draft Place Plan The feedback is provided on behalf of AFRA and will be published along with this email response on our website. www.afra.network The Alliance of Folkestone Residents Associations provides a platform for residents groups and works closely with several civic voice partner organisations. The Place Plan as a framework for regeneration of Folkestone is a matter of significance and concern for all 54000 residents of the town. It is reasonable to say that it is of importance to all residents and businesses within the district, as well as visitors and investors. Considerable time and careful consideration has been given to this important subject - as a consultative group ourselves. We have looked at this work from a strategic point of view - leaving others to debate the multitude of points of detail which have created an ongoing furore. Our key observations, therefore, are primarily to do with the consultation and methodology for developing this work, rather than the content. The content and the litany of ideas, opportunities and suggestions can be varied, adjusted - and will clearly need to be. The Place Plan is essentially an outline of the possibilities, without the supporting reality of resources, ownership, permissions or statutory powers being investigated. Despite this, it has some positive aspects to it as a vision for Folkestone with a number of ideas which deserve to be worked on further, with appropriate input. The authors/consultants themselves note repeatedly that the substance and further development require ongoing consultation. Finally - perhaps most significantly - the accepted definition of Place planning includes the clear requirement that this is based upon the needs of local people, around whom and with whom the built environment and civic amenities should be devised and co-developed.			ongoing engagement requirements. Section 7.0 Make It Happen of the Place Plan outlines the ongoing commitment to engagement. Future individual project activity will consider this
AFRA (Alliance of Folkestone Residents Associations)	A snapshot of some potential caveats and concerns on reading through the Plan in reference to the six missions which underpin the descriptions and indicative suggestions for the six action areas, have been noted with very brief comments as follows: • M1 Celebration • This Plan has to be seen for what it is: very much a partial celebration of community character and the town's core assets – something of a post-lockdown party, perhaps. • M2 Town centre for the future • "Look no further" there is the central over-promise and under-deliver history which has failed the majority of the community over decades: needs further work and thought. • Future imperfect: notably only a very generalised vision emerges for the next generation and the marginalised: the young, the poor, those from minority groups. • M3 All voices • Again, the exercise to date has disappointed on a massive scale (see further below) • There is as yet no practical mechanism for ongoing consultation or engagement	N/A	N/A	Future individual project activity should consider observations and feedback provided in addition to ongoing engagement requirements.

		o 17 young people represents a very limited effort in engaging the next generation o Few community groups were engaged, mostly representing 'establishment' voices • M4 Sustainability o The minimal reference to climate change needs little comment: no planetnothing! • M5 Opportunity o For developers, this is a continuing feast; for the community, more substance is needed in projects such as new uses for urban space, significant new partnership working and a radical departure in pump-priming smaller scale projects, rather than the serial indicators of a propensity for large-scale			
		 development grandeur. M6 Sustainable quality Development and contracting history will limit confidence in planning eversight. 			
Urban Appraisal	AFRA (Alliance of Folkestone Residents Associations)	o Development and contracting history will limit confidence in planning oversight Summary This is possibly the most useful document, collating multiple references to FHDC characteristics, which might have been assumed to be in place already, in order to underpin the policy-making process and the work of senior officers. Apparently this is not the case. This piece of work effectively and efficiently iterates some of the disturbing and shocking issues for our community and the future of our Town. To show disinterest in any section of our community is to disregard personal and professional responsibility; it is also a near certain recipe for failure, in the current social and economic context. Context: identifying the challenge for our community While the District Council is not responsible for health or education services, for example, there is a clear problem with these services failing to be provided in tandem with developments in and around the Town. The result is usually a deficiency of choice or opportunity for those with limited personal resources. The proposals and opportunities set out in the closing summative section show the need for such partnerships, as well as the value of professional expertise, partnership roles and good local knowledge.	N/A	N/A	Future individual project activity should consider observations and feedback provided in addition to ongoing engagement requirements.
Urban Appraisal	AFRA (Alliance of Folkestone Residents Associations)	Climate change and sustainability Disappointingly, as mentioned in the review of the main section of the Place Plan, the Urban Appraisal has very little to say on the wider implications of climate change, the implications for development, sustainability, quality of life, waste management, etc. This has to be noteworthy, given the proximity of the Town to the sea and the overall District topography. Some residual errors – such as the incorrect designation of the starting point for the Leas Coastal Park – will be picked up by experts, purists and community activists. However, there is some point to assessing the natural amenities – and useful food for thought in the current scarcity of green spaces, public amenities – despite some sites in the Town literally gathering weeds and being barred to public access.	N/A	3.5 environment	Update Place Plan with correct designation. Future individual project activity should consider observations and feedback provided in addition to ongoing engagement requirements.
Urban Appraisal	AFRA (Alliance of Folkestone Residents Associations)	Business support and employment For a commercially focused study, there is insufficient detail on the need for investment and regeneration to be facilitated by local administrations by working to support community, business support and infrastructure initiatives. The latter represents a key employment sector. Employment in significant numbers through business support, finance and professional enterprises are shown to provide almost 6000 jobs, with little	N/A	2.1 Living in Folkestone 2.2 Workingin Folkestone	Future individual project activity should consider observations and feedback provided in addition to ongoing engagement requirements.

		evidence of how this can be nurtured, preserved and developed. In another reality check, it emerges that there are now around 5000 claimants – amounting to one sixth of the working population – a figure which has increased 100% in just a year.			
Urban Appraisal	AFRA (Alliance of Folkestone Residents Associations)	Investment The answer of course is that the investment by the Creative Foundation as a major landlord is extremely important but should also be seen within a more balanced local economy, with social enterprise, cooperatives and community initiatives forming part of overall activity.	N/A	N/A	Future individual project activity should consider observations and feedback provided in addition to ongoing engagement requirements.
Urban Appraisal	AFRA (Alliance of Folkestone Residents Associations)	Housing and development planning Modest housing development (other than the major Seafront and Harbour programmes) includes relatively little supply of local affordable housing and almost no social housing at all A fascinating development timeline highlights the history of land-ownership and the evidence of patronage by wealthy individuals in the town's history of development: has this changed? Little community development leadership has impacted upon the town since the post-war period of national renewal and regeneration. The decline of the Town is equally very clearly set out in the three decades leading up to the millennium, at which point there is a reversion to the historic dependency upon a benevolent patron and investor.	N/A	N/A	Future individual project activity should consider observations and feedback provided in addition to ongoing engagement requirements.
Urban Appraisal	AFRA (Alliance of Folkestone Residents Associations)	Data, strategy and causal factors: transport infrastructure as a sign of decline. Of particular interest are the key sections of data and analysis of how the Town is currently faring, both in terms of the infrastructure and in terms of the wider population. Exploring a sample section of this report provides some clues to what has gone wrong and what needs to be done to open up a new set of prospects and opportunities. The Transport and Movement section notably highlights a series of issues – which serve to illustrate the overall verdict - in this response - of inaction as a causal factor in the risk of continuing decline for the Town Centre. A lack of imagination and a lack of concerted action with partners on these can be perceived in other segments of the Urban Appraisal which in turn feeds into the substantive Draft Plan. Among several notable issues and statements within the Appraisal from this particular section are: Historic ring-road design as a legacy from the port era Middleburgh square "an impenetrable boundary" to town centre Pedestrian network, with some significant accessibility issues Cycling not well provided for overall in a "hostile environment" Lack of integration, notably to help make the significant rail links more attractive Bus services good, central; bus station set for redevelopment! Significant car usage shown as essential for retail centres, with limited parking Usage possibly affected by pedestrian issues, lack of integration etc. Limited charging points for electric vehicles High Street footfall down 16% over four years	N/A	N/A	Future individual project activity should consider observations and feedback provided in addition to ongoing engagement requirements.
Urban Appraisal	AFRA (Alliance of Folkestone Residents Associations)	Community cohesion The Appraisal includes some devastatingly sharp notes on socio-economic factors, and yet provides few answers to these concerns within the draft Plan, as noted earlier. The following are key quotations from the Appraisal:	N/A	N/A	Observational feedback

		 "The research show that Folkestone is increasingly divided and unequal" "Folkestone is a divided town. There are pockets of severe deprivation around the centre and north-east of the town. Four areas are in the top 10% most deprived in the country and struggle particularly with low incomes and high unemployment and crime." "For example, the life expectancy between least and most deprived is 6.9 years lower for men and 3.7 years lower for women" "there is a clear opportunity for the town centre to fulfil a stronger community, social and civic function." "Overall the combination of limited connections, steep gradients, and routes that require the use of steps affect pedestrian access to the harbour and seafront." "Folkestone lacks a competitive leisure offer. 			
Urban Appraisal	AFRA (Alliance of Folkestone Residents Associations)	Land occupancy and living in this Place Key issues identified in the Land Usage section also highlight this sense of reactive, rather than proactive policy-making. Again, a genuine Place Plan has people at the heart of the proposals, which is not as strongly evident as it should be here. • Dominance of retail • Lack of leisure & community uses and cultural destinations • Key anchor stores are closing or have closed (such as Debenhams) • Lack of quality guest accommodation & hotels • No healthcare facilities found in the Town Centre (but the Debenhams site will be used for vaccinations) AFRA members have pressed for years for the issue of licencing policy to be addressed properly and with a proper balance between the enterprise and residential interests.	N/A	N/A	Observational feedback
Urban Appraisal	AFRA (Alliance of Folkestone Residents Associations)	Character and perception Two other brief points, to round off this section of the review of the draft Place Plan will focus on a symptom of missed opportunity and misdirection of the discussion – again, the responsibility of the commissioning. Firstly: the Perceived Character mapping serves to highlight the extent and strength – clearly underused – of the historic character area. Inevitably, the heritage community were not sufficiently involved in this piece of work and some avoidable offence was caused, not least by the exclusion of the Town's patron saint, St. Eanswythe, from the original mapping of the Town Centre action zone. Secondly, there are so many missed opportunities to realise potential in a creative way which admits to the paucity of financial resources or investment for some of the core issues facing our community. This means that there is no indication of how we might address such issues because there is very little meaningful reference to the deployment of the key asset of human energy in the community. The evidence that there is a lack of green space, space for children and families could surely lead to greater opportunities for community gardens; the lack of much needed skills training begs the question of why these cannot be asked of those with time and experience to offer; the somewhat ageing Neighbourhood Watch is not mentioned as a partial means of addressing the behaviours which are becoming a daily dispiriting experience for retailers, residents and visitors. And so on. And so it goes: the Appraisal highlights need, but only very faintly alludes to remedy, before it skips back to status quo recommendations which	N/A	N/A	Future individual project activity should consider observations and feedback provided in addition to ongoing engagement requirements.

		are assumed to be the property of the decision makers and the developers, rather than the community.			
Engagement Report	AFRA (Alliance of Folkestone Residents Associations)	Finally, we refer to earlier and widely shared concerns over what has broadly been seen as a necessarily limited exercise – which is not necessarily a criticism of the professional capability of the consultancy.	N/A	N/A	Observational feedback
Engagement Report	AFRA (Alliance of Folkestone Residents Associations)	More seriously, the final report provides yet more evidence of consultation exclusion, which cannot be fully attributed to or blamed upon the CoVid19 pandemic. This work clearly failed to take account of the well-known digital divide affecting those in poorer households and a significant proportion of older members of the community To celebrate the use of social media securing 2000 page views in 6 months would be ill-advised when a single post on the Veolia contract issues recently secured 7000 views in 48 hours. There were few print or broadcast media mentions if any – and therefore significant sections of the community were not engaged.	Engagement Report	3.4	Update narrative in Engagement report to capture the non-digital promotion of the project e.g. full page spread in YDT, Pressreleases, posters in key locations etc.
Engagement Report	AFRA (Alliance of Folkestone Residents Associations)	Where next with community engagement? Thus should have been a determination to create a standing community consultative body – such as has been in place in many other localities for many years.	Engagement Report	3.4	Section 7.0 Make It Happen of the Place Plan outlines the ongoing commitment to engagement. Future individual project activity will consider this.
Engagement Report	AFRA (Alliance of Folkestone Residents Associations)	Conclusion: The willingness to sign off on this Plan must be assessed as unacceptable without further assurances, primarily because the issues identified are not adequately addressed through unequivocal commitment to Council actions. These should involve firstly taking ownership for their response to the Plan's 'Missions' and secondly making an explicit commitment to genuine community engagement and community service. Final verdict: The Place Plan has some of the right answers – but leaves too many unanswered questions. Once again, we offer the reminder: "If this is our Town, this must be our Plan." Ownership is more than property	N/A	N/A	Section 7.0 Make It Happen of the Place Plan outlines the ongoing commitment to engagement. Future individual project activity will consider this.
Place Plan	Local resident	GENERAL POINTS ON THE WHOLE CONSULTATION EXERCISE The effects of the pandemic and the influx of London people over the last few years, has heralded an astronomical rise in house prices and private rents. This has resulted in much of the younger local population being priced out of the housing market forever. There is very little affordable housing being built, plenty of luxury flats though on the beach, in town and in Hythe. Hardly any social housing. What does the future really hold for young people who would like to remain in this town? Without realising it, WE MADE THAT have just highlighted all the bad decisions and mistakes made in the previous decades which will now need to be corrected by a massive investment in this Place Plan PAYERS PARK I am focusing on this because Payers Park is mentioned in WE MADE THAT's comment and shows no in depth research of its past whatsoever. That is its history from a derelict space to refurbishment by Creative Folkestone in 2013 and re-opening in September in 2014 as part of the Triennial.	N/A	N/A	Future individual project activity should consider observations and feedback provided in addition to ongoing engagement requirements.

		6.4 "It is a charming green space with views across the valley but is currently surrounded by the rear of the buildings which means it is easily forgotten. Because of its location it forms an underutilised connecting space between a number of parts of the town." WMT go on to say: 2.13 SCOPE. Hub of potential uses around Payers Park. Outcome. Payers Park becomes better used and perceptions of safety are improved." CONCLUSION - PAYERS PARK's future: Over the last few months, before the launch of the Triennial, improvements have been put in place by the CF together with the Council to keep the Park clean.and litter free. Waste Management for both Commercial and Domestic tenants' rubbish has been improved by a 3rd Cage finally being installed for the very large number of Community Bins. The new buildings, just completed by The Old High Street steps, means this end of Lower Payers Park will have 24/7 tenants' eyes on this hidden hotspot. Crime will be reduced. KCC Social Services Connections are working with the problem teenagers and children from the large community who inhabit the Park which will make the Park safe for the whole community to use as was intended when it reopened If the original ideas for Payers Park can finally be realised then it will be something to celebrate. I believe FOLCA needs to be the very first building to be worked on. It could be made an exciting destination for everyone to use Somewhere UNIQUE TO FOLKESTONE and unlike any other Debenhams in the rest of England. I believe this will kick start regeneration of the Town Centre and encourage future investors to come on board. It could also result in better community togetherness.			
Place Plan	Local resident	 The road alongside Central Station is Station Approach - not Folkestone Station Road. This name is confusing, as Station Road is by Folkestone West. A cursory glance at SouthEastern's website would have confirmed this. This may have been due to an over-reliance on Google Maps - as a Google Local Guide, I was able to have the erroneous name corrected. I did point this out to We Made That - whilst they corrected other errors, they left this in. Central Station has 70 car parking spaces, not zero. Again, this information is on the station's website. I fail to see how they missed an entire car park! The Lower Leas Coastal Park is sometimes missing the 'Lower'. It is incorrect to say that "Leas Coastal Park extends all the way to Harbour Street" or that "Road of Remembrance traverses down Leas Coastal Park". If you look at the maps, you will see that there is missing data (e.g. Fishing Museum absent, no Leas Cliff Hall or Quarterhouse on the evening activities map, no DISK or Rainbow Centre as facilities of that type) or outdated information (e.g. Junction 13 is on there, despite closing before the pandemic, but One Foot in the Grape is not) and that the colours are very close to each 	Urban Appraisal Place Plan	3.5 Air Pollution	Update documents with incorrect labelling on Urban Appraisal. Air polution feedback to be provided to PRD/WMT for comment. Future project development to ensure appropriate representation from heritage groups.

other (e.g. the map on p.30 has a light green for play parks and a slightly darker shade for retail, an orange for hotels and salmon for leisure - but I can't even see any play parks marked e.g. Payer's Park is not) - it is necessary to zoom in to a level where the image quality breaks up to see the data.

- Mentions of the "Triennale" despite my having pointed out it is "Triennial". Perhaps most seriously, though, there is data on page 46 regarding road and rail noise. It suggests that "the general noise levels are below the acceptable range of 90 Hz". There are several issues with this data:
- The key suggests that the data indicates "the level of noise according to the strategic noise mapping of rail sources within areas with a population of at least 100,000 people". We don't have a population of 100,000 in Folkestone.
- The map highlights roads as particularly noisy, yet the data is allegedly from "rail sources". This is very misleading.
- 90 Hz is a frequency, not a unit of noise levels. A 90 Hz sound is of fixed pitch, approximately that of an F sharp on the low E string of a guitar. A violin cannot play a frequency below 196 Hz. The use of Hz is repeated throughout the map key rather than dB, or perhaps more accurately a weighted unit such as dB(A).
- Even if they had said 90 db(A), this is not a 'range'. A range would be, say, 80 90 dB(A).
- There is no legal limit for road noise, although there is in the workplace employers must assess the health risk for employees and provide relevant training at 80 db(A) daily or weekly average exposure and provide ear protection and hearing protection zones at 85 dB(A). It is worth noting that continued exposure to 70 dB(A) will eventually cause hearing loss and that even continued exposure to 60 dB(A) can lead to shortened lifespan see this article on London traffic noise levels and WHO recommendations. Note that the decibel scale is logarithmic.

Heritage appears to have been given scant regard in the Place Plan. Originally, it suggested moving the War Memorial, which is outrageous. You will know the uproar caused by an attempt to do that to the Weston Memorial. That said, paving around it and painting art on the ugly concrete buildings that surround it does not do it any justice, either. Despite many heritage assets being pointed out in consultation, little notice was taken. For example, the recent confirmation that Saint Eanswythe's relics are, in all probability, her is a huge deal. It means pilgrimages to Folkestone to see the earliest known remaining relics of an English Saint and likewise the earliest known of a Kentish Royal Family member - if not the Royal Family. This would mean coaches would need to be able to get near the Parish Church. Yet you are proposing closing roads near the Church to pedestrianise around the War Memorial, making access harder. The plan suggests the Church is not visible enough. Well, that's because it has trees in its churchyard, which must not be removed. We all know it's there. The problem is the World doesn't know of Eanswythe's relics as we aren't advertising the site. The plan's solution is to "redesign West Cliff Gardens to highlight the

	link to the church". West Cliff Gardens is itself primarily heritage buildings. Unless you're going to knock down the old Herald office (which you aren't) - you do nothing to aid the Church and this is a complete waste of money. Also, the suggestion of an "improved entrance to the path to the Parish Church of St Mary and St Eanswythe" is absolutely despicable - the path in the churchyard is Listed, as are the bollards at the entrances and the lamp bracket in West Cliff Gardens. Likewise, the cobblestones in the Old High Street are not to be messed with - both they and the pavements are old and characterful. And that's pretty much the only mention heritage gets - everything else is a vague "heritage assets are refurbished and open for the public to use" and that should be "in-line with the Heritage Strategy". The trouble is that the Heritage Strategy is still in draft, with no timeline for completion. I could say the same of culture in general - with the exception of the Creative Quarter, which is a private enterprise, it gets little consideration. Where does the plan embrace Folkestone Music Town? It even left the two main venues off the evening things to do map! St. Eanswythe's School is struggling to raise funds to save Dance Easy, an Asset of Community value, as a much-needed community hall with less than three weeks to go. Why could this not have been in the Place Plan as a Town Centre venue and why are the Council not supporting the project in the first place? Why is the bandstand not mentioned? It is a heritage asset badly in need of restoration.		
Place Plan Local resident	Folkestone Town Centre Place Plan: Comments Archaeology There is a need to take into account the potential impact on buried archaeological remains during the proposed public realm works, particularly where there is proposed street tree planting, and ensure that desk based archaeological impact assessments form part of the work undertaken at the deetailed design stage prior to the delivery stage (section 7 page 97). Coastal Area & Heritage Quarter section 6.5, plan on p. 65 and inset plan on p. 66 showing proposed tree planting along Sandgate Road and areas east of war memorial on the Leas and along Pound Way and West Cliff Gardens. There is a potential for buried archaeological features and deposits related to the medieval priory in these areas and for later medieval structures along Sandgate Road. Harbour & Sunny Sands Zone section 6.6 p. 72 area 1.17 public realm upgrades in the area of Harbour Street & Tram Road area (existing car park and open space adjacent to Royal George) including proposed development areas on the north end of the existing car park and the new site for a multi storey car park along Tram Road. There is a potential for buried late Anglo Saxon and medieval archaeological features and deposits in the harbour area. Further Comments Page 62 refers to a request for a Conservation Area Appraisal and focused heritage strategy. It is unclear what this refers to. Much emphasis is placed on the heritage value of the Church of SS Mary & Eanswythe, pilgrimage and the	Various	Future individual project activity should consider observations and feedback provided in addition to ongoing engagement. Ensure appropriate representation from heritage and archeological groups.

Place Plan	Cllr Laura Davison on behalf of FHDC Councillors	'probable' remains of St Eanswythe, but there is a lot more to Folkestone's heritage than this. Pages 71 and 75 refer to Unesco funding for the Kent Downs/The Warren as part of the Harbour & Sunny Sands actions but how does this fit into the study area shown on the plans in section 3? Place Plan feedback submitted on behalf of Labour councillors on FHDC Aug 2021 Overall – much more work to do to meaningfully engage and adapt the plan. It's not ready yet. Currently lopsided. None of the 'access to opportunity' mission points (mission 5) and only 1 of the 'a place for all voices' mission points (mission 3) have made it through to the 7 priorities laid out in the plan. These two missions are designed to capture the points made by young people; therefore the voices of young people are missing from the current top priorities. The proposed plans for each of the geographic areas need more work and scrutiny and engagement with local people. Responses to the survey were split and also limited (18 only for the second one); therefore not a good evidential basis. Closing the bus station is a major proposal. Each action area should have further town hall style meetings to discuss in detail plans and ideas and to take on board residents feedback. The final priorities bear a striking resemblance to the priority projects already identified by the current administration - eg Folca, Market Improvement Plan. Essential to have an independent structure rooted in the community in place as part of moving forward. Place Plan should be a living thing that evolves and is reviewed, not just a shiny report that gathers dust or a tick box exercise for appearance sake. The Place plan should also be a people plan. Concerns remain about the way stakeholders were selected and prioritised for engagement. District councillors were not invited to the themed stakeholder workshops or one to ones, despite being the elected representatives of the community. There was very limited engagement with Folkestone town councillors despite direct referenc	Various	Various	Future individual project activity should consider observations and feedback provided in addition to ongoing engagement requirements.
Place Plan	Go Folkestone	Folkestone Place Plan: The 'end of stage' 20 August 2021 position of Go Folkestone, a local amenity society with over a hundred members and many more magazine readers. We Made That have developed a process which allowed us to look at potential changes which could be made to make Folkestone a better place. We need to take their ideas and decide which ones we can afford to adopt. In doing so we need to examine the consequences, some unintended, if the ideas are implemented. We feel that there are 2 main problems No. 1: How to ensure we retain a vibrant town centre: Retail has a major part to play and needs footfall from residents with disposable income. These residents will mostly travel by car or walk, many will come by bus to a very convenient bus station, very few by train or by bicycle. They will want to get close to a good shopping centre. In brief we feel the plan does not fully address this. We support the WMT ideas to pull local government, leisure, cultural and community uses into the centre to support retail uses; this is a rational strategy. However there is a suggestion of fewer supermarkets, with the removal of Sainsbury's and LIDL both floated in	Various	Various	Future individual project activity should consider observations and feedback provided in addition to ongoing engagement requirements.

different ways. We feel supermarkets anchor different parts of the town centre. Unless Sainsbury's or a new express supermarket can anchor the shopping area west of Folca/Debenhams it will be in trouble. We also feel the Plan reduces easy access & parking in general in the town centre, & possibly even on the seafront, which is crazy, particularly when electric charging points in supervised car parks may become more important.

No.2: How to improve Folkestone as a tourist destination
The plan proposes some improvements. We strongly back the
Harbour Arm and F51 Skate Park developments .However the proposal to
pedestrianize the Road of Remembrance without making significant other
improvements in how to visit the Harbour or the largely ignored but very
important Lower Leas Coastal Park is a major concern. Getting into Folkestone,
including the seafront, 'in season' is very difficult and there is nowhere to park.
We strongly advise a Folkestone West > Central Sta. > Town Centre > Seafront
link bus service, rather than conventional Park and Ride, but FHDC cannot avoid
the fact that families continue to prefer to visit by car . The plan does not
improve access for visitors.

Points that come up repeatedly at Go Folkestone meetings:

1. ROADS: We need a sensible road system to replace the obsolete system forced on the town in the 1960's, to redirect heavy traffic to a long-forgotten Ferry Service to France. Access to the redeveloped and popular Harbour area and Lower Leas coastal park is very restricted and a review of the roads system has been promised. Tram Road provides opportunities for improvement by incorporating the railway line and Dyke Road to made a Boulevard down to the harbour possibly including a light railway. Simply removing parking along the road by putting parking spaces on the railway line would be a low cost option. Cycling to the harbour is well provided for along Weir Bay Road. Making part of Sandgate Road one way needs a lot of further consultation as the knock on effects would, in our view be detrimental.

The redevelopment of the former Saga Offices at Middelberg House may provide a also provide a further opportunity to look at the roads system overall.

2. STATION AREA: We support the WMT criticism of the Folkestone Central railway station early in its report. It is lacking attractiveness and seeming disconnected from the town centre by plain and massive Bouverie Place and Middelberg House. We support more connection by redeveloping the Middelberg House 'blockage' . We support more floral and artistic work to be done around the Central Station. The curve of the railway bridge wall and the small green area in front could have a mural and flowers. Radnor Park and Kingsnorth Gardens do add attraction nearby and should be signposted. 3. ONE TOWN CENTRE ONLY: We need the seafront developments by the Folkestone Harbour Coy to be supported as apartments with appropriate facilities. But repeated Go Folkestone meetings view a large commercial floorspace there i.e. to the extent of a second town centre, as extremely undesirable. Phase 1 of 5 at the seafront, currently building, has only 84 units. Eventually there will be a few thousand residents on the seafront but it will not be even 10% of the town's 52,400 population. Extra convenience shops here could bolster Tontine Street and the harbour square can justify some more

tourist shops and particularly restaurants and leisure uses. BUT we feel that the

recent poor experience of Dover St James and its effect on Dover Town Centre (nothing but estate agency boards in Biggin Street and no great busyness in St James, despite massive DDC subsidy) proves that towns of Folkestone's size can only bear one clear town centre. It was a blessing when circa 2005 Asda relocated its planned big supermarket to Bouverie Place away from the earlier Godden Plan of a stand-alone cinema/supermarket block on the seafront. If it hadn't then Sandgate Road would have been much poorer. If there are supermarket plans for the seafront (we do ask) then we would at most support perhaps one Waitrose Express or similar.

- 4. CAR PARKING: We need parking in the middle of Town such as St, Eanswythes Way (next to Lidl), which is excellent. The former NCP next to the Saga Building/Middelberg would greatly benefit the town if revived. Sainsbury's Car Park is important. We support the idea of a 'new seafront' car park on the site of Stoneleigh House (Tram Road) but view the projected loss of car parks at the harbour, and already at Leas Pavilion /Cheriton Place negatively. The Plan is poor on car parking. Folkestone is not London. In London people can do without cars day to day because facilities are densely packed and public transport excellent. In Folkestone most people mix shopping with going to work or school runs by car. The school car journey is admittedly not always essential but is frequent, and jobs are usually out of town.
- 5. BUILDINGS OF CHARACTER: It is essential that Folca (at least the front part), the handsome former Crown Post Office and all the PO buildings in Bouverie Square , certain quality buildings in Guildhall Street esp. next to the Town Hall and above the orthodontics practice , the whole of Rendezvous Street including the Burton Building , and most of the fine Victorian buildings in Sandgate Road are safeguarded . They may however justify conversion e.g. to apartments .We will work with others to make a 'local list' to add to already listed buildings such as Lloyds . We view very positively plans to put town hall functions and a health centre into Folca/Debenhams but the combined Victorian and Art Deco character of the building, even if it hasn't been statutorily listed, is vital to the pedestrianized peak, which is viewed as postwar bland in places and 'not cutting it' for visitors or locals compared with the attractive streets from Rendezvous Street to the harbour .
- 6. MAINTENANCE OF WHAT WE HAVE: Members have said that the little maintenance practices, such as higher quality road maintenance are crucial. For example the brick paving is STILL persistently filled in with tarmac in Sandgate Road etc., and tree pits are too rapidly obliterated across the town. Doing it properly may be difficult and expensive but it should be targeted because the town looks better.
- 7. BOUVERIE SQUARE: The existing bus station is a functional and popular, if ugly, facility. It 'greenly' pulls a lot of non-car-users right into town; far more than cycle lanes could! Its considerable advantages must not be lost. The Shellons/Foresters' Way car park if used for buses, or the sketched-in main road bus stops would seem to both deposit people on the wrong side of a busy road. We feel a redesigned smaller Bouverie Square bus station, taking advantage of modern technology to flow buses through faster would be possible. Additional

'bus holding spaces', awaiting a 'flow-through' signal might include Folkestone West Station and some spots along Cheriton Road. We are not against the floated 'contemplation park' in Bouverie Square because it would be a nice town centre park, perhaps with Triennial style artworks and seriously large trees, but it would be half the size. The blank flank walls of Bouverie Place, rightly criticized on Page 11 of the study, need to be changed.

- 8. TOWN SQUARES: All meetings supported more landscaping and street action in the Folca area and elsewhere, although we did feel the artists' impressions of such areas were sometimes as misleading as the Marble Arch Mound; there isn't much space. Comments were made that views of Folca were taken from a position which would have to be in Barclay's rear area. The historic area from Rendezvous Street to the harbour is a good product. The Sandgate Road/Bouverie area needs more. The underwhelming back of the Town Hall aka Bankers' Gate is frequently passed through from the car park and might be even more often so when tourism to St Eanswythe's increases. It needs to be another improvement, perhaps led by the town council, using the cobbles, the features of the listed Town Hall, which lend themselves to small murals, and the shallow 'sitting' steps, to create another meeting area.
- 9. LICENSING: Go Folkestone recognizes the need for late licensed outlets in the town centre, but with increasing residential numbers in town they need limits. When a licensing plan comes forward we would expect all but a couple of well-run and free-standing units to be closed by midnight. We would also expect heavy CCTV, serious anti-litter measures and a 'staggered licensing route' of small, licensed takeaways and outlets, as in Canterbury, to encourage revellers to leave town quickly. Meetings supported allowing one or two edge of town, late night entertainment uses as a youth facility, perhaps as part of the mooted Silver Spring commercial development at Park Farm? If we do, we must steer clear of the parts of Park Farm that do adjoin residential districts.
- 10. A RESORT TOWN: Go Folkestone wants a new start for Folkestone, after years of the Council thinking tourism is a lost cause. It definitely is not. We have the seafront, sandy beaches, the wonderful Harbour Arm, and the amazing St Eanswythe discoveries. The historic area roughly from the Town Hall to The Bayle, the parish church, Grace Hill and down the Old High Street to the sea end of Tontine Street must be safeguarded and marketed as The Old Town. Local history societies, Go Folkestone, Folkestone Town Council and others need to divide up projects between each other to promote tourism and heritage e.g. St Eanswythe, Fishing Museum. The Seafront and harbour must be tourist friendly. The Leas must be treated carefully, but the majority of members, including some Leas residents, feel it needs some controlled nightlife because it is partly a tourist area. To use the GF strapline: Folkestone: One hour from London, One Hour from France, five minutes from the beach.
- 11. RETAIL ALTERNATIVES: We applaud the sensible WMT emphasis on leisure, community, health and government uses coming to the town centre ,including the tail of Sandgate Road. DC, PC and other members want the potential for tenpin bowling , swimming pools , escape rooms , indoor markets , play centres and even amusement arcades and outdoor play to be properly

investigated. There is a current campaign to save the Dance Easy dance school in The Bayle. If it doesn't succeed a dance centre can easily be promoted in the right-sized secondary shop. Markets nowadays could include a combination of tourist seafront markets, registered and regulated farmers' markets and the general market e.g. farmers' market in Sandgate Road, general market in Guildhall Street on different days. We do not wish to weaken existing hotels but feel a budget, dead- centre hotel is a possibility, and might be an alternative for the Middelberg Square redevelopment, but the seafront also lacks a hotel of high quality.

12 LIBRARY AND CINEMA: The latest GF meeting, and previous ones, discussed again the moving of the core public library use to a town centre shop or shops, with the fine 1880's Grace Hill building taking on adult education, KCC patch services, and heritage research. The KCC 'Cube' might help this rejig financially, by become ground floor adult education but upper floors residential. Cinema-wise we prefer Folca to be a health centre rather than a heavily carved-up cinema, which would finish Silver Screen. The latter is a characterful, proportionate cinema that would repay improvement i.e. a bigger second screen. In the presence of three theatres already it lacks any other use for the popular raked auditorium. The Quarter-house is an alternative arthouse cinema & culture hub, but a pub theatre or two for the Music Town initiative should be encouraged.

13 SEAFRONT LEISURE: We broadly support the sketched-in water-based uses adjacent to Sunny Sands. On the seafront as a whole, many people including most GF members would like a lido and retro crazy golf, or if technically and financially possible, a Margate style tidal pool. If it is a non-starter please give us technical proof. The artwork associated with the Triennial is an important part of making Folkestone in general and the seafront in particular a memorable visit. This should continue to develop, particularly on the seafront axis from The Stade and Harbour Square (clearly touristy) to the quieter but still vital and successful Lower Sandgate Road Coastal Park. The latter, which on Trip Advisor is the main tourist attraction of the town, needs more parking.

14 SANDGATE ROAD WEST: West of Barclays the shopping gets its own section in the WMT report, though it only really says that a mix of shop and residential should be encouraged and some community uses might need to bolster the limited shop demand. Many locals are nervous that this area will decline badly as the seafront, Harbour and Old High Street are developed by Sir Roger De Haan and others, pulling money east. The Council must take measures to anticipate this such as good parking and some council .medical or residential use of the shops in what may otherwise become a tailed-off peripheral area. Express supermarkets should be pursued as potential strengthening this shaky area, particularly if the perfectly adequate Sainsburys' is threatened with removal. The Co-op, Waitrose and Morrisons are all absent in central Folkestone, and Sainsburys could usefully shift forward and have a main road presence.

15 THE LEAS LIFT AND THE SLOPES' PROBLEM: The seafront developers

Place Plan

Local business	Nevertheless, I would like to say that there are many areas that I don't agree with or wish to make comment on: pedestrianisation/redevelopment of the Bus Station	N/A	Spatial maps	Place re captured Future individual project activity should consider observations and feedback provided in addition to
	I'm sure there are many who have the time to read and comment on all or many of the points in the Place Plan; unfortunately we do not as a business trying to recover from the pandemic.			Update spatial documents to ensure all businesses in Cheriton
	of continuous shopping frontage .Imagine how nicely some of the large buildings in Guildhall Street or Sandgate Road could convert if, instead of trying to poke in a flat above a shop that hasn't got enough room for wheelie bins, let alone parking, some of the ground floors were turned residential. This would provide nice entrances, flats for the elderly or disabled and/or proper rubbish and parking facilities. Don't make a shibboleth of 100% shopping frontages. 80-90% over a decent length of shops will do. 17: CYCLING: Pedestrian and cycle routes are highlighted as poor (p13), but the hilliness of Folkestone makes it difficult to see Folkestone as a cycle town. We therefore feel there is too much emphasis on cycles The obvious cycle routes to emphasise are the attractive and flat ones - the promenade and The Leas, but this needs care because of pedestrians. Attractive but steep connections between the two levels include the Road of Remembrance, Zig Zag path, Metropole steps. A revival of the Spirit of the Leas project (see No 15) could help cycling. The Council are going to have to fight quite hard even to get a sensible cycle policy on The Promenade and The Leas because of widespread nervousness but we back the effort.			Undate spatial documents to
	the old Leas Lift to enhance the seafront links. 16: RESIDENTIAL CONVERSIONS OF SHOPS AND OFFICES: If there are fewer shops in the post Covid internet world then owners in some of the minor shopping streets should be encouraged to put in dwellings, and the WMT report appears to support this. Viable shops can then fill empty units in town. Perhaps Guildhall Street should join Grace Hill and Town Walk in this since those three streets in particular seem to have limited retail futures. On the St Eanswythe's Way side of Guildhall Street many units have residential planning permission which would probably be enhanced if it could be redesigned to be 100% domestic. Cheriton Place is currently healthy but will decline if Sainsburys' goes. Town Walk needs to be allowed complete redevelopment as residential because it is a commercial failure. FHDC must not be obsessed with the idea of centing the propring fronters.			
	have a legal planning obligation to provide a vertical link in the Leas Lift area. This might help Sandgate Rd West and hotels near The Leas. Go Folkestone also thinks more money should be spent on cleaning and even re-opening the ageing footpaths down The Leas e.g. Cow Path, Road of Remembrance stairs etc. It views The Spirit of The Leas project which proposed this but failed to get Lottery funding as an opportunity that needs retrying, to improve pleasant beach access for visitors. We also believe that the old Leas Lift is Folkestone's most distinctive, potential tourist attraction, and should reopen as a hydraulic, 'Victorian' lift. We know the maintenance problems but the town lacks any other emblematic tourist attractions except, to be fair, for the excellent harbour arm. We would probably not oppose an additional, modern, higher capacity lift next to			

	redevelopment of many shops into accommodation no thought given to night time economy and how it can enhance the town and encourage new residents whilst a picture of our business is noted in one of the sections; we as a business are STILL missed off the maps the overall cultural importance of THE TOWN has not been considered the historical importance of THE TOWN has not been considered where is the retail offering? - we need shops not just restaurants and cafes If the ideas in the Place Plan are put forward and agreed on, who is going to pay			ongoing engagement requirements.
	and decide what is actually done? I appreciate that at some point, discussions have to be turned into actions however there has definitely been a lack of engagement and publicising of these ideas and the consultation process. the Place Plan and Area Appraisal do contain a number of factual errors (the "Leas Coastal Park" as mentioned below doesn't exist and is two separate			
Place Plan Cllr Prater	areas: the Lower Leas Coastal Park, and The Leas: separate by design, history ownership and topology. There are a number of other areas where there are simple errors like that: incorrect road names and basic (non-fundamental, but jarring) issues. Place Plan page 7 for example: "Folkestone is a gateway location to Europe, situated only 10miles away from the port of Dover and close to the Eurostar terminal and airport at Ashford." Mentioning that we're also home to the Eurotunnel terminal, one of the largest gateways to Europe, would also probably be important here, for example! Area Appraisal, page 23: "1966 - Leas Lift closes" Well, maybe. But if it did, it reopened (the current lift site) and was operating to around 2010. Suggesting its been closed for 55 years is not true In terms of the accessibility points, I'm assuming plain text / large font / hi res versions of all documents are available (if not, they should be, and if so, they should really have been linked to on the web page – why make people ask for them?). The broad thrust of the proposals I accept, and can support: the moving the bus station, but keeping it in the Middleburg Sq area (although linear rather than	Urban Appraisal Place Plan	Various	Update documents with correct labelling and naming conventions. Future individual project activity should consider observations and feedback provided in addition to ongoing engagement requirements.

		reuse of that space to provide public realm or new development space to enhance that realm. Although I understand the point being made below about "removal of supermarkets" I don't get that impression from the proposals: Sainsbury's, Lidl and Iceland sites all feature potential future use "mixed development" but I'm assuming that could well include in each of them a new or reconfigured supermarket / retail offer if there is still demand for them at that time, but there would likely be more associated housing etc. I think that's what's meant? Specifically on parking however, the car parks in Shellons Street is suggested for removal, as well as potentially in St Eanswythe Way with the redevelopment there. That looks like a significant drop in spaces overall, but I can't see where that is quantified, or explained in any detail how it would be mitigated. Iceland and Sainsbury's redevelopment would be likely to have the same effect, as will the Middleburg Square redevelopment: between them, a substantial percentage of the Town Centre parking. Bear in mind that the seafront development will also in time see a significant number of spaces lost at the Harbour too (outline planning permission has flats and shops over much of the current parking there) so more space loss. In the harbour area, that looks like more of a "space swap" at the moment: existing open car park to a multistorey nearby: fine – I understand moving spaces to better advantage, but if we are going to lose central Folkestone spaces entirely, we should be facing that, not hiding it. What is the number potentially to be lost? Or would we want developers to retain at least the current number of spaces? What is the potential for full time Park and Ride to replace them if needed? This feels unaddressed to me. Thank you for the opportunity to comment on the final draft of the place plan. Here are my comments:			
Place Plan	Local resident	 At the June public webinar, I flagged up that the public quotes in the plan highlighted comments seeking more evening/night time uses but did not include the feedback from those concerned about noise and anti-social behaviour and was therefore unbalanced and not representative of the range of feedback received. A commitment was made at the webinar to address this but it is noticeable that this had not been included as promised. This gives an impression of selective hearing of feedback which damages the credibility of the consultation exercise. It also makes the report misleading. At various places there is a welcome encouragement for the town centre being an attractive place to live, for increased housing there and for residents having good physical and mental health. However, there is no recognition of the way that this requires an approach to (and constraints on) the evening / night time economy that reliably protects and enhances residential amenity, particularly by rigorous prevention of noise. The impact of noise on residential amenity is well recognised by the night time industry - which has lobbied in other parts of the country to oppose measures to protect residential amenity and the right to quiet enjoyment of ones home - and so should have been fed into the report by the NTIA even if not recognised by other consultation partners. It needs to be made clear in the report that residential amenity needs to be protected, that tranquility is an asset and that an aim of the town centre being an 	N/A	Licensing Policy	Forward feedback on Licensing Policy and the impact of night time activity and the protection of residential amenity to the Licening Policy Review consultation. Future individual project activity should consider observations and feedback provided in addition to ongoing engagement requirements.

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Local resident place Plan. should consider observations a	Place Plan and	nd FIRRG	beginning of consultation and connection between the people of Folkestone and the FHDC Not a one off exercise. As you have stated, there have been twenty two previous "One Off" consulted upon schemes etc which came to nothing. Or very nearly nothing. I Make the following general points. 1. Some elements of the Place Plan content are pure theory, relatively irrelevant until and unless they pass properly through the filter of meaningful consultation and bring the logistics together on the detail. Also essential is the need to fully consider social and socio/economic community needs in this work. 2. There needs to be more recognition that a town is only a town if there is commerce and shops. The vast majority of shops/businesses in Folkestone are independent traders, and their needs and requirements are paramount if the people of Folkestone, residents, want to have a town of any meaning. If the council continues to prioritise residents parking schemes over parking for visitors/shoppers Folkestone Town Centre will die Place Plan or No place Plan. 3. The recognition that an integrated transport strategy is needed as a matter of urgency is very welcomed. Folkestone's roads and junctions were created for moving port traffic in and out of Folkestone in the 70"s For Folkestone to survive in 2021/22/23/25 and become the "community" town of the future, the road system needs to basically go back to how it was before the event of the Roll on Roll Off port of Folkestone. 4. Returning Tontine Street to two-way working and retaining two-way working on Tram Road, with better parking solutions, whilst, making The Road of Remembrance One-Way uphill would allow the new residents of the Folkestone Seafront Development, access to the town via a single-lane uphill Road of Remembrance, turning right onto West Terrace and left at the traffic lights onto a two-way working, Sandgate Road. Even the parking on Sandgate Road could be retained to support the shops and as for width, day and night cars are double parked i	Various	Various	
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		6. Everyone needs to remember the damming/shocking comments about Folkestone in the recent FHDC commissioned Watermelon Report			
Place Plan	Town	Destination, Landmarks & Leisure. The seafront, cultural quarter & harbour are not easily connected. Don't push all buses to the Harbour Arm and Seafront development. Folkestone is bigger than just this area. The place Plan proposal suggest blocking lower Dover Road near F51 Skate Park. It also states their is a deprived area. If this road block goes ahead at the bottom of Dover Road. You will be segregating the deprived area. In 2018 a number of buses were stopped going up Dover Road and were redirected through Tontine Street. By segregating the deprived area, you will stop all buses to low income families, who rely on buses. Residents will have to go a long way around to get to their homes. If you then put all traffic two onto Tontine Street you will have gridlock on a daily basis. Since Tram Road and Tontine Street (buses and Taxis only from Town) went two way in 2015. We see every summer at weekends gridlock around the bottom of Tram Road, Tontine Street, Harbour Street and Harbour Approach. To alter this to twoway with full traffic on Tontine Street is ludicrous. There is also comments about two way traffic in lower Dover Road, how does that work? Utter nonsense. Town Centre - Visual perception. I agree that from the station to the town it is shabby and needs soft greening and seating. I hope what your plan is not just superficial. So far the town centre have a few independent shops and more cafes, coffee shops, restaurants and bars. If that is all it's going to be with nothing really to draw residents or visitors to it. Why should anyone go there? You talk about skilling up. My question is skilling up for what? What skills are needed for pouring a coffee or a pint. What is proposed is still low skilled poorly paid service industry. Those that get a Grammar school education will still leave to find quality professions. Local further education needs to improve no just what academics want, but more vocational skills. Give our young people more choice and skills to make this town a better place to be	Moving sustainably	Various	Future individual project activity should consider observations and feedback provided in addition to ongoing engagement requuirements. Insight to be made available when Transport/Parking Brief and associated project starts.

	many cities in the UK such as Liverpool, who got rid of their bus station. Buses still come into the town centres and it works really well, if done properly. Buses around local areas all stop at 6pm, so no transport facilities if couples wanted to go into town for the night time economy. Key findings - Transport Movements. Changes to topography provides physical barriers but brings character and opportunity. Action Area - Harbour and Sunny Sands Harbour Way car park, there is no such place. It is Tram Road car park with entrance and exit via Tram Road. You seem to want to remove an extremely popular car park earning money for the council or taxpayers. What is the building on the car Park plot? Leave it as a car park. You want to remove planning in Stoneleigh house, Tram Road for 14 very much needed affordable housing, into a multi storey car park, no thank you. Please don't dump all the developers of the seafront parking on our deprived community. We already suffer too much pollution, noise pollution and poor quality health. No parking on the Harbour Line either. How would any cars access or egress the Harbour Line when cars in Tram road area are gridlocked? Leave the Harbour Line as a community walk way and garden down to the harbour. Sunny Sands Pavilion. Where is this? Are you talking about the Southern Water Plant on Coronation Parade above Sunny Sands. Tidal Pool, extra toilets and better showers has been asked for over many years, so great idea.			
	Here's a novel idea. Ask locals to draw up a plan that works. They no how the area works. It would cost a lot less than it has done. I think a lot of what was presented in the June webinar is excellent and			
Place Plan Local resident	Folkestone will be a better place if a lot of those ideas get implemented. I have gone through the slides from the June webinar and have given feedback on the parts I feel strongly about. I have also included some ideas of my own that I would have contributed during one to one sessions had I been able to participate back when those took place. I hope this is helpful. Mission 4: Moving sustainably 4.1 Mobility hub alongside train station: bike hire and other supporting uses. I would love to see a large Click2Cycle hire docking stations for people to use bikes to travel to and from both Folkestone Central and Folkestone West stations. When Click2Cycle Started I thought it was a shame the train stations were left out of the scheme. It would be great to have e-bikes and scooters available for hire so people could cycle easily up the hills from the Harbour and Sandgate to the station. Of course it would also be necessary to expand the Click2Cycle scheme to include stations throughout the whole town so everybody has access to a hire bike near their	Moving sustainably Celebrate What's Great	4,1, 4.2, 4.3, 4.4, 4.6, 4.9, 4.12, 4.14, 4.14, 4.23 1.2, 1.14, 1.16	Future individual project activity should consider observations and feedback provided in addition to ongoing engagement requirements.

Secure cycle parking and multi-level cycle parking to provide maximum capacity as is common in the Netherlands and the towns in East Anglia.

4.2 Overhaul of the legacy highway system: Cheriton Gardens and Cheriton Road, redesign of junction to enable all directions of travel from this point, and make accessible for all.

The current arrangement means that people cycling do not have direct routes to and from the station. I would suggest keeping these roads one way for motor vehicles but also install kerb protected contra-flow cycle tracks or even better bidirectional cycle tracks.

- 4.3 Wayfinding and enhancing the cycling and walking experience: Cheriton Road, Cheriton Gardens and Castle Hill Avenue.
- Improved wayfinding with signs and maps would be fantastic.
- I would also suggest continuous footways/pavements at junctions with side streets to give pedestrians clear priority over motor vehicles turning into and out of those side streets. (I've included a photo of this later in my comments)
- Better cycle provision on Castle Hill Avenue. Cycling on this road can be very intimidating with drivers overtaking closely and dangerously. Perhaps remove half the parking to facilitate this.
- Remake the Station Roundabout into Kent's first Dutch style roundabout modelled on the recently-opened roundabout in Cambridge to give pedestrians and people cycling priority over motor vehicles. In fact do this to all the roundabouts in Folkestone.
- 4.3 New and improved routes: Broadmead Road and through Ship Steet site.
- Fantastic idea. New and improved routes for pedestrians and people cycling could be accomplished by placing modal filters throughout this area to create a Low Traffic Neighbourhood.
- Filter Broadmead at the Station roundabout and under the narrow underpass where it becomes Guildhall. Other modal filters would be necessary as well to completely remove through traffic from the area shown below while maintaining access by car to all properties.
- 4.4 Work with other organisations, such as Cycling UK and Cycle Shepway, to support and encourage sustainable and active travel. Would be good to include the word 'enable' alongside support and encourage. Reduction in motor traffic alongside dedicated cycle and pedestrian infrastructure will help enable people to cycle and walk more and drive less. Folkestone is a relatively small town where most things are close enough for cycling and walking to be the default modes for most journeys. Under the current conditions cars unnecessarily dominate our streets. I think there are a lot of good ideas within the Place Plan that will help people walk and cycle more.
- 4.6 Explore options for a bus link into the town centre which could form part of a Park and Ride scheme.
- Any park and ride scheme needs to be frequent and less expensive than parking in the centre and harbour areas. Explore creating a dedicated traffic-free

bus rapid transit route that can transport people between the M20, the station, the town centre and harbour.

• Perhaps make the Road of Rememberance a bus only corridor direct to the Harbour.

Action areas: Sandgate Road West

1.2 Public realm upgrades and new public spaces: Public realm improvements along Sandgate Rd West

I like the idea of expanded pavements along here. Most people are walking to these shops so this will make a big difference. Make sure there are dedicated bays for lorries making deliveries/pickups. Double parking is currently a problem alongSandgate Road West - narrowing the roadway will probably discourage this practice.

Make all the pavements continue across the side streets so it is clear that pedestrians have right of way over turning motor vehicles. The below photo is from Waltham Forest and shows a continuous pavement.

Provide benches and places for people to sit and rest.

4.9 Improved cycle parking provision

Yes this is important - and that the cycle parking be ample and spread evenly so there is a place to park a bike in near the entrance to every shop.

Action areas: Town Centre Core

Mission 1: Celebrate what's great

Upgrade to Cheriton Place - an additional suggestion.

Cars dominate this narrow street - leaving barely enough room for people/pedestrians. Remove most of the parking in narrow Cheriton Place and extend the pavement or provide outdoor seating/parklets for the cafes and restaurants along here. This street is too narrow for parking, pavements and a travel lane for cars. A reallocation of space would be a boon to the businesses along here.

This photo shows a parklet in Broadway Market in Hackney.

Mission 4: Moving sustainably

4.12 'Mobility Hub' with cycle hire & storage (NCP carpark*)

In addition to the mobility hub we could also create a cargo bike logistics hub in the NCP carpark. This would be a site where packages and goods would be transferred from vans and lorries to cargo bikes for last mile deliveries to businesses and residences in the town centre and neighbouring areas. There could be another last mile logistics hub near Folkestone West Station.

Action areas

Town Centre Core:

Bouverie Square and Middleburg Square

Bouverie Square could be a stop on the bus priority route from the M20 to the Harbour.

Action areas

Creative Quarter area

4.14 Localised improvement of lanes and paths in historic core

Old High Street - repave this street to create a better experience for pedestrians

		and wheelchair users. Raise the centre roadspace to the same level as the pavement and make every shop wheelchair accessible.			
		4.15 Redesign of road layout to improve all modes of travel			
		and movement Pedestrians have a raw deal around here - particularly because of the current			
		one way system and the dominance of fast car traffic. I support the removal of			
		the one way system as well as the introduction of zebra crossings where there are currently only informal pedestrian crossings where motor vehicles have			
		priority.			
		Bradstone Road/Dover Road - there are a lot of pedestrians crossing here and			
		they find it difficult because cars dominate and there are no formal zebra			
		crossings. Bottom of Old High Street - install a formal zebra crossing across Tontine Street			
		to where the Party Bar is.			
		Install a zebra crossing across Tontine Street from the Quarter House to the			
		steps up to St Michaels Streets - this is an important pedestrian link.			
		Action areas			
		Coastal area and Heritage Quarter			
		1.13 Public realm upgrades to Road of Remembrance Make the Road of Rememberence a dedicated bus route for the Park and Ride			
		from the M20 to the Harbour. This road would be busses, bikes and pedestrians			
		Only. Dhoto below in of the bug only Cot and Mutten Bridge near Breadway Market in			
		Photo below is of the bus only Cat and Mutton Bridge near Broadway Market in Hackney.			
		Action areas Harbour and Sunny Sands			
		1.16 Public realm upgrades to Harbour Street and exploring options for Harbour			
		Way car park to become a key public space incorporating the Urban Room			
		Great idea.			
		4.23 Tidal pool -			
		Another great idea. Also consder putting the tidal pool in the harbour itself. Copenhagen Harbour Swimming by Bjarke Ingels Group.			
		I am sorry to see that the Folkestone council is going to move the bus station to			
		Shellons Street. Despite saying the new town plan is for the benefit of the people			
		of Folkestone, I feel that moving the bus station is only helping the visitors. I think that the elderly and frail people will be trapped along Guildhall Street, as			
		they will not be physically able to walk up the steep hill from Lidl to the rest of the			
		town. At the moment they are able to get out at the bus station and go into the			Future individual project activity
Place Plan	Local resident	shops down Sandgate Road, then go along Guildhall Street to get a bus back to the bus station.	Moving	1.6	should consider observations and feedback provided in addition to
i iaut Fiaii	via Cllr Fuller	tile bus station.	sustainably	1.0	ongoing engagement
		I must admit the bus station looks horrendous. There are large planters, which			requirements.
		had trees in, along the side and back walls of Asda, but no one watered them so the trees all died, and the gardens by the bus station building are only full of			
		weeds. Stagecoach is only interested in running the buses, not what the station			
		looks like. If the council bought the bus station, but let Stagecoach keep using it,			
		it could all be upgraded. Knock down the canopy, which is falling down anyway,			

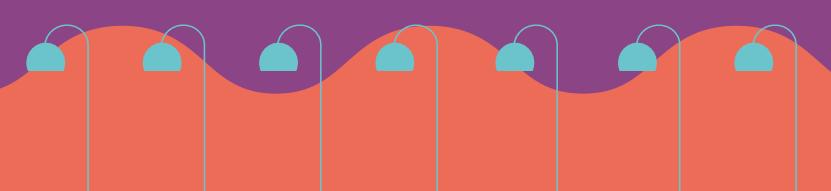
Page
9 13
3

and replace it with one just in front of the building. It would then be possible to have the gardens at either end, as well as the planters, filled with trees and flowers, and you could also have hanging baskets everywhere. All this would make the bus station a pleasure to use, be far more convenient for people to use, and brighten up the top end of the town.	
Why do we need a garden in the middle of the town when we already have the beautiful Leas a short distance away.	

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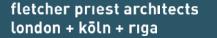














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1.0 Foreword and executive summary p3		4.0 The Grand Challenge	p20	7.0 Making it happen	p92
2.0 Introduction About the project	p4	5.0 Place Plan Missions	p21	Phasing Funding Enabling change Priority actions Testing uses and enabling assets Future engagement Next steps	
		6.0 Actions	p29		
3.0 Context and participation Folkestone today Urban appraisal Licensing and policy review Engagement	p6	Introduction Action areas: — Station Arrival — Sandgate Road (West) — Town Centre Core — Creative Quarter — Coastal and Heritage Quarter — Harbour and Sunny Sands — Overview of actions		8.0 Appendices Urban Appraisal Engagement Report	

Front image credit: Studio Oiseau

Revisions tracker

Rev. Date Description

- 02-07-2021 Draft issue to client team
A 06-08-2021 Final issue for Cabinet

1.0 FOREWORD AND EXECUTIVE SUMMARY

Foreword

Executive summary

I am very pleased to endorse this ambitious plan which sets the direction for a sustainable and vibrant future for Folkestone Town Centre.

The role of town centres is changing and the Place Plan takes a holistic view of the way in which Folkestone Town Centre can continue to harness the natural potential of the area. With a fantastic coastline, great transport links, a thriving culture and leisure offer, investment in new homes and businesses and growing communities, Folkestone has much to celebrate already. However there is also much that needs to be done to build on this and ensure the town centre continues to adapt and diversify moving forward.

We Made That developed the plan on behalf of the council and engaging across a wide range of stakeholders has been key to identifying opportunities, creating a vision for the future and setting out the way in which this can be delivered.

I want to thank everyone who has contributed to the development of the Place Plan. This engagement has been vital in shaping the overall ambition and actions which will achieve it.

The council will continue work with partners in the public sector, businesses, investors and the community to promote and deliver the aims of the plan. It's a plan for the future and our work starts now to ensure that Folkestone continues to thrive as one of the best coastal towns in the country for our businesses, residents and visitors.

Zhai

Cllr David Monk Leader of Folkestone & Hythe District Council



Why the Place Plan is being produced

The Place Plan for Folkestone Town Centre sets out a vision to guide the town centre's evolution for years to come. Informed by a comprehensive community engagement process and input from industry experts, the document is intended to build on current strengths and guide a trajectory that responds to contemporary challenges. The Place Plan acknowledges the history of the area and raises awareness of its cultural offer and growth potential, including recommendations to enable business growth and economic development for the area. It addresses key themes such as setting ambitions for investment opportunities, supporting a public realm and improved animated public spaces, fostering dynamic employment environment and improving transport and movement in the town centre.

The Place Plan will be used to guide future public sector investment and action in Folkestone town centre, and may be used to develop emerging planning policy and guidance. The Place Plan will also be used to encourage future investment as potential investors are engaged. Outputs will also enable public bodies, private landowners and the wider community to progress with clear delivery and implementation plans in the knowledge that they can contribute to the Missions set out here.

The Grand Challenge and Missions

The 'Grand Challenge' is to overcome decline in Folkestone's Town Centre by embracing opportunity, addressing the climate emergency, celebrating what's already great and bringing the town's communities together. Six 'missions' set out the route to responding to the Grand Challenge. A series of proposed actions have been defined and illustrated in the Place Plan to achieve these missions across areas of Folkestone's Town Centre.

- Mission 1: Celebrate what's great
- Mission 2: Town centre for the future
- Mission 3: A place for all voices
- Mission 4: Moving sustainably
- Mission 5: Access to opportunity
- Mission 6: Deliver sustainable quality

Strategic alignment

The Place Plan is fully aligned with FHDC's 'Creating Tomorrow Together' Corporate Plan, whilst offering a higher level of town centre-specific fidelity, .

A thriving environment will be created through actions to deliver Mission 1: 'Celebrate what's great' and through Mission 4: 'Moving sustainably'. Ambitions to support a vibrant economy that is accessible to all Folkestone's communities are addressed by Mission 2: 'Town centre for the future' and Mission 5: 'Access to opportunity'. Positive community leadership will be explicitly supported by Mission 3: 'A Place for All Voices'. Finally, a common intent to secure quality homes and infrastructure is addressed under Mission 6: 'Deliver sustainable quality', which also responds to the council's declaration of a climate emergency.

Engagement

The engagement process aimed to capture local knowledge and empower communities to take part in the future of the town centre. The process sought to reach as wide as possible to involve the full diversity of Folkestone's communities, including those underrepresented groups and the seldom heard. This process has built consensus towards a vision and plan for the future of the town centre area. It has balanced strategic stakeholder ambitions with wider public priorities and opinion on where investment should be targeted. It has been exciting to see an enthusiastic and engaged response from a large and varied number of Folkestone's community groups, businesses, residents and stakeholders.

The Place Plan sets out the ways in which it has responded to the voices heard as well as the onwards opportunities to shape forthcoming change. So far this process has involved:

- 17 workshops and public webinar events for a range of participants
- 150 survey and email responses
- 167 directly engaged in workshops and one-to-one conversations
- 266 attended public webinar events

Featured priority actions

Through the process of developing the Place Plan, seven priority actions have been identified and foregrounded in the 'Making it happen' section. These priority actions have also been influenced by the public engagement process.

- Station arrival and town centre connections
- Improved gateway to the town centre including a new bus station layout
- FOLCA development scheme
- Sandgate Road town lab, public realm and 'Guildhall Sauare'
- F51 environs and Payers Park
- Harbour Line/ Tram Road
- Sunny Sands

The above priority actions will be co-supportive of the council's current work to progress redevelopment of the Ship Street site. A stronger town centre will improve development prospects and future inward investment, and new residents will drive additional footfall to the centre. A reciprocal relationship of affordable housing across sites within and beyond the town centre may also be possible.

Testing uses, enabling assets and securing funding In the face of limited resources, funding will need to be sought from a variety of sources, which this Place Plan will help enable.

The Place Plan provides an opportunity to think about 'place' and the type of outcomes which can be achieved within Folkestone Town Centre. Much of this can be achieved through the delivery of physical actions; improving public realm, active travel and enabling exciting things to happen in the town's buildings. The Place Plan is, however, also an opportunity to think about fundamentals of how people interact with a place, the sense of ownership people have of their town centre and the quality of experience they have when they are there. Getting this right will help to embed the physical interventions proposed within the Place Plan and will ultimately support better economic, social, and commercial outcomes.

2.0 INTRODUCTION

About this project

The Place Plan for Folkestone Town Centre sets out a vision to guide the town centre's evolution for years to come. Informed by a comprehensive stakeholder and community engagement process and input from industry experts, the document is intended to build on current strengths and guide a trajectory that responds to contemporary challenges. The design team have held a comprehensive programme of engagement to make sure that the Place Plan is guided by the views and needs of local people and those who use the town centre.

The Place Plan will be used to guide future investment and action in Folkestone town centre in a cohesive manner, and may be used to develop emerging planning policy and guidance. Outputs will also enable public bodies, private landowners and the wider community to progress with clear delivery and implementation plans in the knowledge that they can contribute to the Missions set out here.

The Place Plan addresses key themes such as setting the ambition for investment opportunities, supporting a public realm and improved animated public spaces, fostering dynamic employment environment and improving transport and movement in the town centre.

Folkestone and Hythe District Council commissioned an experienced, multidisciplinary team with a track record in working with public sector and regeneration, to develop a Place Plan for Folkestone Town Centre. Architects and urban designers, We Made That, led the project design team and the community engagement process. Transport and movement specialists, Steer, looked into town centre access. Socio-economic experts, PRD, advised on the economy and town centre business opportunities. Architects, Fletcher Priest, advised on the architecture of specific opportunity sites and the Night Time Industries Association provided support to review the existing licensing policy to support the evening economy in the town. The licensing policy review is a separate document which will have a separate consultation and review process.



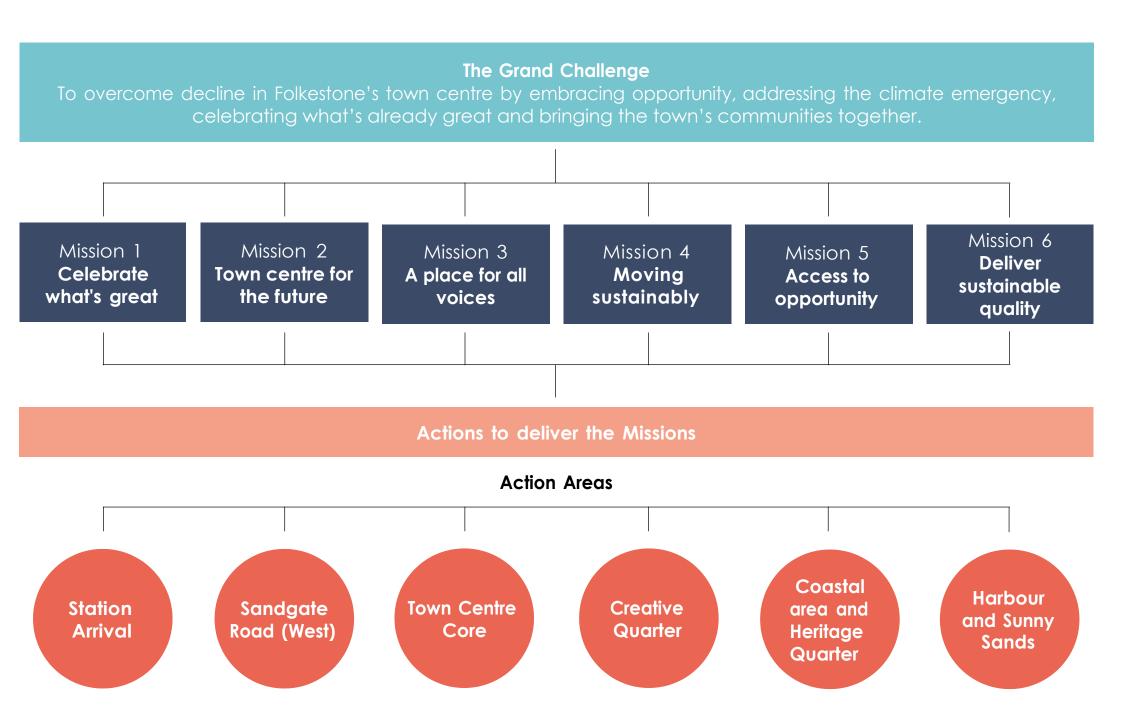
2.0 INTRODUCTION

How the Place Plan is structured

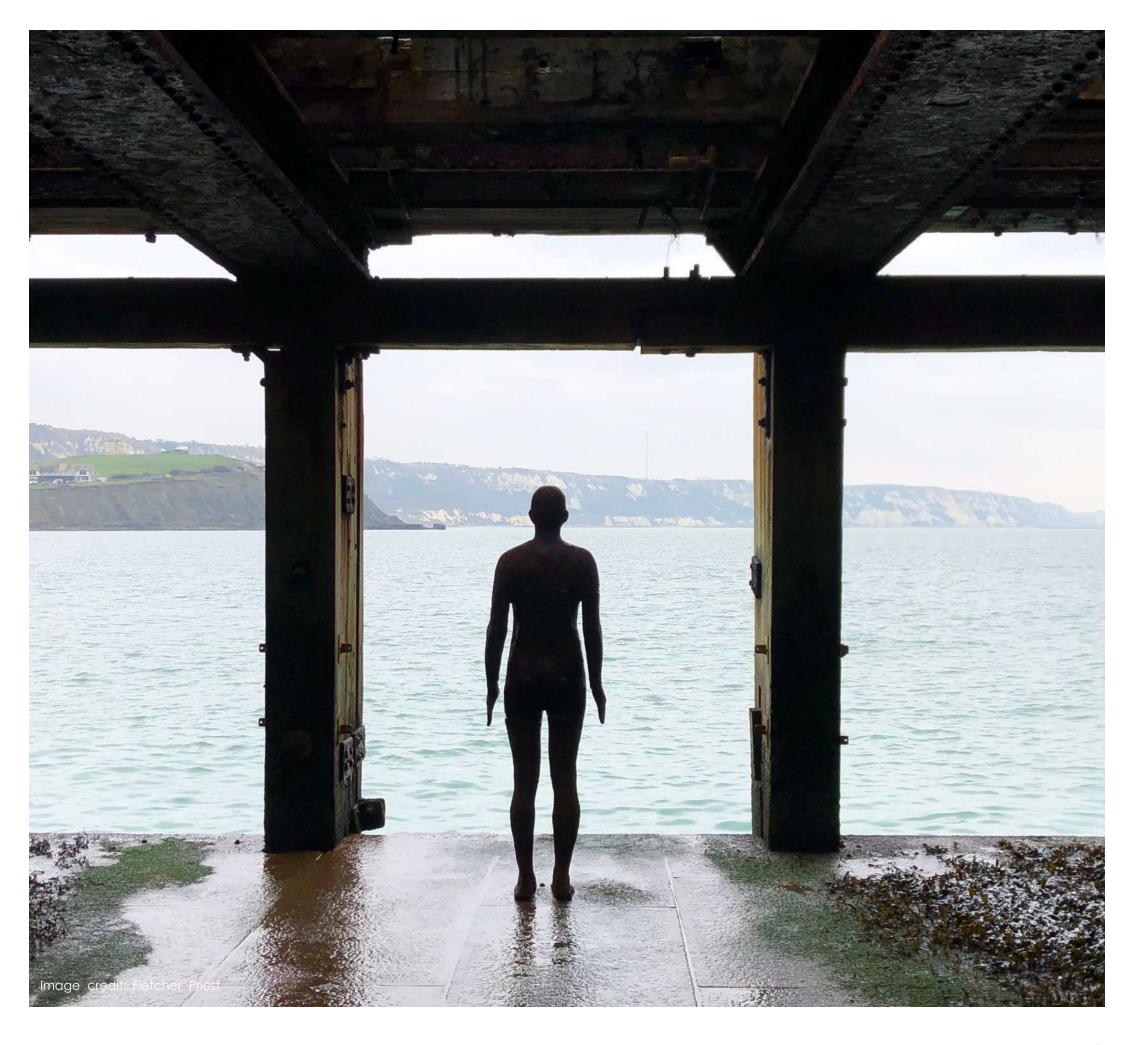
The Grand Challenge sets a bold and overarching target for the future of the town centre. To address this cross-cutting aim, six 'missions' have been developed. These respond directly to specific issues from the appraisal process, and correspond with specific proposed actions and interventions, and clear, targeted impacts.

Specific actions are set out to deliver against the missions to help shape the future of the town centre. These have been developed based on the opinions gathered during the engagement process and findings from the Urban Appraisal. For the purpose of the Place Plan communication, the actions to deliver the missions are grouped according to geographic areas of the town centre.

This mission-oriented approach is intended to create a pathway to attain sustainable and inclusive growth led by both public and private sectors.



3.0 CONTEXT AND PARTICIPATION



Folkestone today

Folkestone is the largest and most significant town in the Folkestone and Hythe district. Folkestone's strategic location means that it is a key coastal gateway to Europe and has good transport connections, in particular the fast rail link to London. Arts-led development has been a focus over recent years, particularly through Sir Roger De Haan's Creative Folkestone initiative and Folkestone Harbour & Seafront Development Company.

Folkestone is a gateway location to Europe, with Folkestone Eurotunnel terminal close by, 10miles away from the port of Dover and airport at Lydd.

Folkestone is home to around 52,400 people, making up 46% of Folkestone & Hythe District's (FHD) population. Whilst the wider district is quite rural, Folkestone town centre itself is densely populated and has some of the highest population density in Kent. This has been driven by strong population growth in recent years driven by in-migration from other parts of Kent and the wider South East.

KEY

(Source: Folkestone and Hythe District Council Core Strategy Review Draft Framework)

Folkestone and Hythe District Flood Zone 3 1//, Extreme Flood Hazard 1//, **AONB** 1//, Larger International Habitats Study area boundary Town centre District Centres Local Centres Railway M20 A Roads Ν 5km

To Canterbury To London (54 minutes by train) Elham Lyminge \Rightarrow Ashford International Hawkinge Cheriton Sandling Eurotunnel Westenhanger To Dove Ham Street **Folkestone** Hythe **Continental Europe** (35 minùtes via Eurotunnel) Lydd Airpor

Urban Appraisal

The site analysis and urban appraisal work - included as an appendix to the Place Plan - gives us an up-to-date understanding of the current use and operation of Folkestone Town Centre, as well as its historic, social and economic context. On the ground observational analysis forms a part of this process and reveals more nuanced qualitative aspects that are otherwise hard to capture. This section of the document summarises the key findings from this analysis.

Study area

The town centre boundary as defined by Folkestone and Hythe District Council encompasses the historic, cultural and economic hub of the town. The proposed study area extends beyond the town centre, including a number of opportunity sites recognised in the Local Plan.

The primary focus of the Place Plan is the Town Centre, whilst considering the study area boundary as the context within which it sits.

KEY						
	Town centre b	ooundary as defined in the Adopted Local				
	Plan 2020					
	Ship Street o	pportunity site				
	Place Plan study area					
Ν	0	200m				
\bigcap	1					



Key findings from the Urban Appraisal

Visiting Folkestone

Folkestone is already an attractive place to visit.

Beautiful beaches, strong heritage and excellent train & road links to London and Europe have supported a growing visitor economy in recent years. Station usage data, with over 1.8 million entries and exits made at the two stations in the town in 2019/2020, shows a 19% increase on 2015 levels and a 65% increase on 2010.

Folkestone has good transport links but lacks a sense of arrival.

Arrival from the station is disconnected and lacks wayfinding to the town centre and local assets.

Bouverie Place offers the only recognisable landmark of arrival into the town centre but has poor visual appeal. There is no central public square or welcoming entrance

Lack of quality hotels.

Whilst the development of the Creative Quarter has boosted visitors, hotel investment has lagged behind. Provision of good quality 3-4* hotels would promote the evening economy and improve visitor satisfaction.

Access to the coast should be stitched through to the town centre.

The seafront, Cultural Quarter and the harbour areas are landmark attractions but are not well connected.

As a coastal gateway to Europe, a harbour location with historic significance and an existing seaside destination, this character is not necessarily apparent in all parts of the town centre.

Heritage assets could be further celebrated.

Heritage assets are of significant importance to the southern areas of the town centre and coastline. Current policy lacks identification of these assets.

The conservation area around Church Street and The Bayle contain empty units and is threatened by planned residential development.

The Cultural Quarter and developing food culture is putting Folkestone on the map.

Creative Folkestone, the Triennial & other festivals have put the Town on the map. The Quarter has created new jobs & the creative economy is becoming increasingly recognised locally and nationally. With the opening of high end restaurants such as Rocksalt, the cafe and restaurant offer is becoming a reason to travel to Folkestone.

Opportunities for the Place Plan

Better pedestrian links and public realm around the town centre area will help to stitch under-used areas back together, placing an emphasis away from the Cultural Quarter.

Improving connectivity and wayfinding to the station area will improve footfall in the town centre area.

Encourage the development of hotel developments to promote overnight visitor economy.

Explore opportunities to connect other parts of the town centre to the coast and coastal heritage, whether physically or through activities and uses.

The Place Plan should seek to celebrate listed and/ or characterful buildings in the town centre such as The Folkestone Museum through uses and public realm interventions.

The Place Plan should build on the success of Creative Folkestone's investment in programmes & events, helping to promote this strong offer. Diversity and accessibility of offer is important.

Living in Folkestone

Central & north-eastern Folkestone has pockets of severe deprivation.

In Folkestone Central and Harbour wards, 30% of children live in low income households compared to 20% across FHD and 18% nationally. This contrasts to communities in the southwest who are some of the least deprived nationally. The disparity in health, well-being & quality of life outcomes contributes to the sense of an increasingly divided town.

Skills levels are comparatively low compared to the rest of Kent, the South East and England averages.

Data is only available at FHD level, but shows a higher proportion of residents with no qualifications and a lower percentage with degree-level or above than those comparators. Youth unemployment is as high as 5% in some parts of the town centre, compared to 3% in FHD and 2% in Kent.

Folkestone needs to attract and retain young people to live and work in the town.

Folkestone has a higher proportion of working age people (aged 16-65) living in the town than the FHD and Kent averages. This relatively large potential workforce means that the town has strong productive capacity. However, forecasts show that the working age population is likely to stagnate and there could be as much as a +53% growth in residents aged over 65.

Housing in the town centre is poor quality & unaffordable.

There is a high proportion of private rented housing in the town centre (52%) compared to district (20%) and county (15%) levels. However, comparatively cheaper house prices in the town (compared to outer coastal areas) are increasingly attracting young workers & families. Data shows that housing affordability levels in Folkestone (ratio of house prices to income) are the lowest in Kent.

There is a need to increase shared feelings of identity and community cohesion in Folkestone.

A study on social capital by Kent County Council found that Folkestone Central Ward had one of the lowest social capital (defined as formation of networks and trust between people) in the county. Folkestone has seen its social capital go from strength to strength in recent years, associated with the growing creative sector & range of community groups.

Opportunities for the Place Plan

Focussing short term physical improvements in the tightly deprived geography could act as positive precursor to longer term improvements.

Build on the success of the Folkestone Community Works programme and ensure continued support beyond the end of the project in 2022.

There is opportunity to improve attainment & provide pathways for young people into higher education, by capitalising on the recent investment in Folkestone College and improving links with universities in Canterbury.

Provide pathways into work, training and skills development for young people to address low skills levels and help to retain young people. In some cases, given the lower supply of available jobs, this will mean looking for new routes into education and other positive activities.

New developments must work for Folkestone & complement the town centre. Deprived and long-established communities need to benefit from and have a role in shaping these new developments. Housing must continue to be affordable for Folkestone's residents & attracting young people.

Boosting a sense of belonging and civic pride. Supporting increased community participation and volunteering is essential for creating local prosperity and enabling a greater sense of ownership and social integration.

Town centre uses

Footfall has fallen in the town centre.

Footfall has fallen 16% in the past 4 years according to the Folkestone visitor insight Baseline Report.

The Turner Bates Study in 2019 highlighted leakage to neighbouring towns such as Ashford due to leisure offer. With 10,000sqm of commercial space coming as part of the seafront development, this problem could be exacerbated and also increase the perception of a 'town of two halves'.

The retail offer reflects wider trends.

Vacancy rates are high; a survey conducted in February 2019 for the FHSF EOI found that 14.9% of units are vacant across the town centre. The Secondary shopping area has a higher vacancy rate of 16%. This fits with UK-wide trends the decline of the traditional high street, the restructuring of the economy around new sectors & the changing tourism sector. Perceptions are that the independent retail offer is strong but tends to cater to a younger audience.

Visual perception of the town centre is poor.

There is a need for visual improvements to add vibrancy and improve quality of environment.

There are large areas around Bouverie Place & the bus station being used for service access, waste management and parking. Back of house and service areas create blank frontages and edges, contributing to a perceived lack of quality public realm in the central town centre area.

Natural assets are within close proximity.

Rural landscapes, AONB, coastline and parks are within close proximity. This offers an opportunity to further encourage active lifestyles, supporting health & wellbeing in post pandemic recovery.

The Sandgate Road part of the town centre is close to the sea front and yet very disconnected. There is an opportunity for vistas and connections to be a real asset to the town centre.

The evening economy is limited.

Few businesses are open into the evening and many close before 7pm. There is a lack of quality guest accommodation & hotels which limits options for overnight stays.

There is no particular focus for night time activity.

Otterpool Park should attract more footfall.

This opportunity should be maximised through strategic investment in the town centre to ensure its attractiveness for this new catchment. Folkestone town centre should be the major town centre of choice for the 20,000+ thousand new residents of Otterpool Park. This will support quality of life in the new town, and business opportunities in Folkestone.

Opportunities for the Place Plan

The Place Plan should create a clear strategy for uses in the town centre that complements activity in the Creative Quarter, harbour area and seafront. Attracting creative re-use to respond to support civic & community functions will build on the social value of the high street. Supporting a mix of uses will ensure a vibrant town centre and support Covid-19 recovery. More radical solutions include social value leases.

There is opportunity to soften the pedestrian environment by increasing greening and seating.

Develop a long term vision for spaces to the north of Sandgate Street and connections to the north.

Seek opportunities to improve links from the town centre to natural assets - especially the coastline from Sandgate Street. Make better use of underutilised green assets such as Leas Cliff, to create improved connections.

Introducing complementary new uses, markets, leisure and events will help expand the 24 hour economy. Longer opening times and hotel provision will support evening activation but should remain family friendly. A review of the current licensing policy is underway.

Proposals and strategies should take into consideration the potentially increased footfall from this future populations and aim to provide services and opportunities accordingly.

Investment & development

The town centre needs an integrated approach.

Currently perceived as a town centre with two halves, previous development and private investment has been focused on the Cultural Quarter and Seafront/Harbour development. The focus must now be shifted so that the town centre provides an offer that is accessible to everybody and does not discourage those communities that are most deprived.

There are many opportunities for development in the town centre.

There have not been any major developments in the town centre apart from the seafront area. The Core Strategy lacks an over arching vision for Folkestone's town centre and its high streets. There are relevant opportunities in the town centre for residential development which can also support activity, but must include provision for those who are most deprived.

Working in Folkestone

The town centre isn't a very attractive and supportive environment for business growth.

Business accommodation in the town centre is poor, with a limited offer of high-quality space for businesses, particularly for businesses to start-up in and scale. According to the PBA study in 2015, 72% of retail units are under 200 sqm in size. Many premises are constrained with small floor plates, lending themselves to independent retailers.

Folkestone is reliant on sectors that have been hit hardest by the pandemic.

Folkestone is reliant on tourism, leisure, and sectors impacted by Brexit including fishing and logistics. The latest data shows that those claiming Universal Credit or Jobseekers' Allowance is up 100% from January 2020. The high claimant rates in the town are likely to be made worse when furlough ends, worsening deprivation.

The nature of employment in Folkestone should be challenged.

Jobs are predominantly concentrated in the public admin, education and health sector (driven by employment in schools & the Royal Victoria Hospital). The retail & hospitality sectors are also dominant compared to national averages. District data shows that people working in FHD have lower weekly earnings than Kent, South East and national averages. There is also a degree of in work poverty

Opportunities for the Place Plan

Seek opportunities to encourage investment in the town centre core. Create opportunities for experimentation with alternative uses including social and community services. Explore opportunities within the town centre for strategic and housing development that will help mitigate against some of the issues facing the core town centre and capitalise on potential.

The Place Plan must support the provision of suitable and affordable business accommodation, for example through physical changes and business support programmes. The Place Plan must respond to the major challenges caused by Covid-19 and Brexit. There may be new opportunities related to changing work patterns, remote working and renewed focus on healthy living.

Skills and training support for residents as well as improvements within 'foundational' sectors are needed. New approaches to participation and local ownership will also help ensure more value is retained within the town, supporting better local outcomes.

Transport and movement

The over-engineered, largely obsolete road network should be seen as an opportunity for radical change.

There is a complex highway network system and ring road with one-way streets that has not been updated following the closure of Folkestone's harbour. The ring road segregates the Station and forms a triangular loop around the town centre and buildings have turned their back to it.

Pedestrian & cycle environment and connections are poor.

Climate and coastal change will be particularly visible in this seaside location.
Reliance on private vehicles for travel contributes to air pollution and overall emissions. The priority is currently for cars and there is deficient pedestrian and cycle friendly routes with no cycle infrastructure through the town centre.

Changes in topography provides physical barriers but brings character and opportunity.

Steep vertical distances have contributed to the fact that the retail and historic heart has become separated from the coastline. Opportunities for large scale growth are hindered by the geographic situation.

Alleyways, stairs and cutthroughs are important assets that give Folkestone its character but provide problems with accessibility.

Public transport systems are good and well used.

The high speed rail connection has been an important factor in attracting visitors and opportunities for work.

The bus network is very well used throughout the day for both local trips and connections to nearby towns, and is an important function for the town centre.

Opportunities for the Place Plan

Explore opportunities to remodel parts of this network to create exemplar people friendly public spaces, streets and routes

Provision for sustainable modes of transport, such as the cycling infrastructure, must be improved and encouraged.

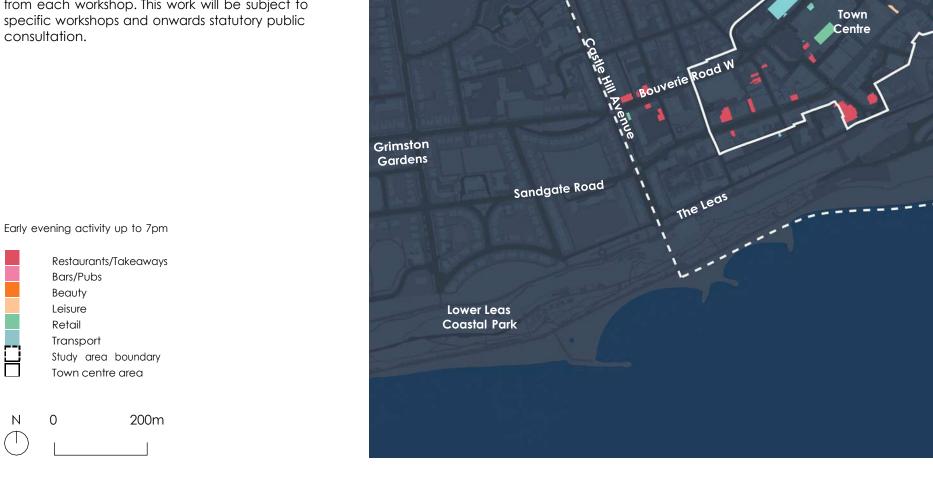
Accessibility must be considered to overcome barriers to movement and reconnecting assets.

Improve connections to the train station. Capitalise on the existing bus network and consider public realm interventions that support this. Consider relocating the bus station if it can improve the passenger experience and maintain good access to the town centre, without adversely impacting on bus operations.

Licensing Policy Review

The Night Time Industries Association have been specifically commissioned to review the District's licensing policy. This commission has run concurrently with the development of the Place Plan. The aim of the policy review is to develop a policy that helps to bring about the ambitions of the Place Plan to animate the town centre with a vibrant day-time and evening economy, while respecting the needs of those who live and work in the town centre.

To ensure the policy works for the people of Folkestone, Night Time Industries Association held a series of focused workshops in May, with members of the local licensed business community, resident's association, community interest groups and stakeholder parties. The invited groups and presentations from each of the workshops are available on the FHDC website along with a summary from each workshop. This work will be subject to specific workshops and onwards statutory public consultation.





Engagement overview

Overview

The engagement process for the Folkestone Town Centre Place Plan made a commitment to listening to the full spectrum of Folkestone's communities, to ensure that the Place Plan was guided by the views and priorities of strategic and delivery partners, businesses, community stakeholders as well as the wider public, residents and visitors. We Made That held a variety of events and communication methods to ensure a wide range of opinions and voices were captured and presented. Focused workshops, one-toone conversations, stakeholder meetings, a dedicated website and two public webinars were organised throughout the course of the Place Plan's development. The engagement approach was designed to provide multiple opportunities for interested parties to have their say in shaping the Place Plan, making sure that the team fed back how suggestions had been incorporated as the Place Plan developed.

Due to the circumstances of COVID-19 and government guidelines, all engagement activities were held online. To reach those who were not able to engage digitally, physical posters were placed around the Town Centre to advertise the public webinars and a printed presentation and survey pack could be requested over the phone for those who could not attend the virtual webinars. The dedicated Place Plan section of the Council website was regularly updated with the webinar recordings and content, presentations, notes from workshops and engagement process updates and information about the Place Plan was included in Your District Today issued to every household in the District.

This work is only just the beginning and the next steps in the engagement process beyond the production of this Place Plan document have been set out in the Making It Happen section.

Who has been engaged

At the beginning of the process, We Made That worked with the Council to identify a list of groups and individuals to engage with: strategic & delivery partners, key stakeholders, community & interest groups, business groups and residents' groups. The team worked to expand the contact list throughout the project, to broaden the reach and include seldom heard groups wherever possible.

A full list of participants who were invited to and took part in engagement activities can be found in the Appendix. To invite Folkestone's communities to take part in the Place Plan process, we spoke to, invited and gathered contacts for 645 individuals and groups, who can be grouped into the following categories:

- Community and voluntary organisations
- Educational institutions
- Council and local ward members
- Strategic stakeholders
- Local businesses, networks and organisations
- Landowners and developers
- Youth groups and networks
- Residents and residents groups
- Equalities groups
- Creative networks and organisations
- Religious groups and institutions
- Heritage and interest groups
- Transport, active travel and environmental networks

Monitoring the equalities data of respondents against the demographics of the area has helped to build a picture of the balance and representation of communities' views. More information can be found in the Appendix.

17 workshops and public webinar events

150 surveys and email responses

167 detailed conversations

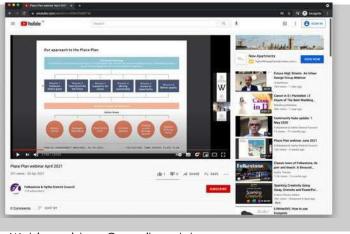
266 attended public webinar events

459 youtube views

645 contacts compiled



Webinar poster, produced by Studio Oiseau



Webinar video, Council youtube page

How we have engaged

Impact in numbers: one-to-ones & workshops

46 one-to-one conversations

15 virtual workshops to discuss priorities and ambitions, including young people

96 invited to workshop events

121 workshop participants; residents, community groups, businesses and stakeholders, including 17 school students

One-to-one conversations, February to April 2021

Conversations were held with stakeholders who had previously expressed interest to the Council in being involved in the Place Plan and were aimed at understanding priorities and interest in attending workshops. Conversations were held using telephone or virtual video conferencing software such as Zoom.

Digital workshops, February and March 2021 A. Workshops with stakeholders

Four themed workshops were held with stakeholders as an opportunity for a detailed discussion over priorities and ambitions for the Place Plan. The presentation included key findings from the appraisal work and research so far. A series of questions were posed to prompt discussion about the Town Centre, according to the theme of the workshop:

- 1. Community & Culture
- 2. Places, Heritage & Revitalisation
- 3. Business & Skills
- 4. Transport, Active Travel & Leisure

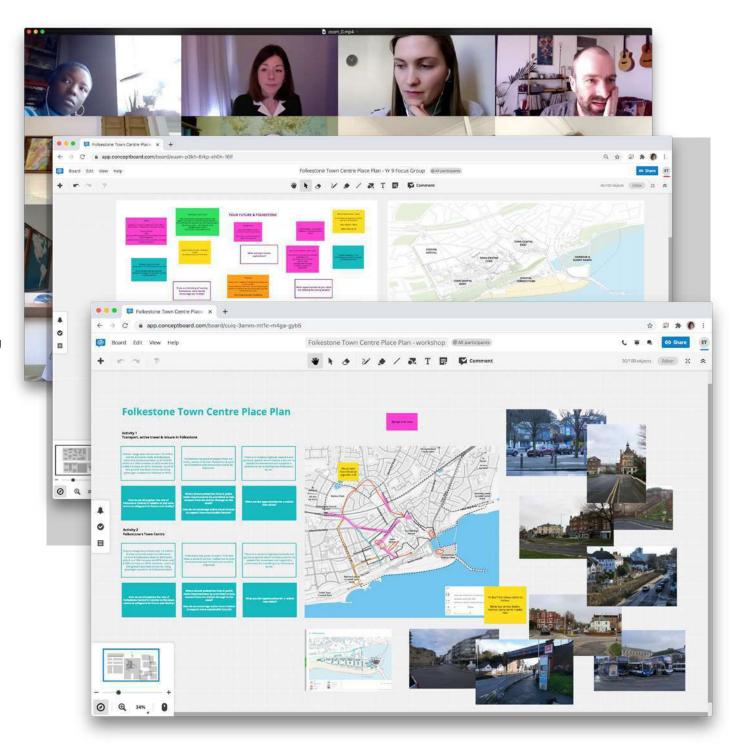
Feedback was incorporated into the development of emerging ideas and was reflected at the public webinars.

B. Targeted youth outreach sessions

As the project developed, we committed to holding three additional workshops with Year 5, Year 9 and Year 12 students from Morehall Primary and Folkestone Academy. Through this, we have started to understand more about what would attract young people to live, work and stay in Folkestone. The team worked with the Council to develop a schools contact list who were kept informed about the public events. Representatives from school institutions and educational groups were also a part of the stakeholder workshops.

C. Strategic stakeholder workshops

Nine workshops have been held over the course of the Place Plan project development, giving strategic and delivery partners a chance to feed back on the developing Place Plan. These included the Town Centre Working Group, All Members, Officers Working Group, Creative Quarter Regeneration Steering Group, Scrutiny Committee, CLT (Leadership Team), Council and project team Officers



Workshop material produced using Conceptboard, digital transport workshop and Year 9 focus group

How we have engaged

Impact in numbers: public webinars

95 survey results

266 attendees

322 questions asked

Public webinars, April and June 2021

Two public webinars were held using Zoom to discuss the emerging Place Plan, share views and ask questions. The first webinar in April was aimed at discussing priorities and vision. The second webinar event in June reflected back insight gathered from the first webinar and presented opportunities and actions that were informed by the research and engagement process.

A survey was launched so that if anyone couldn't make the webinar live they could still get involved. A survey and printed pack was made available for those who did not have online access.

The webinars were broadcast through the Council blog and press release, stakeholders platforms and social networking sites. A physical flyer was also disseminated and emails were sent to the contact list gathered throughout the process. The feedback received at the webinars and through the online surveys helped to shape the final Place Plan.

Impact in numbers: website & social media 2 FAQ notes updated after the public webinars 459 youtube video views of webinars 1951 website views 37,356 social media reach

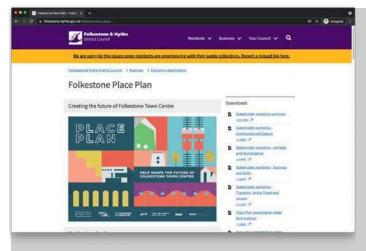
Project website, ongoing

A project page was hosted on the Council's website and led by the Council's communications team. The website provided accessible feedback in the form of project information, regular progress updates, contact information and engagement event invitations. Content and surveys from the public webinars were also uploaded. The website will continue to be updated to record project development: www.folkestone-hythe.gov.uk/folkestoneplaceplan.

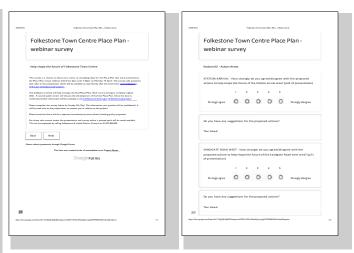
Social media and email communication

The Council and design team's social media platforms including Facebook, Twitter, Youtube were used to broadcast about public events and create opportunities for local people to share ideas. Members of the public could email or telephone the We Made That design team directly or through the specifically created Place Plan Council email address during the engagement period. All correspondence was logged and fed into developing proposals wherever possible.

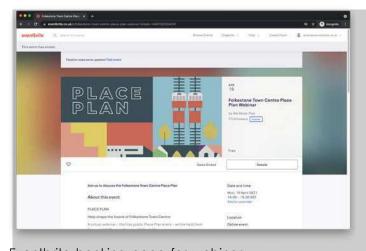
Please see the Appendix for further details on the engagement process.



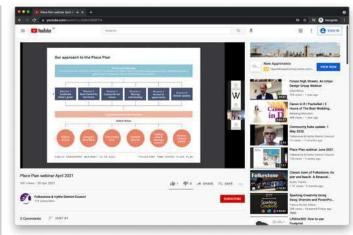
Dedicated project website: www.folkestone-hythe.gov.uk/folkestoneplaceplan



Survey to accompany webinar presentation



Eventbrite booking page for webinar



Recording of webinar event, FHDC youtube page

Key findings from the engagement

Town centre uses

You said:

- There is a desire to see uses in the town centre diversify beyond retail whilst reflecting the needs of the community
- There is a need for low cost spaces for charities in the town centre
- The town centre should include more green spaces, including safe play areas for children

We've included:

- Testing a range of uses and integrating community spaces within the town centre
- Identify a strategy for onwards engagement to identify possible new uses for the town centre area
- Provision of green spaces in the town centre and enhancement of existing ones
- Reinstating Bouverie Square as a key public space with possible provision of play spaces

"It would be great if spaces on the high street that are multi functional, can be community spaces, pop-up shops and can change simply to what the needs are of the community." "Many shops have, or will, close now due to the pandemic. How can the Council encourage new uses rather than more of the same?"

"Are you going to try to get more green areas in the town centre? I mean tree and plants as it is so much a concrete area and that is depressing"

"Will children be able to play in the Central area?"

Heritage, culture and leisure

You said:

- There is a mixed reaction about offer and demand when it comes to evening and night time uses
- Due to lack of/ limited evening offer in the town centre, people are travelling to near-by towns with better offer such as Canterbury
- Desire to recognise the Parish Church of St Mary and St Eanswythe as one of Folkestone's key assets

We've included:

- Continuing to develop strategy to encourage evening uses and overnight stays
- Improving connections to and from the Parish Church of St Mary and St. Eanswythe and the town centre
- Provision of spaces for young people in the town centre, including improved facilities for Shepway Youth

"There is an untapped market of people who want to go out in town at night but are forced to go to Canterbury for lack of facilities "There has been recent (2020) international interest in St Eanswythe, but it is not clear that awareness of this unique aspect of Folkestone's heritage has really made it into the plan so far."

"Despite this agenda focussing on the town centre, we should also find a place for young peoples club / night-time entertainment outside the town centre, specifically on the massive empty spaces on The Park Farm Industrial Retail site." "I think we should focus developments on supporting younger people - they have always been left behind. We need to ensure we offer opportunities, including places to meet"

Business and skills

You said:

- Skills and training for young people is a way of addressing the economic disparities within the town
- The adult education offer is seen as insufficient
- Test pioneering and alternative approaches
- Ongoing support for start-ups and availability of work spaces as a way of retaining the skilled workforce
- Reasonable rent levels and rent relief as to encourage businesses to take on and retain spaces in the town centre

We've included:

- Opportunities for youth enterprise
- Expanding the educational offer of "the Cube"
- Using vacant units as 'hubs' for testing new uses

"Folkestone has 2 of the poorest wards in the country. The community need to address the needs of the children from those wards and it would be good if the town centre space could be used to help upskill the young people there."

"Very limited adult education courses available in the evenings. Would really appreciate craft/ hobby skills courses."

"Could we have a vision to be one of the leading towns of the future, pioneering and testing alternative approaches for the UK? We could attract and create jobs to improve environmental performance and reduce social inequality."

"Good ideas to help start up businesses, but once they have started what then? To keep and develop a skilled work force based in the town, work places need to be available, otherwise the town will just be a dormitory"

Key findings from the engagement

Accessibility, safety and cleanliness

You said:

- The lack of certain facilities such as Changing Place toilets make the town centre inaccessible to certain groups
- Lack of adequate lighting makes certain areas feel unsafe
- Cleanliness of the town centre is a recurring theme adding to the perceived neglect and lack of safety

We've included:

this?"

- Provision of Changing Place Toilets, in the town centre and harbour area
- Public realm enhancements along with improvements to street lighting
- Improve safety for pedestrians

'Street lighting is poor from

Central station to town centre after

dark. If we want walkable streets

visible routes. Have you addressed

we need to address safety and

 Populating vacant units in the town centre to address the perceived sense of neglect

Transport and connectivity

You said:

- Desire to see a strategy for transition to electric vehicles and low carbon transportation systems
- Concerns about further limiting the provision of parking spaces within the town centre
- Traffic is perceived as having a negative impact on pedestrian experience and access to the coast
- Parts of the town are pleasant to cycle through but there is a desire to see that extended to other areas

We've included:

- Proposals to ensure that the environment of those roads are more conducive to safe walking and safe cycling
- Park and ride scheme and a mobility hubs at the station and harbour area
- New vertical connection between the Old Town and the harbour

"Really love the idea of a low carbon transportation system throughout the town...where are we with the harbour line, park and ride

and community transport?"

"Turning Tontine Street into a one way Road in the 1960 sealed its fate. Would two-way working in Tontine Street with direct access to the Harbour and the beach rekindle the need for visitor shopping and family dining."

"The experience of cycling along the coastline is lovely but this should be more consistent from the moment you arrive in Folkestone and across the town centre." "Has a Park and Ride scheme been considered? Would land at the old Folkestone East railway station be suitable?"

Further work and ongoing engagement

You said:

- Desire to further develop sustainability a strategy and Folkestone's Net Zero agenda
- Creating a young person Shadow Council
- Desire to see ongoing involvement from the council in some of the initiatives

We've included:

- Creating a long term strategy to ensure youth involvement in the Place Plan and in the development of the town going forward
- Re-evaluating Missions 6 with a bolder approach to the climate crisis and biodiversity crisis
- Making recommendations for long term engagement strategies

"Could our ambition for town centre and Missions 2 and 4 be bolder when it comes to sustainability/ Net Zero?"

"A stronger Net Zero agenda for Folkestone could stimulate new green jobs? Help unlock new green public and private finance?"

"Could we create a young person shadow council or a board to insure that meets their needs?"

"Delivering quality should include residential liveability, health and noise as well as environmental sustainability." "Are there plans to bridge the gap between implementing sustainablyminded solutions and engaging people in them/teaching people how to use them. I.e. cycle lanes - will the local authority then offer schools and community organisations funding for cycle lessons"

the years."

"Some of Folkestone's problems

are not helped by the general air of

neglect, rubbish, etc. It is not very

welcoming to walk around and see

the obvious neglect, spanning over

"Around the town centre the speed of the traffic is extremely dangerous for people on foot to cross them."

"Can the development of the

town centre include provision of

Changing Place toilets for people

who require hoist transfers and a

changing bed, and are unable to

use standard accessible toilets? "

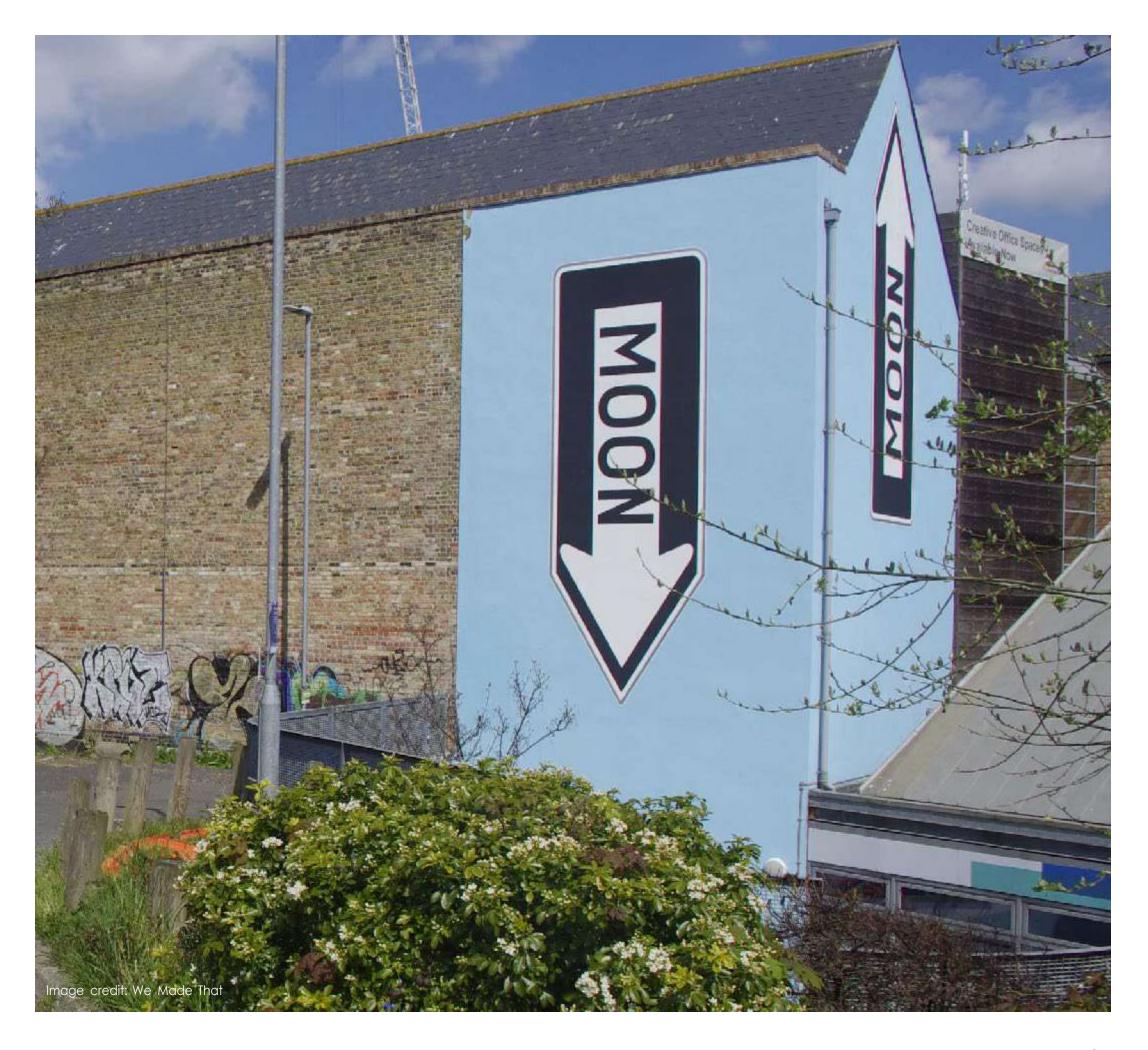
Place Plan for Folkestone Town Centre $v \in ADE$ THAT

4.0 THE GRAND CHALLENGE

To overcome decline in
Folkestone's town centre
by embracing opportunity,
addressing the climate
emergency, celebrating what's
already great and bringing the
town's communities together.



5.0
PLACE PLAN MISSIONS



PLACE PLAN MISSIONS

Six missions set out the ambitions for the place plan. These have been developed based on the opinions gathered during the engagement process and findings from the Urban Appraisal. A set of actions are then set out to deliver against each of these missions. The six missions are described on the following pages.





Mission 2

Town centre for the future





Mission 4

Moving sustainably



Mission 5
Access to opportunity



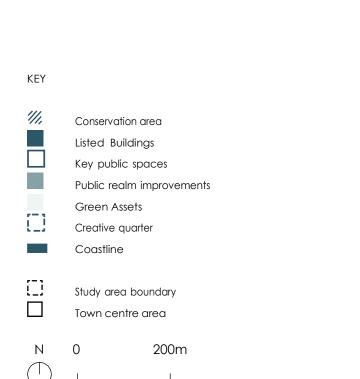
Mission 6 **Deliver sustainable quality**

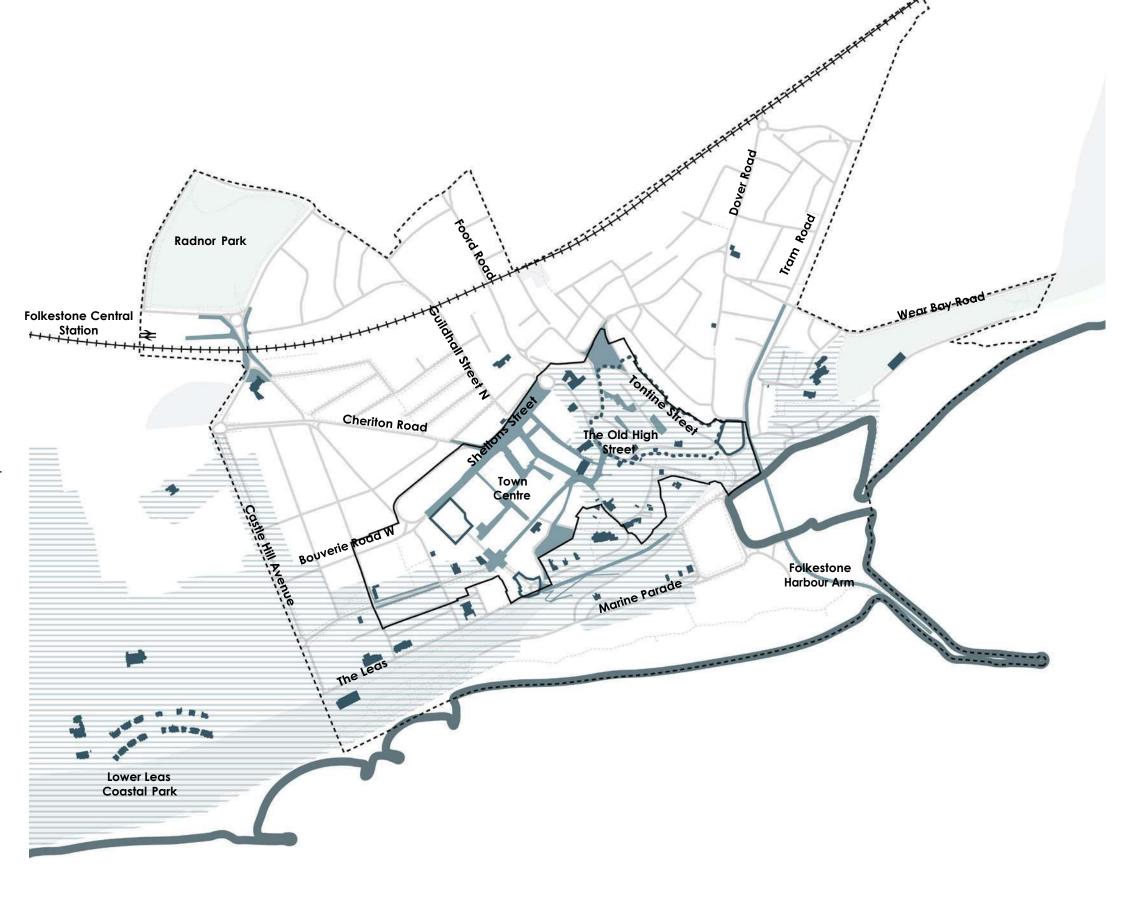
5.0 PLACE PLAN MISSIONS

Mission 1: Celebrate what's great

Make the most of Folkestone's best assets - its coastline, its communities, its heritage and its creativity - to attract visitors and enhance the lives of residents.

Folkestone's rich history as an attractive destination remains relevant to this day. The town's future success and its ability to overcome contemporary challenges will depend upon its ability to remain a desirable place to live, work and visit. So many of Folkestone's distinctive features are fundamental to this desirability, in particular its coastline and built heritage. The Place Plan therefore seeks to make the most of the great things about Folkestone, through improved connections and public realm, refurbishment and renovation, and showcasing. Actions to deliver on this mission will foster Folkestone's strong civic pride, which has been so clear throughout the Place Plan engagement process.

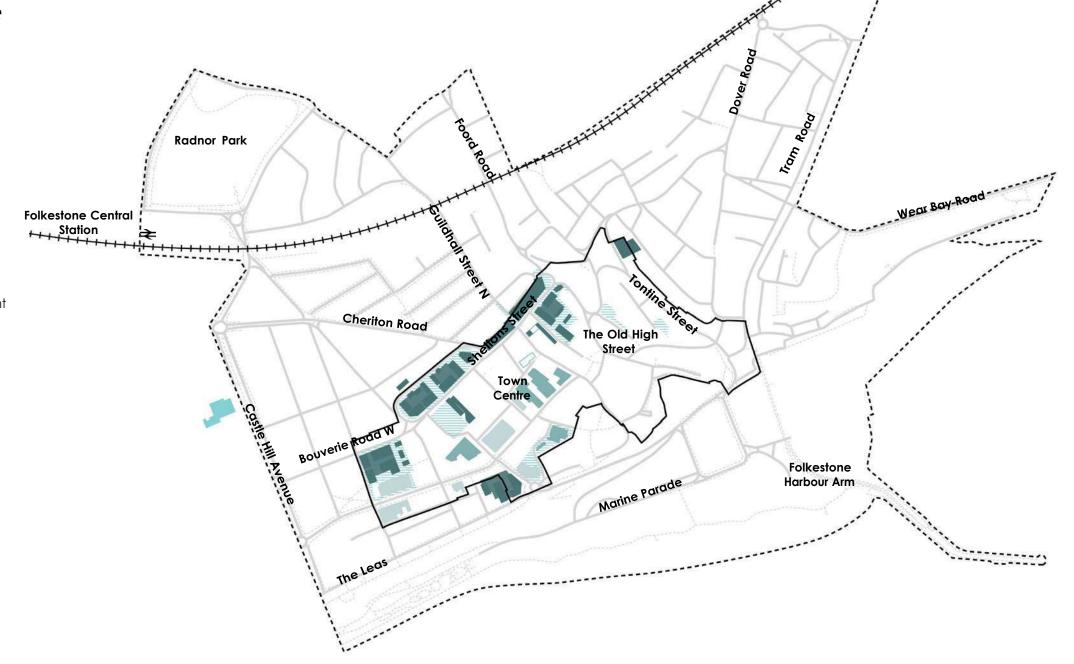




Mission 2: Town centre for the future

Reinvigorate the town centre core by identifying opportunities for future inward investment, a range of new uses, community services and employment opportunities.

High streets and town centres across the country are facing significant change due to national trends of declining conventional retail. Folkestone town centre also has its own specific challenges. As the town centre evolves past the Covid-19 pandemic, introducing a new, more diverse set of uses will be necessary to attract footfall and create a dynamic centre and vibrant economy. Trends in commercial property markets suggest that new operational models, including increased community involvement can contribute to successful centres.



Short Term Opportunity Sites
Medium Term Opportunity Sites
Long Term Opportunity Sites
Enhanced public realm
Vacant units
FHDC offices

Study area boundary
Town centre area

N 0 200m

Mission 3: A place for all voices

Work with the people of Folkestone to develop proposals that are meaningful to all, now and into the future.

A repeated theme from the Place Plan public engagement has been that of regeneration in the town happening 'to' communities rather than 'with' them. The Place Plan seeks to address this through its own development process, as well as identifying onwards opportunities for engagement and participation to be embedded in the delivery of actions – Creating Tomorrow Together. Full details of the engagement that has informed the Place Plan are available as an appendix to this report.





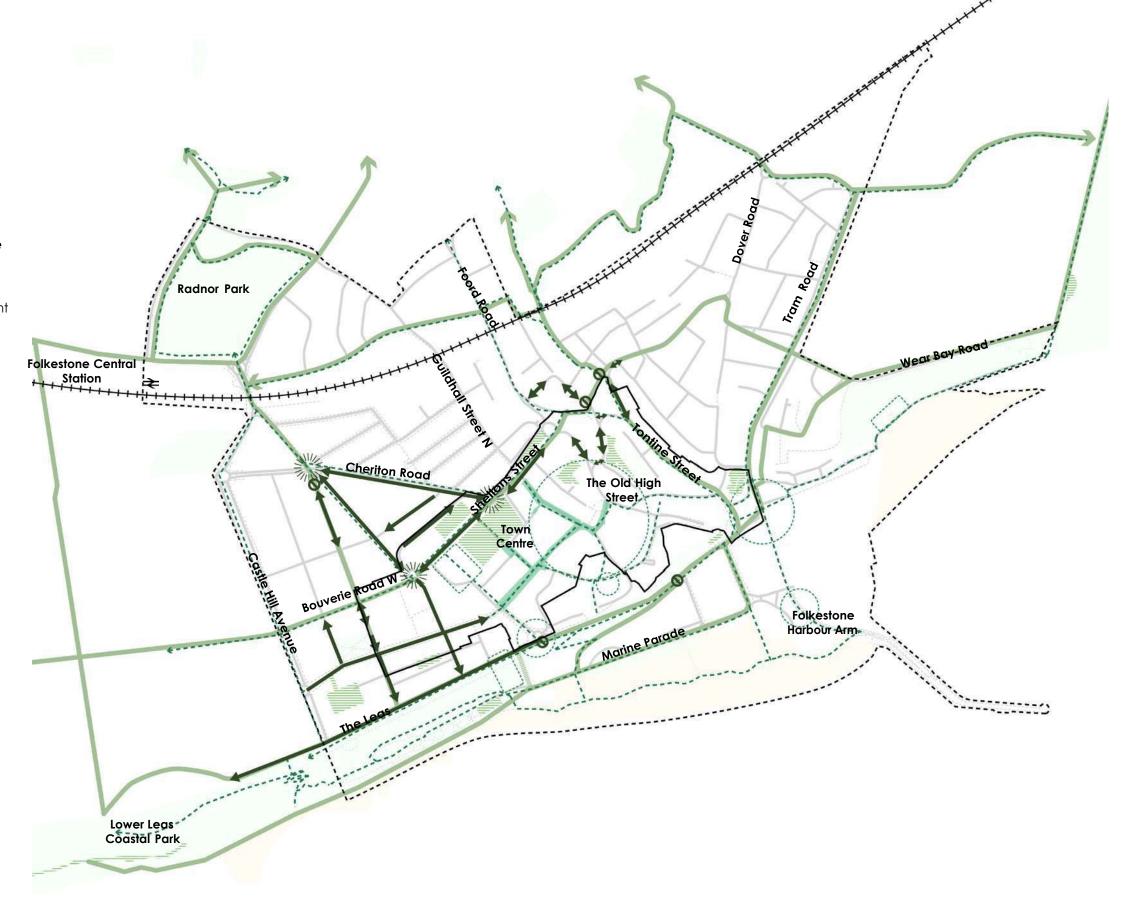
5.0 PLACE PLAN MISSIONS

Mission 4: Moving sustainably

Create an environment that better connects the town centre and surroundings and supports active movement and enables healthy lifestyles and wellbeing.

A consistent theme from the Place Plan engagement has been the negative impact that cars and traffic have on the town centre. Actions to deliver on this mission seek to unpick historic and outdated road networks and reinstate two-way working, whilst finding opportunities for quality pedestrian and cycle infrastructure connecting through the town centre to the public transport networks, harbour, key amenities, and linking to routes to destinations in the wider area. This in turn will promote the use of active travel as a viable alternative to private cars, supporting healthy lifestyles and reducing environmental impact. The Place Plan nevertheless recognises the importance of access to the town centre by car, and proposes a dedicated parking review to ensure that provision will be suitable for future need and demand.



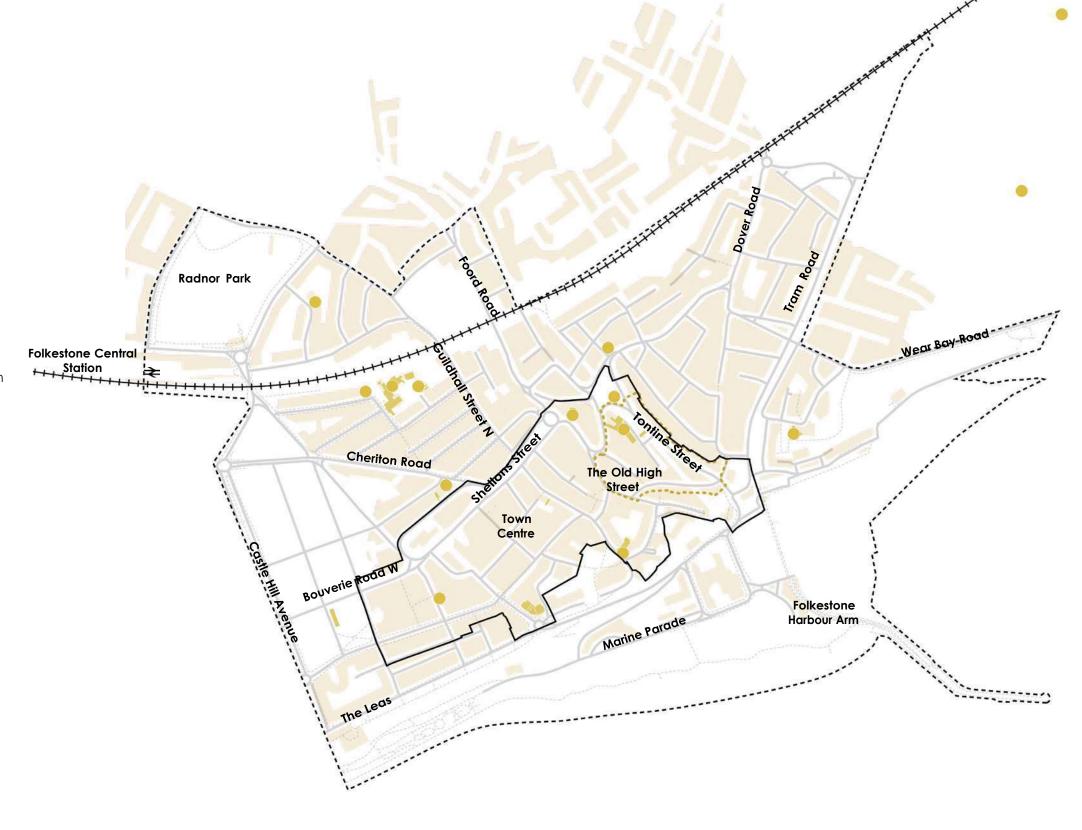


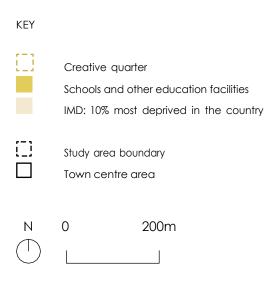
5.0 PLACE PLAN MISSIONS

Mission 5: Access to opportunity

Embed opportunities for support, skills and training to allow all residents of Folkestone to benefit from change.

The Place Plan identifies multiple opportunities for Folkestone, but years of regeneration activity in the town tell us that more must be done to ensure that all Folkestone's communities can benefit from this change. The Place Plan identifies specific opportunities for skills development, enterprise support and fostering community cohesion that can benefit the town centre and its residents.





Mission 6: Deliver sustainable quality

Ensure that all outcomes - whoever they are delivered by - meet Folkestone's full potential for exemplary quality and address the twin crises of climate breakdown and biodiversity loss.

The future of Folkestone Town Centre will be shaped by multiple partners: local authorities and private developers, charities and communities. This mission seeks to ensure that whomever is responsible, the shared goals for change should be that development is of the highest quality and is ambitious in tackling the climate crisis. Many actions to deliver on this mission are relevant across the town centre.



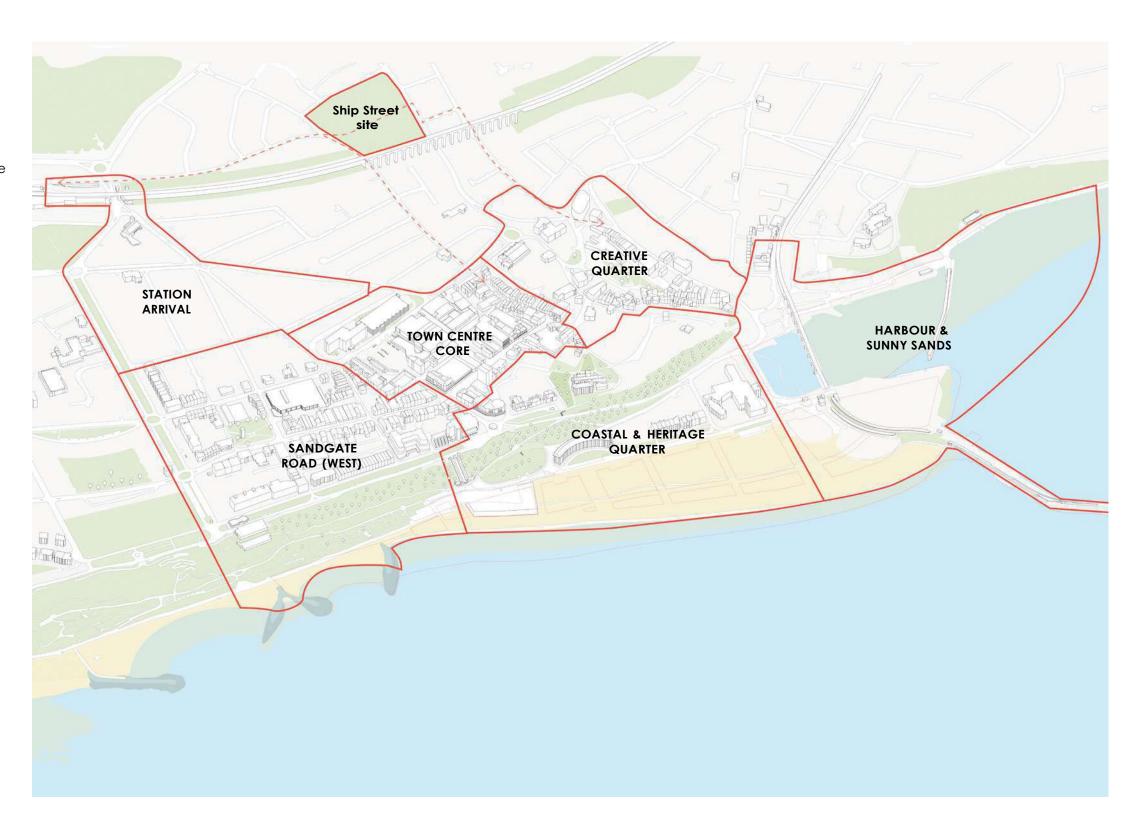


6.0 ACTIONS



Action areas and contents

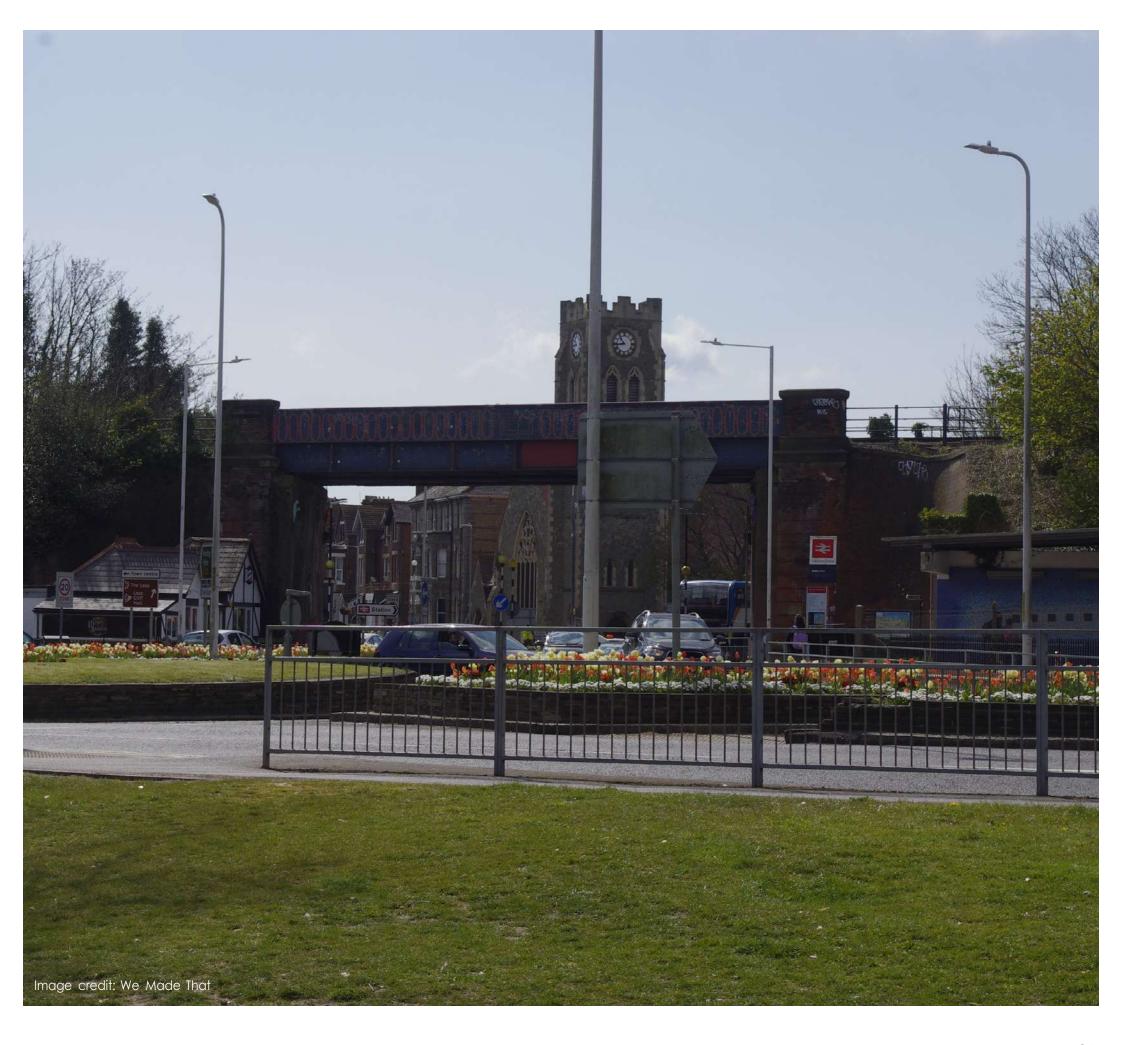
The actions have been grouped under six specific town centre geographies, as illustrated in the adjacent image. These sub areas have been identified to help illustrate and group together actions to deliver the Missions. Ship Street is a council-owned site that is currently being brought forward. The site has potential to contribute to the future health of the town centre and routes from the Station through to the town centre.



6.1 ACTIONS: STATION ARRIVAL

Actions

Actions in the area seek to create a better sequence of spaces around the Folkestone Central Station for residents and visitors alike. They set out to improve the arrival experience for those travelling to Folkestone by train, as well establishing active travel as a priority for those visiting the town or using the station, with improved space for pedestrians and cycles



6.1 ACTIONS: STATION ARRIVAL

Existing condition

Folkestone Central Station provides great links to the town from London (53 minutes) and the South East region, but it is located away from the town centre. It is also accessed by the A259, the main arterial road along the coast, which serves as an immediate barrier to pedestrian movement.

Folkestone Station Road connects to the car park but also forms the forecourt and main arrival space when arriving by train. This provides a real opportunity to create a much more welcoming space.

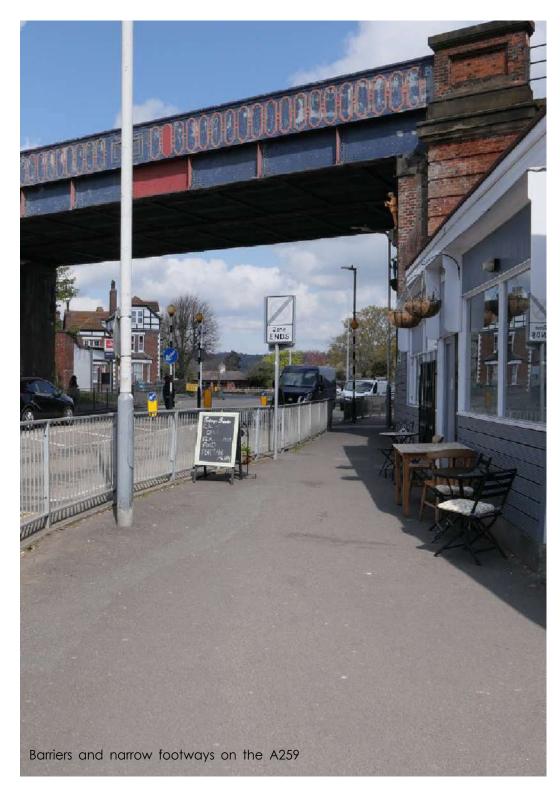
The arrangement of road junctions currently presents an intimidating environment for pedestrians or cyclists wanting to access the town centre. Raised planters add colour and visual appeal but also act as barriers to pedestrian movement. There are a number of active uses surrounding these spaces including a café, a hairdressers and a tattoo parlour, which would contribute positively to an improved public realm There is plenty of opportunity to make cycling an walking to and from the station much more inviting.

Key challenges

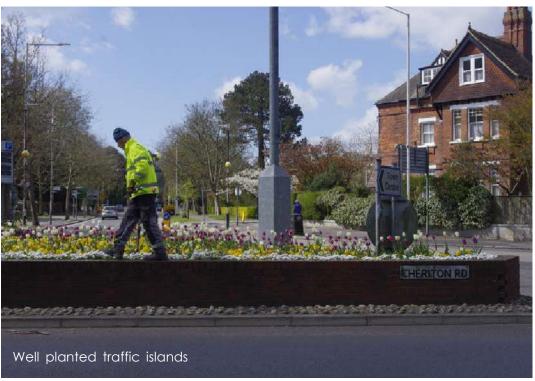
- Station Approach provides an underwhelming arrival space for train passengers
- Spaces around the station are relatively hostile for pedestrians
- Links to the town centre are poor
- Wayfinding for pedestrians is limited to one counter intuitive route to the town centre

What you've said

- Desire to see a strategy for transition to electric vehicles and low carbon transportation systems
- Parts of the town are pleasant to cycle through but there is a desire to see that extended to other areas
- The Station Arrival area should be seen as the principle gateway to the town







6.1 ACTIONS: STATION ARRIVAL

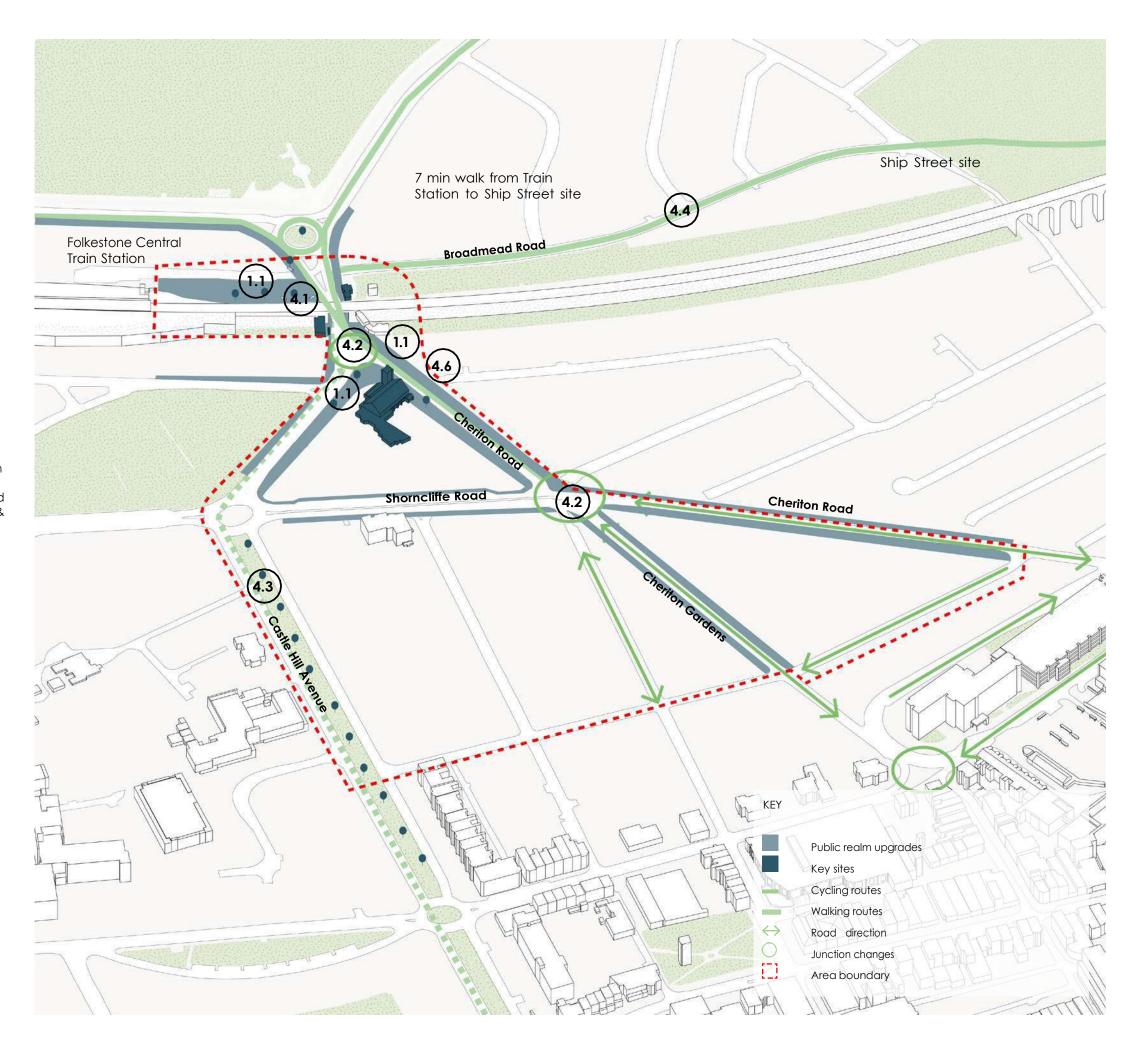
Actions

Mission 1: Celebrate what's great

1.1 Public realm upgrades & new public spaces: Upgrades to station arrival areas as a gateway into Folkestone

Mission 4: Moving sustainably

- 4.1 Mobility hub alongside train station: Potential to include cycle hire/electric cycles
- 4.2 Overhaul of the legacy highway system: Cheriton Gardens & Cheriton Road, redesign of junction to enable all directions of travel from this point
- 4.3 Wayfinding and enhancing the cycling & walking experience: Cheriton Road, Cheriton Gardens & Castle Hill Avenue
- 4.4 New and improved routes: Broadmead Road & through Ship Street site linking to F51
- 4.5 Work with other organisations, such as Cycling UK and Cycle Shepway, to support & encourage sustainable & active travel*
- 4.6 Explore options for a bus link into the town centre which could form part of a Park & Ride scheme



^{*}Action not spatially located

6.1 ACTIONS

Station Arrival: Station area design

- 1.1 Public realm upgrades & new public spaces:
 Upgrades to station arrival areas as a gateway into Folkestone
- Upgrade Folkestone Station Road with new paving and planting to create a welcoming forecourt to the station building
- Extend footways to create more space for pedestrians and activity
- Reconfiguration of Cheriton Road/Castle Hill Avenue junction
- Reconfiguration of Cheriton Road/Radnor Park Road roundabout
- New pedestrian crossings
- Improved lighting
- New trees
- Specific consideration given to gender inclusivity in the design of this public space
- 4.1 Mobility hub alongside train station: Potential to include cycle hire/ electric cycles
- Work with Network Rail to identify space as part of the station forecourt
- Electric bike hire
- Electric car charging points in the station car park
- 4.2 Overhaul of the legacy highway system: Cheriton Gardens and Cheriton Road, redesign of junction to enable all directions of travel from this point
- 4.3 Wayfinding & enhancing the cycling and walking experience: Cheriton Road, Cheriton Gardens and Castle Hill Avenue
- Signage to support routes to the town centre
- Segregated cycle lanes along Cheriton Road (north of Castle Hill Avenue) and Radnor Park Road
- 4.4 New and improved routes: Broadmead Road & through Ship Street site linking to F51
- 4.6 Explore options for a bus link into the town centre which could form part of a Park and Ride Scheme
- Consider electric or hydrogen buses



6.1 ACTIONS: STATION ARRIVAL

Actions matrix

Action	Mission	Scope	Impacts	Outcomes	Action owner/ promoter	Priority	Estimated Cost
1.1	1. Celebrate what's great	Public realm upgrades and new public spaces	 Public realm is clean, high quality, inclusive and attractive Folkestone has a positive external reputation Will help drive inward investment and attract new development 	 Welcoming arrival spaces and streets with generous and quality space for pedestrians and safe provision for cyclists 	FHDC / KCC Highways / Network Rail / Southeastern Railways	High	Medium (£151,000 - £2m)
4.1	4. Moving sustainably	Mobility hub alongside train station: Potential to include cycle hire/ electric cycles	 Key places are connected by active travel More people use public transport to get around and fewer use private cars Residents have good physical and mental health 	 Provision for sustainable transport and mobility options at the interchange from the station 	Network Rail / Southeastern Railways/ KCC Highways / FHDC / Levelling Up Fund (LUF)	High	Medium (£151,000 - £2m)
4.2	4. Moving sustainably	Overhaul of the legacy highway system: Cheriton Gardens and Cheriton Road, redesign of junction to enable all directions of travel from this point	 The route from the station to the town centre is safe, accessible and welcoming Air pollution is reduced, and air quality is improved Will help drive inward investment and attract new development 	 Improved streets, that are easier to navigate for all modes of travel, with slower traffic speeds, and improved space for pedestrians and cyclists 	KCC Highways/ FHDC / Stagecoach/ LUF	High	High (£2m+)
4.3	4. Moving sustainably	Wayfinding and enhancing the cycling and walking experience: Cheriton Road, Cheriton Gardens and Castle Hill Avenue	Key places are connected by active travel	 Greening, tree planting, seating and wayfinding interventions as well as cycle parking and cycle lanes where possible and useful 	KCC Highways/ FHDC/ LUF	High	Medium (£151,000 - £2m)
4.4	4. Moving sustainably	New and improved routes: Broadmead Road and through Ship Street site (this could include provision for skateboarding)	 Residents have good physical and mental health The route from the station to the town centre to the coast is safe, accessible and welcoming Key places are connected by active travel 	 A new route to the harbour area and F51 that takes in the viaduct and any new development at Ship Street 	KCC Highways/ FHDC / Shepway Sports Trust and F51	Low	Low (£0 - £150,000)
4.5	4. Moving sustainably	Work with other organisations, such as Cycling UK and Cycle Shepway, to support and encourage sustainable and active travel	 Residents have good physical and mental health Air pollution is reduced, and air quality is improved More people use active travel to get around and fewer use private cars 	 Initiatives to encourage residents to cycle 	FHDC / Cycling UK / Cycle Shepway/ KCC Highways	Medium	Low (£0 - £150,000)
4.6	4. Moving sustainably	Explore options for a bus link into the town centre which could form part of a Park and Ride scheme	 The route from the station to the town centre to the coast is safe, accessible and welcoming More people use public transport to get around and fewer use private cars Will help drive inward investment and attract new development 	 A bus link that both connects the train station to the town centre and reduces demand for cars parking 	Stagecoach / FHDC/ KCC Highways	High	Low (£0 - £150,000)

Actions

Actions in the Sandgate Road (west) area seek to strengthen this part of the high street to anchor and attract visitors and shoppers through the western end of the town centre. This will be achieved through public realm upgrades and building refurbishments, encouraging new uses to populate vacant units and other initiatives to help businesses and community participation.



Existing condition

Sandgate Road (west) is characterised by smaller, generally independent retail and food and drink establishments. The retail is primarily convenience goods serving the local population and the cafés, restaurants and takeaways support this.

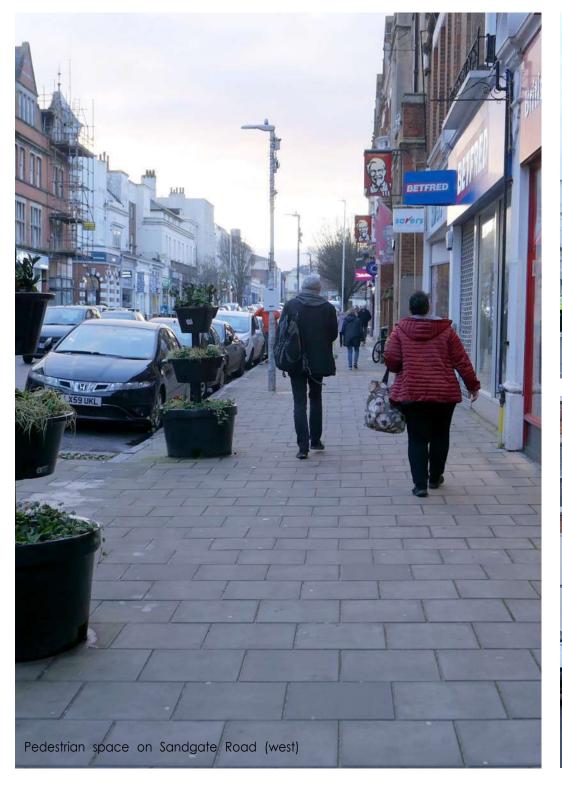
Buildings along the street are characterful dating from Folkestone's Victorian heyday. The street itself is wide with adequate pavement space for pedestrians. When combined with the sometimes grand buildings the overall effect is of a grand avenue. This is undermined to a degree by the dominance of cars, both parked and moving, which block views and movement across the street.

Key challenges

- Sandgate Road (west) is a successful local high street but could perform better to anchor the western end of the town centre
- The street has some quality heritage building stock which is often poorly maintained

What you've said

- Due to lack of/ limited evening offer in the town centre, people are travelling to near-by towns with better offer such as Canterbury
- Traffic is perceived as having a negative impact on pedestrian experience and access to the coast







Actions

Mission 1: Celebrate what's great

1.2 Public realm upgrades & new public spaces: Public realm improvements along Sandgate Rd (West)

Mission 2: Town centre for the Future

- 2.1 Testing new uses within units along Sandgate Rd (west)
- 2.2 Future mixed-use development opportunity: Sainsbury's site
- 2.3 Populate vacant retail units

Mission 3: A place for all voices

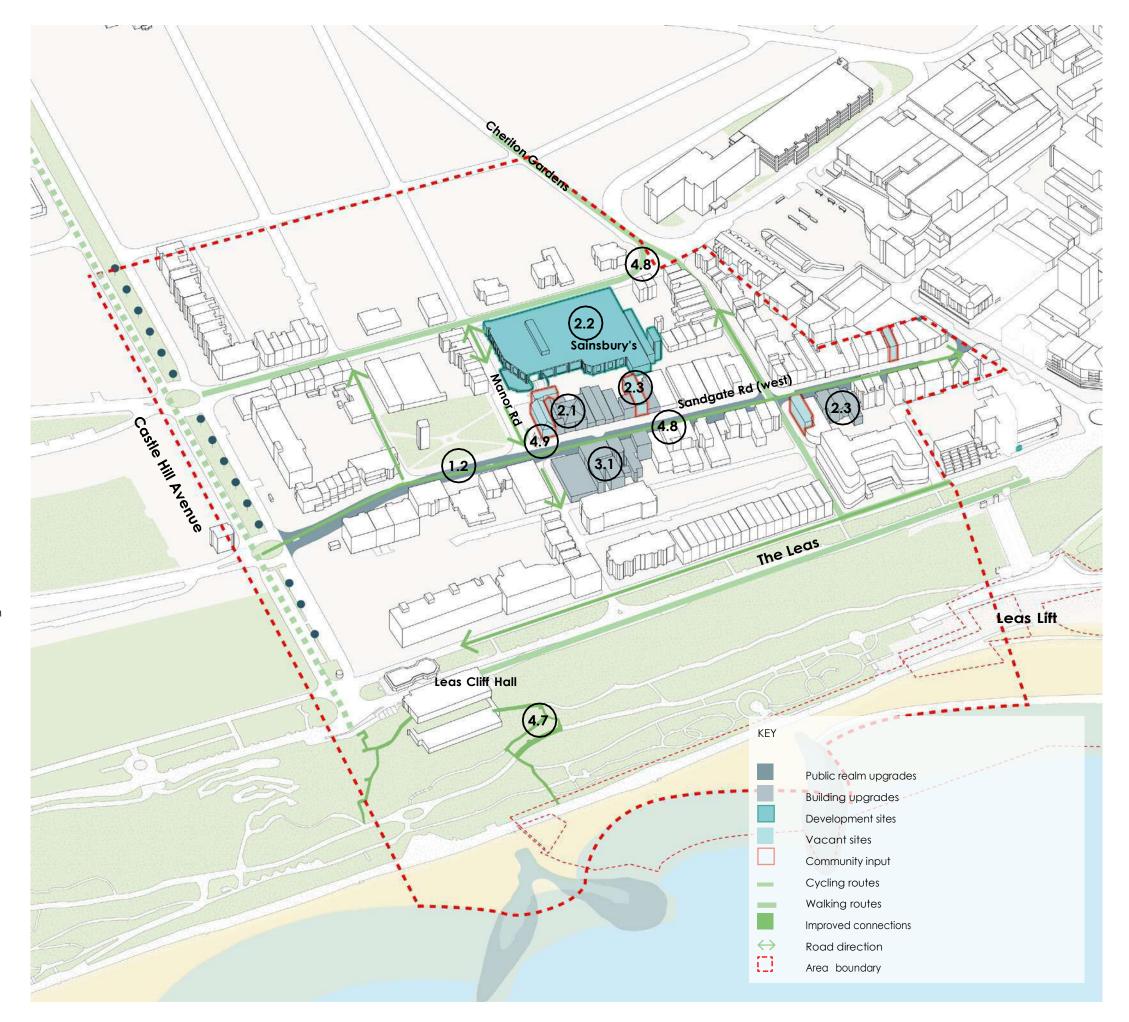
3.1 Community involvement in choosing/testing uses

Mission 4: Moving sustainably

- 4.7 Seamless connection through from the station to the coast: around Leas Cliff Hall
- 4.8 One-way east-bound traffic flow
- 4.9 Improved cycle parking provision

Mission 5: Access to opportunity

- 5.1 Encourage local businesses to set up training programmes to develop business sectors*
- 5.2 Enterprise facilitation & participation programmes with under-served communities*



^{*}Action not spatially located

Sandgate Road (West) design

1.2 Public realm upgrades & new public spaces: Public realm improvements along Sandgate Rd (West)

- One-way eastbound traffic functioning on Sandgate Road West
- Extended footways with parking at footway level
- Increased street-tree planting
- Rain garden SUDs and increase biodiversity through modern 'in bloom'.
- Encourage refurbishment of building frontages both at ground floor and upper floors
- Improved lighting
- Specific consideration given to gender inclusivity in the design of this public space

2.1 Testing new uses within units along Sandgate Road

Encourage landlords and occupiers to test new uses in vacant units

2.2 Future mixed-use development opportunity: Sainsbury's site

- Potential redevelopment of supermarket site if it becomes available, with residential above supermarket podium
- Town house developments
- New public through route with play space

2.3 Populate vacant retail units

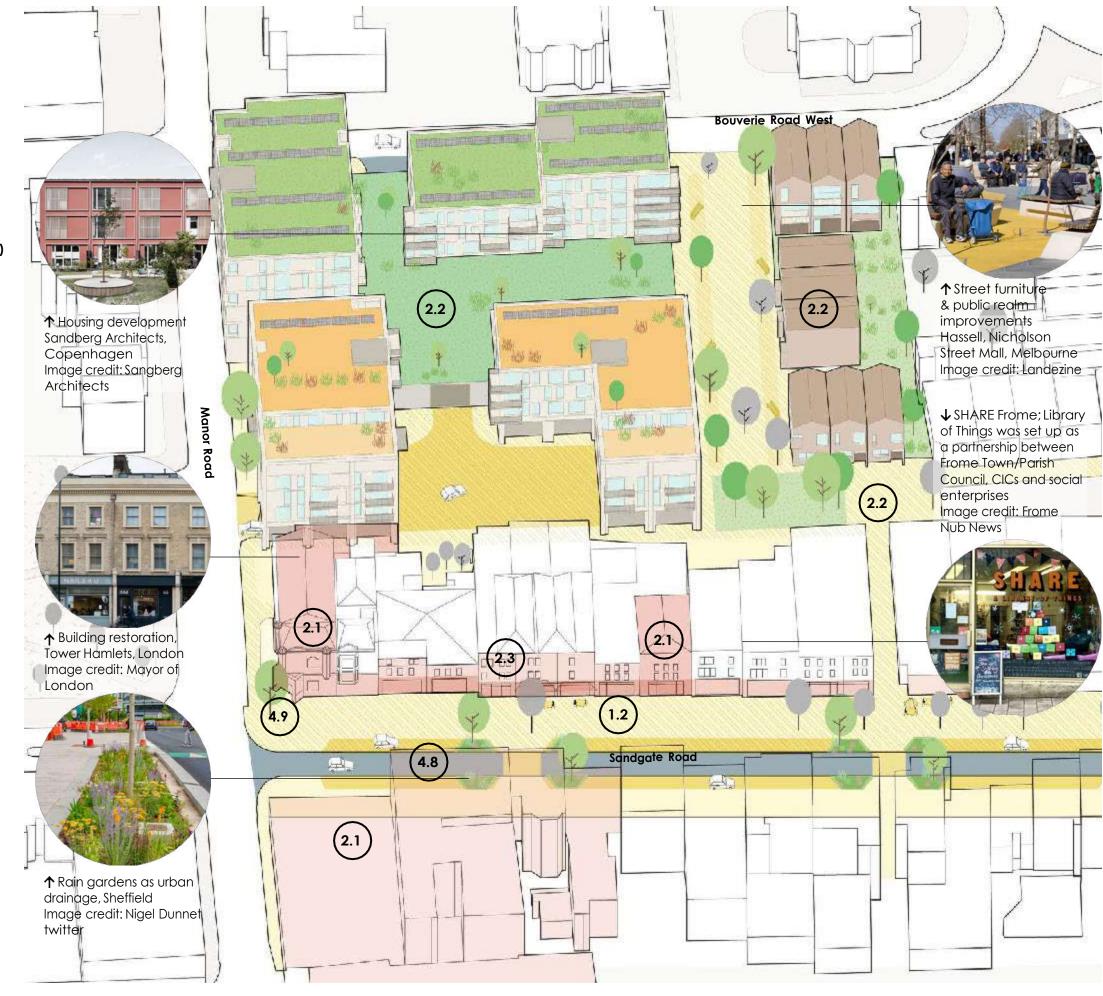
Develop and work with strategies for populating vacant units

3.1 Community involvement in choosing/testing uses

- Set up programmes to work with the community to establish and test new uses, and possible creation of a space similar to the Urban Room Folkestone
- 4.8 One-way east-bound traffic flow

4.9 Improved cycle parking provision

Cycle parking on the high street



ACTIONS: SANDGATE

ROAD (WEST)

Actions matrix

Action	Mission	Scope	Impact	Outcomes	Action owner/ promoter	Priority	Estimated Cost
1.2	1. Celebrate what's great	Public realm upgrades and new public spaces: Public realm improvements along Sandgate Rd (West)	 Folkestone residents feel more positive and optimistic about their town Public realm in the town centre is clean, high quality, inclusive and attractive Heritage assets are refurbished and open for the public to use Will help drive inward investment and attract new development 	 A high street that residents can feel proud of, visitors will want to visit and that anchors the west end of the town centre 	FHDC/ LUF/ FHDC High Street Fund	Medium	Medium (£151,000 - £2m)
2.1	2: Town Centre for the Future	Testing new uses within units along Sandgate Road (West)	 Folkestone has diverse spaces which enable businesses to stay and grow in the town centre New behaviours and practices piloted in the town which can be scaled in the future The town centre offers all social, civic and economic functions that people need day and night will help drive inward investment and attract new development 	A town centre that is resilient to change	FIRRG/ Private landlords and enterprises/ FHDC	High	Low (£0 - £150,000)
2.2	2: Town Centre for the Future	Future mixed-use development opportunity: Sainsbury's site	 The town centre is an attractive and affordable place to live Ensuring net zero emissions on delivery The town centre offers all social, civic and economic functions that people need day and night Potential development opportunity for inward investment 	 A supermarket or commercial uses that are better integrated into the town centre, with additional homes to bring further footfall to the high street 	Sainsburys/ site freeholder	Low	High (£2m+)
2.3	2: Town Centre for the Future	Populate vacant retail units	 Folkestone has diverse spaces which enable businesses to stay and grow in the town centre New behaviours and practices piloted in the town which can be scaled in the future Will help drive inward investment and attract new development 	A lively town centre with diverse uses and activity	FHDC/private landlords & enterprises	High	Low (£0 - £150,000)
3.1	3. A place for all voices	Community involvement in choosing/ testing uses	 Residents actively participate in the town centre and are involved in improving it Residents have a sense of stewardship and belonging to their town There is greater trust between local people and the council Everyone feels welcome in the town centre 	 An engaged local population and a town centre with uses that serve the needs of residents 	FHDC	High	Low (£0 - £150,000)

ACTIONS: SANDGATE

ROAD (WEST)

Actions matrix

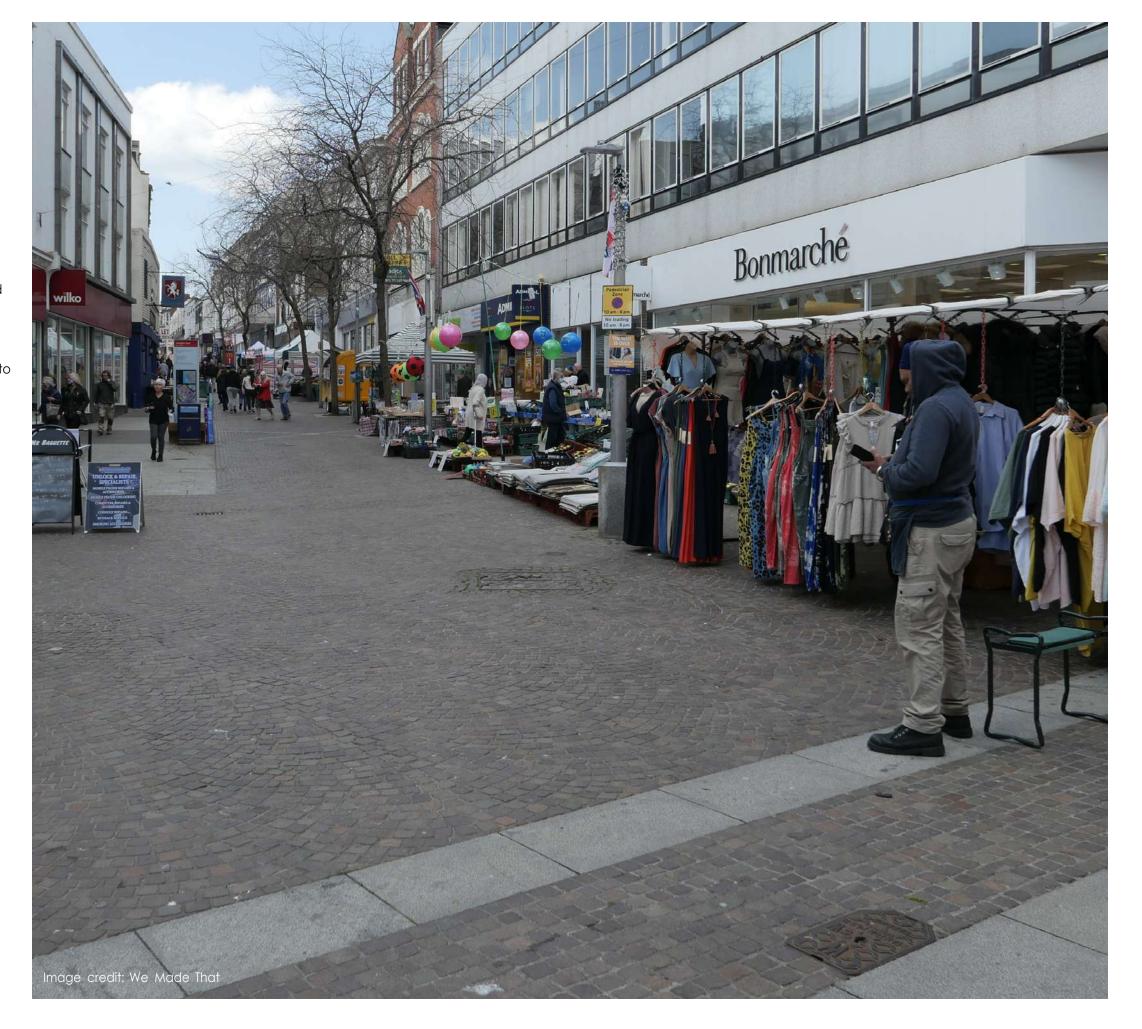
Action	Mission	Scope	Impact	Outcomes	Action owner/ promoter	Priority	Estimated Cost
4.7	4. Moving sustainably	Seamless connection through from the station to the coast: around Leas Cliff Hall	 Residents have good physical and mental health The route from the town centre to the coast is safe, accessible and welcoming Key places are connected by active travel Will help drive inward investment and attract new development 	An accessible pedestrian route from the town centre to the coast	KCC Highways/ FHDC / Leas Cliff Hall	Medium	Medium (£151,000 - £2m)
4.8	4. Moving sustainably	One-way east-bound traffic flow	— The town centre in an attractive place to walk	 Increased pedestrian space and less vehicle traffic 	KCC highways/ FHDC/ LUF	Low	Medium (£151,000 - £2m)
4.9	4. Moving sustainably	Improved cycle parking provision	— The town centre is an attractive place to cycle	 Cycle parking hoops at useful and visible locations that encourage people to cycle 	FHDC/ KCC Highways	High	Low (£0 - £150,000)
5.1	5: Access to opportunity	Encourage local businesses to set up training programmes to develop business sectors	 Residents have the skills and opportunity to participate in the economy Local people are supported to set up businesses in the town centre Young people see the benefits of living and working in Folkestone and want to stay in the town 	 A strengthened local economy with greater employment opportunities 	FIRRG/ Local businesses/ Community Led Local Development funding (CLLD)	High	Low (£0 - £150,000)
5.2	5: Access to opportunity	Enterprise facilitation and participation programmes with deprived communities	 Residents have the skills and opportunity to participate in the economy The Council leads by example on social value 	 Greater aspiration within all parts of the community 	FHDC/ CLLD	High	Low (£0 - £150,000)

6.3
ACTIONS: TOWN
CENTRE CORE

Actions

A number of actions in the Town Centre Core area look to create a vastly improved sequence of arrival spaces from the north. Unpicking the outdated road network will release opportunity for new public spaces, development and an improved bus station and mobility hub.

A second key theme is working to bring new uses into the town centre to bring variety and as a strategy to occupy vacant units. These actions also look to create opportunities for business, enterprise and education. Public realm actions on Sandgate Road, Guildhall Street and in the streets and spaces behind, will support and encourage the rejuvenation of the Town Centre Core area. All this will help drive inward investment.



ACTIONS: TOWN CENTRE CORE

Existing condition

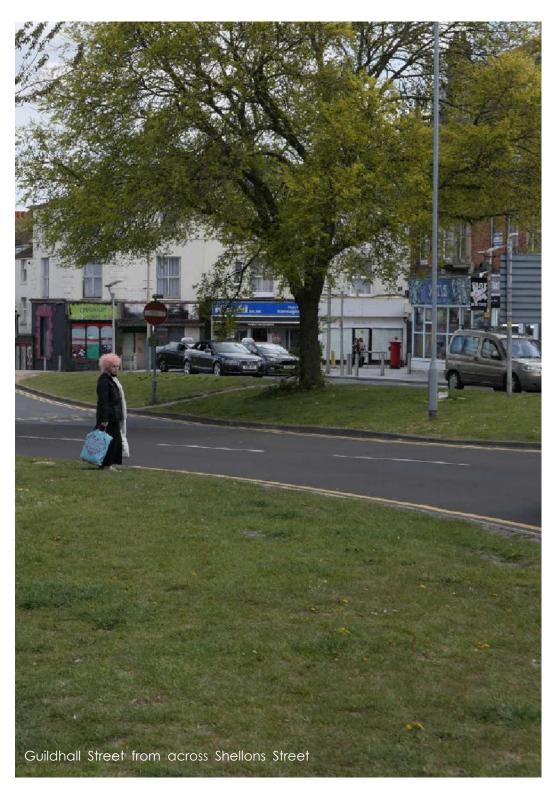
The Town Centre Core area is largely pedestrianised with a focus of activity on Sandgate Road and Guildhall Street. Sandgate Road is designated as Primary Retail Frontage in the Local Plan, and Guildhall St is designated as Secondary Frontage, though both have suffered from evidenced and reported decline over recent years with high levels of vacancy and decreasing footfall both in evidence. Sandgate Road in particular has felt the effects of national retail multiples leaving town centres, with the remaining large floor plates proving difficult to let. Guildhall Street attracts lower footfall than the town centre, though the independent landlords have been able to let out smaller units more easily and the area appears to have weathered the pandemic comparatively well. The eastern end of Sandgate Road meets the older part of the town centre where a café and restaurant scene is developing. Behind Sandgate Road, the domineering Bouverie Place shopping centre remains well used and fully let.

Key challenges

- Middelburg Square, Shellons Street and the bus station form a sequence of hostile, trafficfocused environments that act as a barrier to pedestrian movement to the north of the town centre particularly when approaching from the rail station
- Larger retail spaces on Sandgate Road remain vacant
- Long term decline in footfall and increasing vacancy, reflecting national trends in town centre retail

What you've said

- Diversify town centre uses beyond retail whilst reflecting the needs of the community
- There is a need for low cost spaces for charities
- The town centre should include more green spaces, including safe play areas for children
- There is a mixed reaction about offer and demand when it comes to evening uses
- Providing ongoing support for start-ups and having a range of workspaces available could retain the town's talent post-Covid
- Investment is important to improve the visual appearance of the core town centre area







6.3 ACTIONS: TOWN

CENTRE CORE

Actions

Mission 1: Celebrate what's great

- 1.3 Public realm improvements and crossings along Shellons Street
- 1.4 Upgrades to Guildhall Street and improved market offer
- 1.5 Public realm and greening to Sandgate Road and service areas
- 1.6 Reinstating Bouverie Square as an arrival space and focal point
- 1.7 'Guildhall Square' as a new civic square
- 1.8 New Silver Screen/ Museum/ Town Council signage
- 1.9 External promotion of Folkestone as a place to work and do business*

Mission 2: Town centre for the future

- 2.4 'Town Lab': Folkestone Town Centre as a 'lab' to test new uses, experiment and try new ideas
- 2.5 Relocate FHDC Customer Access Point into town centre
- 2.6 Create/combine/scale a single business network*
- 2.7 FOLCA building re-imagined
- 2.8 Future mixed use development opportunity: Saga Building & NCP Car Park
- 2.9 Future mixed-use development opportunity: Post Office buildings & Store 21
- 2.10 Future mixed-use development opportunity: Larger retail units

Mission 4: Moving sustainably

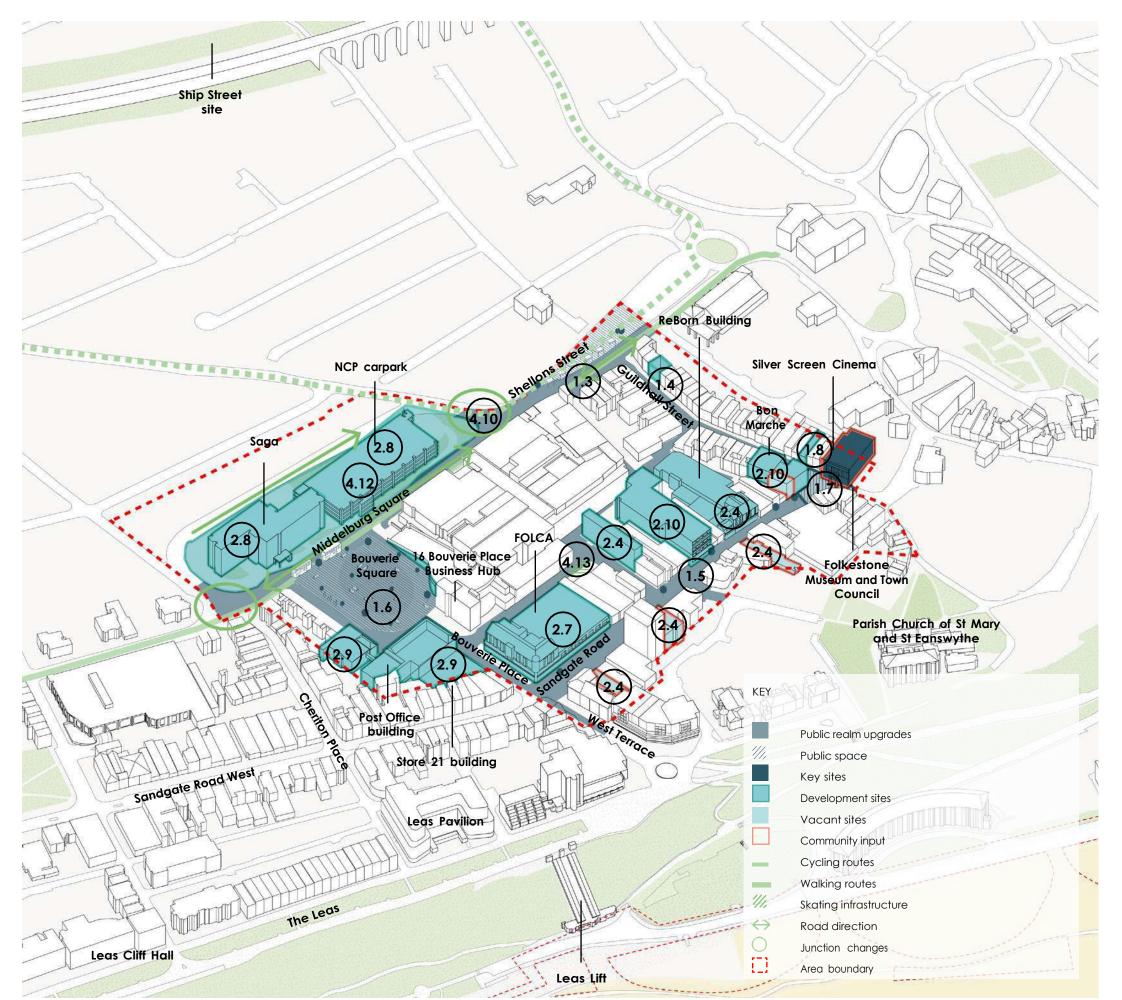
- 4.10 Improved gateway to the town centre including a new bus station layout
- 4.11 Parking review
- 4.12 'Mobility Hub' with cycle hire and storage
- 4.13 Explore options to integrate cycling and skateboarding in the town centre

Mission 5: Access to opportunity

- 5.3 Skills hub: work with educational institutions and businesses*
- 5.4 Create a town centre business launchpad programme*
- 5.5 Explore opportunities for more diverse community ownership of assets*
- 5.6 Review free WiFi and digital provision*

Mission 6: Deliver sustainable quality

- 6.1 Reviews of town centre housing policy and licensing to address poor quality housing*
- 6.2 Market improvement programme*
- 6.3 Place Plan developed to become adopted planning
- 6.4 Town centre design review panel, including community representatives*



^{*}Action not spatially located

6.3 ACTIONS: TOWN CENTRE CORE

Sandgate Road, Guildhall Street and Shellons Street design

1.3 Public realm improvements and crossings along Shellons Street

- Re-align the highway to two-way function
- Remove car park to enabling additional space to be created for pedestrians and potential development

1.4 Upgrades to Guildhall Street and improved market offer

- Market infrastructure (market plots, electricity hook ups)
- Development of empty site
- Upgrade and improved lighting

1.5 Public realm and greening to Sandgate Road and service areas

- Rain gardens and tree planting
- Specific consideration given to gender inclusivity

1.7 'Guildhall Square' as a new civic square

- Public seating and relocated cycle parking
- Specific consideration given to gender inclusivity
- 1.8 New Silver Screen/Museum/Town Council signage and activate rear of the Town hall onto Market Place
- 2.4 'Town Lab': Folkestone Town Centre as a 'lab' to test new uses, experiment and try new ideas
- 2.5 Relocate FHDC Customer Access Point into town centre

2.7 FOLCA building re-imagined

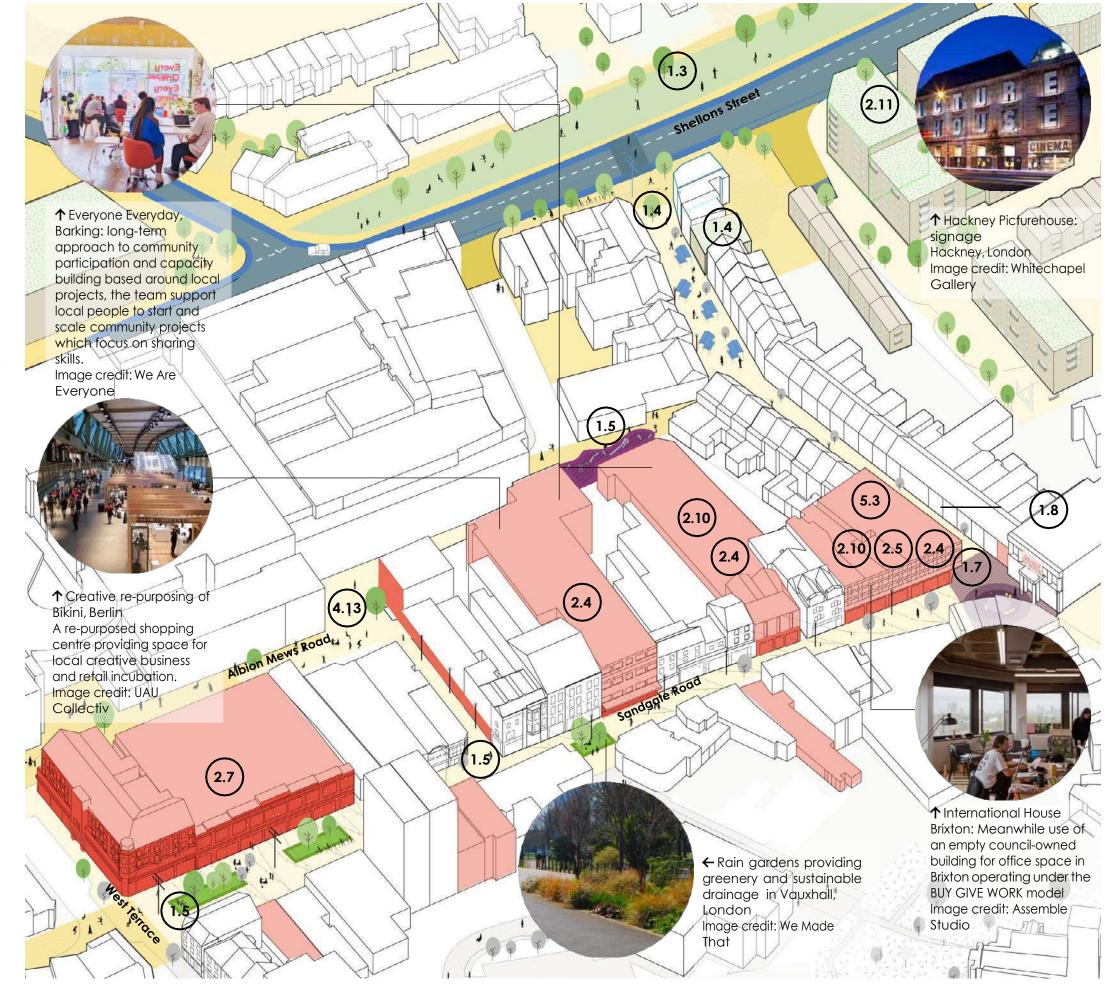
- Short term measures for adaptive reuse and bold signage
- Opening up and stripping back the interior to allow for new uses, including onto Albion Mews Road
- Delivery of state of the art health centre

2.10 Future mixed-use development opportunity: Larger retail units

 New flexible work space to complement developing business hub at Bouverie Place with retail at ground and separate unit facing onto Oxford Terrace

4.13 Explore options to integrate cycling and skateboarding in the town centre

Small scale provision to activate back spaces



6.3

ACTIONS: TOWN CENTRE CORE

Shellons Street design

Remodelling of Shellons Street improves public realm and releases sites for comprehensive redevelopment providing new residential space in the town centre and active ground floor uses.

- Prominent gateway site at entry to town centre
- Potential for residential-led mixed use development with active ground floor uses
- Improved public realm along Shellons Street and Guildhall Street and scaled-down two-way roads
- Highways engineering releases development sites for new homes and active ground floor uses
- Lidl site and Pay+Display car park can be brought forward in phases
- A podium block on the Lidl site can retain a food retailer, however, edges need to be activated to create a positive relationship with new public realm





6.3 ACTIONS: TOWN CENTRE CORE

Bouverie Square and Middelburg Square design

1.6 Reinstating Bouverie Square as an arrival space and focal point

- Relocate bus station along Middelburg Square
- Reconfigure carriageway through the square to improve setting
- Introduce rain gardens, SUDs, greenery and trees
- Re-purpose bus station building as café
- New 'pavilion' building opportunity to frame the eastern side of the square
- Improve pedestrian space along Bouverie Place
- Informal play space
- Explore new uses in the Post Office Building
- Changing Places Public Toilet in the former bus station building
- Specific consideration given to gender inclusivity in the design of this public space

2.8 Future mixed use development opportunity: Saga Building & NCP Car Park

2.9 Future mixed-use development opportunity: Post Office buildings & Store 21

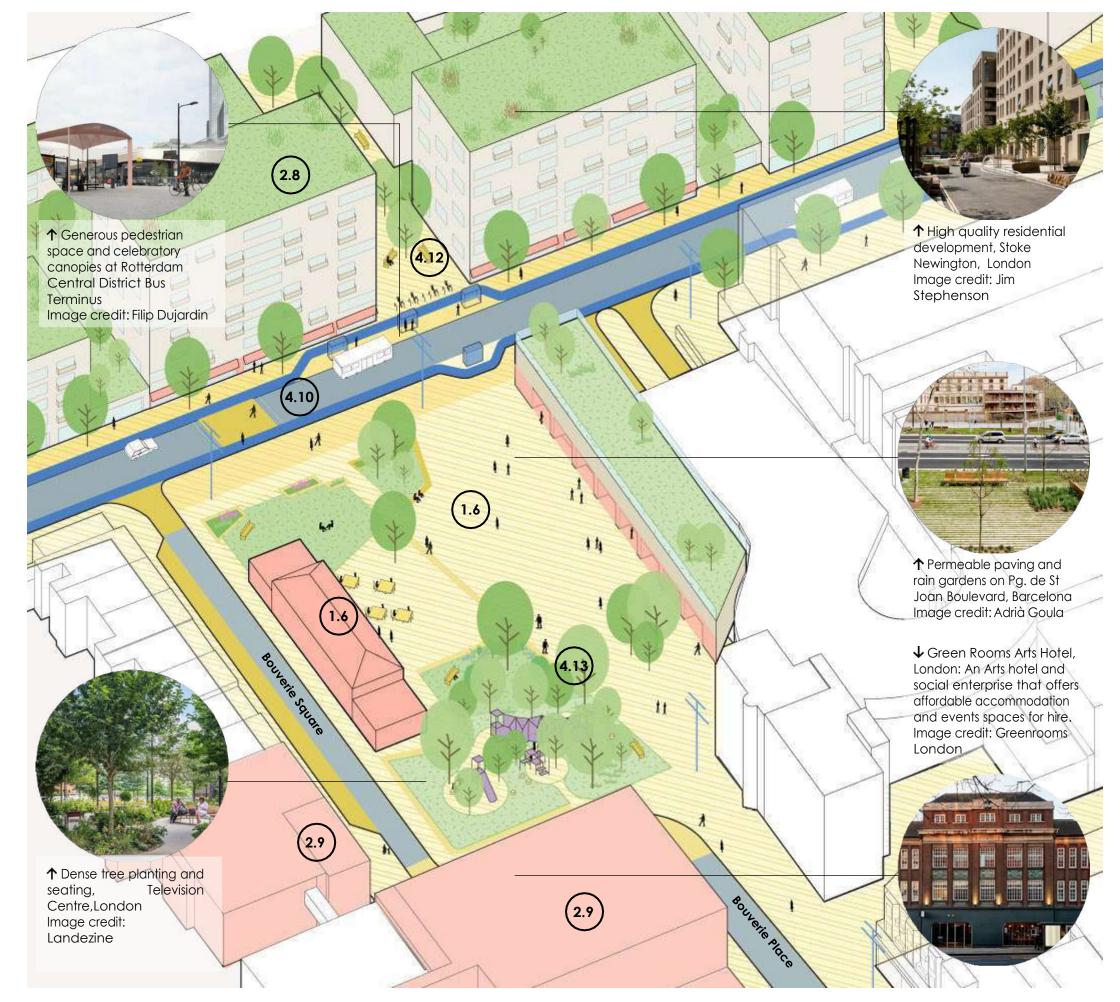
4.10 Improved gateway to the town centre including a new bus station layout

- Reintroduce two-way traffic on Middelburg Square and Shellons Street
- Refurbishment or redevelopment of the Saga building site and NCP car-park
- Relocate bus station along Middelburg Square
- Segregated cycle paths along Middelburg Square
- New pedestrian crossings across Middelburg
- New trees along Middelburg Square

4.12 'Mobility Hub' with cycle hire and storage

- Located either in the NCP car-park or as part of a new development of the site
- Shared cars and (cargo) bikes, information kiosk, a smart locker, a charging point for electric vehicles

4.13 Explore options to integrate cycling and skateboarding in the town centre (including skateable landscaping)



6.3
ACTIONS: TOWN
CENTRE CORE

Bouverie Square and Middleburgh Square design

Bouverie Square, the current location of the bus station, could return to its former use as a key green public space to serve the town centre. The bus station would be relocated along Middelburg Square which will be returned to two-way traffic function. The Middelburg Square sites could be redeveloped or re-purposed with commercial space at the ground floor and residential or works space above.

In this vision, a new pavilion type building frames the eastern edge of the square providing space for commercial activity to activate the space. The bus station building is re-purposed as a café focus for the square. The open space accommodates gardens, play space, public seating and cycle parking.

The significant development opportunities in this area offer the potential to appropriately respond to the town centre's heritage, supporting Bouverie Square in creating a high-quality, locally distinctive sense of place.



Page 181

CENTRE CORE

6.3

Middelburg Square design: adaptive reuse

The Saga building has the capacity to provide muchneeded high-quality workspace and amenity for the wider neighbourhood. Refurbishment of the Saga building enables swift access to market and reduces carbon impact. A rebranding could capitalise on the distinctive architecture. The NCP park is in a good location to become a multi-modal mobility hub.

Key interventions to Saga building:

- a new entrance and open ground floor with informal reception, café and workspace
- active uses at ground level
- removal of brick walls and other boundaries to create a landscaped interface and opportunity for ground floor uses to spill out into public realm
- refurbishment of office floors to create high quality office space
- introduction of roof terraces to provide shared amenity and increase greening
- end-of-journey facilities to promote active travel
- upgrades to mechanical, electrical and plumbing equipment to improve energy performance



CENTRE CORE

Action	Mission	Scope	Impact	Outcomes	Action owner/ promoter	Priority	Estimated Cost
1.3	1. Celebrate what's great	Public realm improvements and crossings along Shellons Street	 The town centre is an attractive place to walk and cycle The route from the station to the town centre is safe, accessible and welcoming Will help drive inward investment and attract new development 	 A generous and welcoming public space marking the entrancing into the town centre through Guildhall Street 	KCC Highways/ FHDC/ LUF	High	High (£2m+)
1.4	1. Celebrate what's great	Upgrades to Guildhall Street and improved market offer	 Folkestone residents feel more positive and optimistic about their town Public realm in the town centre is clean, high quality, inclusive and attractive Will help drive inward investment and attract new development 	 Guildhall Street becomes a thriving high street with a busy food market that supports other uses along the street, to enable delivery of improved and new market offer 	FHDC	Medium	Medium (£151,000 - £2m)
1.5	1. Celebrate what's great	Public realm and greening to Sandgate Road & service areas	 Folkestone residents feel more positive and optimistic about their town Public realm in the town centre is clean, high quality, inclusive and attractive Folkestone has a positive external reputation Will help drive inward investment and attract new development 	Greenery softens and brings visual interest to the town centre as well as providing sustainable drainage to reduce flooding	FHDC	High	High (£2m+)
1.6	1. Celebrate what's great	Reinstating Bouverie Square as a key arrival space and focal point	 Folkestone residents feel more positive and optimistic about their town Folkestone has a positive external reputation Attracts inward investment Will help drive inward investment and attract new development 	 Folkestone Town Centre gains a new green space at its heart that acts as a welcoming arrival space and provides green amenity, play provision and a place to dwell 	Stagecoach/ Radnor Estate/ FHDC/ LUF	High	High (£2m+)
1.7	1. Celebrate what's great	'Guildhall Square' as a new civic square	 Heritage assets are refurbished and open for the public to use Folkestone residents feel more positive and optimistic about their town 	 The Town Hall, Museum and Cinema gain an improved setting for greater visibility 	FHDC/ FTC	High	Medium (£151,000 - £2m)
1.8	1. Celebrate what's great	New Silver Screen/Museum/Town Council signage and activate rear of the Town hall onto Market Place	 Heritage assets are refurbished and open for the public to us Folkestone residents feel more positive and optimistic about their town 	 Uses within the Town Hall building gain greater visibility in the town 	FTC	High	Low (£0 - £150,000)
1.9	1. Celebrate what's great	External promotion of Folkestone as a place to work and do business	 Folkestone is known as a good place to work and do business Folkestone has a positive external reputation Will help drive inward investment and attract new development 	 Folkestone's economy develops creating further employment opportunities for local communities 	FHDC/ FHDC Place Brand	High	Low (£0 - £150,000)

Action	Mission	Scope	Impact	Outcomes	Action owner/ promoter	Priority	Estimated Cost
2.4	2: Town Centre for the Future	'Town Lab': Folkestone Town Centre as a 'lab' to test new uses, experiment and try new ideas	 Folkestone has diverse spaces which enable businesses to stay and grow in the town centre New behaviours and practices piloted in the town which can be scaled in the future The town centre offers all social, civic and economic functions that people need day and night Will help drive inward investment and attract new development 	 Town centre uses diversify beyond retail creating a new function and purpose for the high street and new uses for vacant sites 	FHDC and landlords	High	Low (£0 - £150,000)
2.5	2: Town Centre for the Future	Relocate FHDC Customer Access Point into Town Centre	 New behaviours and practices piloted in the town which can be scaled in the future The town centre offers all social, civic and economic functions that people need day and night 	 The local authority has a presence the heart of the town, occupying potentially vacant space and bringing footfall to the high street 	FHDC	High	Medium (£151,000 - £2m)
2.6	2: Town Centre for the Future	Create/combine/scale a single business network	 Folkestone has diverse spaces which enable businesses to stay and grow in the town centre New behaviours and practices piloted in the town which can be scaled in the future 	 Existing networks come together to collaborate and develop a shared approach to developing the economy of Folkestone Town Centre 	FHDC/Creative Folkestone/ FIRRG/ local businesses	Low	Low (£0 - £150,000)
2.7	2: Town Centre for the Future	FOLCA building re-imagined	 Folkestone residents feel more positive and optimistic about their town Folkestone is known as a good place to work and do business Heritage assets are refurbished and open for the public to use Ensuring net zero carbon emissions on delivery Folkestone has a positive external reputation Will help drive inward investment and attract new development 	A cluster of new uses anchors the western end of the pedestrianised high street in a well-loved building	FHDC/ Developers	High	High (£2m+)
2.8	2: Town Centre for the Future	Future mixed use development opportunity: Saga Building & NCP Car Park	 Folkestone has diverse spaces which enable businesses to stay and grow in the town centre Ensuring net zero carbon emissions on delivery New behaviours and practices piloted in the town which can be scaled in the future Inward investment and development opportunity will help bring forward other initiatives (action 4.10) 	 Remodelled or refurbished buildings bring new uses and create active frontages onto Middelburg Square alongside a reconfigured roads 	Landowners/ developers	Short	High (£2m+)

Action	Mission	Scope	Impact	Outcomes	Action owner/ promoter	Priority	Estimated Cost
2.9	2: Town Centre for the Future	Future mixed-use development opportunity: Post Office buildings & Store 21	 Folkestone has diverse spaces which enable businesses to stay and grow in the town centre ensuring net zero emissions New behaviours and practices piloted in the town which can be scaled in the future Will help drive further inward investment and attract new development 	New uses activate Bouverie Square and Bouverie Place and bring footfall to the town centre	Post Office/ commercial Landlord	Long	High (£2m+)
2.10	2: Town Centre for the Future	Future mixed-use development opportunity: Larger retail units	 Folkestone has diverse spaces which enable businesses to stay and grow in the town centre Will help drive further inward investment and attract new development 	 Town centre uses diversify beyond retail creating a new function and purpose for the high street and new uses for vacant sites 	Commercial landlords	Medium	Medium (£151,000 - £2m)
4.10	4. Moving sustainably	Improved gateway to the town centre including a new bus station layout	 Key places are connected by active travel More people use public transport to get around and fewer use private cars Air pollution is reduced, and air quality is improved Will help drive inward investment and attract new development 	 Streets at the northern edge of the town centre become welcoming for pedestrians and cyclist and an improved transport hub frees up Bouverie Square to become a new green space for the town centre 	KCC Highways/ FHDC/ Stagecoach/ LUF	High	High (£2m+)
4.11	4. Moving sustainably	Parking review	The town centre is an attractive place to walk and cycle	 Parking spaces can be consolidated to a small number of central locations that reduce car usage in town centre streets. 	FHDC	Short	Low (£0 - £150,000)
4.12	4. Moving sustainably	'Mobility Hub' with cycle hire & storage	 More people use public transport and active travel modes to get around and fewer use private cars 	 More options for active and sustainable travel are made available to residents and visitors 	FHDC/NCP/ Cycling UK	High	Medium (£151,000 - £2m)
4.13	4. Moving sustainably	Explore options to integrate cycling and skateboarding in the Town Centre	 Residents have good physical and mental health 	 Folkestone becomes known for its distinct skateboarding offer drawing in visitors and investment 	KCC Highways/ FHDC/Shepway Sports Trust	Medium	Medium (£151,000 - £2m)
5.3	5: Access to opportunity	Skills hub: work with educational institutions & businesses	 Residents have the skills and opportunity to participate in the economy The Council leads by example on social value Young people see the benefits of living and working in Folkestone and want to stay in the town 	Greater aspiration within all parts of the community	FHDC/ Folkestone College/The Cube	Long	Low (£0 - £150,000)

CENTRE CORE

Actions matrix

Action	Mission	Scope	Impact	Outcomes	Action owner/ promoter	Priority	Estimated Cost
5.4	5: Access to opportunity	Create a Town Centre business launchpad programme	 Local people are supported to set up businesses in the town centre Local businesses can access contracts and opportunities in the town Will help drive inward investment and attract new development 	 A strengthened local economy with greater employment opportunities 	FTC/FHDC	Medium	Low (£0 - £150,000)
5.5	5: Access to opportunity	Explore opportunities for more diverse community ownership of local assets	 Residents have the opportunity to participate in the economy Local people are supported to set up businesses in the town centre The Council leads by example on social value 	Greater aspiration within all parts of the community	Local communities/ FTC/FHDC	Low	Low (£0 - £150,000)
5.6	5: Access to opportunity	Review free WiFi and digital provision	 Residents have the opportunity to participate in the economy The Council leads by example on social value 	 Folkestone's outward reputation as a forward thinking place to live, work and do business improves 	FTC/FHDC/KCC	Medium	Low (£0 - £150,000)
6.1	6: Deliver sustainable quality	Reviews of Town Centre housing policy and licensing to address poor quality housing	 New and existing homes in the town centre are safe and high quality 	 Low quality housing is eradicated and social well-being is increased 	FHDC	Medium	Low (£0 - £150,000)
6.2	6: Deliver sustainable quality	Market improvement programme	 Council works collaboratively with partners to deliver on the place plan and attract investment Activates pedestrianised space for general market and artisan/seasonal markets 	 Footfall and spend at markets increases, benefiting other business and activating the town centre, and high quality market offer will support additional traders to town centre 	FTC/FHDC	High	Low (£0 - £150,000)
6.3	6: Deliver sustainable quality	Place Plan developed to become adopted planning policy	 All new developments in the town centre are sustainable and high quality Ensuring design is net zero – reusing assets and property where possible Heritage assets are refurbished and open for the public to use 	The Place Plan has increased status to help officers influence change in the town centre	FHDC	Medium	Low (£0 - £150,000)
6.4	6: Deliver sustainable quality	Town Centre design review panel, including community representatives	 All new developments in the town centre are sustainable and high quality New and existing homes in the town centre are safe and high quality Local people have influence in future developments Council works collaboratively with partners to deliver on the place plan and attract investment Ensuring design is net zero – reusing assets and property where possible 	Increased collaboration on development in the town centre by experts and the local community	FHDC	Medium	Low (£0 - £150,000)

Page 185

6.4 ACTIONS: CREATIVE QUARTER AREA

Actions

Actions seek to remodel the transport network to both create more legible routes for vehicles as well as better spaces and connections for pedestrians. The actions also propose to activate edges of Payers Park which will improve perceptions of the park and make the mix of uses in the area more visible, and to invest in and improve social provisions such as the Shepway Youth Hub and The Cube adult education centre.



6.4 ACTIONS: CREATIVE

QUARTER AREA

Existing condition

The Creative Quarter area is focussed around The Old High Street but also encompasses links up to Shellons Street and to F51. The effect of The Creative Quarter's regeneration of The Old High Street is beginning to be felt more widely in places like Rendezvous Street and Market Place. Payers Park which lies just behind The Old High Street is a charming green space with views across the valley, but is currently surrounded by the rear of buildings which means it is easily forgotten. Because of its location it forms an underutilised connecting space between a number of parts of the town.

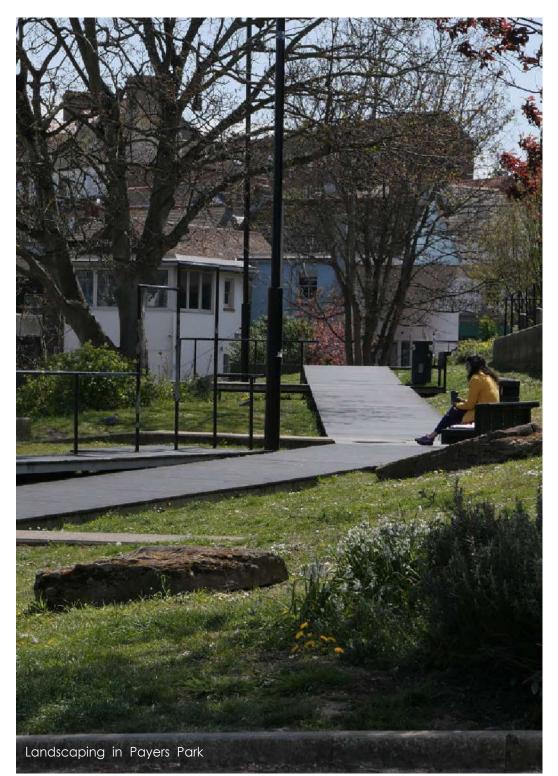
F51 will be a significant destination and landmark in the town when it opens. The area surrounding it, to the north of the Creative Quarter, is dominated byoneway two lane roads with very little pedestrian space. Combined with the steep topography the area presents a significant barrier to pedestrian movement and opportunity should be found to improve this and maximise the potential of F51 in this part of town centre.

Key challenges

- Steep topography and one-way road networks mean the wealth of activities and assets in the area are poorly connected
- Payers Park could be better activated by surrounding uses

What you've said

- The adult education offer is seen as insufficient
- Lack of adequate lighting makes certain areas feel unsafe
- The Creative Quarter is doing well and provides a strong offer to attract businesses
- Room for improvement includes variety of offer, cleanliness and safety (Tontine Street and Payers Park in particular)
- Some residents are concerned about night time uses
- Access through Payers Park is difficult as the gradient is steep
- Many students feel as though the Creative Quarter is inaccessible







6.4 **ACTIONS: CREATIVE** QUARTER AREA

Actions

Mission 1: Celebrate what's great

- 1.10 Public realm upgrades: The Cube, F51 and Payers Park
- 1.11 Build on and expand social initiatives*
- 1.12 Public art programmes in the Creative Quarter

Mission 2: Town centre for the Future

- 2.11 Future mixed-use development opportunity: LIDL site
- 2.12 Licensing policy review along with a set of principles for the evening economy to direct what it looks like and what it needs to achieve: Programme of evening events to test new uses and operating hours
- 2.13 Hub of potential uses around Payers Park

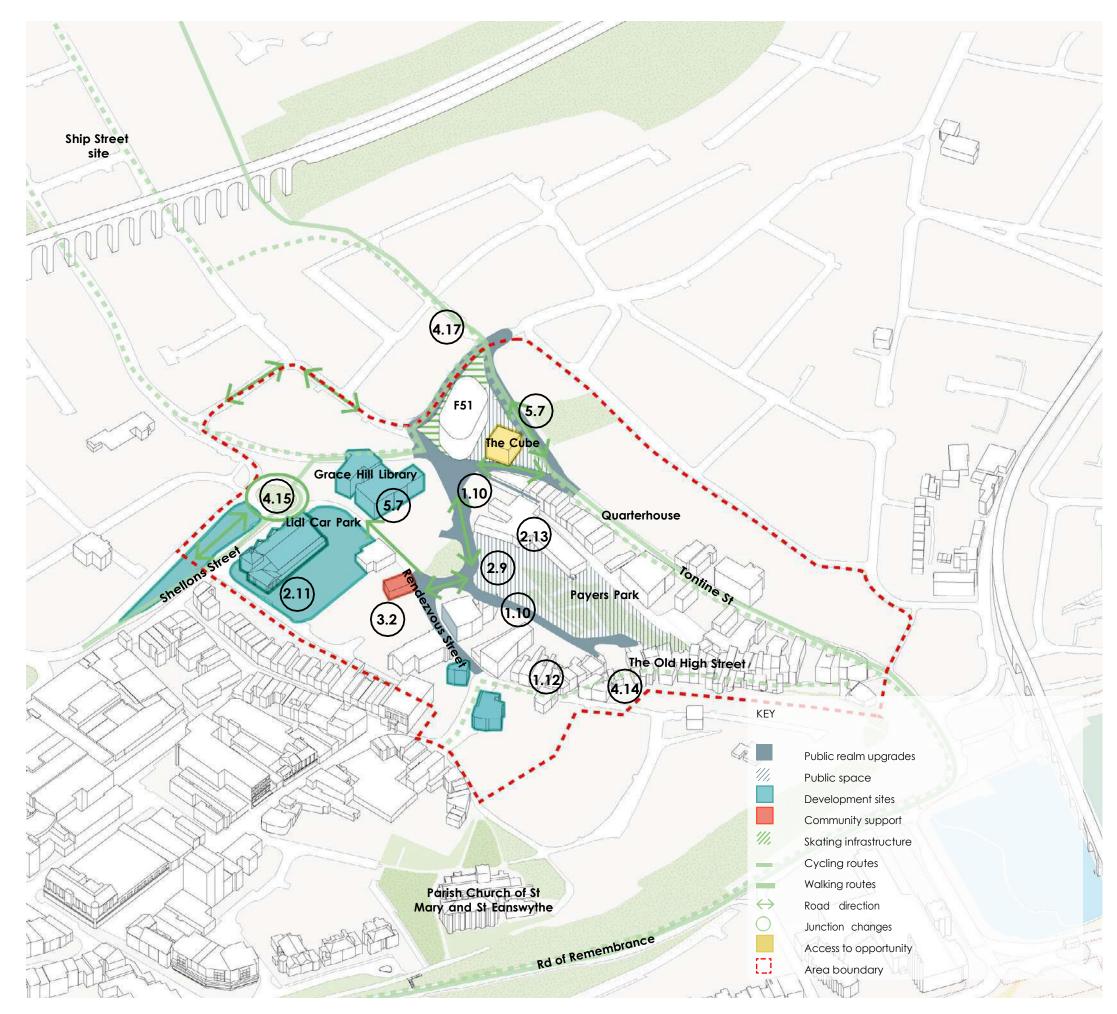
Mission 3: A place for all voices
3.2 Support Shepway Youth Hub with larger spaces

Mission 4: Moving sustainably

- 4.14 Localised improvement of lanes and paths in historic
- 4.15 Redesign of road layout to improve all modes of travel and movement
- 4.16 Embracing of future transport technologies: 'on demand' public transport for off-peak times to support evening and night time uses
- 4.17 Promote 'leisure loop' and other active routes as circuits around wider area

Mission 5: Access to opportunity

- 5.7 Expand on the offer of The Cube adult education centre and Grace Hill Library
- 5.8 Continuation of the Folkestone Community Works programme



^{*} Action not spatially located

6.4 ACTIONS: CREATIVE QUARTER AREA

Payers Park and F51 environs design

1.10 Public realm upgrades: The Cube, F51 and Payers Park

- Close section of Dover Road and create new public space
- Improve footways and extend footways where possible, particularly across vehicle entrances
- Reclaim underutilised parking space in Payers Park as new green space
- Improve paving on Payers Park (road) for pedestrians
- Improve lighting, particularly through the park
- Specific consideration given to gender inclusivity in the design of this public space

2.13 Hub of potential uses around Payers Park

- Reconfigure The Glassworks to better address the park
- Encourage businesses on Tontine Street and The Old High Street/Rendezvous Street to open up onto Payers Park
- Opportunity for small scale development to provide positive frontage onto Payers Park

3.4 Support Shepway Youth Hub with larger spaces

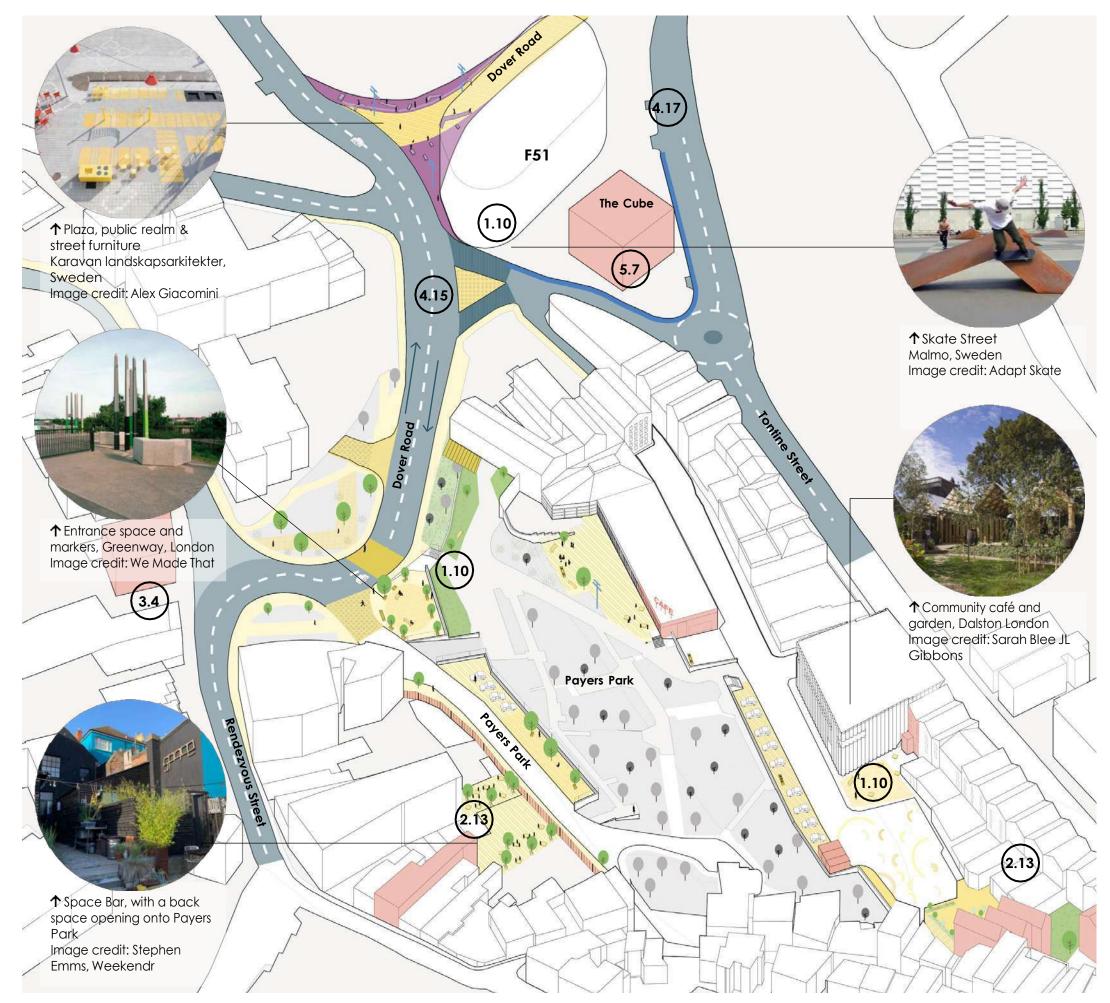
Allocate space in any redevelopment of the Lidl site

4.15 Redesign of road layout to improve all modes of travel and movement

- Two-way direction on Dover Road
- Closure of section of Dover Road in front of F51
- Allow all traffic to travel south into Tontine Street
- Introduce a pedestrian crossing on Dover Road

4.17 Promote 'leisure loop' and other active routes as circuits around wider area

- Wayfinding finger posts or ground plaques to mark out routes
- 5.7 Expand on the offer of The Cube adult education centre and Grace Hill Library



ACTIONS: CREATIVE

QUARTER AREA

Action	Mission	Scope	Impact	Outcomes	Action owner/ promoter	Priority	Estimated Cost
1.10	1. Celebrate what's great	Public realm upgrades: The Cube, F51, and Payers Park	 Folkestone residents feel more positive and optimistic about their town Public realm in the town centre is clean, high quality, inclusive and attractive Folkestone has a positive external reputation 	 Important assets are better connected to the town centre and gain better settings and visibility 	Creative Folkestone/ FHDC/KCC Highways/ LUF	High	High (£2m+)
1.11	Celebrate what's great	Build on and expand social initiatives	 Folkestone residents feel more positive and optimistic about their town 	 Residents have increase access to initiatives 	KCC/FHDC/ Shepway Sport Trust/	High	Low (£0 - £150,000)
1.12	Celebrate what's great	Public art programmes in the Creative Quarter	— Folkestone has a positive external reputation	 Creating moments of interest through the area and a celebration of local and international talent 	Creative Folkestone/ FHDC/ Landowners and tenants	Medium	Low (£0 - £150,000)
2.11	2: Town Centre for the Future	Future mixed-use development opportunity: LIDL site	 An opportunity for development and inward investment The town centre is an attractive and affordable place to live The town centre offers all social, civic and economic functions that people need day and night Ensuring net zero carbon emissions on delivery 	New homes and better integration into the town centre	Landowner/ FHDC	Low	High (£2m+)
2.12	2: Town Centre for the Future	Licensing policy review along with a set of principles for the evening economy to direct what it looks like and what it needs to achieve: Programme of evening events to test new uses & operating hours	 The town centre offers all social, civic and economic functions that people need day and night 	 The town centre becomes activated into the evening and perceptions of safely are improved 	FHDC	High	Low (£0 - £150,000)
2.13	2: Town Centre for the Future	Hub of potential uses around Payers Park	 Folkestone has diverse spaces which enable businesses to stay and grow in the town centre The town centre offers all social, civic and economic functions that people need day and night 	 Payers Park becomes better used and perceptions of safety are improved 	Creative Folkestone/ FHDC/ freeholders of adjacent businesses	High	Medium (£151,000 - £2m)

6.4

ACTIONS: CREATIVE

QUARTER AREA

Action	Mission	Scope	Impact	Outcomes	Action owner/ promoter	Priority	Estimated Cost
3.2	3: A place for all voices	Support Shepway Youth Hub with larger spaces	 Residents actively participate in the town centre and are involved in improving it Residents have a sense of stewardship and belonging to their town Communities are socially integrated and support each other There is greater trust between local people and the council 	Young people have more space to learn, play, spend time and meet other people	KCC	Medium	Medium (£151,000 - £2m)
4.14	4. Moving sustainably	Localised improvement of lanes and paths in historic core	 The town centre is an attractive place to walk and cycle Residents have good physical and mental health Key places are connected by active travel 	 Increased visibility and accessibility to the historic part of the town 	KCC Highways/ FHDC	Medium	Medium (£151,000 - £2m)
4.15	4. Moving sustainably	Redesign of road layout to improve all modes of travel and movement	 The town centre is an attractive place to walk and cycle Key places are connected by active travel Air pollution is reduced, and air quality is improved 	 The road network is easier to navigate for all modes of movement, and space is freed up for improved pedestrian space and cycling 	Creative Folkestone/ FHDC/ KCC highways/ LUF	High	High (£2m+)
4.16	4. Moving sustainably	Embracing of future transport technologies: 'on demand' public transport for off-peak times to support evening and night time uses	 The town centre is accessible throughout the day and night More people use public transport to get around and fewer use private cars 	 Residents and visitors have better access to the town centre throughout the day and evening 	Stagecoach/ FHDC	Medium	High (£2m+)
4.17	4. Moving sustainably	Promote 'leisure loop' and other active routes as circuits around wider area	 The town centre is an attractive place to walk and cycle Key places are connected by active travel 	 Increased awareness of Folkestone's many assets 	Folkestone Town Council/ Folkestone Museum/ FHDC/Creative Folkestone	High	Low (£0 - £150,000)

ACTIONS: CREATIVE

QUARTER AREA

Action	Mission	Scope	Impact	Outcomes	Action owner/ promoter	Priority	Estimated Cost
5.7	5: Access to opportunity	Expand on the offer of The Cube adult education centre and Grace Hill Library	 Residents have the skills and opportunity to participate in the economy Local people are supported to set up businesses in the town centre The Council leads by example on social value 	 Increased access to these valuable social and educational services and increase use of Grace Hill Library 	Kent Adult Education	Medium	Low (£0 - £150,000)
5.8	5: Access to opportunity	Continuation of the Folkestone Community Works programme	 Residents have the skills and opportunity to participate in the economy Local people are supported to set up businesses in the town centre The Council leads by example on social value Local businesses can access contracts and opportunities in the town Young people see the benefits of living and working in Folkestone and want to stay in the town 	 Helping people into work, supporting local businesses including provision of business space, improve access to services for businesses and residents 	FHDC	High	Low (£0 - £150,000)

6.5 ACTIONS: COASTAL AREA & HERITAGE QUARTER

Actions

Actions aim to improve connections between the important parts of the area: the coast, the heritage quarter, the Parish Church of St Mary & St Eanswythe, as well as the town centre, The Leas and The Lower Leas Coastal Park. A key set of actions is create a set piece moment in the town scape around the War Memorial Statue which sits at the fulcrum of The Leas, The Road of Remembrance and West Terrace connecting to Bouverie Square.



ACTIONS: COASTAL AREA & HERITAGE QUARTER

Existing condition

The coastal area and Heritage Quarter are currently divided by the steep level change between the town centre and the coast. The Road of Remembrance forms the main point of connection traversing this level difference, but as a narrow road with a very narrow footway, this actually creates added severance for pedestrians.

The Heritage Quarter sits between Sandgate Road and the coast, but is easily missed with little visual clues to draw in passers by. The Parish Church of St Mary and St Eanswythe is steeped in history with the probable remains of Saint Eanswythe buried on site. A set of steep steps from The Parade is the only usable connection to the harbour from this area.

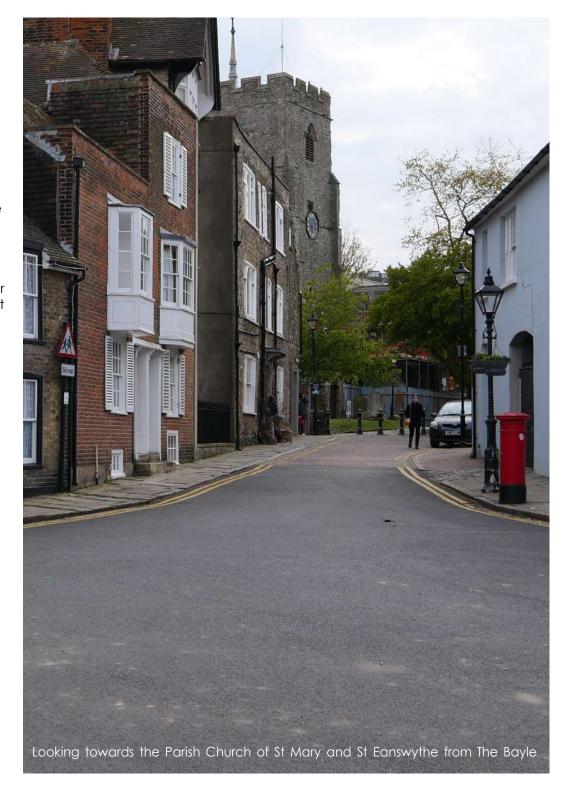
At the western end of the Heritage Quarter is the War Memorial Statue, currently situated on a roundabout at the junction of the Leas, West Parade and The Road of Remembrance. With the eastern end of the Leas promenade, the top of the Leas Lift very close, and the axial link to Bouverie Square, this location could be a much more significant fulcrum in Folkestone's townscape.

Key challenges

- Despite their proximity, the coast and the heritage quarter are very poorly connected
- The War Memorial Statue and remembrance features are under-celebrated by their context and public realm
- Parish Church of St Mary and St Eanswythe and the heritage quarter are not visible in the town

What you've said

- Desire to recognise the Parish Church of St. Mary and St. Eanswythe as one of Folkestone's key assets and site of pilgrimage
- Request for a Conservation Area Appraisal and focused heritage strategy
- Concerns over the impact of evening and night time uses on residents
- The War Memorial is an important feature and must be treated with the utmost respect in any proposals in this area. It should not be relocated







6.5 ACTIONS: COASTAL AREA & HERITAGE QUARTER

Actions

Mission 1: Celebrate what's great

1.13 Public realm upgrades to Road of Remembrance 1.14 Improvements to area around War Memorial

- 1.15 Improved connections and better visibility of the Parish Church of St. Mary and St. Eanswythe
- 1.16 Heritage renewal in-line with the Heritage Strategy

Mission 2: Town centre for the Future

- 2.14 Aspen House and Westcliff House facade improvements
- 2.15 Future mixed use development opportunity: Iceland site
- 2.16 Explore opportunities for development of car-park site

Mission 4: Moving sustainably

- 4.15 Redesign of road layout to improve all modes of travel and movement
- 4.18 Seamless connection through from the station to the coast and between the coast and Heritage Quarter
- 4.19 Reinstate the Leas Lift
- 4.20 Provide vertical transport system in addition to Leas Lift



ACTIONS: COASTAL AREA & HERITAGE QUARTER

Coastal area & Heritage Quarter: War Memorial Statue area design

1.13 Public realm upgrades to Road of Remembrance

- Pedestrianise Road of Remembrance
- Resurface the street to create a space to promenade
- New seating to create places to pause
- Lighting to trees and artworks

6.5

 Specific consideration given to gender inclusivity in the design of this public space

1.14 Improvements to area around War Memorial

 Redesign the junction to create a generous public space that celebrates that statue and surrounding vistas

1.15 Improved connections and better visibility of Parish Church of St. Mary and St. Eanswythe

 Redesign West Cliff Gardens to highlight the link to the church

2.14 Aspen House and Westcliff House facade improvements

 Celebrate the architecture to create a suitable frontage onto the new plaza space and Westcliff Gardens

2.15 Future mixed use development opportunity: Iceland site

Create a more suitable frontage to this important corner

4.18 Seamless connection through from the station to the coast and between the coast and Heritage Quarter

- Improved entrance to the path to the Parish Church of St Mary and St Eanswythe
- Signage and wayfinding
- Improve pathways that link to Marine Parade with new paving, railings, lighting and landscaping
- To be reviewed in-line with seafront development proposals

4.19 Reinstate the Leas Lift



6.5 ACTIONS: COASTAL AREA & HERITAGE QUARTER

War Memorial area design

A new setting is created for the War Memorial; a civic space at the junction of The Leas, The Road of Remembrance, West Parade and the Leas Lift, with views over the sea. The Road of Remembrance becomes a pedestrianised route through a landscaped park, much like the Lower Leas Coastal Park, with upgraded paths linking to the coast and up to the Parish Church of St Mary and St Eanswythe. Upgrades to surrounding buildings and potential redevelopment further activate this important space in the townscape and offer opportunities to respond to the significant local heritage in this area.



Page 198

6.5

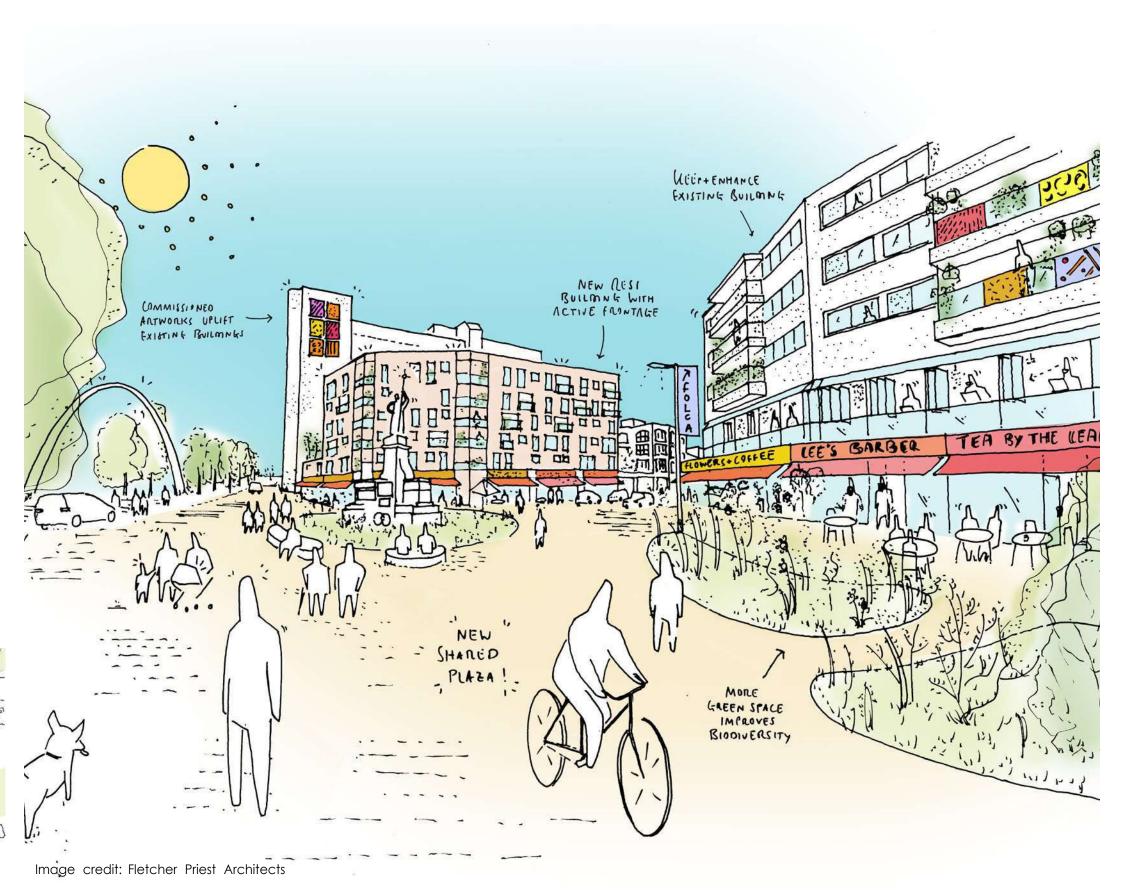
ACTIONS: COASTAL AREA & HERITAGE QUARTER

Iceland building, Aspen House & Westcliff House

In the short term, the Iceland site can be uplifted with improvements to the blank brick wall and by opening up the ground floor onto the roundabout.

Longer-term opportunities include the redevelopment of the podium structure and car park at the rear of the site with opportunities for new residential uses. An extended podium structure accommodates associated car parking and enables the retention of a food retailer on the site.

Upgrades to the lower levels of Aspen House and Westcliff House improve public realm interfaces. Improvements to Pound Way and parking courts creates a more pleasant link between Road of Remembrance and Sandgate Road. Art commissions can enhance the appearance of retained apartment buildings.





ACTIONS: COASTAL AREA

& HERITAGE QUARTER

Action	Mission	Scope	Impact	Outcomes	Action owner/ promoter	Priority	Estimated Cost
1.13	1. Celebrate what's great	Public realm upgrades to Road of Remembrance	 Folkestone residents feel more positive and optimistic about their town Public realm in the town centre is clean, high quality, inclusive and attractive Heritage assets are refurbished and open for the public to use Folkestone has a positive external reputation Residents, especially deprived residents, are better able to connect with the coast to support their physical and mental health The route from the town centre to the coast is safe, accessible and welcoming Residents have good physical and mental health Key places are connected by active travel 	 The Road of Remembrance becomes a pedestrianised route through a landscaped park, much like the Lower Leas Coastal Park, with upgraded paths linking to the coast and up to the Parish Church of St Mary and St Eanswythe 	KCC Highways/ FHDC/ LUF	High	High (£2m+)
1.14	1. Celebrate what's great	Improvements to area around War Memorial	 Public realm in the town centre is clean, high quality, inclusive and attractive Heritage assets are refurbished and open for the public to use The route from the town centre to the coast is safe, accessible and welcoming 	 A new setting is created for the War Memorial; a civic space at the junction of The Leas, The Road of Remembrance, West parade and the Leas Lift, with views over the sea 	KCC Highways/ FHDC/ LUF	High	Medium (£151,000 - £2m)
1.15	1. Celebrate what's great	Improved connections and better visibility of the Parish Church of St. Mary and St. Eanswythe	 Public realm in the town centre is clean, high quality, inclusive and attractive Heritage assets are refurbished and open for the public to use 	 Increase visibility and awareness of the Parish Church and its heritage 	FHDC/St. Mary and St. Eanswythe Church	Medium	Medium (£151,000 - £2m)
1.16	1. Celebrate what's great	Heritage renewal in-line with the Heritage Strategy	Heritage assets are refurbished and open for the public to use	— Delivery of ambitions set out in the Heritage Strategy	FHDC	High	Low (£0 - £150,000)
2.14	2: Town Centre for the Future	Aspen House and Westcliff House facade improvements	 Folkestone residents feel more positive and optimistic about their town 	 A better setting for the memorial statue 	Landowner/ FHDC	Medium	Medium (£151,000 - £2m)
2.15	2: Town Centre for the Future	Future mixed use development opportunity: Iceland site	 The town centre is an attractive and affordable place to live The town centre offers all social, civic and economic functions that people need day and night 	New homes and active uses that would better frame the new civic space	Landowner/ FHDC	Medium	High (£2m+)

ACTIONS: COASTAL AREA

& HERITAGE QUARTER

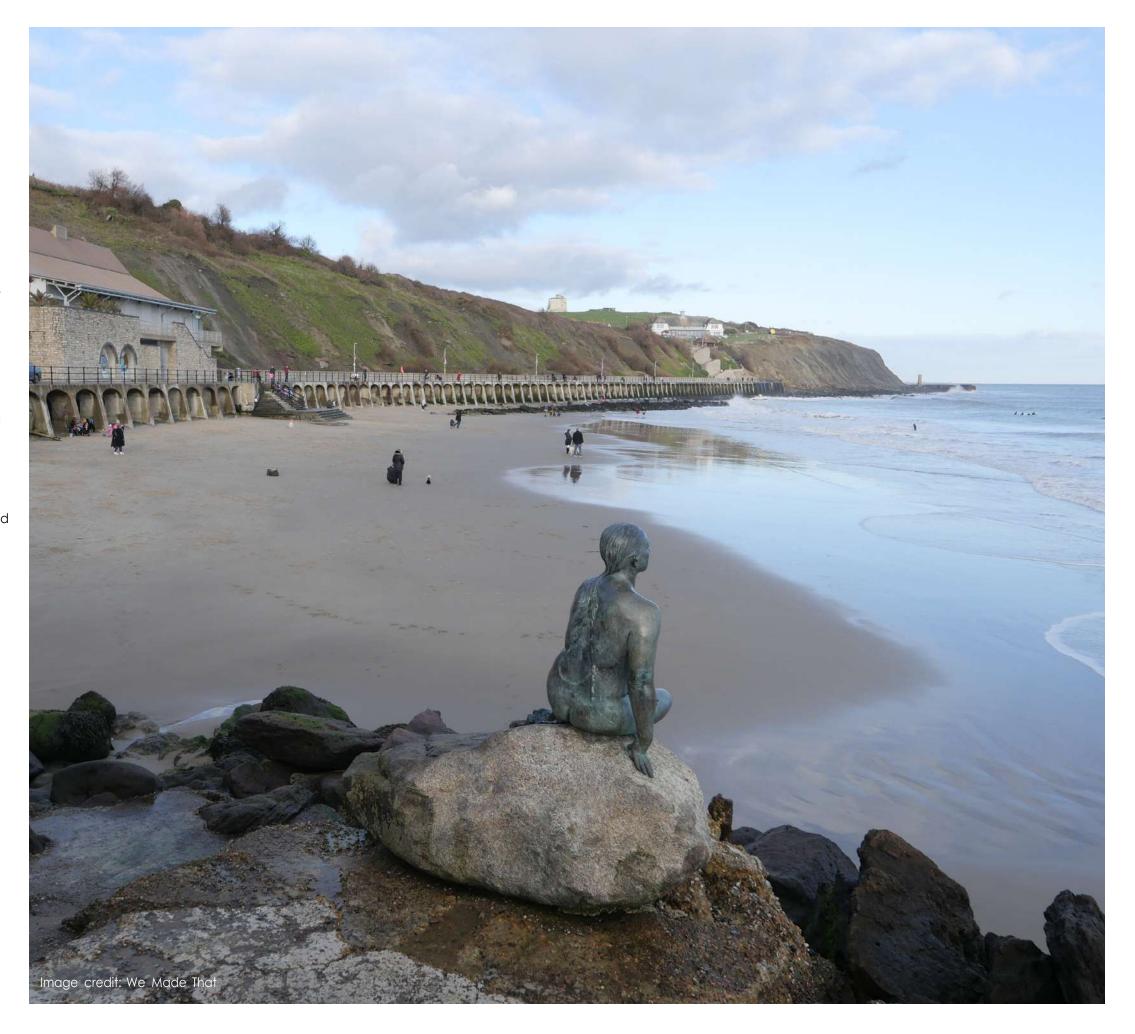
Action	Mission	Scope	Impact	Outcomes	Action owner/ promoter	Priority	Estimated Cost
2.16	2: Town Centre for the Future	Explore opportunities for development of car park site	 Folkestone has diverse spaces which enable businesses to stay and grow in the town centre The town centre is an attractive and affordable place to live 	 Potential new homes and planning gains that could support other actions 	FHDC	Low	High (£2m+)
4.18	4: Moving sustainably	Seamless connection through from the station to the coast and between the coast and Heritage Quarter	 The route from the town centre to the coast is safe, accessible and welcoming Residents have good physical and mental health Key places are connected by active travel 	 New pedestrian routes and landscaping that celebrate the cliffs much like the Lower Lease Coastal Park 	FHDC/KCC Highways	Medium	Medium (£151,000 - £2m)
4.19	4: Moving sustainably	Reinstate Leas Lift	 The route from the town centre to the coast is safe, accessible and welcoming Key places are connected by active travel 	 A reinstated accessible link that connects the coast to the town centre and mitigates the steep level change 	Folkestone Leas Lift CIC	High	High (£2m+)
4.20	4: Moving sustainably	Provide vertical transport system in addition to Leas Lift	 The route from the town centre to the coast is safe, accessible and welcoming Key places are connected by active travel 	 A new accessible link that connects the harbour area to the town centre and mitigates the steep level change 	FHDC/ Development partners	Low	High (£2m+)

ACTIONS: HARBOUR & SUNNY SANDS

Actions

Actions in the Harbour and Sunny Sands are focussed around making more of the sea and coast, and other assets in the area, including the Harbour Line.

Sunny Sands is a well loved hidden gem in Folkestone. Actions seek to make more of this area for local people as well as visitors, to increase use of the sea, and to access this part of the town. Increased activity will bring opportunities for work and enterprise. Actions also seek to unlock potential of the space and assets around the harbour to improve links to other parts of the town: the Tram Road car park as an arrival space from the Old High Street, The Harbour Line and Tram Road as a new connection for walking, cycling and public transport between neighbourhoods in the east to the coast and town centre.



ACTIONS: HARBOUR

& SUNNY SANDS

Existing condition

The harbour area is the historical heart of Folkestone, and though it has lost its functional importance in recent years, its social relevance has been revived by recent interventions such as the Harbour Arm, the Rocksalt restaurant and the harbour fountains. It now forms a focus of activity in the town.

To the east of the harbour is Sunny Sands, one of few sandy beaches in the South East and little known beyond local residents. The Stade, which connects the Harbour area to Sunny Sands host a few seafood shacks, public toilets and a kayak rental hut. Beyond that, there are no facilities or commercial outlets around Sunny Sands itself.

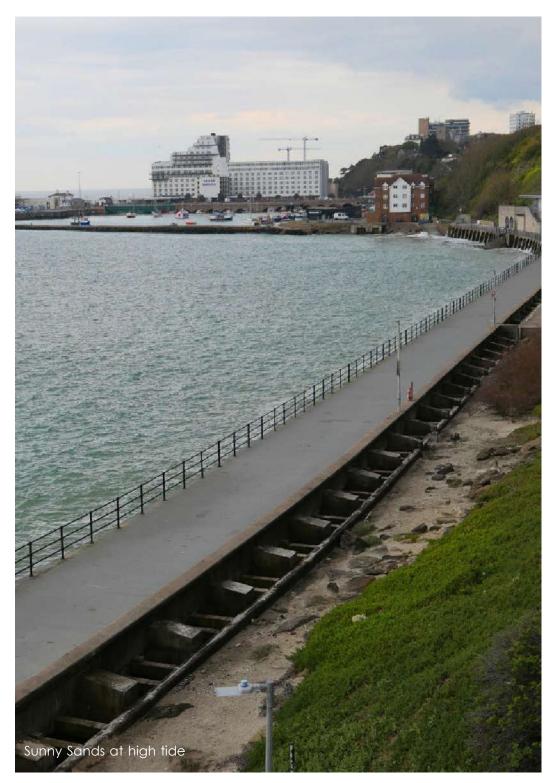
Bissecting the whole area is the Harbour Line, a now disused rail link from the main line to the former ferry terminal. South of The Stade, this has been transformed into a raised landscaped promenade. North of The Stade the railway lies unused and fenced off next to Tram Road, with potential to become something special for East Folkestone.

Key challenges

- Sunny Sands is disconnected and easily overlooked as an asset, both in terms of health and well-being for residents and as a visitor attraction.
- Car parking dominates much of the harbour area,
- The Harbour Line is currently unattractive forms a line of severance through the town

What you've said

- Skills and training for young people is a way of addressing the economic disparities within the town
- The lack of certain facilities such as Changing Place toilets make the area inaccessible to certain groups
- Concerns about further limiting the provision of parking spaces within the town centre
- The transition from the Creative Quarter to the harbour area is important
- Provision of family friendly activities is important







ACTIONS: HARBOUR & SUNNY SANDS

Actions

Mission 1: Celebrate what's great

- 1.17 Public realm upgrades to Harbour Street and exploring options for Tram Road car park to become a key public space with potential for development to activate the space
- 1.18 Seek UNESCO heritage funding for Kent Downs/The Warren

Mission 3: A place for all voices

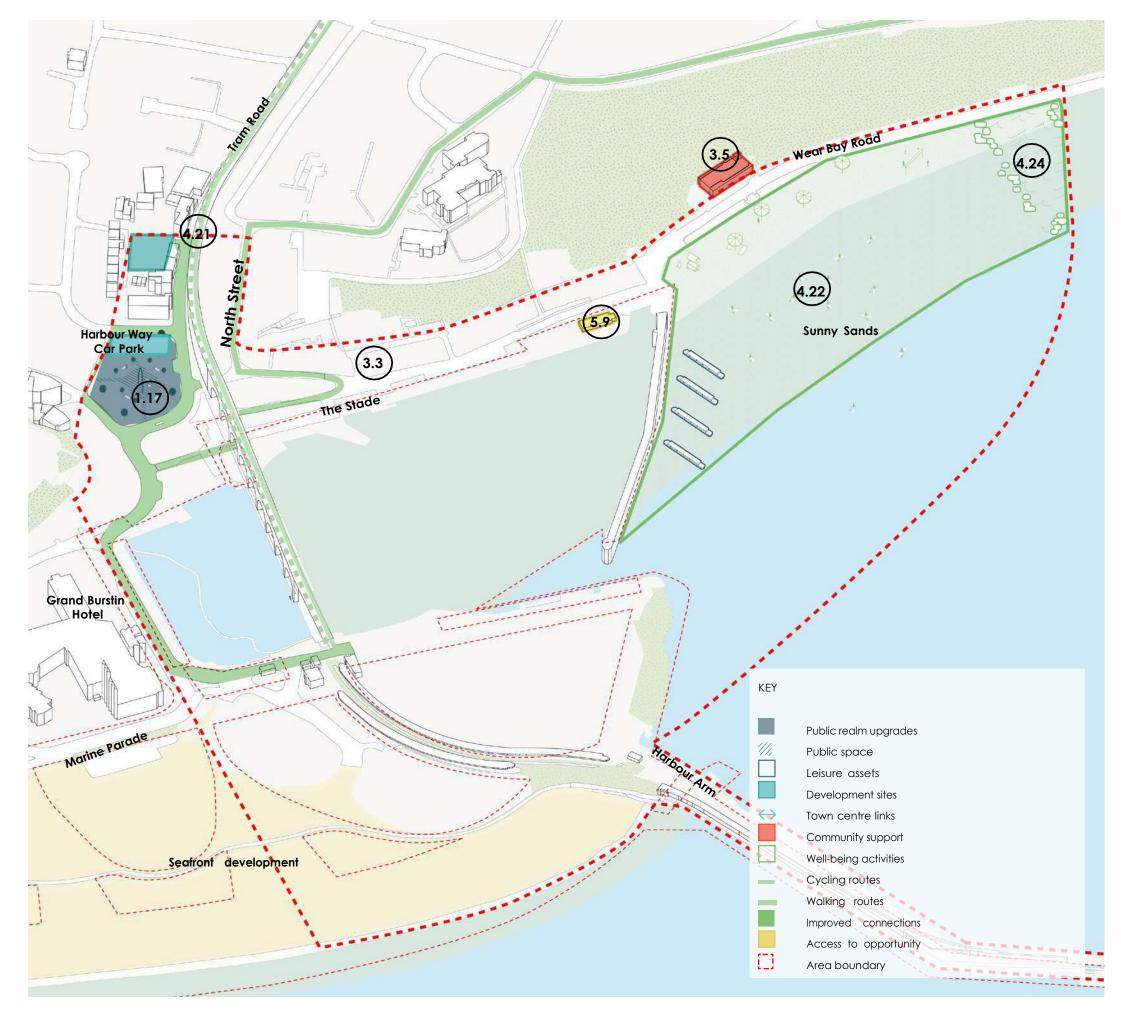
3.3 Expand public toilet and shower offer at Sunny Sands to ensure beach is accessible to all including Changing Places toilets

Mission 4: Moving sustainably

- 4.21 Harbour Line/ Tram Road improvements
- 4.22 Well-being and sports activities supported along the coast (Sunny Sands): water sports, kayaking etc.
- 4.23 Explore feasibility for a tidal pool

Mission 5: Access to opportunity

5.9 Potential for 'summer jobs' for young people alongside recreational offer, as well as training opportunities



6.6 ACTIONS: HARBOUR & SUNNY SANDS

Harbour Line/Tram Road design

- 1.17 Public realm upgrades to Harbour Street and exploring options for Tram Road car park to become a key public space potential for development to activate the space
- Explore opportunities to relocate parking provision e.g. to Stoneleigh House site
- Explore development options for part of the site
- Create a unified public space that straddles Harbour Street and Tram Road
- Specific consideration given to gender inclusivity in the design of this public space

4.21 Harbour Line/ Tram Road improvements

- Shared pedestrian and cycle route along the former railway
- Seating, planting and moments for pause and play
- Adjustments to road layout to accommodate buses into East Folkestone
- Design planting and landscaping for biodiversity, sustainable drainage and carbon sequestration
- Specific consideration given to gender inclusivity in the design of this public space



6.6
ACTIONS: HARBOUR
& SUNNY SANDS

Harbour Line/ Tram Road design

The Tram Road car park is currently the space that greets you arriving from the Old High Street into the harbour area. It is a space that is of course dominated by cars and doesn't present a welcoming environment for pedestrians.

The Place Plan follows locally-developed proposals to relocate parking to a more suitable nearby location such as Stoneleigh House on Tram Road. This would free up the car park space to become an important civic space connecting the Old High Street, the harbour area and the start of the Harbour Line. The Harbour line will become an extension of the linear park that has been created at its southern end. The new stretch will accommodated a walking and cycling route connecting neighbourhoods in the east of the town, as well as places to stop and sit or play.



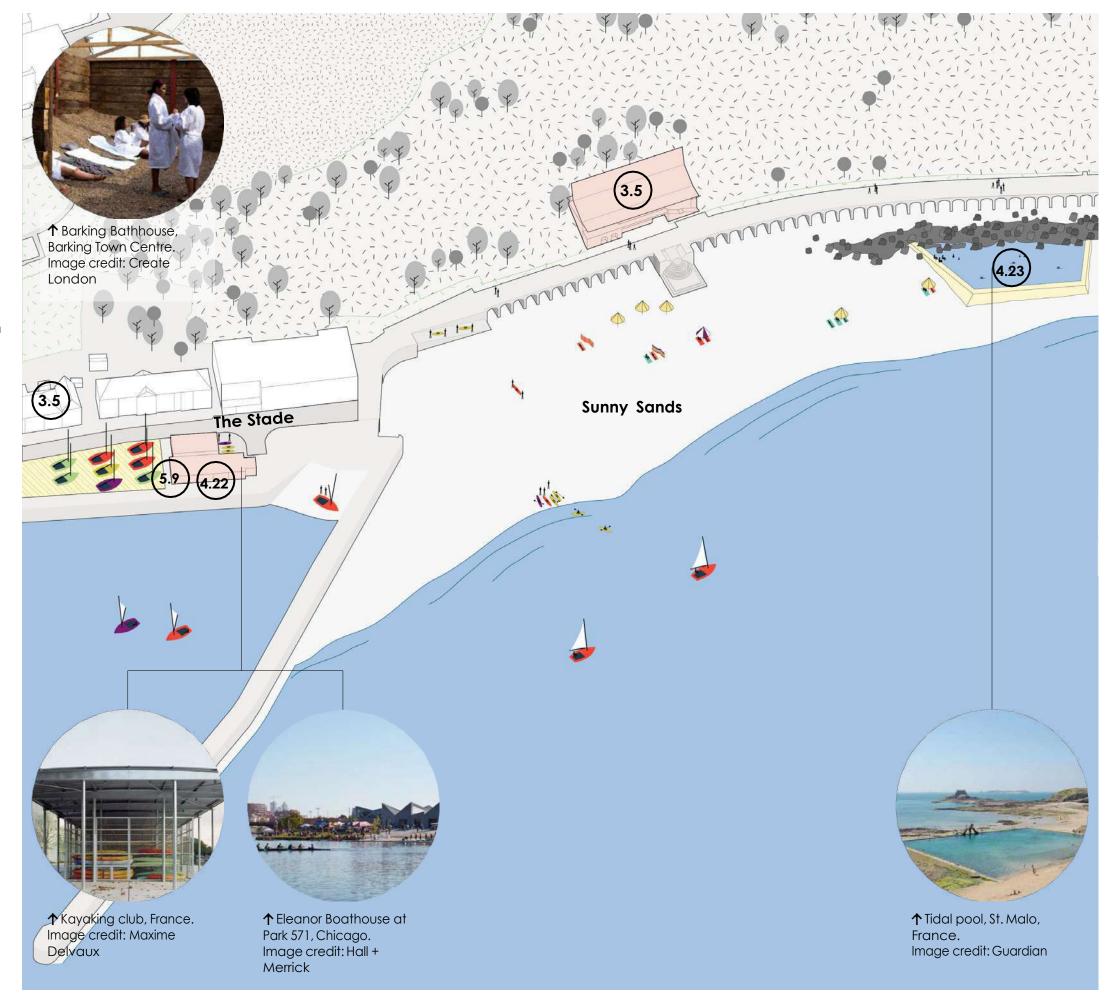
ACTIONS: HARBOUR & SUNNY SANDS

Sunny Sands design

- 3.3 Expand public toilet and shower offer at Sunny Sands to ensure beach is accessible to all including Changing Places toilets
- Explore options to improve toilet and shower facilities at Sunny Sands
- Expand the public toilet offer on The Stade to include a Changing Places toilet
- 4.22 Well-being and sports activities supported along the coast (Sunny Sands): water sports, kayaking etc.
- Promote water sports equipment hire and training
- Consider a new building facility to accommodate equipment
- Encourage family friendly and accessible activities
- Extra provision for lifeguards

4.23 Explore feasibility for a tidal pool

- Explore options for a natural tidal pool
- 5.9 Potential for 'summer jobs' for young people alongside recreational offer, as well as training opportunities



ACTIONS: HARBOUR

& SUNNY SANDS

Action	Mission	Scope	Impact	Outcomes	Action owner/ promoter	Priority	Estimated Cost
1.17	1. Celebrate what's great	Public realm upgrades to Harbour Street and exploring options for Tram Road car park to become a key public space potential for development to activate the space	 Folkestone residents feel more positive and optimistic about their town Public realm is clean, high quality, inclusive and attractive 	 A new civic space connecting the Old High Street, the harbour area and the start of the Harbour Line 	FHDC	Medium	High (£2m+)
1.18	1. Celebrate what's great	Seek UNESCO heritage funding for Kent Downs/The Warren	 Folkestone residents feel more positive and optimistic about their town Folkestone has a positive external reputation Heritage assets are refurbished and open for the public to use 	 Nearby natural assets are internationally recognised and receive funding to support them 	FHDC/KCC	Low	Low (£0 - £150,000)
3.3	3: A place for all voices	Expand public toilet and shower offer at Sunny Sands to ensure beach is accessible to all including Changing Places toilets	— Everyone feels welcome in the town centre	The harbour area and Sunny Sands become accessible for more people	FHDC	High	Medium (£151,000 - £2m)
4.21	4. Moving sustainably	Tram Road improvements	 The town centre is an attractive place to walk and cycle Residents have good physical and mental health Air pollution is reduced, and air quality is improved Key places are connected by walking and cycling More people use public transport to get around and fewer use private cars 	 A new route for walking and cycling, and improved public transport, connecting to neighbourhoods in the east, as well a new public green space 	Network Rail/ KCC Highways/ FHDC	High	High (£2m+)
4.22	4. Moving sustainably	Wellbeing and sports activities supported along the coast (Sunny Sands): water sports, kayaking etc.	 Folkestone residents feel more positive and optimistic about their town Heritage assets are refurbished and open for the public to use Residents, especially deprived residents, are better able to connect with the coast to support their physical and mental health 	Sunny Sands becomes a focus for water sports and activities relating to the sea	Shepway Sports Trust/FHDC	Medium	Low (£0 - £150,000)

ACTIONS: HARBOUR

& SUNNY SANDS

Action	Mission	Scope	Impact	Outcomes	Action owner/ promoter	Priority	Estimated Cost
4.23	4. Moving sustainably	Explore feasibility for a tidal pool	 Residents have good physical and mental health 	 A new visitor attraction and asset for the town 	FHDC/ Environment Agency	High	High (£2m+)
5.9	5: Access to opportunity	Potential for 'summer jobs' for young people alongside recreational offer, as well as training opportunities	 Local people are supported to set up businesses in the town centre Young people see the benefits of living and working in Folkestone and want to stay in the town Residents have the skills and opportunity to participate in the economy 	 Young people have new opportunities to experience work, for enterprise, and for training 	Recreation businesses/ FHDC	Medium	Low (£0 - £150,000)

6.7 OVERVIEW OF ACTIONS





6.7 OVERVIEW OF ACTIONS

Action	Mission	Action area	Scope	Impacts	Outcomes	Action owner/ promoter	Priority	Estimated Cost
1.1	1. Celebrate what's great	Station Arrival	Public realm upgrades and new public spaces	 Public realm is clean, high quality, inclusive and attractive Folkestone has a positive external reputation Will help drive inward investment and attract new development 	 Welcoming arrival spaces and streets with generous and quality space for pedestrians and safe provision for cyclists 	FHDC / KCC Highways / Network Rail / Southeastern Railways	High	Medium (£151,000 - £2m)
1.2	1. Celebrate what's great	Town Centre Core	Public realm upgrades and new public spaces: Public realm improvements along Sandgate Rd (West)	 Folkestone residents feel more positive and optimistic about their town Public realm in the town centre is clean, high quality, inclusive and attractive Heritage assets are refurbished and open for the public to use Will help drive inward investment and attract new development 	 A high street that residents can feel proud of, visitors will want to visit and that anchors the west end of the town centre 	FHDC/ LUF/ FHDC High Street Fund	Medium	Medium (£151,000 - £2m)
1.3	1. Celebrate what's great	Town Centre Core	Public realm improvements and crossings along Shellons Street	 The town centre is an attractive place to walk and cycle The route from the station to the town centre is safe, accessible and welcoming Will help drive inward investment and attract new development 	 A generous and welcoming public space marking the entrancing into the town centre through Guildhall Street 	KCC Highways/ FHDC/ LUF	High	High (£2m+)
1.4	1. Celebrate what's great	Town Centre Core	Upgrades to Guildhall Street and improved market offer	 Folkestone residents feel more positive and optimistic about their town Public realm in the town centre is clean, high quality, inclusive and attractive Will help drive inward investment and attract new development 	 Guildhall Street becomes a thriving high street with a busy food market that supports other uses along the street, to enable delivery of improved and new market offer 	FHDC	Medium	Medium (£151,000 - £2m)
1.5	1. Celebrate what's great	Town Centre Core	Public realm and greening to Sandgate Road & service areas	 Folkestone residents feel more positive and optimistic about their town Public realm in the town centre is clean, high quality, inclusive and attractive Folkestone has a positive external reputation Will help drive inward investment and attract new development 	Greenery softens and brings visual interest to the town centre as well as providing sustainable drainage to reduce flooding	FHDC	High	High (£2m+)

6.7 OVERVIEW OF ACTIONS

Action	Mission	Action area	Scope	Impacts	Outcomes	Action owner/ promoter	Priority	Estimated Cost
1.6	1. Celebrate what's great	Town Centre Core	Reinstating Bouverie Square as a key arrival space and focal point	 Folkestone residents feel more positive and optimistic about their town Folkestone has a positive external reputation Attracts inward investment Will help drive inward investment and attract new development 	 Folkestone Town Centre gains a new green space at its heart that acts as a welcoming arrival space and provides green amenity, play provision and a place to dwell 	Stagecoach/ Radnor Estate/ FHDC/ LUF	High	High (£2m+)
1.7	1. Celebrate what's great	Town Centre Core	'Guildhall Square' as a new civic square	 Heritage assets are refurbished and open for the public to use Folkestone residents feel more positive and optimistic about their town 	 The Town Hall, Museum and Cinema gain an improved setting for greater visibility 	FHDC/ FTC	High	Medium (£151,000 - £2m)
1.8	1. Celebrate what's great	Town Centre Core	New Silver Screen/Museum/ Town Council signage and activate rear of the Town hall onto Market Place	 Heritage assets are refurbished and open for the public to us Folkestone residents feel more positive and optimistic about their town 	 Uses within the Town Hall building gain greater visibility in the town 	FTC	High	Low (£0 - £150,000)
1.9	1. Celebrate what's great	Town Centre Core	External promotion of Folkestone as a place to work and do business	 Folkestone is known as a good place to work and do business Folkestone has a positive external reputation Will help drive inward investment and attract new development 	 Folkestone's economy develops creating further employment opportunities for local communities 	FHDC/ FHDC Place Brand	High	Low (£0 - £150,000)
1.10	1. Celebrate what's great	Creative Quarter Area	Public realm upgrades: The Cube, F51, and Payers Park	 Folkestone residents feel more positive and optimistic about their town Public realm in the town centre is clean, high quality, inclusive and attractive Folkestone has a positive external reputation 	 Important assets are better connected to the town centre and gain better settings and visibility 	Creative Folkestone/ FHDC/KCC Highways/ LUF	High	High (£2m+)
1.11	1. Celebrate what's great	Creative Quarter Area	Build on and expand social initiatives	 Folkestone residents feel more positive and optimistic about their town 	 Residents have increase access to initiatives 	KCC/FHDC/ Shepway Sport Trust	High	Low (£0 - £150,000)
1.12	1. Celebrate what's great	Creative Quarter Area	Public art programmes in the Creative Quarter	Folkestone has a positive external reputation	 Creating moments of interest through the area and a celebration of local and international talent 	Creative Folkestone/ FHDC/ Landowners and tenants	Medium	Low (£0 - £150,000)

6.7 OVERVIEW OF ACTIONS

Action	Mission	Action area	Scope	Impacts	Outcomes	Action owner/ promoter	Priority	Estimated Cost
1.13	1. Celebrate what's great	Coastal Area & Heritage Quarter	Public realm upgrades to Road of Remembrance	 Folkestone residents feel more positive and optimistic about their town Public realm in the town centre is clean, high quality, inclusive and attractive Heritage assets are refurbished and open for the public to use Folkestone has a positive external reputation Residents, especially deprived residents, are better able to connect with the coast to support their physical and mental health The route from the town centre to the coast is safe, accessible and welcoming Residents have good physical and mental health Key places are connected by active travel 	— The Road of Remembrance becomes a pedestrianised route through a landscaped park, much like the Lower Leas Coastal Park, with upgraded paths linking to the coast and up to the Parish Church of St Mary and St Eanswythe	KCC Highways/ FHDC/ LUF	High	High (£2m+)
1.14	1. Celebrate what's great	Coastal Area & Heritage Quarter	Improvements to area around War Memorial	 Public realm in the town centre is clean, high quality, inclusive and attractive Heritage assets are refurbished and open for the public to use The route from the town centre to the coast is safe, accessible and welcoming 	 A new setting is created for the War Memorial; a civic space at the junction of The Leas, The Road of Remembrance, West parade and the Leas Lift, with views over the sea 	KCC Highways/ FHDC/ LUF	High	Medium (£151,000 - £2m)
1.15	1. Celebrate what's great	Coastal Area & Heritage Quarter	Improved connections and better visibility of the Parish Church of St. Mary and St. Eanswythe	 Public realm in the town centre is clean, high quality, inclusive and attractive Heritage assets are refurbished and open for the public to use 	 Increase visibility and awareness of the Parish Church and its heritage 	FHDC/St. Mary and St. Eanswythe Church	Medium	Medium (£151,000 - £2m)
1.16	1. Celebrate what's great	Coastal Area & Heritage Quarter	Heritage renewal in-line with the Heritage Strategy	 Heritage assets are refurbished and open for the public to use 	 Delivery of ambitions set out in the Heritage Strategy 	FHDC	High	Low (£0 - £150,000)
1.17	1. Celebrate what's great	Harbour & Sunny Sands	Public realm upgrades to Harbour Street and exploring options for Tram Road car park to become a key public space potential for development to activate the space	 Folkestone residents feel more positive and optimistic about their town Public realm is clean, high quality, inclusive and attractive 	 A new civic space connecting the Old High Street, the harbour area and the start of the Harbour Line 	FHDC	Medium	High (£2m+)

6.7 OVERVIEW OF ACTIONS

Action	Mission	Action area	Scope	Impacts	Outcomes	Action owner/ promoter	Priority	Estimated Cost
1.18	1. Celebrate what's great	Harbour & Sunny Sands	Seek UNESCO heritage funding for Kent Downs/The Warren	 Folkestone residents feel more positive and optimistic about their town Folkestone has a positive external reputation Heritage assets are refurbished and open for the public to use 	 Nearby natural assets are internationally recognised and receive funding to support them 	FHDC/KCC	Low	Low (£0 - £150,000)
2.1	2: Town Centre for the Future	Sandgate Road (West)	Testing new uses within units along Sandgate Road (West)	 Folkestone has diverse spaces which enable businesses to stay and grow in the town centre New behaviours and practices piloted in the town which can be scaled in the future The town centre offers all social, civic and economic functions that people need day and night will help drive inward investment and attract new development 	A town centre that is resilient to change	FIRRG/ Private landlords and enterprises/ FHDC	High	Low (£0 - £150,000)
2.2	2: Town Centre for the Future	Sandgate Road (West)	Future mixed-use development opportunity: Sainsbury's site	 The town centre is an attractive and affordable place to live Ensuring net zero emissions on delivery The town centre offers all social, civic and economic functions that people need day and night Potential development opportunity for inward investment 	 A supermarket or commercial uses that are better integrated into the town centre, with additional homes to bring further footfall to the high street 	Sainsburys/ site freeholder	Low	High (£2m+)
2.3	2: Town Centre for the Future	Sandgate Road (West)	Populate vacant retail units	 Folkestone has diverse spaces which enable businesses to stay and grow in the town centre New behaviours and practices piloted in the town which can be scaled in the future Will help drive inward investment and attract new development 	A lively town centre with diverse uses and activity	FHDC/private landlords & enterprises	High	Low (£0 - £150,000)

6.7 OVERVIEW OF ACTIONS

Action	Mission	Action area	Scope	Impacts	Outcomes	Action owner/ promoter	Priority	Estimated Cost
2.4	2: Town Centre for the Future	Town Centre Core	'Town Lab': Folkestone Town Centre as a 'lab' to test new uses, experiment and try new ideas	 Folkestone has diverse spaces which enable businesses to stay and grow in the town centre New behaviours and practices piloted in the town which can be scaled in the future The town centre offers all social, civic and economic functions that people need day and night Will help drive inward investment and attract new development 	Town centre uses diversify beyond retail creating a new function and purpose for the high street and new uses for vacant sites	FHDC and landlords	High	Low (£0 - £150,000)
2.5	2: Town Centre for the Future	Town Centre Core	Relocate FHDC Customer Access Point into Town Centre	 New behaviours and practices piloted in the town which can be scaled in the future The town centre offers all social, civic and economic functions that people need day and night 	 The local authority has a presence the heart of the town, occupying potentially vacant space and bringing footfall to the high street 	FHDC	High	Medium (£151,000 - £2m)
2.6	2: Town Centre for the Future	Town Centre Core	Create/combine/scale a single business network	 Folkestone has diverse spaces which enable businesses to stay and grow in the town centre New behaviours and practices piloted in the town which can be scaled in the future 	 Existing networks come together to collaborate and develop a shared approach to developing the economy of Folkestone Town Centre 	FHDC/Creative Folkestone/ FIRRG/ local businesses	Low	Low (£0 - £150,000)
2.7	2: Town Centre for the Future	Town Centre Core	FOLCA building re-imagined	 Folkestone residents feel more positive and optimistic about their town Folkestone is known as a good place to work and do business Heritage assets are refurbished and open for the public to use Ensuring net zero carbon emissions on delivery Folkestone has a positive external reputation Will help drive inward investment and attract new development 	 A cluster of new uses anchors the western end of the pedestrianised high street in a well-loved building 	FHDC/ Developers	High	High (£2m+)

6.7 OVERVIEW OF ACTIONS

Action	Mission	Action area	Scope	Impacts	Outcomes	Action owner/ promoter	Priority	Estimated Cost
2.8	2: Town Centre for the Future	Town Centre Core	Future mixed use development opportunity: Saga Building & NCP Car Park	 Folkestone has diverse spaces which enable businesses to stay and grow in the town centre Ensuring net zero carbon emissions on delivery New behaviours and practices piloted in the town which can be scaled in the future Inward investment and development opportunity will help bring forward other initiatives (action 4.10) 	 Remodelled or refurbished buildings bring new uses and create active frontages onto Middelburg Square alongside a reconfigured roads 	Landowners/ developers	Short	High (£2m+)
2.9	2: Town Centre for the Future	Town Centre Core	Future mixed-use development opportunity: Post Office buildings & Store 21	 Folkestone has diverse spaces which enable businesses to stay and grow in the town centre ensuring net zero emissions New behaviours and practices piloted in the town which can be scaled in the future Will help drive further inward investment and attract new development 	New uses activate Bouverie Square and Bouverie Place and bring footfall to the town centre	Post Office/ commercial Landlord	Long	High (£2m+)
2.10	2: Town Centre for the Future	Town Centre Core	Future mixed-use development opportunity: Larger retail units	 Folkestone has diverse spaces which enable businesses to stay and grow in the town centre Will help drive further inward investment and attract new development 	 Town centre uses diversify beyond retail creating a new function and purpose for the high street and new uses for vacant sites 	Commercial landlords	Medium	Medium (£151,000 - £2m)
2.11	2: Town Centre for the Future	Creative Quarter Area	Future mixed-use development opportunity: LIDL site	 An opportunity for development and inward investment The town centre is an attractive and affordable place to live The town centre offers all social, civic and economic functions that people need day and night Ensuring net zero carbon emissions on delivery 	New homes and better integration into the town centre	Landowner/ FHDC	Low	High (£2m+)

6.7 OVERVIEW OF ACTIONS

Action	Mission	Action area	Scope	Impacts	Outcomes	Action owner/ promoter	Priority	Estimated Cost
2.12	2: Town Centre for the Future	Creative Quarter Area	Licensing policy review along with a set of principles for the evening economy to direct what it looks like and what it needs to achieve: Programme of evening events to test new uses & operating hours	and economic functions that people need day and night	The town centre becomes activated into the evening and perceptions of safely are improved	FHDC	High	Low (£0 - £150,000)
2.13	2: Town Centre for the Future	Creative Quarter Area	Hub of potential uses around Payers Park	 Folkestone has diverse spaces which enable businesses to stay and grow in the town centre The town centre offers all social, civic and economic functions that people need day and night 	 Payers Park becomes better used and perceptions of safety are improved 	Creative Folkestone/ FHDC/ freeholders of adjacent businesses	High	Medium (£151,000 - £2m)
2.14	2: Town Centre for the Future	Coastal Area & Heritage Quarter	Aspen House and Westcliff House facade improvements	 Folkestone residents feel more positive and optimistic about their town 	 A better setting for the memorial statue 	Landowner/ FHDC	Medium	Medium (£151,000 - £2m)
2.15	2: Town Centre for the Future	Coastal Area & Heritage Quarter	Future mixed use development opportunity: Iceland site	 The town centre is an attractive and affordable place to live The town centre offers all social, civic and economic functions that people need day and night 	 New homes and active uses that would better frame the new civic space 	Landowner/ FHDC	Medium	High (£2m+)
2.16	2: Town Centre for the Future	Coastal Area & Heritage Quarter	Explore opportunities for development of car park site	 Folkestone has diverse spaces which enable businesses to stay and grow in the town centre The town centre is an attractive and affordable place to live 	 Potential new homes and planning gains that could support other actions 	FHDC	Low	High (£2m+)
3.1	3. A place for all voices	Sandgate Road (West)	Community involvement in choosing/testing uses	 Residents actively participate in the town centre and are involved in improving it Residents have a sense of stewardship and belonging to their town There is greater trust between local people and the council Everyone feels welcome in the town centre 	An engaged local population and a town centre with uses that serve the needs of residents	FHDC	High	Low (£0 - £150,000)

6.7 OVERVIEW OF ACTIONS

Action	Mission	Action area	Scope	Impacts	Outcomes	Action owner/ promoter	Priority	Estimated Cost
3.2	3: A place for all voices	Creative Quarter Area	Support Shepway Youth Hub with larger spaces	 Residents actively participate in the town centre and are involved in improving it Residents have a sense of stewardship and belonging to their town Communities are socially integrated and support each other There is greater trust between local people and the council 	Young people have more space to learn, play, spend time and meet other people	KCC	Medium	Medium (£151,000 - £2m)
3.3	3: A place for all voices	Harbour & Sunny Sands	Expand public toilet and shower offer at Sunny Sands to ensure beach is accessible to all including Changing Places toilets	Everyone feels welcome in the town centre	The harbour area and Sunny Sands become accessible for more people	FHDC	High	Medium (£151,000 - £2m)
4.1	4. Moving sustainably	Station Arrival	Mobility hub alongside train station: Potential to include cycle hire/ electric cycles	 Key places are connected by active travel More people use public transport to get around and fewer use private cars Residents have good physical and mental health 	 Provision for sustainable transport and mobility options at the interchange from the station 	Network Rail / Southeastern Railways/ KCC Highways / FHDC / Levelling Up Fund (LUF)	High	Medium (£151,000 - £2m)
4.2	4. Moving sustainably	Station Arrival	Overhaul of the legacy highway system: Cheriton Gardens and Cheriton Road, redesign of junction to enable all directions of travel from this point	 The route from the station to the town centre is safe, accessible and welcoming Air pollution is reduced, and air quality is improved Will help drive inward investment and attract new development 	 Improved streets, that are easier to navigate for all modes of travel, with slower traffic speeds, and improved space for pedestrians and cyclists 	KCC Highways/ FHDC / Stagecoach/ LUF	High	High (£2m+)
4.3	4. Moving sustainably	Station Arrival	Wayfinding and enhancing the cycling and walking experience: Cheriton Road, Cheriton Gardens and Castle Hill Avenue	Key places are connected by active travel	 Greening, tree planting, seating and wayfinding interventions as well as cycle parking and cycle lanes where possible and useful 	KCC Highways/ FHDC/ LUF	High	Medium (£151,000 - £2m)

6.7 OVERVIEW OF ACTIONS

Action	Mission	Action area	Scope	Impacts	Outcomes	Action owner/ promoter	Priority	Estimated Cost
4.4	4. Moving sustainably	Station Arrival	New and improved routes: Broadmead Road and through Ship Street site (this could include provision for skateboarding)	 Residents have good physical and mental health The route from the station to the town centre to the coast is safe, accessible and welcoming Key places are connected by active travel 	 A new route to the harbour area and F51 that takes in the viaduct and any new development at Ship Street 	KCC Highways/ FHDC / Shepway Sports Trust and F51	Low	Low (£0 - £150,000)
4.5	4. Moving sustainably	Station Arrival	Work with other organisations, such as Cycling UK and Cycle Shepway, to support and encourage sustainable and active travel	 Residents have good physical and mental health Air pollution is reduced, and air quality is improved More people use active travel to get around and fewer use private cars 	 Initiatives to encourage residents to cycle 	FHDC / Cycling UK / Cycle Shepway/ KCC Highways	Medium	Low (£0 - £150,000)
4.6	4. Moving sustainably	Station Arrival	Explore options for a bus link into the town centre which could form part of a Park and Ride scheme	 The route from the station to the town centre to the coast is safe, accessible and welcoming More people use public transport to get around and fewer use private cars Will help drive inward investment and attract new development 	 A bus link that both connects the train station to the town centre and reduces demand for cars parking 	Stagecoach / FHDC/ KCC Highways	High	Low (£0 - £150,000)
4.7	4. Moving sustainably	Sandgate Road (West)	Seamless connection through from the station to the coast: around Leas Cliff Hall	 Residents have good physical and mental health The route from the town centre to the coast is safe, accessible and welcoming Key places are connected by active travel Will help drive inward investment and attract new development 	An accessible pedestrian route from the town centre to the coast	KCC Highways/ FHDC / Leas Cliff Hall	Medium	Medium (£151,000 - £2m)
4.8	4. Moving sustainably	Sandgate Road (West)	One-way east-bound traffic flow	— The town centre in an attractive place to walk	 Increased pedestrian space and less vehicle traffic 	KCC highways/ FHDC/ LUF	Low	Medium (£151,000 - £2m)
4.9	4. Moving sustainably	Sandgate Road (West)	Improved cycle parking provision	The town centre is an attractive place to cycle	 Cycle parking hoops at useful and visible locations that encourage people to cycle 	FHDC/ KCC Highways	High	Low (£0 - £150,000)

6.7 OVERVIEW OF ACTIONS

Action	Mission	Action area	Scope	Impacts	Outcomes	Action owner/ promoter	Priority	Estimated Cost
4.10	4. Moving sustainably	Town Centre Core	Improved gateway to the town centre including a new bus station layout	 Key places are connected by active travel More people use public transport to get around and fewer use private cars Air pollution is reduced, and air quality is improved Will help drive inward investment and attract new development 	 Streets at the northern edge of the town centre become welcoming for pedestrians and cyclist and an improved transport hub frees up Bouverie Square to become a new green space for the town centre 	KCC Highways/ FHDC/ Stagecoach/ LUF	High	High (£2m+)
4.11	4. Moving sustainably	Town Centre Core	Parking review	The town centre is an attractive place to walk and cycle	 Parking spaces can be consolidated to a small number of central locations that reduce car usage in town centre streets. 	FHDC	Short	Low (£0 - £150,000)
4.12	4. Moving sustainably	Town Centre Core	'Mobility Hub' with cycle hire & storage	 More people use public transport and active travel modes to get around and fewer use private cars 	 More options for active and sustainable travel are made available to residents and visitors 	FHDC/NCP/ Cycling UK	High	Medium (£151,000 - £2m)
4.13	4. Moving sustainably	Town Centre Core	Explore options to integrate cycling and skateboarding in the Town Centre	Residents have good physical and mental health	 Folkestone becomes known for its distinct skateboarding offer drawing in visitors and investment 	KCC Highways/ FHDC/Shepway Sports Trust	Medium	Medium (£151,000 - £2m)
4.14	4. Moving sustainably	Creative Quarter Area	Localised improvement of lanes and paths in historic core	 The town centre is an attractive place to walk and cycle Residents have good physical and mental health Key places are connected by active travel 	 Increased visibility and accessibility to the historic part of the town 	KCC Highways/ FHDC	Medium	Medium (£151,000 - £2m)
4.15	4. Moving sustainably	Creative Quarter Area / Coastal and Heritage Area	Redesign of road layout to improve all modes of travel and movement	 The town centre is an attractive place to walk and cycle Key places are connected by active travel Air pollution is reduced, and air quality is improved 	 The road network is easier to navigate for all modes of movement, and space is freed up for improved pedestrian space and cycling 	Creative Folkestone/ FHDC/ KCC highways/ LUF	High	High (£2m+)
4.16	4. Moving sustainably	Creative Quarter Area	Embracing of future transport technologies: 'on demand' public transport for off-peak times to support evening and night time uses	 The town centre is accessible throughout the day and night More people use public transport to get around and fewer use private cars 	 Residents and visitors have better access to the town centre throughout the day and evening 	Stagecoach/ FHDC	Medium	High (£2m+)

6.7 OVERVIEW OF ACTIONS

Action	Mission	Action area	Scope	Impacts	Outcomes	Action owner/ promoter	Priority	Estimated Cost
4.17	4. Moving sustainably	Creative Quarter Area	Promote 'leisure loop' and other active routes as circuits around wider area	 The town centre is an attractive place to walk and cycle Key places are connected by active travel 	— Increased awareness of Folkestone's many assets	Folkestone Town Council/ Folkestone Museum/ FHDC/Creative Folkestone	High	Low (£0 - £150,000)
4.18	4: Moving sustainably	Coastal Area & Heritage Quarter	Seamless connection through from the station to the coast and between the coast and Heritage Quarter	 The route from the town centre to the coast is safe, accessible and welcoming Residents have good physical and mental health Key places are connected by active travel 	 New pedestrian routes and landscaping that celebrate the cliffs much like the Lower Lease Coastal Park 	FHDC/KCC Highways	Medium	Medium (£151,000 - £2m)
4.19	4: Moving sustainably	Coastal Area & Heritage Quarter	Reinstate Leas Lift	 The route from the town centre to the coast is safe, accessible and welcoming Key places are connected by active travel 	 A reinstated accessible link that connects the coast to the town centre and mitigates the steep level change 	Folkestone Leas Lift CIC	High	High (£2m+)
4.20	4: Moving sustainably	Coastal Area & Heritage Quarter	Provide vertical transport system in addition to Leas Lift	 The route from the town centre to the coast is safe, accessible and welcoming Key places are connected by active travel 	 A new accessible link that connects the harbour area to the town centre and mitigates the steep level change 	FHDC/ Development partners	Low	High (£2m+)
4.21	4. Moving sustainably	Harbour & Sunny Sands	Tram Road improvements	 The town centre is an attractive place to walk and cycle Residents have good physical and mental health Air pollution is reduced, and air quality is improved Key places are connected by walking and cycling More people use public transport to get around and fewer use private cars 	 A new route for walking and cycling, and improved public transport, connecting to neighbourhoods in the east, as well a new public green space 	Network Rail/ KCC Highways/ FHDC	High	High (£2m+)

6.7 OVERVIEW OF ACTIONS

Action	Mission	Action area	Scope	Impacts	Outcomes	Action owner/ promoter	Priority	Estimated Cost
4.22	4. Moving sustainably	Harbour & Sunny Sands	Wellbeing and sports activities supported along the coast (Sunny Sands): water sports, kayaking etc.	 Folkestone residents feel more positive and optimistic about their town Heritage assets are refurbished and open for the public to use Residents, especially deprived residents, are better able to connect with the coast to support their physical and mental health 	Sunny Sands becomes a focus for water sports and activities relating to the sea	Shepway Sports Trust/FHDC	Medium	Low (£0 - £150,000)
4.23	4. Moving sustainably	Harbour & Sunny Sands	Explore feasibility for a tidal pool	Residents have good physical and mental health	 A new visitor attraction and asset for the town 	FHDC/ Environment Agency	High	High (£2m+)
5.1	5: Access to opportunity	Sandgate Road (West)	Encourage local businesses to set up training programmes to develop business sectors	 Residents have the skills and opportunity to participate in the economy Local people are supported to set up businesses in the town centre Young people see the benefits of living and working in Folkestone and want to stay in the town 	A strengthened local economy with greater employment opportunities	FIRRG/ Local businesses/ Community Led Local Development funding (CLLD)	High	Low (£0 - £150,000)
5.2	5: Access to opportunity	Sandgate Road (West)	Enterprise facilitation and participation programmes with deprived communities	 Residents have the skills and opportunity to participate in the economy The Council leads by example on social value 	 Greater aspiration within all parts of the community 	FHDC/ CLLD	High	Low (£0 - £150,000)
5.3	5: Access to opportunity	Town Centre Core	Skills hub: work with educational institutions & businesses	 Residents have the skills and opportunity to participate in the economy The Council leads by example on social value Young people see the benefits of living and working in Folkestone and want to stay in the town 	Greater aspiration within all parts of the community	FHDC/ Folkestone College/The Cube	Long	Low (£0 - £150,000)

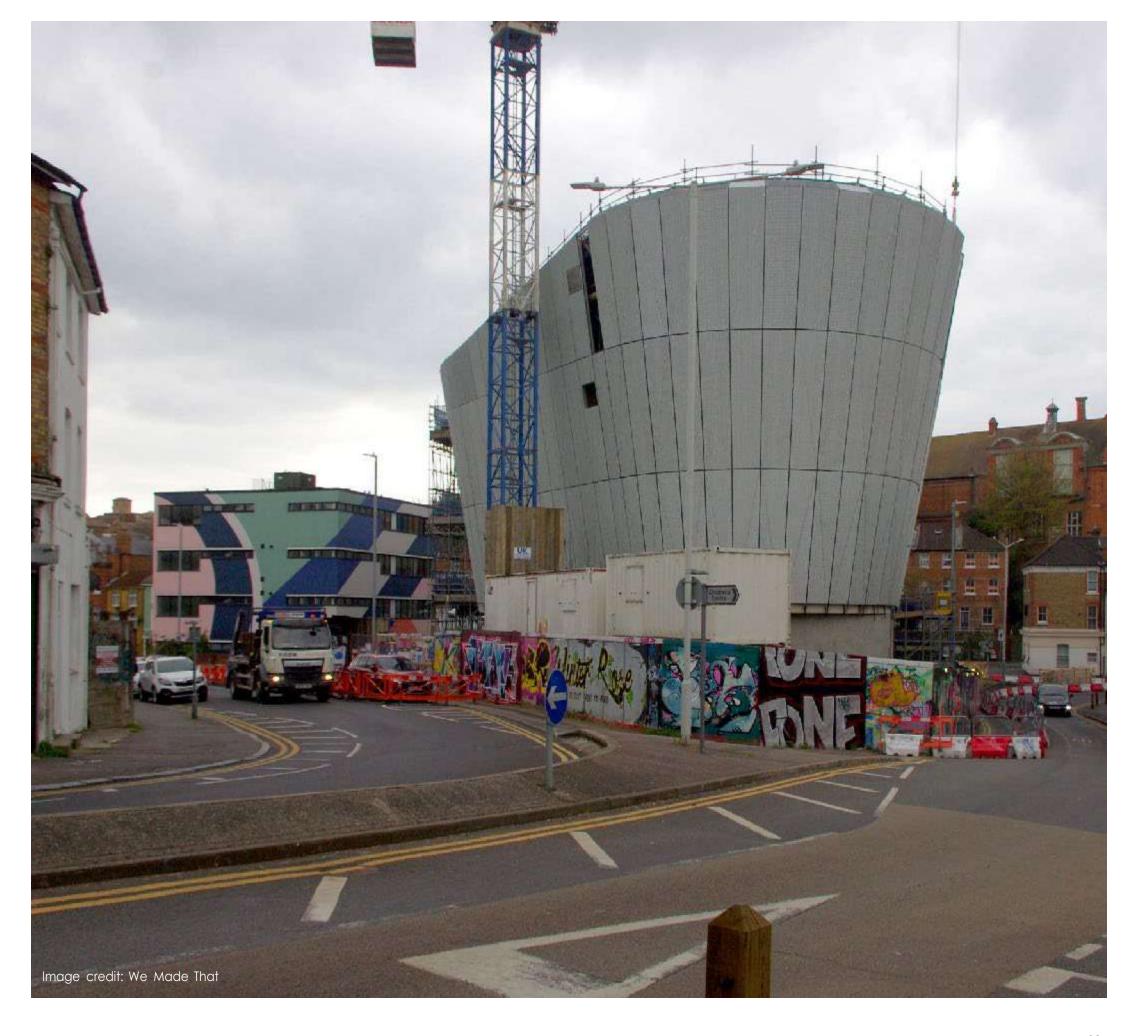
6.7 OVERVIEW OF ACTIONS

Action	Mission	Action area	Scope	Impacts	Outcomes	Action owner/ promoter	Priority	Estimated Cost
5.4	5: Access to opportunity	Town Centre Core	Create a Town Centre business launchpad programme	 Local people are supported to set up businesses in the town centre Local businesses can access contracts and opportunities in the town Will help drive inward investment and attract new development 	 A strengthened local economy with greater employment opportunities 	FTC/FHDC	Medium	Low (£0 - £150,000)
5.5	5: Access to opportunity	Town Centre Core	Explore opportunities for more diverse community ownership of local assets	 Residents have the opportunity to participate in the economy Local people are supported to set up businesses in the town centre The Council leads by example on social value 	Greater aspiration within all parts of the community	Local communities/ FTC/FHDC	Low	Low (£0 - £150,000)
5.6	5: Access to opportunity	Town Centre Core	Review free WiFi and digital provision	 Residents have the opportunity to participate in the economy The Council leads by example on social value 	 Folkestone's outward reputation as a forward thinking place to live, work and do business improves 	FTC/FHDC/KCC	Medium	Low (£0 - £150,000)
5.7	5: Access to opportunity	Creative Quarter Area	Expand on the offer of The Cube adult education centre and Grace Hill Library	 Residents have the skills and opportunity to participate in the economy Local people are supported to set up businesses in the town centre The Council leads by example on social value 	 Increased access to these valuable social and educational services and increase use of Grace Hill Library 	Kent Adult Education	Medium	Low (£0 - £150,000)
5.8	5: Access to opportunity	Creative Quarter Area	Continuation of the Folkestone Community Works programme	 Residents have the skills and opportunity to participate in the economy Local people are supported to set up businesses in the town centre The Council leads by example on social value Local businesses can access contracts and opportunities in the town Young people see the benefits of living and working in Folkestone and want to stay in the town 	 Helping people into work, supporting local businesses including provision of business space, improve access to services for businesses and residents 	FHDC	High	Low (£0 - £150,000)

6.7 OVERVIEW OF ACTIONS

Action	Mission	Action area	Scope	Impacts	Outcomes	Action owner/ promoter	Priority	Estimated Cost
5.9	5: Access to opportunity	Harbour & Sunny Sands	Potential for 'summer jobs' for young people alongside recreational offer, as well as training opportunities	 Local people are supported to set up businesses in the town centre Young people see the benefits of living and working in Folkestone and want to stay in the town Residents have the skills and opportunity to participate in the economy 	Young people have new opportunities to experience work, for enterprise, and for training	Recreation businesses/ FHDC	Medium	Low (£0 - £150,000)
6.1	6: Deliver sustainable quality	Town Centre Core	Reviews of Town Centre housing policy and licensing to address poor quality housing	 New and existing homes in the town centre are safe and high quality 	 Low quality housing is eradicated and social well-being is increased 	FHDC	Medium	Low (£0 - £150,000)
6.2	6: Deliver sustainable quality	Town Centre Core	Market improvement programme	 Council works collaboratively with partners to deliver on the place plan and attract investment Activates pedestrianised space for general market and artisan/seasonal markets 	 Footfall and spend at markets in the town centre increases benefiting other business and activating the town centre, and high quality market offer will support additional traders to town centre 	FTC/FHDC	High	Low (£0 - £150,000)
6.3	6: Deliver sustainable quality	Town Centre Core	Place Plan developed to become adopted planning policy	 All new developments in the town centre are sustainable and high quality Ensuring design is net zero – reusing assets and property where possible Heritage assets are refurbished and open for the public to use 	 The Place Plan has increased status to help officers influence change in the town centre 	FHDC	Medium	Low (£0 - £150,000)
6.4	6: Deliver sustainable quality	Town Centre Core	Town Centre design review panel, including community representatives	 All new developments in the town centre are sustainable and high quality New and existing homes in the town centre are safe and high quality Local people have influence in future developments Council works collaboratively with partners to deliver on the place plan and attract investment Ensuring design is net zero – reusing assets and property where possible 	Increased collaboration on development in the town centre by experts and the local community	FHDC	Medium	Low (£0 - £150,000)

7.0 MAKING IT HAPPEN



Phasing

The Place Plan will be used to guide future public sector investment and action in Folkestone town centre, and may be used to develop emerging planning policy and guidance. The Place Plan will also be used to encourage future investment as potential investors are engaged. Outputs will also enable public bodies, private landowners and the wider community to progress with clear delivery and implementation plans in the knowledge that they can contribute to the Missions set out here.

Necessarily, the Place Plan proposals are currently presented as high level concepts. Prior to delivery, definition will need be added through a number of onwards steps and further studies.

The Place Plan provides an opportunity to think holistically about 'place' and the type of outcomes which can be achieved within Folkestone town centre. Much of this can be achieved through the delivery of physical actions; improving public realm, active travel and enabling exciting things to happen in the town's buildings. The Place Plan is, however, also an opportunity to think about fundamentals of how people interact with a place, the sense of ownership people have of their town centre and the quality of experience they have when they are there. Getting this right will help to embed the physical interventions proposed within the Place Plan and will ultimately support better economic, social, and commercial outcomes.

Funding

In the face of limited resources, funding will need to be sought from a variety of sources. This may involve investment from Community Infrastructure Levy (CIL), Section 106 or similar development-related funding, Folkestone and Hythe District Council, Kent County Council and other potential funding streams.

Private developers, local businesses and charities will also have key role in positively contributing to the town centre. A number of opportunity sites have been explored through development options for key sites within the Place Plan, many of which are privately-owned.

It will also be necessary to target a range of external funding opportunities including, but not limited to; central government funds, cultural grants, heritage and conservation funds, biodiversity and community funding, and other crowdfunding initiatives. At the time of writing (summer 2021), the Levelling Up Fund is supporting investment in town centres, active travel and cultural infrastructure, all of which would be relevant to the aims of the Place Plan. Future funding streams may also emerge, and the existence of the Place Plan will allow swift action to secure funding support.

Enabling change

Addressing challenges of participation, civic pride and psychological ownership takes time. Testing uses, enabling assets and capacity building provides the basis for incremental change and, ultimately, greater impact and retention of benefits within Folkestone.

The Place Plan aims to provide everyone with opportunities to contribute to making and remaking Folkestone town centre by coming together to develop common spaces and shared resources. This Place Plan recognises that community and civil society groups are full of great ideas and are well-placed to propose sustainable solutions to local challenges or opportunities. The missions and actions set out aim to support innovative community- or citizen-led projects that build local resilience.

Potential actions are not limited to just those shown here. Further ideas that support the missions are welcomed.

The steps to enabling change will also require good governance. An independent structure, rooted in local stewardship, would align closely with the government's emerging proposals around 'A Right to Regenerate'. Such an approach could also be accompanied by capital investment in cultural, transport and urban regeneration themes of the Levelling Up Fund, balancing early capital investment with longer term approaches to ownership to better embed the impact of the fund.

A number of more detailed appendices have been produced as an initial step to support future changes.

Embedding Sustainability

The Place Plan identifies multiple opportunities to improve Folkestone town centre's overall environmental performance. This includes:

- Reducing emissions from the construction and operation of buildings on identified development sites
- Promoting waste reduction, reuse and recycling, particularly under Mission 2: Town Centre for the Future
- Reducing water consumption in new developments and in green space maintenance
- Improving resilience to the effects of climate change, for example, through introducing Sustainable Urban Drainage and mitigating the effects of hotter weather in building designs
- Promoting conservation and wildlife, for example, through adding greenery and improving biodiversity
- Promoting sustainable growth and green jobs

Whilst these opportunities exist, the onwards development of the Place Plan into adopted policy, with specific environmental performance standards and the ability to make requirements of development in the town centre is considered to be the most effective way of pursuing the aims of Mission 6: Deliver Sustainable Quality. This will allow further articulation and interrogation of the local desire to exceed national-level environmental policy, which is beyond the scope of the current Place Plan commission.

Priority actions

Through the process of developing the Place Plan, seven priority actions have been identified and foregrounded here. Each brings together a number of specific actions from the Place Plan. It also includes a number of relationships to adaptive re-use or longer-term intensification and redevelopment opportunities in the town centre.

These priority actions have also been influenced by the public engagement process.

- Station arrival and town centre connections
- Improved gateway to the town centre including a new bus station layout
- FOLCA development scheme
- Sandgate Road town lab, public realm and 'Guildhall Square'
- F51 environs and Payers Park
- Harbour Line/ Tram Road
- Sunny Sands

The above priority actions will be co-supportive of the council's current work to progress redevelopment of the Ship Street site. A stronger town centre will improve development prospects, and new residents will drive additional footfall to the centre. A reciprocal relationship of affordable housing across sites within and beyond the town centre may also be possible.



Priority actions

Station arrival and town centre connections

This group of interventions is vital to supporting the continued success of Folkestone as a destination. These actions are immediate priorities to allow the town to respond to increases in domestic tourism and maximise related benefit to the town and town centre. Visitors and residents alike should feel welcomed to the town, with a positive first impression for tourists. Public transport and active travel should be the primary modes for visitors, who should be able to arrive comfortably by train and continue their onwards journeys - including towards the town centre - feeling safe and being able to navigate easily. Local residents will also benefit from improved health and well-being outcomes derived from increased levels of walking and cycling.

Actions include:

- 1.1 Public realm upgrades and new public spaces: around train station with a potential for a small public square as a gateway into Folkestone.
- **4.1** Mobility hub alongside train station: bike hire and other supporting uses
- **4.2** Overhaul of the legacy highway system: Cheriton Gardens and Cheriton Road, redesign of junction to enable all directions of travel from this point, and make accessible for all
- **4.3** Wayfinding and enhancing the cycling and walking experience: Cheriton Road, Cheriton Gardens and Castle Hill Avenue

Key next steps

- Detailed engagement with KCC Highways
- Detailed engagement with Network Rail
- Detailed feasibility design and modelling
- Concept design
- Further public engagement

Improved gateway to the Town Centre including a new bus station layout

The Middelburg Square site marks the arrival to the town centre and can contribute positively to its setting with a mix of uses. Delivery of new homes in the town centre can contribute to key missions through a mix of uses at ground level including retail, workspace, leisure and other key amenities.

The potential future relocation of bus and coach station along Shellons Street and the reinstating of the historic civic square at Bouverie Place create the opportunity for improved public realm. A pavilion building along the eastern edge of the square will resolves the hostile edge of the shopping centre. Taken together, the above interventions will transform a vehicle-dominated and neglected area of the town centre into a valued asset where people will dwell, relax and enjoy themselves, a priority to revive the fortunes of this area of town.

Actions include:

- 1.3 Public realm improvements along Shellons Street
- **1.6** Reinstating Bouverie Square
- **2.8** Explore options for refurbishment or redevelopment of buildings on Middelburg Square
- **4.10** Improved gateway to the Town Centre: Guildhall/ Shellons St junction and Middelburg Square, including a new bus station layout.
- **4.11** Parking review
- 4.12 'Mobility Hub' with cycle hire & storage

Key next steps

- Detailed engagement with KCC Highways
- Detailed engagement with Stagecoach
- Work with land owners and developers
- Detailed feasibility design and modelling
- Concept design
- Further public engagement

FOLCA development scheme

This prominent site presents an opportunity to add uses to the town centre through meanwhile and long-term interventions. Meanwhile interventions can activate the high street and help to make FOLCA a local destination with commercial, medical and leisure uses. A longer-term strategy can target the retention of the existing buildings, while bringing new residential space to the town centre.

Following recent council acquisition, both the immediate actions and long-term planning of this site are high priority. Local authority control of the site means that interventions can set a town for the future aspirations for the town centre.

Actions include:

2.7 Folca building used for medical provision/residential/leisure/ commercial

Key next steps

- Detailed feasibility design
- Detailed engagement with future occupiers and service provider
- Deliver short-term uses
- Concept design
- Further public engagement

Sandgate Road town lab, public realm and 'Guildhall Square'

Sandgate Road is consistently referred to as the area of the town centre that has suffered greatest decline. Investment in the quality of the environment here is a clear priority, as are actions to address vacancy and introduce new, diverse uses to the town centre. Through celebrating existing assets, as well as a programme to embrace innovation in the town centre offer, these interventions can cherish Folkestone's past, whilst looking to its future.

Actions include:

- 1.4 Upgrades to Guildhall Street and improved market offer
- **1.5** Public realm upgrades to Sandgate Road
- 1.7 'Guildhall Square' as a new civic square
- **1.8** New Silver Screen/Museum/Town Council signage and activate rear of the Town hall onto Market Place
- 2.3 'Town Lab': Folkestone Town Centre as a 'lab' to test new uses, experiment and try new ideas
- 4.13 Explore options to integrate cycling and skateboarding in the Town Centre
- **6.2** Market improvement programme

Key next steps

- Engagement with market traders, business owners and landlords
- Further public engagement
- Refresh landlord database
- Concept design
- Detail design and delivery

F51 environs and Payers Park

The opening of F51 will put Folkestone 'on the map' nationally and internationally for skateboarding and urban sports. The town centre can benefit from this significant new destination, but is currently poorly connected by hostile routes and underused public spaces. These actions are a priority to maximise benefits from F51 across a wider area of Folkestone. from its opening later in 2021.

Actions include:

- 1.10 Public realm upgrades: The Cube, F51 and Payers' Park
- **2.13** Hub of potential uses around Payer's Park
- **4.15** Redesign of road layout to improve all modes of travel and movement
- **4.17** Promote 'leisure loop' and other active routes as circuits around wider area

Key next steps

- Detailed engagement with KCC Highways
- Work with F51 and Creative Folkestone
- Detailed feasibility design and modelling
- Concept design
- Further public engagement

Harbour Line/ Tram Road

With its potential to link east Folkestone's communities into the town centre through active travel and green routes, the Harbour Line and Tram Road should be considered a local priority. Historic action to develop ideas for this route have gained strong community support, and the potential to deliver on them will reflect local enthusiasm. The council has already been taking action to secure control of the Harbour Line, and the ability to move swiftly into delivery will demonstrate commitment.

Actions include:

- 1.17 Public realm upgrades to Harbour Street and exploring options for Harbour Way car park to become a key public space
- 4.20 Tram Road improvements

Key next steps

- Complete FHDC acquisition
- Detailed engagement with KCC Highways
- Detailed feasibility design and modelling
- Concept design
- Further public engagement

Sunny Sands

The local significance of this area - particularly to those communities who have been long-established in the town - has been made clear throughout the engagement process. Modest investment here can secure the leisure offer of the beach as part of the day trip experience which includes the town centre, whilst also recognising and improving assets for local residents.

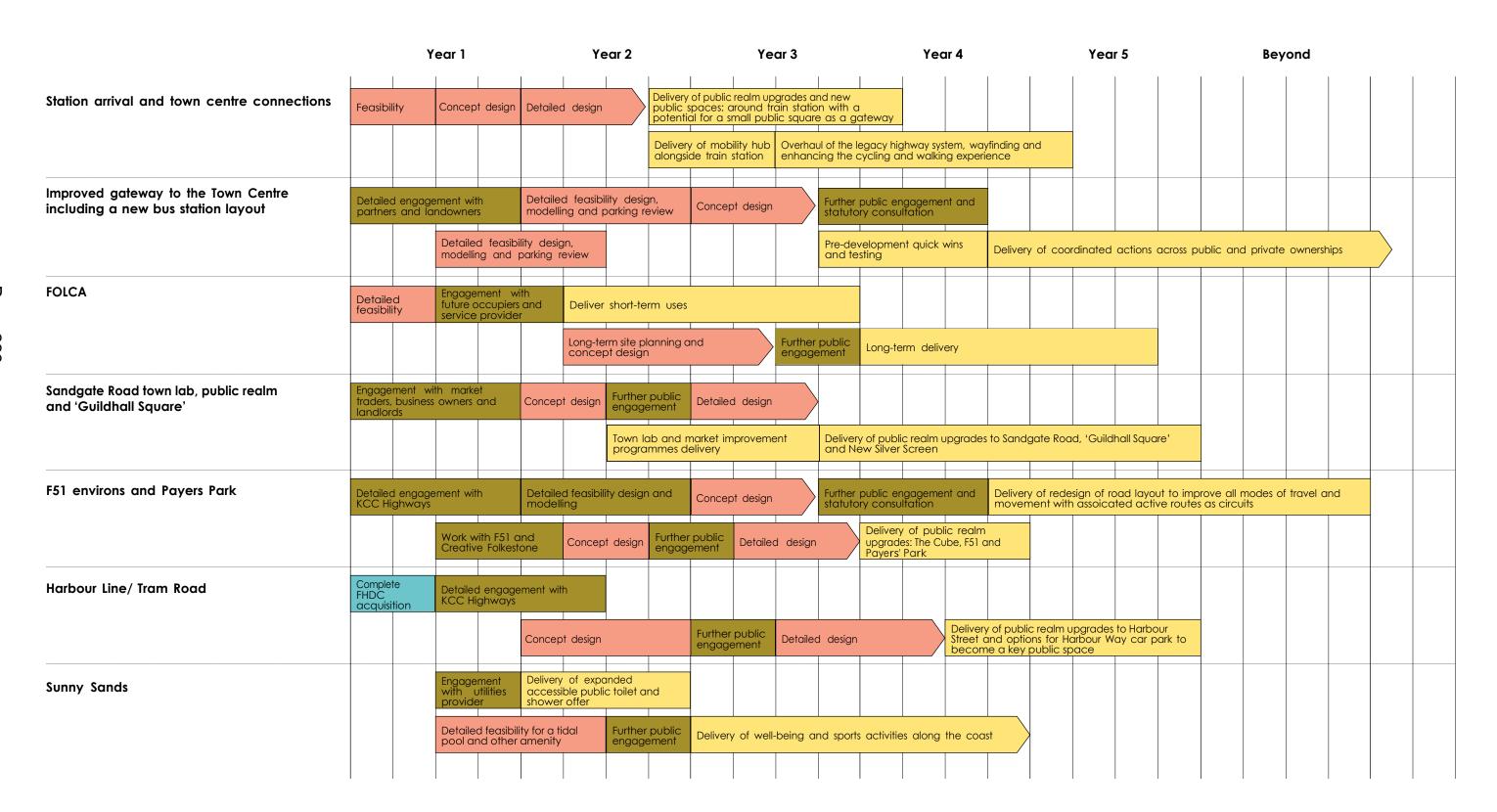
Actions include:

- **3.5** Expand public toilet and shower offer at Sunny Sands to ensure beach is accessible to all
- **4.21** Well-being and sports activities supported along the coast: water sports, kayaking etc.
- **4.22** Explore feasibility for a tidal pool

Key next steps

- Detailed engagement with utilities provider
- Detailed feasibility design and modelling
- Concept design
- Further public engagement

The diagram below describes potential phasing for the priority projects identified. This phasing will of course be dependent on funding and other factors as described at the start of this section.



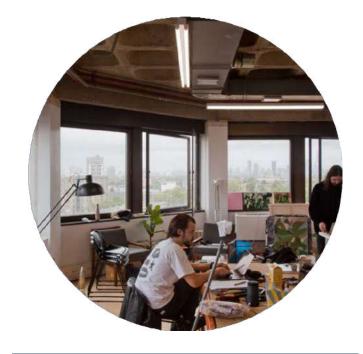
Testing new uses and enabling assets

As with any town centre, Folkestone has a number of prominent property assets which are either in public sector ownership or where the council and its partners can exert influence. Typically, these would have been used for public services or would have been let commercially to generate revenue for the county or district council. Where these were vacant for a period of time, there may have been some meanwhile use on a property-by-property basis.

A more challenged commercial landscape and a general devaluation (nationally) in town centre property values has created an opportunity for the council and its partners to rethink the way property portfolios are managed and the outcomes which they can deliver. In the short term, a more outcomes driven approach to property can provoke and enable new uses which are more relevant to the needs of local people and those looking to relocate. In the longer term, residents and businesses can come to recognise greater 'ownership' of public assets, taking a greater role in their future. The evolution of the existing Creative Quarter through progressive leasing and ownership means that Folkestone already has a history in this sort of activity.

Practically, the council and partners could develop a socially orientated approach to the town centre property. This could enable the public sector (on behalf of the community) to take a portfolio approach to managing local assets against a suite of clearly defined social and commercial aims, objectives and deliverables that address affordability and target local sectors and groups. A Council Business Engagement Manager is one means to help activate and curate ground floor uses within vacant properties owned by third parties. An alternative could be to establish a charity or trust, which could take over the leasehold of the ground floor uses with the agreement of participating landlords. Working with local partners, the charity could curate uses and deliver a mix of events to improve the experience, service offer, and environment of the high street.

Particular case studies have been included that demonstrate successes elsewhere.



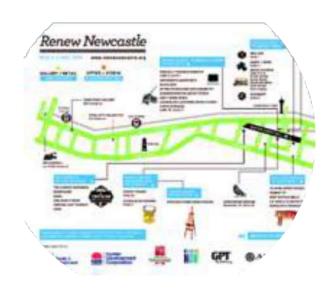
International House, Brixton

In 2018, the charity 3Space took on the lease from the council and opened a meanwhile office space focused on local entrepreneurs and businesses. 3Space take care of all maintenance in the building and have committed to paying the council a fixed rent of £1.1m over five years.

The space operates under the BUY GIVE WORK model where for every space that is commercially rented by a business, a space is given away free to a local non-profit or youth start-up etc.

The building is spread over 12 storeys with five 'Buy' floors for businesses, five 'Give' floors dedicated to community and charitable causes and two socialising/networking floors. Facilitating interaction is at the heart of the model: all commercial tenants are given the opportunity to work, learn and interact with the give floors e.g., employees dedicate an hour of their time a month to supporting others in the building through skill sharing, attending an event or mentoring.

This meanwhile use is helping the council to achieve its objectives around providing workspace in the town centre as well as supporting local businesses, creating new jobs and offering work experience/training opportunities to young people.



Renew Newcastle, Australia

Since 2008, Renew Newcastle (Australia) has been connecting people with vacant spaces, supporting a community of creative entrepreneurs who bring life, interest and activity into underutilised neighbourhoods. Renew Newcastle are a charity who fill empty spaces and work directly with third party property owners to bring them on board and help them understand the benefits.

Through the Renew project, people are given access to vacant space for a short, flexible period of time to develop their business ideas. By partnering with those who share the vision of giving back to their community, it enables the wider community shares in their success and encourages local people to engage with local businesses and spaces.

Filling empty spaces in the city has created a series of positive benefits, including reducing crime, graffiti, vandalism. The project has also given a significant economic and social value back to the community which has attracted new business and residential interest in the city. The project also works with property owners to help them understand the benefits of letting an otherwise empty space e.g. help with maintenance and improving the appeal of their property.



The Old Library, Bodmin

Bodmin is a small town in Cornwall which faces a number of challenges including income deprivation, a struggling high street and a negative image. The Old Library is a historic building in the centre of the town which was sat empty and faced an uncertain future. In 2017, Into Bodmin (a local Community Interest Company) proposed a new use for the building and received funding to redevelop the Old Library into a community hub including a café, performance space, office space and cultural centre. The Old Library is Council owned, and they gave Into Bodmin a ten-year lease with scaling rent to deliver the project (lower initial payments allowed Into Bodmin to establish itself, but the scaling ensured that the local authority benefited in the long term).

The project has been very successful. Citizens Advice and local businesses rent the office space, whilst a range of community-focused activities are hosted in the other parts of the building (e.g. reading classes, a community film club, a repair room with tools and materials for learning new skills). These activities are bringing more people to the town centre, which is benefiting the surrounding local high street businesses.

Enabling long-term participation through capacity building

Folkestone town centre faces significant challenges of a divided and unequal community. Severe deprivation, vacant high streets, low skills levels and poor-quality housing are endemic in the town centre, but this exists right alongside a prosperous creative quarter, growing visitor economy and coastal assets and wealth. Many of these challenges and inequalities have been exacerbated by Covid-19, and feedback from community engagement reveals that levels social capital are low and the relationships between different communities and between residents and the council has been strained.

The town also has a lot of productive potential (e.g. high proportions of working age people, young people and families moving into the town, strong local creative sector) which could be better captured with the right support, employment and training opportunities to help address these challenges.

If the Place Plan is going to address Folkestone's challenges and meet the missions of creating a more resilient town centre, improving social integration and ensuring economic growth benefits everyone, strong community participation throughout the lifetime of the plan will be paramount.

This approach can be incorporated through design, delivery and operation (e.g. public space improvements, the redevelopment of Folca or new approaches to town centre assets as set out above). However, there also needs to be a programme of capacity building which, ultimately, enables everyone in Folkestone to productively participate in the future of their town centre.

Particular case studies have been included that demonstrate successes elsewhere.



Every One Every Day, Barking and Dagenham Long-term approach to community participation in Barking and Dagenham focused on capacity building and skills development amongst local residents. The project supports local people to start and scale their own 'hands on' community projects which share skills and bring people

together.

It was launched in 2017 by the charity
Participatory City Foundation in partnership with
Barking and Dagenham council and funded by
Mayor of London, National Lottery and others.
The idea was in response to the challenges facing
the residents of Barking and Dagenham including
poor education outcomes, widespread poverty,
low levels of employment and limited social
cohesion across a very diverse population.

A network of practical projects (e.g. food growing, gardening, repairing, cooking, business incubation, childcare) now exists across the whole borough which are open to everyone. Projects are designed to encourage people from all walks of life to work together, learn new skills and build social connections. This not only increases skills and creates pathways to employment for residents, but can also improve the physical fabric of neighbourhoods (e.g. through gardening).



Co-lab Dudley

Co Lab is a social lab based on Dudley high street with the aim to create a kinder, more creative and more socially connected high street. The idea of a 'lab' was to try different social experiments on the high street that encourage community activism and participation to build a greater sense of belonging to Dudley. Th Co Lab is based in a previously vacant shop on the high street, and acts as a physical location for local people to come together and engage in different projects. Activities have included Trade Schools, Crafternoons, Make Fest, Do Fest and Edible Dudley.

The goals of the Co Lab include:

- Cultivating a culture of curiosity across the town
- Shifting how local people view and treat public spaces, such that they feel coownership and responsibility
- Creating more spaces and reasons for interaction and connection amongst strangers in Dudley town centre
- Supporting self-organising activity
- Building co-operative relationships with the wider social infrastructure actors and agents in the town, borough and beyond
- Further understanding the importance of social infrastructure on the high street.



Re-imagining the Civic Commons

A programme in a number of cities in the USA which encourages local communities to be more involved in designing, managing and operating public spaces. Examples include community-designed wayfinding or public markets. The project aims to build a sense of community, encourage people from different backgrounds to come together, increase access to nature and public spaces and, as a result, make neighbourhoods more attractive for investment.

The programme supports projects which invest in public space and deliver on four key outcomes:

- Civic engagement: building a sense of community and enabling people from different backgrounds to engage with and shape the future of their public spaces
- Socio-economic mixing: generating opportunities for shared experience among people from different backgrounds
- Environmental sustainability: increasing access to nature, creating environmentally friendly places and encourage active travel
- Value creation: encouraging additional investment in neighbourhoods so they are better places to thrive

Future engagement

A key aspect of the Place Plan is to build consensus towards a vision and plan for the future of the town centre area. Through a detailed engagement process the project team brought together stakeholder and public opinion to design a plan. Delivering projects and actions in Folkestone's town centre successfully will rely on continuing this success and building on processes already established.

Working towards a collective vision requires a broad range of people to get involved together to take ownerships for the ongoing delivery, programming and legacy of the actions identified.

Commitment to onwards public dialogue

The Place Plan aims to empower local people to take ownership of delivering change by producing a plan that the public, private stakeholders and the Council can work towards together. Public support on defining a direction of travel is important in building future ownership and pride over change in the town centre.

The role of the Council

It is not solely up to the Council to formally manage and deliver the actions identified, but to oversee the strategy and be a part of the process. It is expected the Council will facilitate others to take more responsibility in the process, making projects happen.

The Council has already been promoting the Place Plan and its development through the Council project website and social media channels. The project website records the engagement process so far and will continue to be updated to reflect project development and communicates to the wide audience who have already been kept informed about the developing Place Plan.

Steering groups such as the Town Centre Working Group and Design Panel will continue to provide an advisory role in the development of onwards actions.

Working with Folkestone's young people

Engaging young voices in the development of the town centre is vital, and an opinion that has been supported throughout the process so far. Continued support for young people to engage in the Place Plan development will also help to deliver on 'Mission 3; A town for all voices' and continue reaching out to hear voices in more deprived areas in the east.

Initial suggestions have been made to begin a young person's shadow council to guide the discussion.

Supporting community management and stewardship in the longer term

There are a broad range of stakeholders and groups to contact and collaborate with on projects. There is an ambition to create a platform for community ambassadors and project delivery ideas to come forward. Scoping opportunities to establish new delivery structures, both organisational and the potential for social enterprises will help to oversee longer term delivery.

As a start, the groups already engaged are listed at the back of this document in the Engagement Report Appendix.

This is just the start and it's important that opportunities to engage as diverse a network of communities as possible is achieved. Future engagement processes must also be used to test and evaluate the Place Plan, which should continue to adapt.

Next steps

Have you seen a project that interests you? Are you, or an organisation you are part of, interested in delivering a project or being more involved in the process?

You can find out more information here: www.folkestone-hythe.gov.uk/folkestoneplaceplan

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Agenda Item 9

This Report will be made public on 14 September 2021



Report Number **C/21/35**

To: Cabinet

Date: 22 September 2021 Status: Key Decision

Responsible Officer: Charlotte Spendley, Director – Corporate Services
Cabinet Member: Councillor David Wimble, Cabinet Member for the

District Economy

SUBJECT: CORE STRATEGY REVIEW – INSPECTORS' MAIN

MODIFICATIONS FOR PUBLIC CONSULTATION

SUMMARY: This report is to update Cabinet on progress with the Core Strategy Review examination and seek approval to consult on the Main Modifications to the plan, as directed by the planning Inspectors.

REASONS FOR RECOMMENDATIONS:

To enable the council to consult on the Main Modifications to the Core Strategy Review so that the Inspectors can conclude the examination of the plan.

RECOMMENDATIONS:

- 1. To receive and note report C/21/35.
- 2. To approve the Inspectors' Main Modifications set out in Appendix 1 for public consultation.
- 3. To delegate authority to the Director of Corporate Services to finalise the Sustainability Appraisal and any other supporting documents for public consultation alongside the Main Modifications.

1. INTRODUCTION

- 1.1 This report sets out the main modifications to the Core Strategy Review which the council must consult on to finalise the plan.
- 1.2 It should be noted that the main modifications have been prepared at the direction of the planning Inspectors overseeing the examination of the plan, and the council does not have any power to amend, delete or add to the modifications.
- 1.3 Following the consultation, the council will forward the comments it receives to the Inspectors and they will take the comments into account in finalising their report. On receipt of a favourable report from the Inspectors, the council can then proceed to adopt the plan and use it to guide development in the district.

2. PREPARATION OF THE CORE STRATEGY REVIEW

- 2.1 The council has been preparing a review of the Core Strategy to guide development in the district over an 18 year period, from 2019/20 to 2036/37. The Core Strategy Review takes forward existing policies in the adopted 2013 Core Strategy and also introduces new policies for the development of a garden settlement in the North Downs area.
- 2.2 The Core Strategy Review has gone through several stages of consultation, in 2018, 2019 and 2020, and has been revised several times to reflect consultation comments and changes to national planning policy, particularly the introduction of a new national methodology for calculating how many homes local authorities should plan for.

3. EXAMINATION OF THE CORE STRATEGY REVIEW

- 3.1 The council submitted the Core Strategy Review to the Secretary of State on 10 March 2020 for formal examination. On 19 March 2020, two planning Inspectors were appointed to examine the plan, Mr Kevin Ward BA (Hons) MRTPI and Mr Philip Mileham BA (Hons) MRTPI.
- 3.2 The Inspectors asked a number of initial questions about the plan which the council responded to during April and May 2020. Following this, the Inspectors issued a series of detailed Main Matters, Issues and Questions for the council and other participants to address, a process which ran from May to July 2020.
- 3.3 Preparations were made for public hearings to be held in early November 2020; these were to take place in-person at the Civic Centre and through video link, however, these arrangements had to be changed at short notice due to the Coronavirus pandemic and the national lockdown.
- 3.4 New arrangements were put in place so that the hearings could proceed as fully virtual sessions with the Inspectors, council officers and participants appearing by video link. The sessions were broadcast live and recordings were made available on the council's website.

- 3.5 The first series of public hearings opened on 15 December 2020 and ran to 18 December. These hearings covered main matters including: procedural and legal requirements; the housing requirement; the spatial strategy; residential needs; the urban area; the Romney Marsh area; and economic and retail growth.
- 3.6 The hearing sessions resumed on 5 January 2021, following the Christmas and New Year break, and ran to 12 January. This second series of hearings covered: the strategy for the North Downs area; the new garden settlement; the strategy for Sellindge; the supply and delivery of housing land; and other Core Strategy Review policies.
- 3.7 The hearing sessions were then paused to allow time for the council to undertake further work and agree a Statement of Common Ground with Highways England on transport matters.
- 3.8 The Statement of Common Ground was agreed by the parties and submitted to the Inspectors at the start of June; the hearings then resumed on 28 June 2021 covering transport matters and closed on 1 July 2021 with a discussion of administrative and procedural issues.

4. INSPECTORS' INITIAL FINDINGS

- 4.1 Following the final hearing session on 1 July, the Inspectors issued a letter to the council¹ which concluded that the Core Strategy Review had complied with the duty to cooperate and was capable of being found 'sound' subject to main modifications which the Inspectors would be recommending. (The great majority, if not all, local plans are subject to main modifications at the end of the process; the council's Places and Policies Local Plan, adopted in September 2020, had 21 main modifications.)
- 4.2 The Inspectors issued a further letter to the council on 16 July 2021 which set out their broad findings and provided a schedule of the main modifications they have instructed the council to prepare². The letter stated that, subject to their main modifications concerning detailed policy wording:
 - "... we consider that the District Spatial Strategy, the overall approach to the three character areas [Urban Area, North Downs Area and Romney Marsh Area] and settlements within them is sound. The housing requirement of an average of 738 dwellings per year over the plan period is justified ... We are satisfied that the Core Strategy Review will provide for an adequate supply of housing over the plan period and at least a five year supply of housing at the point of adoption. ...

Turning to the proposed New Garden Settlement specifically, we consider that in principle it is justified given the scale of housing need identified, the significant physical and environmental constraints that exist across much of the rest of the District and the limited scope for development within or

¹ See examination document EX098. Inspectors' correspondence can be viewed on the News and Updates page of the examination webpages at: https://www.folkestone-hythe.gov.uk/core-strategy-review-2020/news-and-updates

² See examination documents EX126 and EX127.

- adjacent to existing settlements, beyond that already identified through the recently adopted Places and Policies Local Plan."
- 4.3 Officers have been preparing the main modifications during July and August and have also been preparing responses to the points that the Inspectors raised during the last hearing sessions.
- 4.4 The Inspectors notified the council on 13 September that they are satisfied with the main modifications the council prepared to meet their directions. To progress with the plan, the council must now put the main modifications out for public consultation for a minimum of six weeks.

5. INSPECTORS' MAIN MODIFICATIONS

- 5.1 The Inspectors' main modifications are set out in Appendix 1 to this report. Main modifications are set out in the chapter order of the Core Strategy Review and are shown as modifications to the wording of the submitted plan. Text to be deleted is shown struck-through and additional text marked in bold and underlined.
- 5.2 The main modifications largely reflect:
 - Changes to national planning policy, including the publication of a new version of the National Planning Policy Framework in July 2021.
 - Issues raised by participants throughout the process, including: Natural England regarding the condition of the Stodmarsh protected sites near Canterbury; Highways England regarding highway mitigation; and Ashford Borough Council regarding potential impacts on the Ashford borough.
 - The changing housing supply situation and the need for the council to demonstrate that there is an adequate supply of housing land for the first five years of the plan and sufficient land to meet the overall requirement for the full plan period of eighteen years.
 - Progress that has been made on strategic sites and broad locations in the plan, including: Folkestone Seafront; Shorncliffe Garrison, Folkestone; the former Nickolls Quarry, Hythe; and Sellindge.
 - Amendments needed to ensure consistency of approach between the policies brought forward largely unchanged from the adopted 2013 Core Strategy and the new or substantially revised policies put forward in the Core Strategy Review.
- 5.3 It should be noted that the main modifications have been prepared at the Inspectors' direction, following consideration of national planning policy, the written evidence submitted by the council and other participants, and the discussion at the examination hearings.
- 5.4 The framework for preparing local plans is set by Part 2 of the Planning and Compulsory Purchase Act 2004 as well as Part 6 of the Town and Country Planning (local planning) (England) Regulations 2012.

- 5.5 Once a plan is submitted to the Secretary of State, a local authority's scope to make amendments to the plan ends and the process is determined by the planning Inspectors; the council therefore has no power to amend the Inspectors' main modifications, add further main modifications of its own or delete any main modifications recommended by the Inspectors.
- 5.6 The main modifications must be consulted on for at least six weeks. Anyone may comment on the main modifications, whether they have participated earlier in the process or not, but comments must be limited to the main modifications themselves; the Inspectors will not consider comments which raise new matters or return to matters already examined during the process but which do not form part of the main modifications.
- 5.7 The main modifications will be accompanied by a Sustainability Appraisal and Habitats Regulations Assessment assessing the potential impacts of the modifications, taking into account other plans and programmes. This assessment has been undertaken throughout the plan process by the council's consultants LUC.
- 5.8 The draft Sustainability Appraisal, prepared alongside the main modifications, is attached as Appendix 2 to this report. The Habitats Regulations Assessment was updated in December 2020, in light of the discussions about nutrient neutrality and impacts on the Stodmarsh sites, and this is not expected to need significant revision.³ Recommendation 3 of this report seeks delegated authority for the Director of Corporate Services to approve these supporting documents, and any other supporting materials, for consultation alongside the main modifications.

6. NEXT STEPS

- 6.1 Following Cabinet's decision, officers will prepare the documentation for the public consultation, advertise the consultation and send notifications to interested parties on the local plan database, as well as statutory consultees and other organisations. The consultation is likely to run from the end of September to mid-November.
- 6.2 When the consultation has closed, the council will collate all the comments it has received and send them, through the Programme Officer, to the Inspectors. At this stage the council does not respond to the comments.
- 6.3 The Inspectors will then finalise their report and issue it to the council. The report will set out the Inspectors' conclusions regarding the matters and issues they examined and will include the final schedule of main modifications that they will be recommending to make the plan 'sound', taking into account comments received during the consultation.

³ The addendum to the Habitats Regulations Assessment was published as Examination Document EB 02.95. This is available to view at: <a href="https://www.folkestone-hythe.gov.uk/media/3137/EB-02-95-HRA-Addendum-Nutrient-Neutrality-07-12-2020/pdf/EB 02.95 FHDC Habitats Regulations Assessment Addendum - Nutrient Neutrality 07.12.2020.pdf?m=637429630190700000

6.4 When the council receives the final report the Inspectors' work will end and the plan will be handed back to the council for adoption. At this stage the Inspectors' Report and Main Modifications will be taken back to Cabinet and full Council with the recommendation to adopt the plan with the main modifications recommended by the Inspectors. On adoption the plan has full weight in decision-making and the council can use it to decide planning applications throughout the district.

7. OPTIONS

- 7.1 The options are:
 - 1. To approve the main modifications for consultation; or
 - 2. Not to approve the main modifications for consultation.
- 7.2 Option 1 is the recommended option. Approving the main modifications for consultation will allow the examination process to continue to its conclusion, and, if the council receives a favourable report from the planning Inspectors, it can then proceed to adopt the plan.
- 7.3 Option 2 is not recommended. Not approving the main modifications for consultation will mean that the council cannot proceed with the plan. This means that the council will not have an up-to-date plan in place; without this the council will not be able to meet its development requirements and will be vulnerable to intervention by Government in its planning functions and will also be subject to challenge by developers on the grounds of a lack of housing land supply.

8. RISK MANAGEMENT ISSUES

8.1 The risk management issues are set out below.

Perceived risk	Seriousness	Likelihood	Preventative action
That consultation on the main modifications raises issues that challenge the validity of the process.	High	Low	The main modifications have been prepared at the directions of the Inspectors who are experienced at examining local plans. The council has been supported by legal advice from a Queen's Counsel throughout the hearings.

9. LEGAL/FINANCIAL AND OTHER CONTROLS/POLICY MATTERS

9.1. Legal Officer's Comments (NM)

The Core Strategy forms a statutory element of the local plan for the council setting out the strategic planning framework and policies to guide the Council up to 2036/37.

The review of the plan every five years is a statutory requirement. The Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Development) (England) Regulations 2012 set out the framework for producing local plans.

As outlined in the report, there is a risk of challenge by developers and intervention by the Government in relation to the Council's planning functions if an up to date plan is not in place.

9.2. Finance Officer's Comments (RH)

The most significant costs will be the remaining Inspectors' fees which are not known at this point in time. However, it is anticipated that the likely Inspectors' fees can be met from existing budgets held for the new garden settlement and the strategy team.

9.3. Diversities and Equalities Implications (GE)

An equalities impact assessment was undertaken for the Core Strategy Review and this is part of the examination library (document EB 01.91). Consultation on the main modifications will allow consultees to raise any diversities and equalities issues arising from the modifications themselves and these will be considered by the Inspectors in coming to their conclusions. When the Inspectors' final report is issued an updated Equalities Impact Assessment will be undertaken on the final document for adoption.

9.4. Climate Change Implications (AT)

No direct implications arising from this report. The council is required to consult on the Inspectors' main modifications and has no powers to amend these. Final adoption of the document will follow any comments that consultees may make on the main modifications. A sustainability appraisal (SA) has been undertaken to assess the main modifications and the SA is included as appendix 2 to this report.

10. CONTACT OFFICERS AND BACKGROUND DOCUMENTS

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

Adrian Tofts, Strategy, Policy & Performance Lead Specialist

Telephone: 01303 853438

Email: adrian.tofts@folkestone-hythe.gov.uk

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

(Note: only documents that have not been published are to be listed here)

Appendices:

Appendix 1: Schedule of Inspectors' Main Modifications for Public

Consultation

Appendix 2: Sustainability Appraisal of Main Modifications - Draft

Introduction

Introduction

Folkestone & Hythe District Council submitted its Core Strategy Review (CSR) for Examination in Public on the 10th of March 2020.

The Core Strategy Review is being examined by independent Planning Inspectors Mr Kevin Ward and Mr Philip Mileham whose roles are to assess whether the plan has been prepared in accordance with the legal requirements and is 'sound'.

The examination hearing sessions ran between December 2020 and January 2021; with additional sessions also held in July 2021.

Since the close of the hearings, the Council has received notification from the Planning Inspectors that the Core Strategy Review as submitted meets the legal requirements of the Planning and Compulsory Purchase Act 2004 (as amended), which includes compliance with the Duty to Co-operate. However, a number of changes known as 'Main Modifications' are considered necessary to address issues relating to 'soundness'.

Main Modification Consultation

At the Inspectors' direction, Folkestone & Hythe District Council has prepared a Schedule of Proposed Main Modifications to the Core Strategy Review Submission Draft (2020) for consultation.

These modifications are put forward without prejudice to the Inspector's final conclusions on the Core Strategy Review; and all the representations made will be passed to the Inspectors before the publication of their final report.

Alongside this Schedule of Main Modifications the Council have also made available for comment:

- Sustainability Appraisal Main Modifications September 2021; and
- A Habitat Regulation Assessment: Review of Post Examination Modifications and HRA Conclusions September 2021.

The proposed Main Modifications are arranged in plan order and have the prefix "MM/". Text that is proposed to be deleted is denoted by strikethrough notation, and text that is proposed to be inserted is underlined and in **bold**.

Page 245

FOLKESTONE & HYTHE DISTRICT CORE STRATEGY REVIEW – PROPOSED MAIN MODIFICATIONS

The consultation is only seeking views on the proposed Main Modifications. It is not an opportunity to raise matters that either were, or could have been, part of the earlier representations or hearings sessions on the submitted plan.

Consultation period

The consultation on the Main Modifications, Sustainability Appraisal and Habitats Regulations Assessment runs for a period of six weeks between XX October 2021 until 5.00pm on XX November 2021.

Availability of documents

The above documents are available to view online at

Alternatively, hard copies of the consultation documents are available to view at all local libraries within the district and at the Council offices in Folkestone during normal opening hours.

How to comment

Please use one representation form for each Main Modification you wish to comment on.

Representation forms should be returned to the Strategy, Policy and Performance Team by emailing planning.policy@folkestone-hythe.gov.uk; or by post to Strategy, Policy and Performance, Folkestone & Hythe District Council, Castle Hill Avenue, Folkestone, Kent, CT20 2QY

Main Modification	Policy / Paragraph	Proposed Main Modification
MM01	Policy SS1: District Spatial	Policy SS1 District Spatial Strategy
	Strategy	Housing will be delivered through a new sustainable, landscape-led settlement, with supporting town centre and community uses, based on garden town principles in the North Downs Area, in accordance with policies SS6-SS9. The garden town will maximise opportunities arising from the location, access to London and continental Europe and strategic infrastructure. Housing and supporting community uses will also be delivered through growth in Sellindge (policy CSD9).
		Elsewhere in the district, priority will continue to be given to previously developed land in the Urban Area in Folkestone, for main town centre uses and housing, to enhance the town's role as a sub-regional centre, with opportunity for increased densities within the town centre and maximisation of employment opportunities at key locations.
		Development in the Urban Area will be led through strategically allocated developments at Folkestone Seafront (policy SS10) and Shorncliffe Garrison, Folkestone (policy SS11), and the delivery of strategic mixed-use development at Hythe (policy CSD7).
		Remaining development needs should be focused on the most sustainable towns and villages as set out in policy SS3. Development outside the new settlement and identified centres in the open countryside and on the coast (defined as anywhere outside settlements within Table 4.3 4.4 Settlement Hierarchy) will only be allowed exceptionally, where a rural or coastal location is essential (policy CSD3).
		This is supported by the following strategic priorities for the three character areas of the district:

Main Modification	Policy / Paragraph	Proposed Main Modification
		 Urban Area - The future spatial priority for new development in the Urban Area (Folkestone and Hythe) is on promoting the development of vacant previously developed land, central Folkestone and the north of the town, and other locations within walking distance of Folkestone Central railway station; securing new accessible public green space, plus regenerating western Hythe.
		 Romney Marsh Area - The future spatial priority for new development in the Romney Marsh Area is on accommodating development at the towns of New Romney and Lydd, and at sustainable villages; improving communications; protecting and enhancing the coast and the many special habitats and landscapes, especially at Dungeness; and avoiding further co-joining of settlements and localities at the most acute risk to life and property from tidal flooding.
		• North Downs Area - The future spatial priority for new development in the North Downs area is on the creation of a landscape-led sustainable new settlement based on garden town principles outside the Kent Downs Area of Outstanding Natural Beauty (AONB) boundary, and without material impact designed to avoid or minimise adverse impacts on the AONB, and the expansion of Sellindge. Within the Kent Downs AONB development will be limited to consolidating Hawkinge's growth and sensitively meeting the needs of communities at better-served settlements. Major development will be refused within the AONB other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest, in accordance with the National Planning Policy Framework. All proposed development in the North Downs area will have to satisfy the requirements of policy CSD5 d. in order to avoid any

Main Modification	Policy / Paragraph	Proposed Main Modification
		significant impact on the water quality of the Stodmarsh European designated sites.
		The strategic growth of New Romney is also supported through policy CSD8 to allow the market town to fulfill its potential to sustainably provide for the bulk of the housing, community infrastructure and commercial needs of the Romney Marsh Area. Development will also be planned at other identified settlements in line with the Settlement Hierarchy sufficient to ensure the achievement of growth requirements. In particular, development which helps to maintain and support the local role of the market town of Lydd can meet priority needs.
		Dungeness A should be retained for: offices (within class E), general industrial (within class B2) and storage or distribution (within class B8) and research and development employment uses; employment-related training and educational purposes; and operations and uses associated with the decommissioning of the nuclear power station. Should redevelopment plans come forward for alternative uses unrelated to the function of the nuclear power station (including other energy generation sector uses), the council will work with the Nuclear Decommissioning Authority, local community and other stakeholders to prepare and adopt an Area Action Plan for part or the whole of the site. Should development proposals come forward for the further material expansion of London Ashford Airport at Lydd (beyond the existing permissions and permitted development rights), the council will work with the airport, local community and other stakeholders to prepare and adopt an Action Plan for the site. The council will support small-scale

Main Modification	Policy / Paragraph	Proposed Main Modification
		to being satisfied that there would be no significant adverse impacts to the integrity of the nationally and internationally designated sites of biodiversity value. The preparation of Area Action Plan(s) for the Dungeness A or London Ashford Airport sites will be accompanied by Habitats Regulations Assessment(s) (including Appropriate Assessment) to assess the potential effect of the Area Action Plan proposals on sites within the Natura 2000 network that are protected under the European Birds and Habitats Directives. The Habitats Regulation Assessment(s) must show that
		development would not result in significant adverse effects on these sites of biodiversity value, either alone or in combination with other projects and plans.
		Within identified settlements, development as agreed by the local community in neighbourhood plans will be encouraged where well-related in scale and location to the Settlement Hierarchy, and in line with the strategic policies of the Core Strategy Review and Places and Policies Local Plan.
		In all locations throughout the district, development should be designed to directly contribute to the sense of place and sustainable design as set out in policy SS3.
MM01	Supporting text: Insert new paragraphs to follow paragraph 4.36	Dungeness Power Station [New para.] For over 50 years, Dungeness Power Stations (A & B) have been a cornerstone of the Romney Marsh economy. Dungeness A ceased generation in 2006 and is currently undergoing decommissioning. Initially it was expected that from 2019 the site would enter a period of Care and Maintenance (C&M) lasting some 85 years pending final site clearance. The commencement of C&M would

Main Modification	Policy / Paragraph	Proposed Main Modification
		have had a serious impact on employment (in December 2019 approximately 220 people were employed on the site) as well as the local economy. It is now likely that the C&M phase will be replaced with decommissioning work continuing instead over the coming decades. This could mean that skilled staff are retained, employment is increased, and land is released for new economic uses, or for clearance, earlier that would happen through the C&M approach. [New para.] The Nuclear Decommissioning Authority is expected to announce its decision on whether this approach will be adopted for Dungeness A in the near term. EDF's Dungeness B station is expected to continue generating electricity until 2028, following which it will be decommissioned over a lengthy period. The EDF Director's Report Dungeness B June 2017 reported that the station employs over 550 employees, which is supplemented by over 200 contract partners, so its closure would have major socio-economic impacts although, as with Dungeness A, these would be experienced gradually. It is important to recognise that there is likely to be a significant impact on jobs in the latter stages of the plan period. In the wider context of other current economic challenges and uncertainties, the decommissioning of the Dungeness Power Stations will create significant economic and social challenges for Romney Marsh. In addition to jobs being lost, businesses will find it increasingly difficult to operate successfully in an area which already has some pockets of significant deprivation and therefore the case for supporting local employment opportunities and the future of the Dungeness Power Stations site becomes an important consideration. 4.37 Opportunities also exist for employment development at London Ashford Airport at Lydd, through the implementation of the existing planning permission. The council

Main Modification	Policy / Paragraph	Proposed Main Modification
		acknowledges the positive impact that Lydd Airport could deliver in supporting the regeneration of Romney Marsh and surrounding areas, accordingly Sshould further material development proposals arise, beyond the existing permissions and permitted development rights, the council will seek to work with the airport, local community and other stakeholders to agree a framework by preparing an Action Area Action Plan for the site. The further development of the Mountfield Road Industrial Estate and investment within the nuclear and tourism industries also present opportunities for job creation.
MM02	Section 4.2 Housing and the Economy Growth Strategy Supporting text: Paragraphs 4.42 – 4.56	 4.42 Section 4.1 sets out the government's methodology for assessing how many homes councils need to plan for. Using the latest household projections and affordability figures, the government methodology requires the provision of a minimum of: 738 new homes a year on average over the period 2019/20 to 2036/37 (18 years) or 13,284 additional homes in total. 4.43 This requirement will be delivered by development of the new garden settlement, other strategic sites, sites with planning permission and a number of small- to medium-sized site allocations in the Places and Policies Local Plan. An indicative housing trajectory is given in Appendix 3. All types of homes will be counted towards this requirement, including family homes and flats (C3 use class) and specialist accommodation for the elderly (C2 use class).

Main Modification	Policy / Paragraph	Proposed Main Modification
		 [New para.] The National Planning Policy Framework states that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements. However, local authorities should make a realistic assessment of likely rates of delivery, given the lead-in times for large-scale sites (NPPF, paragraph 73). The delivery of large-scale developments may need to extend beyond an individual plan period and anticipated rates of delivery should be kept under review (NPPF, footnote 37). [New para.] National Planning Practice Guidance (PPG) recognises that a 'stepped' housing requirement (where the housing requirement is phased to reflect the level of housing expected to be delivered across the plan period) may be justified in certain circumstances. The PPG states that this approach may be appropriate where there is a significant change in the level of housing required and/or where strategic sites will have a phased delivery or are likely to be delivered later in the plan period. The Core Strategy Review will deliver a significant change in the numbers of new homes being built in the district, compared to the 2013 Core Strategy and allocates a major strategic site in the form of a new garden town as the focus for future growth. The council considers that a stepped housing requirement is justified and appropriate, and will ensure that the housing requirement is met fully within the plan period. [New para.] Policy SS2 puts forward four phases of delivery over the plan period:
		or 3,110 dwellings in total;

Main Modification	Policy / Paragraph	Proposed Main Modification	
		 Phase 2 – 2024/25 to 2028/29 (five years) – an average of 885 dwellings a year, or 4,425 dwellings in total; 	
		 Phase 3 – 2029/30 to 2033/34 (five years) – an average of 730 dwellings a year, or 3,650 dwellings in total; and 	
		 Phase 4 – 2034/35 to 2036/37 (three years) – an average of 700 dwellings a year, or 2,100 dwellings in total. 	
		This phased approach will deliver a minimum of 13,284 dwellings, an average of 738 homes a year over the 18 years of the Core Strategy Review plan period.	
		Approach to employment provision	
		4.48 As part of the <u>preparation of the Core Strategy Review Places and Policies Local Plan</u> , the Employment Land Review (ELR) (Lichfields, 2017) assessed the future requirements for office and industrial employment uses to 2026. The 2017 ELR considered three different scenarios for office and industrial uses (labour demand, past completion rates and labour supply).	
		 For office uses, the labour demand and supply scenarios indicated that there is <u>was</u> a need to plan for approximately 19,000 sqm of office space. The past completion scenario suggests<u>ed</u> a declining requirement which reflects<u>ed</u> recent 	

Main Policy / Modification Paragraph		Proposed Main Modification
		losses in office space as a consequence of changes to permitted development rights allowing the conversion of office space to residential use; and
		 For industrial uses, the labour demand and supply scenarios indicated that there is was no requirement for further industrial space. However, notwithstanding the long-term decline of industrial jobs in the district, recent development activity indicateds that there remainsed a requirement for some industrial floorspace at a relatively modest level (around 15,500 sqm based on the past completion scenario).
		4.49 Regarding the existing supply, the ELR finds found that generally the district's employment sites showed good activity and low vacancy rates. In particular, a low level of vacancy was evident among industrial sites, demonstrating that much of the current industrial stock was is meeting a need in the market. This includesd good occupancy at lower quality sites, with high demand at the lower end of the rental market. Overall, occupancy levels in the office market appeared to be lower than the industrial market.
		4.50 The ELR conclude <u>ds</u> that, based on the current supply of employment space from planning permissions and allocated sites (some 50,825 sqm of office development and 97,745 sqm of industrial development), there is <u>was</u> a sufficient supply of space to meet the estimated office and industrial requirements under all scenarios to at least 2031.
		4.51 Nevertheless, the ELR also stresse d s that the district's strategic employment allocations need to be well connected with key motorway junctions and/or transport hubs in order to maximise opportunities for their delivery. There are were also some concerns around:
		The balance between limited supply in Folkestone, which exhibits the strongest

Main Modification	Policy / Paragraph	Proposed Main Modification	
		demand, and the rest of the district; and	
		The quality of available employment sites.	
		4.52 These considerations will be closely monitored to see if further intervention, beyond the protection and allocation of land through Places and Policies Local Plan policies E1 and E2 is necessary. The ELR particularly recommend eds the regular assessment of sites and the preparation of an employment land trajectory through the council's Authority Monitoring Report (AMR).	
		4.54 An updated Employment Land Needs Assessment (ELNA) has been completed (2018) to supplement the conclusion and recommendations of the 2017 ELR and Otterpool Park Employment Opportunities Study and inform the preparation of the Core Strategy Review. The update sets out district-wide growth projections and employment land requirements over the period to 2037 by drawing on the latest population projections and economic forecasts. It also provides estimates of employment land needs for the district and the garden town specifically, based on different assumptions about where growth and demand could come from.	
		4.55 In terms of new jobs growth, the update forecasts a much lower level of job growth on an 'average per annum basis' than the 2017 study, albeit covering different periods of time and an end year of 2037. The latest forecasts imply growth of 237 jobs a year (between 2018 and 2037) compared with 445 jobs a year (between 2006 and 2026) in the 2017 ELR. Translated into net floorspace requirements, baseline jobs growth forecasts district-wide indicate a total demand for all 'B class' employment uses non-wide	

Main Modification	Policy / Paragraph	Proposed Main Modification	
		retail employment uses (e.g. falling within use class E, B2 and B8 and sui generis categories) of 16,360 sqm net. This figure is based on a requirement for 24,750 sqm of office floorspace, offset by an 8,390 sqm reduction in manufacturing and distribution floorspace. [New para.] Given that recent development activity has indicated that there remains a requirement for some industrial floorspace, the council intends to plan positively for manufacturing and distribution uses within the district. Therefore, the Core Strategy Review will seek to meet non-retail employment uses of 40,250 sqm based on the 24,750 sqm of office floorspace identified by the ELNA (2018) and 15,500 sqm industrial floorspace identified by the ELR (2017) through the implementation of Policies E1 and E2 of the Places and Policies Local Plan. 4.56 As outlined in the Employment Opportunities Study, however, the creation of a new garden settlement offers a clear opportunity to plan for a higher level of employment growth to accommodate wider growth and inward investment opportunities that exist across the wider district, elsewhere in Kent and beyond. Adopting a labour supply scenario for the new settlement indicates that 4,770 new jobs should be planned for by 2037, leading to a requirement for around 36,760 sqm of the same types of 'B-class' employment floorspace or 8.1ha of employment land.	
MM02	Supporting text: Paragraphs 4.57 – 4.61	Approach to retail provision 4.57 The Folkestone & Hythe Retail and Leisure Needs Assessment (Lichfields, 2018) undertook a partial update of the Town Centres Study (PBA, 2015). This took account of changing retail trends, particularly the increase in online shopping and	

²age 256

Main Modification	Policy / Paragraph	Proposed Main Modification	
		other 'special forms of trading', and the growth of population to provide district-wide retail capacity projections and needs assessment for the Core Strategy Review plan period to 2036/37. The council has completed an update to the recent Town Centre Retail Study (PBA, 2015) to take account of changing retail trends, particularly the increase in online shopping and other 'special forms of trading', and the growth of population over the Core Strategy Review plan period to 2037.	
		4.58 New retail space needs to be planned for to meet the changing demands of the existing population and the needs of new households. This will ensure that the district's retail centres retain existing trade and generate new jobs and economic activity, so that this spending is not lost to competing centres elsewhere. It also helps to reduce journeys, so that local people can meet their needs close to where they live and are not forced to travel long distances for shopping.	
		The Retail and Leisure Needs Assessment (2018) was revised by the Retail and Leisure Needs Assessment (2019) which applied higher population growth figures. The updated study indicates that there is a total need for around 31,200 35,700 sqm (gross) of retail floorspace within the district over the plan period, a reduction of the need this is broadly similar to the need identified by the 2013 Core Strategy (although over a different time period). The need for convenience floorspace (everyday items, including food), and comparison floorspace (occasional and special items) and food/beverage isset out in Table 4.1 below.	
		4.60 Policy SS2 seeks to meet this <u>employment and retail</u> need over the plan period. Retail is, however, a highly volatile sector, as shown by the failures of many well-known high street names in recent years. The council will therefore review the retail capacity of the	

Мо	Main odification	Policy / Paragraph	Proposed Main Modification				
			planning appl may trigger a 4.61 The retail ne- particularly F	ery five years: future studies will be material considerations in determining applications and, if the studies indicate major changes in retail needs, they is a partial review of policies within the plan. need will be met by developments within existing centres in the district, is Folkestone town centre (identified as a strategic town in the district hierarchy), and in the new garden settlement.			
			Floorspace (district-wide)	Cumulative totals			
			(district-wide)	2022	2027	2032	2037
			Convenience goods	4 39 <u>1,100</u>	1,78 4 2,700	3,185 4,600	4 ,620 6,500
			Comparison goods	4, 578 <u>1,500</u>	11,105 <u>6,900</u>	18,570 14,700	26,585 23,300
			Food/beverage	900	2,500	4,100	5,900
			Totals	5,017 3,500	12,889 12,100	21,755 23,400	31,205 <u>35,700</u>
			Table 4.1: Folkeston	ne & Hythe Distric	t Retail Floorspace	Capacity (sqm gro	ess)
	MM02	Policy SS2: Housing and the	Policy SS2 Housing and the Ed	onomy Growth	Strategy		

Main Modification	Policy / Paragraph	Proposed Main Modification		
	Economy Growth Strategy	from 2019/2020 to 203 period. This will be achi new garden town, as w Places and Policies Lo plan period, a stepped four phases, as set o district's housing requ Allied to this rate of hous through supporting emp the protection of sufficient	6/37, a total requirement of 13,285 eved by major strategic growth in the vell as a number of small- and medical Plan. In order to meet the total approach to housing delivery will but in Table 4.2; this acknowledguirement and the phased delivery being delivery, business activity and the playment opportunities in the garder	es the significant change in the of the new garden town. The provision of jobs will be facilitated in settlement, existing town centres, crict, allocations and delivering rural
		Housing (Classes C2/C3)	Target amount of additional development 2019/20 – 2036/37 Minimum of 13,284 dwellings delivered in four phases as set out in the right hand column.	A requirement is set to deliver land for an average of 738 dwellings a year over the plan period (18 years). This is to be delivered in four phases as follows: • 2019/20 to 2023/24 – 622 dwellings a year

Main Policy / Proposed Main Modification Paragraph		Proposed Main Modifica	tion	
				 2024/25 to 2028/29 - 885 dwellings a year 2029/30 to 2033/34 - 730 dwellings a year 2034/35 to 2036/37 - 700 dwellings a year
		Employment Uses (B Classes) (offices, research and development, light industry, Class B2 and Class B8)	 Approximately 8.1 ha strategic employment allocation at new garden settlement (36,760 sqm floorspace) Employment sites in Places and Policies Local Plan policies E1 and E2 	Targets to be monitored and employment / retail needs to be reviewed every five years. Any future studies will be a material planning consideration and may trigger a review of relevant plan policies.
		Goods Retailing (Class A1-A5, excluding A2 services) (retail and food/beverage uses excluding financial and professional services)	Approximately 31,205 35,700 sqm gross, comprising: • 4,620 6,500 sqm convenience goods floorspace; and • 26,585 23,300 sqm comparison floorspace; and • 5,900 sqm food/beverage floorspace	
		Table 4.2		

Main Modification	Policy / Paragraph	Proposed Main Modification		
		Provisions to ensure the effective implementation of this policy are detailed in section 5.3.		
MM02	Supporting text: Paragraphs 4.62 – 4.64	4.62 SS2 primarily addresses Core Strategy Review a Needs: A, C and D.	aims under the following Strategic	
	- 4.04	4.63 The table below shows how the housing requirement to 2036/37 will be met. Due to the scale of strategic allocations (policies SS6-SS11) and need for phasing with infrastructure, they will play a medium- and long-term role in maintaining housing supply.		
		Source	Contribution (net dwellings)	
		Delivery through the allocated garden settlement over the plan period 2018/19 2019/20 to 2036/37 (1)	5,925 <u>5,593</u>	
		Delivery through the further expansion of Sellindge (2)	188 <u>350</u>	
		Delivery through allocated development sites (remaining Core Strategy Policies CSD8 and Places and Policies Local Plan allocations) without planning permission (3)	1,703 <u>1,610</u>	
		'Windfall' sites – allowance of 95 units per annum for 15 <u>13</u> years ⁽³⁾ (4)	1,425 <u>1,235</u>	
		Delivery (minimum) through extant planning permissions and sites under construction (4) (5)	4 <u>,274</u> <u>4,619</u>	
		Total 2019/2020 – 2036/37 (minimum)	13,515 <u>13,407</u>	

Main Modification	Policy / Paragraph	Proposed Main Modification
		Table 4.3 How the housing minimum requirement will be delivered through the plan period
		 (1) Core Strategy Review Policies SS6-SS9. (2) Core Strategy Review Policy CSD9. Remaining part of proposed allocation without planning permission (second phase).
		(3) 5 per cent deducted from Places and Policies allocations without planning full permission to take account of non-delivery (excludes Core Strategy Review Policy CSD8).
		(3) (4) Windfall development accounts for the housing delivery arising from small and medium sites of one to nine dwellings. Evidence from the years 2012/13 to 2018/19 indicates an average of 97 dwellings from windfall development per annum. Early years have been discounted to avoid double counting with existing planning permissions.
		(4) (5) 5 per cent deducted from sites where construction has not started to take account of non-delivery (excludes strategic allocations).
		4.64 Table 4.3 shows the different components of the housing land supply over the Core Strategy Review plan period, including allocations in the Places and Policies Local Plan, existing planning permissions, 'windfall' delivery (small sites of 1 to 9 dwellings) and the strategic allocations in this plan. A cautious approach has been taken, with deductions made for the possible non-delivery of sites (where planning permissions lapse, sites are developed for fewer homes than anticipated or some homes are completed beyond the plan period) and a conservative estimate has been made for windfall development. It is estimated that a minimum 13,515 13,407 new homes will be delivered over the plan period, exceeding the requirement of 13,284 currently set by the Government's national formula for housing need.
MM03	Supporting text: Paragraph 4.78	4.3 Place Shaping and Sustainable Settlements Strategy

Main Modification	Policy / Paragraph	Proposed Main Modification	
		4.78 Close attention will be paid to minimising hazards and flood risks in line with national policy using the sequential approach. It is critical that, where possible, development is directed away from those areas identified as facing greatest hazards in the Strategic Flood Risk Assessment (SFRA) should a flooding event occur. A high priority will be placed on upgrading flood defence infrastructure (see SS5). The sequential approach is to take into account all forms of flooding.	
MM03	Policy SS3: Place-Shaping and Sustainable Settlements Strategy	Policy SS3 Place-Shaping and Sustainable Settlements Strategy Development within the district is directed towards existing sustainable settlements and a new sustainable garden settlement south of the M20 near Westenhanger to protect the open countryside and the coastline, in accordance with policy SS1. Change in settlements will be managed to contribute to their role within the settlement hierarchy (Table 4.4) and local place-shaping objectives, to promote the creation of sustainable, vibrant and distinct communities. The principle of development is likely to be acceptable on previously developed land within defined settlements, provided it is not of high environmental value. All development must also meet the following requirements: a. The proposed use, scale and impact of development should not be of a size, scale and	

Main Modification	Policy / Paragraph	Proposed Main Modification	
		maintain its status in the settlement hierarchy proportionate and consistent with the settlement's status and its identified strategic role (see Table 4.4) within the district.	
		b. Consideration of alternative options within the appropriate area should be evident, with a sequential approach taken as required for applicable uses set out in national policy, for example to inform decisions against clause (c) below on flood risk. In considering appropriate site options, proposals should identify locational alternatives with regard to addressing the need for sustainable growth applicable to the Romney Marsh Area, or Urban Area or North Downs Area.	
		 b. e. For development located within zones identified by the Environment Agency (EA) as being at risk from flooding, or at risk of wave over-topping in immediate proximity to the coastline (within 30 metres of the crest of the sea wall or equivalent), site-specific evidence will be required in the form of a detailed flood risk assessment. This will need to demonstrate that the proposal is safe and meets with the sequential approach within the applicable character area (Urban Area, Romney Marsh Area or North Downs Area), and where applicable, the (if required) exception tests set out in national policy. It will utilise utilising the current applicable Strategic Flood Risk Assessment (SFRA) and provide further information. A site-specific flood risk assessment may be required for other sources of flood risk as identified within EA surface water flood mapping. Development must also meet the following criteria as applicable: i) no residential development, other than replacement dwellings, should take place within areas identified at "extreme risk" as shown on the SFRA 2115 climate change hazard maps; and 	

Policy / Paragraph	Proposed Main Modification
	ii) all applications for replacement dwellings, should, via detailed design and the incorporation of flood resilient construction measures, reduce the risk to life of occupants and seek provisions to improve flood risk management-; and
	iii) strategic-scale development proposals should be sequentially justified against district-wide site alternatives.
	c. d. A design-led and sustainable access approach should be taken to density and layout, ensuring development is suited to the locality and its needs, and transport infrastructure (particularly walking/cycling). Efficient use should be made of central land in town centres or in easy walking distance of rail and bus stations, with appropriate redevelopment of complementary uses above ground floor retail, leisure or other active uses, to directly support the vitality of centres.
	<u>d.</u> e. Proposals should be designed to contribute to local place-shaping and sustainable development by:
	 i) <u>preserving and wherever possible</u> respecting and enhancing <u>statutory and non-statutory listed buildings</u>, <u>monuments and conservation areas and other</u> key historic features of conservation interest <u>and their setting</u>; and
	 ii) <u>including</u> through appropriate sustainable construction measures, <u>measures to optimise</u> including water efficiency and <u>(in cases of new-build development)</u>, <u>measures to optimise</u> a proportion of energy <u>usage</u> from renewable and low carbon sources on new build development.
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Main Modification	Policy / Paragraph		Proposed Main Mo	odification	
		e. f. Development must address of common demonstrated that there is made available in a suitable	nunity, cultural, volun s no longer a need o	tary or social facilitie	es (unless it has been
MM04	Table 4.5 Priority Centres of Activity Network	Location and Development Purpose	Urban Area	Romney Marsh Area	North Downs Area
	Network	Major Employment Sites: To protect existing and provide further industrial (B-class and similar sui generis uses) premises for light industrial, Class B2 and Class B8 type uses suitable to the needs of the district's businesses and inward investors.	Sites in Folkestone and Hythe	Site at New Romney, sites in Lydd	Site at Lympne, site at Hawkinge, sites within new garden settlement
		Town Centres: To accommodate the majority of identified needs for retail, office and leisure uses in the district through new development to improve	Folkestone (main town centre) and Hythe	New Romney	New garden settlement

Main Modification	Policy / Paragraph		Proposed Main M	odification	
		their vitality, public realm, mix of uses, and daytime and evening economy.			
		District Centres: To accommodate appropriate development to maintain their mix of uses and improve their vitality, viability and public realm.	Cheriton	Lydd	Hawkinge
		Local Centres: To protect crucial services and accommodate development that maintains their viability for residents and visitors.	Sandgate village, other neighbourhood parades	Dymchurch	Lyminge, Elham, Sellindge, sites within new garden settlement
		Table 4.5: Priority Centres of Ac	ctivity Network		
MM04	Policy SS4: Priority Centres of Activity Strategy	Policy SS4 Priority Centres of Activity St In focal points for maintaining at Centres of Activity, development	nd developing jobs a	· · · · · · · · · · · · · · · · · · ·	•
		contributes to continued centre including A and B-class uses, Activity network as shown on	e viability. Major con should be located i	nmercial <u>and em</u> n accordance with	ployment development, the Priority Centres of

Main Modification	Policy / Paragraph	Proposed Main Modification
		Development in Priority Centres of Activity will be allowed where it does not result in a net loss of on-site non-retail employment B-Class uses, and it does not jeopardise the identified commercial purpose of areas set out in the Priority Centres of Activity network (see Table 4.5). Strategic objectives will be delivered through the following principles: a. A 'town centre first' policy will operate for applicable uses in line with national policy. Potential town centre activities or those creating significant transport demand, including retail, leisure and major office uses, should be located: i) Sequentially, looking firstly at locations within town centres, then on the edge of centres, and only then out of centre with a preference given to accessible sites which are well connected to the town centre; and ii) With regard to their impact on the vitality and viability of, and existing, committed and planned investment in, the defined town, district and local centres. b. For other employment-generating (non-town centre) activities, investment should alternatively be directed to designated Major Employment Sites. If suitable sites are shown to be unavailable and unfeasible within any Priority Centre of Activity, development for employment-generating uses will enly be acceptable where it accords with Policies SS1, SS3 and CSD3. • In accordance with policies SS1, SS3 and CSD3; and • Where demonstrated to be in locations suffering longstanding deprivation (and subject to directly contributing to local workforce up-skilling, sustainable transport

Main Modification	Policy / Paragraph	Proposed Main Modification
		C. Sustainable employment development proposals will be encouraged in appropriate locations in areas suffering longstanding deprivation where they increase employment opportunities in the area and contribute to local workforce up-skilling. d. To deliver commercial regeneration objectives, mixed-use development on employment land may be acceptable in line with the above principles where appropriate new non-retail employment B-class premises are provided; and the proposals provide a net gain of suitable local job opportunities, and where it can also be demonstrated that a following criterion is also satisfied (subject to the satisfaction of unless other site specific policies) apply: i) At appropriate older Major Employment Sites, it directly delivers a range of small new and replacement industrial premises more appropriate to local needs; or ii) In and on the edge of Town Centres, it provides a significant quantum of small incubation premises/offices designed to meet the needs of indigenous start-up businesses. All development in Town and District Centres should contribute to a mix of active ground floor uses, with predominantly retail goods (A1) frontage shopping retained at the core of centres. Elsewhere in Town Centres an appropriate mix of offices (A2/B1), cultural, community and voluntary facilities, and other shop uses will be permitted; with a limited increase in the proportion of restaurants (A3) where they add to the shown to be adding to the choice, vitality, tourist appeal and evening economy of Town Centres.

Main Modification	Policy / Paragraph	Proposed Main Modification	
MM05	Policy SS5: District Infrastructure	Policy SS5 District Infrastructure Planning	
	Planning	1. Development should provide, contribute to or otherwise address the district's current and future infrastructure needs. Infrastructure that is necessary to support development must exist already, or a reliable mechanism must be available to ensure that it will be provided at the time it is needed.	
		2. The Community Infrastructure Levy (CIL) has been introduced to ensure that, alongside Section 106 contributions, resources are in place sufficient to meet the infrastructure needs of the district in line with the growth provisions of this strategy. CIL applies to all qualifying forms of development across the district, and a meaningful proportion of levy revenues raised in each neighbourhood will be used to deliver infrastructure within that neighbourhood. Developer contributions through specific legal requirements will continue to be negotiated taking appropriate account of the development's viability for required local infrastructure (including facilities essential for development to take place or to mitigate the immediate impact of development).	
		 3. CIL and developer contributions will be used to secure resources contributing towards essential infrastructure needs. Potential infrastructure requirements of this Core Strategy Review are identified in the council's Infrastructure Delivery Plan. Planning permissions will only be granted where suitable developer contributions are secured or are accompanied by a CIL liability notice, and where: a. The design of a development aims to reduce unnecessary or unsustainable demands on physical and social/community infrastructure, and environmental or utility network 	

Main Modification	Policy / Paragraph	Proposed Main Modification
		 b. Development does not jeopardise current or planned physical infrastructure; and c. The location, design or management of development provides a choice of means of transport and allows sustainable travel patterns, for pedestrians, cyclists and/or public transport. The travel demand of new development proposals will be considered and managed and tailored solutions will be developed to limit car use generated by new developments. All major trip-generating uses will provide Travel Plans. 4. Where the provision of infrastructure is necessary to facilitate and/or mitigate the impacts of development (including the cumulative impacts of allocated and other developments), developers will be required, where necessary, to provide the necessary infrastructure and/or make a proportionate contribution towards such infrastructure, including circumstances where such infrastructure has been forward-funded from other sources (other than non-repayable public sector funding). Necessary infrastructure will be secured by planning obligations and, where appropriate, other agreements, including Section 278 agreements.
MM06	Policy SS6: New Garden Settlement Development Requirements	Policy SS6 New Garden Settlement Development Requirements Land is allocated within the North Downs area for a new garden settlement as shown on the Policies Map.

Main Modification	Policy / Paragraph	Proposed Main Modification
		The settlement will be developed on garden town principles and will have a distinctive townscape and outstanding accessible landscape, both of which will be informed by the historic character of the area. It will be planned to be sustainable, providing new homes with a broad mix of tenures, employment opportunities and community facilities within easy walking and cycling distance. It will be a landscape-led development that responds to its <u>location within</u> the setting within of the Kent Downs AONB landscape and the adjacent Lympne Escarpment with an emphasis on a network of green and blue spaces including woodland and other planting, open space and recreation that supports healthy living, encourages interaction between residents, enhances local biodiversity and mitigates impacts on views from the scarp of the Kent Downs. Environmentally the settlement will be a beacon of best practice, making best use of new technologies, and will be designed to achieve a low carbon, low waste and highly water efficient development.
		Given the location of the proposed new settlement and its relationship with the Kent Downs AONB, it is essential that the landscape-led proposals include appropriate structural landscaping in order to avoid or minimise adverse impacts on the AONB and views in and out of the AONB in accordance with policy SS7.
		Outline planning permission will be granted for a comprehensive proposal that is supported by a masterplan prepared by the site promoters. The masterplan shall be prepared in partnership and in consultation with the local planning authority, stakeholders, partner organisations, local people and interest groups, in accordance with the three-tier approval structure and include a detailed phasing and delivery strategy.
MM06	Policy SS6: New Garden	(1) New Homes

Main Modification	Policy / Paragraph	Proposed Main Modification
	Settlement Development Requirements	a. The settlement shall provide for a minimum of 5,925 circa 5,600 new homes in a phased manner within this plan period (2019/20 to 2036/37) with potential for future growth to provide a total of 8,000-10,000 homes (subject to detailed masterplanning) within the site allocation area beyond the plan period (subject to detailed masterplanning and an assessment of potential impacts on the Kent Downs AONB in line with Policy SS7);
		b. The mix of tenure and size of new homes shall be in accordance with Policies CSD1 and CSD2 and evidence in the Strategic Housing Market Assessment, Parts 1 and 2 (PBA, 2016/2017) (or subsequent revision to the evidence base) and shall include build for rent provision to meet identified need. A minimum of 22 per cent of all dwellings should be provided as affordable homes, subject to viability;
		c. All homes shall meet the adopted Nationally Described Space Standards in accordance with Policy HB3 of the Places and Policies Local Plan (or any revision to that policy);
		d. Within the early phases, development shall provide homes located in neighbourhoods in and around the <u>new</u> town centre (Policy SS7 (2)), well-connected to the centre by a walking, cycling and public transport network. Close to the town centre there shall be a higher proportion of smaller residential units serving all age groups. <u>Other phases of development may come forward in tandem if they are well-connected to an existing rural centre or primary village with capacity to provide for the day-to-day needs of new residents, are in accordance with the masterplan for the garden town, maintain its quality and do not prejudice its overall delivery;</u>

Main Modification	Policy / Paragraph	Proposed Main Modification
		(2) Self-build and custom-build homes
		 a. A proportion of proposed dwellings shall be provided as self-build or custom-build plots, having regard to the need identified by the council, with each substantial phase contributing a proportion of self-build and custom-build housing;
		 Innovative self-build and custom-build designs will be encouraged that are flexible and incorporate new technologies, particularly those that achieve carbon and water neutrality. In small or single unit schemes the objective will be to achieve low carbon and high water efficiency; and
		(3) Employment development
		a. The settlement shall provide approximately 36,770 36,760 sqm net of employment floorspace (B use classes which may include office, research and development and light industrial uses within Class E, and uses falling within Class B2 and B8) by 2037. Development beyond the plan period has the potential to provide for approximately 57,600 sqm of employment floorspace in total within the site allocation area. A different delivery rate or quantum of employment development will need to demonstrate that employment provision aligns with population growth to ensure that the town grows in a sustainable way following garden town principles. Other employment opportunities will be created by the retail and other town centre development set out in Policy SS7(2)(b) as well as community uses. The settlement's location near the gateway to Europe (Channel Tunnel) provides the opportunity to deliver employment and town

Main Modification	Policy / Paragraph	Proposed Main Modification
		centre development that complements other centres including Folkestone town centre, Hythe and other growth areas across East Kent;
MM07	Supporting text: Paragraphs 4.178 – 4.180	 4.178 Landscape-led masterplanning and the high quality design and layout of the town (its 'townscape') will be key to the success of the settlement, with particular regard to the impact on views from the AONB. Each neighbourhood should have a distinctive character with different densities of development. The masterplan should show the relationship of different land uses, the height and massing of buildings, the legibility of streets and how the development will make use of high quality materials that are sensitive to, and sit comfortably alongside, the local environment. There is existing design guidance that can be drawn on, including the Kent Design Guide (Kent Design Initiative) and the Kent Downs Area of Outstanding Natural Beauty Landscape Design Handbook (Kent Downs AONB Unit), but the development will need to be informed by detailed design codes drawn up with the participation of the local community. The area's heritage assets, in particular Westenhanger Castle and its setting, together with other non-designated heritage assets, can make a significant contribution to the character of the new settlement, that can help attract future residents, businesses and visitors and create a strong sense of place from the outset. Proposals must be accompanied by a comprehensive Landscape Institute's and Institute of

Main Modification	Policy / Paragraph	Proposed Main Modification
		Environmental Management & Assessment's 'Guidelines for Landscape and Visual Impact Assessment' (Third Edition) or updates to this guidance.
		At the heart of the development will be a vibrant town centre that will meet the needs of residents, workers and visitors with attractive cultural, community, shopping and leisure facilities, as well as spaces for events and meetings to foster community cohesion. The Retail and Leisure Need Assessment 2018 Update indicates that the new garden settlement can support approximately 12,900 sqm (gross) (June 2019 update) projections suggest the new town and local centres within the new Otterpool Park settlement could provide between 10,800 and 16,700 sqm gross of retail (convenience and comparison) and food and beverage floorspace by 2037. Service uses (class A1 non-retail and class A2 financial and professional services) could increase this requirement to 15,500 sqm (gross) the garden settlement overall floorspace projection to 13,000 to 20,000 sqm gross by 2037. This will need to be carefully planned and phased, particularly any proposals above these indicative requirements, to avoid any detrimental impacts on nearby town centres (such as Folkestone, Hythe, New Romney, Ashford and Dover) or shops and facilities in nearby villages, yet also meet the everyday needs of the settlement and nearby communities. Each neighbourhood in the garden settlement will also need to be supported by educational, recreational and community facilities. It is expected that the retail provision will be provided as part of the new town centre, which should be located at the heart of the garden settlement, within easy walking distance of the station. Other small-scale retail development would be expected to be provided at 'local centres' in neighbourhoods through the separate phases of the development. It is expected that the individual units provided for comparison retail will not exceed in the region of 500sqm, unless justified by a retail impact

²age 276

Main Modification	Policy / Paragraph	Proposed Main Modification
		assessment, and that the majority of retail development will be provided as small local stores. Details of how the retail development is proposed to be phased across the development, to align with residential development, should be submitted with the application.
		4.180 The settlement presents a major opportunity to secure a high speed rail service between Westenhanger and London St Pancras. The council is pursuing this with the train operating companies, which are bidding for the new South Eastern franchise, infrastructure providers and also with Network Rail and other stakeholders. A transport hub should be provided, located at Westenhanger station, allowing easy transfer between walking, cycling, bus and train journeys. The railway station upgrade and hub will potentially deliver:
		 Lengthening of the existing platforms; New and refurbished station buildings with improved customer facilities; A new footbridge between platforms; and
		Car parking to meet the needs of the new town and nearby villages. Ways of integrating the station improvements with other land uses and facilities should also be explored.
		[New para.] In order to meet the demand for increased rail patronage on the high speed rail service from the increasing population of the garden settlement, and other development in the Folkestone & Hythe District and the rest of East Kent, there

Main Modification	Policy / Paragraph	Proposed Main Modification
		will be a need to engage with the relevant rail stakeholders including Network Rail, the rail franchise or concession operator, and the Department for Transport to encourage sufficient capacity to support the future population. Whilst the Council has limited direct control over this issue, it will work together with Ashford Borough Council, Kent County Council and other East Kent authorities to lobby the relevant stakeholders to increase the capacity on the high speed service, to ensure that the capacity exists to serve the additional demand created from the new development.
MM07	Policy SS7: New Garden Settlement – Place-Shaping Principles	Policy SS7 New Garden Settlement – Place Shaping Principles (1) A landscape-led approach a. The design and layout of the development shall be landscape-led and include within it structural landscaping in order to avoid or minimise adverse impacts on the Kent Downs AONB and views into and out of the AONB. Where required to mitigate any such impacts arising from the development, structural planting shall be carried out at an appropriate stage in relation to each phase in order to optimize its effectiveness, and include the provision of new habitats for priority nature conservation species. Applications shall be accompanied by a landscape and visual impact assessment that should inform the landscaping scheme at a structural and local level. Proposals shall demonstrate a landscape-led approach that respects topography and views, particularly from the Kent Downs Area of Outstanding Natural Beauty and helps mitigate impact on views from the scarp of the Kent Downs, guided by a Landscape and Visual Impact Assessment. The assessment should

Main Modification	Policy / Paragraph	Proposed Main Modification
		consider the proposal itself and any cumulative impacts arising from developments in the vicinity of the proposal; and
		b. A green and blue infrastructure strategy shall be developed that enhances existing green and blue infrastructure assets in accordance with Policy CSD4. Additionally the strategy shall deliver:
		i. Advanced woodland planting and habitat creation using native species to benefit later phases of development, particularly from prominent locations visible from the Kent Downs Area of Outstanding Natural Beauty, and to avoid as far as possible temporary loss of biodiversity value when construction begins. Advanced woodland planting, habitat creation and community green space shall also be designed to relate to local landscape character and to prevent the coalescence of the new settlement with Lympne and to separate neighbourhoods within the settlement itself. Planting and habitat creation should also be used to provide distance buffers between the M20/High Speed transport corridor for noise and air quality mitigation purposes;
		ii. Clear net biodiversity gains over and above residual losses through the planting of native species and the creation of green ecological corridors to improve species' ability to move through the environment in response to predicted climate change, and to prevent isolation of significant populations of species. The strategy shall enhance nearby Harringe Brooks ancient woodlands, (including ecological connections, future management and community access) Local Wildlife Sites, Otterpool Quarry Site of Special Scientific Interest and other sensitive ecological features, including the existing pond at the former Folkestone Racecourse,

Main Modification	Policy / Paragraph	Proposed Main Modification
		Enhancements may include improvements to ecological connections both within and outside the allocation boundary, their future management and community access, where appropriate. Proposals must demonstrate that there will be no impact on the Lympne Escarpment Site of Special Scientific Interest, unless exceptional circumstances can be demonstrated, in line with Places and Policies Local Plan Policy NE2;
		iii. A pollinator network throughout the settlement with connection to the wider countryside, with the aim of providing all-year round support for pollinators, through the use of native species;
		iii.iv. A new country park, easily accessible from the town centre and beyond and supported by and linked to other areas of strategic open space, that enhances the historic landscape setting of Westenhanger Castle;
		iv.v. Playing fields and sports provision, play areas, informal open spaces, allotments and woodland located to maximise use and meet the sporting, leisure and recreational needs of the garden settlement as informed by the council's Playing Pitch and Sports Facilities Strategies;
		v.vi. Publicly accessible, well-managed and high quality open spaces, which are linked to the open countryside and adjoining settlements. This shall be informed by an access strategy that seeks to protect and enhance existing public rights of way, and create new public rights of way. The strategy shall balance demands for public access with ecological and landscape protection, taking into account the impacts of increased access on the Kent Downs AONB and Folkestone to Etchinghill

Main Modification	Policy / Paragraph	Proposed Main Modification
		Escarpment Special Area of Conservation and other protected areas, which might necessitate the need for mitigation to be secured;
		vi.vii. Sustainable drainage systems (SuDS) to maximise landscape and biodiversity values and to prevent avoid any increase in, and where possible reduce, downstream flooding of the East Stour River, developed as part of an integrated water management solution; and
		vii.viii A long-term security and management plan of the Green Infrastructure estate which ensures community involvement and custodianship.
		(2) A vibrant town centre
		b. Food shopping (convenience retail) shall be provided within the town centre to allow choice and variety as well as reducing the need to travel for day-to-day needs. The Retail and Leisure Need Assessment 2018 Update (June 2019 update) indicates that the new garden settlement can support approximately 3,150sqm up to 4,284sqm (gross) of convenience retail floorspace within the plan period to 2037. A range of other shopping floorspace (comparison retail) shall also be provided to create a vibrant town centre. The 2018 Update Retail and Leisure Need Assessment (June 2019 update) indicates that the new garden settlement can support approximately 7,300sqm up to 9,108sqm (gross) of comparison retail floorspace within the plan period. A mix of other town centre uses should be provided, including food and beverage space (approximately 2,450sqm gross) (up to 3,305sqm gross) and non-retail and financial and professional services (approximately 2,600 sqm gross 3,300sqm gross). An impact assessment shall be

Main Modification	Policy / Paragraph	Proposed Main Modification
		undertaken The stated floorspace projections by use class type (baseline values) as drawn from the Retail and Leisure Need Assessment (June 2019 update) are to represent the upper limit of floorspace provision within the garden settlement across the plan period, so that it only meets the needs generated by the development itself. Should any phase of development propose a provision of floorspace that, when considered cumulatively to take account of the total floorspace provision across the garden settlement, would lead to the exceedance of one or more of the floorspace values stated within this policy, or if any individual comparison retail unit were to exceed 500sqm gross floorspace, then the promoter shall have to submit an impact assessment to demonstrate that there would be no detrimental significant impacts on the vitality and viability (including local consumer choice and trade) of nearby local village centres and other town centres including Folkestone, Hythe, New Romney, Dover and Ashford, by the scale and/or phasing of town centre development particularly where provision above these indicative thresholds is proposed; and (6) Sustainable access and movement
		c. The capacity of M20 junction 11 shall be upgraded and other key junctions on the road network will be redesigned and improved in partnership with Highways England and Kent County Council.

Main Modification	Policy / Paragraph	Proposed Main Modification
	_	Policy SS8 New Garden Settlement – Sustainability and Healthy New Town Principles (1) A sustainable new town b. All new build housing shall be built to water efficiency standards that exceed the current building regulations so as to achieve a maximum use of 90 110 litres per person per day of potable water (including external water use). The development shall be informed by a Water Cycle Strategy which includes detail of: i. Water efficiency, and demand management measures to be implemented to minimise water use and maximise the recycling and reuse of water resources (i.e. through the use of 'grey' water) across the settlement, utilising integrated water management solutions; ii. The need to maintain the integrity of water quality, how it will be protected and improved, and how the development complies with the Water Framework Directive; iii. Surface water management measures to avoid increasing, and where possible to
		reduce, flood risk through the use of Sustainable Drainage Systems (SuDS); and

	Main Modification	Policy / Paragraph	Proposed Main Modification
			 iv. Water services infrastructure requirements and their delivery having regard to Policy CSD5, and as agreed with the relevant statutory providers, and the Environment Agency's guidance on Water Cycle Studies;
7			c. All proposed development will have to satisfy the requirements of policy CSD5 (d). in order to avoid any significant impact on the water quality of the Stodmarsh European designated sites;
			e.d. For non-residential development, development shall achieve BREEAM 'excellent Outstanding' standard including addressing maximum water efficiencies under the mandatory water credits;
	MM09	Supporting text:	New Garden Settlement – Infrastructure, Delivery and Management
		New paragraphs following existing	Delivery of critical and necessary infrastructure
		paragraph 4.190	4.189 The creation of a new garden settlement will be a long-term initiative, lasting 20 to 30 years and delivered through a phased approach. Initial development will focus on new housing in and around a town centre (Policy SS7(2)) and additional village neighbourhoods will grow around this core.
			4.190 The creation of a new settlement generates economies of scale that can be used to deliver critical and necessary infrastructure at the earliest opportunity and throughout

Main Modification	Policy / Paragraph	Proposed Main Modification
		the town's development. The uplift in land value that will be created by the granting of planning permission will be captured to provide:
		The highest quality townscape and landscape;
		High standards of energy and water efficiency;
		Early investment in infrastructure; and
		 A sustainable funding stream for the management and maintenance of the community facilities and public realm over the long-term.
		[New para.] Policies for the new garden settlement are supported by the infrastructure
		delivery schedule set out in Appendix 5. This is intended to give adequate certainty to guide a development of this scale, given that will be built out over
		several decades with some development beyond the plan period, while
		recognising that it is not possible to fix every element of the scheme before the
		development commences. Some elements of infrastructure provision will be affected by new technologies, for example, or wider changes in society such as
		the ability to work from home, that cannot be predicted with certainty looking
		several decades ahead.
		[New para.] The National Planning Policy Framework recognises this issue: paragraph
		72 states that the supply of large numbers of new homes can often be best
		achieved through planning for larger scale development such as new settlements or significant extensions to existing towns and villages. However,
		the NPPF adds that the delivery of large-scale developments may need to extend

Main Modification	Policy / Paragraph	Proposed Main Modification
Modification	•	beyond an individual plan period, and the associated infrastructure requirements may not be capable of being identified fully at the outset (footnote 35). Anticipated rates of development and infrastructure requirements should, therefore, be kept under review and amended as policies are updated. [New para.] There will therefore need to be some flexibility regarding phasing and this will be kept under through detailed monitoring. A three-tiered approach to approval and delivery has been agreed to allow for this, building on the national best practice for large scale developments. Each phase of development will be supported by a sequence of submissions to the local planning authority to provide a progressive layering of increasingly detailed information from the over-arching and site-wide strategy (Tier 1), through substantive key phases (Tier 2) to detailed reserved matters application for sub-phases within a specific phase and on individual development sites (Tier 3). The precise extent, components and location of each key phase must be agreed with the local planning authority as delivery of the scheme progresses. Reserved matters
		applications can only be submitted for approval for any part of the site where the relevant key phase has been defined and all of the key phase framework documents have been approved. Limited exceptions may be allowed where necessary to provide critical or enabling infrastructure.
		Waste-water infrastructure [New para.] Southern Water has indicated that there is some, but limited, capacity within the existing system, which could accommodate the very early phase of

Main Modification	Policy / Paragraph	Proposed Main Modification
		development. However there is a need to develop a more holistic solution for the
		phasing and development of wastewater infrastructure.
		[New para.] In this regard there are currently three potential options for the provision of waste water infrastructure to support the needs of the development. The off-site
		option (upgrading Sellindge WWTW, option 1) and on-site option (on-site
		WWTW, option 2) are both viable options and these should be developed further
		to establish a preferred solution. Southern Water has confirmed that a second off-site option, to connect via Range Road Pumping Station, Hythe to the West
		Hythe Wastewater Treatment Works located approximately 7km to the south-
		east of the garden settlement, is not viable and should not be taken further. To
		ensure that there will be no negative impacts upon the surrounding
		communities, water quality or flood risk as a result of the development, including
		upon the neighbouring authority of Ashford Borough, the provision of
		wastewater infrastructure will be controlled through appropriate trigger point(s)
		relating to the occupation of development, to reflect the required timing of the
		wastewater infrastructure, and secured through the Section 106 agreement.
		Proposals for wastewater treatment should meet the requirements of Policy
		CSD5 regarding nutrient neutrality.
		'Monitor and manage' approach to highways infrastructure – Strategic Road Network
		[New para.] A traffic monitoring and management strategy is to be prepared by the applicant(s) for development within the site allocation for the new garden
		settlement for submission to (and consideration by) the local planning authority
		in consultation with Highways England, taking account of wider transport

Main Modification	Policy / Paragraph	Proposed Main Modification
		changes that may come forward throughout the plan period and reflecting traffic
		levels at the point of delivery.
		[New para] The purpose of the strategy is to:
		Enable the benefits of the anticipated modal shift to determine the requirement for, and most appropriate form of, highway mitigation; and
		Ensure that there is an appropriate safeguard in place to monitor whether the distribution and volume of traffic generated by occupied development is as predicted by modelling work carried out to inform the position agreed by Highways England and the district council in the signed Statement of Common Ground dated June 2021 (or updates to this statement).
		In this manner, any mitigation scheme is subject to a 'monitor and manage' approach to implementation.
		[New para.] Traffic volumes are to be monitored throughout the plan period to inform when, or if, the mitigation to be implemented in relation to the Strategic Road Network, and specifically M20 Junction 11, M20 Junction 12 to 13 proposals and the Alkham Valley interchange (A20/A260) is required.
		[New para.] The schemes of mitigation agreed with Highway England to appropriately mitigate planned growth to 2037 represents a 'worst-case' scenario, and it is entirely possible that, under the monitor and manage framework, the mitigation that is required will be the subject of refinement and revision. In addition, the timing as to when a specific scheme of highway mitigation is required relative

Main Modification	Policy / Paragraph	Proposed Main Modification
		to housing completions at the new garden settlement could be subject to change. The mitigation solutions will be kept under review, through the monitor and manage approach, on the basis that the transport modelling that supports the Core Strategy Review has demonstrated that the majority of interventions to the Strategic Road Network will not be required until towards the end of the plan period, or beyond. [New para.] The approach is appropriately robust to provide certainty about what transport infrastructure is needed, and by when, to ensure that development does not proceed until the impacts are understood and accounted for. 'Monitor and manage' approach to highways infrastructure – Local Road Network [New para.] The traffic monitoring and management strategy will also consider the local road network, as a means of controlling off-site traffic movements such that they do not bring about unacceptable impacts on nearby communities. A key requirement of the monitoring strategy, therefore, is that it will need to include actions for intervention should the monitoring show that traffic levels from the new garden settlement exceed what was predicted from the transport modelling and shown in the Transport Assessment. [New para.] If the need for intervention is triggered, it will be contingent on the associated developer(s) to implement traffic calming and other sustainable transport measures as a means to encourage modal shift and act as a deterrent to seek to reduce traffic to the distribution shown within the modelling.

Main Modification	Policy / Paragraph	Proposed Main Modification	
		[New para.] The legal agreement will need to secure a sustainable transport funding agreement with the applicant for sustainable transport and off-site traffic calming measures, subject to the appropriate legislative tests relating to planning obligations, which can be drawn down in the event that such measures are required to be implemented. The applicant will need to provide costed examples of the type of traffic calming or other sustainable transport measures that could be implemented as part of a monitoring strategy from which the secured capital sum is to be calculated. Where impacts relate to the road network outside Folkestone & Hythe district, consultation shall take place with the relevant local authority on the proposals. [New para.] Policy SS9 requires that highways mitigation measures are provided through planning obligations. Section 278 is part of the Highways Act 1980 that enables a highway authority to enter into an agreement with a third party to deliver improvements on the existing public highway. Works on the local highway network will require an agreement between the developer and Kent County Council. Improvements to the strategic road network require approval from Highways England, acting on behalf of the Secretary of State for Transport. Section 278 is a mechanism that allows highways improvements required as a result of a development to be implemented directly by either the developer or the highway authority, or through a developer contribution for future works on the wider highway network.	

MM09	Policy SS9: New	Policy SS9
	Garden	New Garden Settlement – Infrastructure, Delivery, Phasing and Management
	Settlement –	
	Infrastructure,	(1) Delivery of infrastructure and phasing
	Delivery and	
	Management	a. The settlement should be self-sufficient regarding education, health, community, transport and other infrastructure, where necessary allowing for the expansion and
		improvement of nearby facilities such as secondary education and waste;
		b. Critical <u>and necessary</u> infrastructure, such as <u>including</u> primary education, <u>highways</u> <u>mitigation and wastewater infrastructure</u> should be provided in the first phase of
		development to support investment and community development in accordance with
		the indicative infrastructure delivery schedule at Appendix 5 and a delivery
		strategy which sets out broadly how the development is to be phased and
		delivered, unless it can be demonstrated that:
		i) Relevant infrastructure capacity is readily available to service the quantum of development proposed;
		ii) The relevant infrastructure will be provided in advance of the proposed development; or
		iii) Alternative provision can be secured and agreed with the relevant provider and the local planning authority to meet the relevant requirement.
		Proposals will be required to accord with the three-tier approval structure. Proposals which would deliver unsustainable, disconnected and isolated
		development will be refused.

- c. A traffic monitoring and management strategy shall be submitted for approval by the local planning authority in consultation with the local highway authority, Highways England and other relevant authorities in relation to traffic movement and impact on the surrounding road network;
- d. Proposals will be required to demonstrate that necessary highways capacity is available for each quantum of development, taking into account cumulative development of the garden settlement, set within the monitor and manage framework relating to both the Strategic Road Network and Local Highways Network.
- e. Traffic volumes shall be monitored through the plan period to inform when, or if, mitigation shall be required and implemented in relation to the Strategic Road Network, and specifically M20 Junction 11, M20 Junction 12 to Junction 13 and the Alkham Valley Interchange (A20/A260). Mitigation will be delivered in accordance with schemes approved by Highways England and the relevant local highway authority, and the mitigation frameworks for the Strategic and Local Highway Networks set out in Appendix 5, as appropriate in order to achieve net zero harm in terms of highway capacity and highway safety;
- f. Development proposals will be required to be supported by planning obligations that provide for the payment of proportionate contributions towards the carrying out and/or implementation of strategic and other necessary highway mitigation works and improvements, or by direct delivery of the works and improvements, where monitoring identifies the need for such works at any stage during the lifetime of the development and which cannot otherwise be managed. Where

necessary and appropriate, the occupation of the development shall be regulated by reference to the completion of any such works;

- g. Where highway improvements are required to other junctions or links outside the Folkestone & Hythe District, consultation shall take place with the relevant local authority prior to the proposals being agreed;
- h. A degree of overlap between one phase and another one may be acceptable, providing it can be demonstrated that this The provision of infrastructure should be phased in a way that does not disadvantage early residents or neighbouring communities through placing pressure on existing infrastructure in the local area. The creation of a post of community development worker should be explored, to serve the early phases until the town is established, secured through the Section 106 agreement;
- E.i. The nearby communities of Lympne, Barrow Hill, Sellindge, Westenhanger, Saltwood, Stanford and Postling should have appropriate access to and benefit from the infrastructure provided. If it is appropriate for infrastructure to be shared with existing communities then this shall be decided through local consultation as part of the masterplanning process; and
- d.j. Infrastructure provision will be secured and/or funded through Section 106 and Section 278 legal agreements, or secured by conditions, to ensure it is delivered at the appropriate phase of the development in accordance with Policy SS5, paragraph 4.

(2) A smart town

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d. Ducting for the fibre-optic and other cabling, energy and other service infrastructure shall be provided in multi-service corridors outside the public highway (where this is defined to be trafficked surface, i.e. not inclusive of pavement) that are easily accessible to
statutory undertakers to avoid unnecessary highway works and surface repairs.

age 294

Main Modification	Policy / Paragraph	Proposed Main Modification	
MM10	Paragraph Policy SS10: Spatial Strategy for Folkestone Seafront	Policy SS10 Spatial Strategy for Folkestone Seafront Folkestone Seafront is allocated for mixed-use development, providing up to 1,000 homes, in the region of 10,000 sqm of floorspace comprising small shops and retail services (A use classes), offices (within class E B4) and other community and leisure (C1, D1, D2 and sui generis) uses: together with beach sports and sea sports facilities and with associated and improved on-site and off-site community and physical infrastructure. Planning permission will only be granted where: h. Development delivers 22% 300 affordable housing dwellings for central Folkestone, subject to viability (or if total residential quantum is less than 1,000 units, a 30 per cent centribution). i. Residential buildings achieve a minimum water efficiency of 110 90-litres per/person/day. All development must be designed and constructed to achieve high standards of environmental performance, and buildings should be designed to allow convenient waste recycling.	

Main Modification	Policy / Paragraph	Proposed Main Modification	
MM11 Green box before paragraph 4.207		Shorncliffe Garrison, Folkestone	
		A hybrid permission, including full planning permission for phases 1A and 1B at Shorncliffe Garrison, Folkestone (14/0300/SH) was granted in 17 December 2015, totalling 1,200 homes. Development started on site in 2016 and 233 homes had been completed by the start of the Core Strategy Review plan period in 2019/20. is progressing on site, with subsequent Reserved Matters approval in place for phases 1D and 2B of the development. Construction is continuing on site and, with further reserved matters applications being approved, around three quarters of the strategic site is now complete, under construction or has detailed planning permission awaiting start on site. A further 967 homes are expected to be completed by the end of the plan period in 2036/37, completing the development of the strategic site. Policy SS11: Spatial Strategy for Shorncliffe Garrison, Folkestone is retained from the 2013 Core Strategy to guide the remaining phases of development.	
MM11	Policy SS11: Spatial Strategy	Policy SS11 Spatial Strategy for Shorncliffe Garrison, Folkestone	
	for Shorncliffe Garrison, Folkestone	The Shorncliffe Garrison complex is allocated for a predominantly residential development of around 1,000 dwellings to 2026 (up to 1,200 dwellings by 2031) and an improved military establishment, together with a hub of new community facilities, associated enhancements to sports and green infrastructure, and on-site and off-site travel infrastructure upgrades. Planning permission will also only be granted where:	

Main Modification	Policy / Paragraph	Proposed Main Modification
MM12	Policy CSD1: Balanced Neighbourhoods	 i. Development delivers 360 22% affordable housing dwellings for the Urban Area subject to viability (or if the total residential quantum is less than 1,200 units, 30 per cent). j. Residential buildings achieve a minimum water efficiency of 110 90 litres/person/day. All development must be designed and constructed to achieve high standards of environmental performance, and buildings should be designed to allow convenient waste recycling. Policy CSD1 Balanced Neighbourhoods Development resulting in new housing (class C3) will be allowed in line with policy SS3 (optimising distinctiveness, appeal, sustainability, and accessibility of places) where it contributes to the creation of balanced neighbourhoods through high-quality design proposals which address identified affordable housing needs. All housing development should include a broad range of tenures incorporating market housing for sale and affordable housing (affordable housing for rent, starter homes, discounted market sales housing and other affordable routes to home ownership including rent to buy and shared ownership), where practicable and subject to viability as follows:

Main Modification	Policy / Paragraph	Proposed Main Modification		
		 Development proposing (or land capable of accommodating) 6 to 10 dwellings (net gain) within the Kent Downs Area of Outstanding Natural Beauty should provide financial contributions towards the provision of affordable housing equivalent to one affordable dwelling on-site; 		
		Development proposing (or land capable of accommodating) 11 to 14 dwellings (net gain) at any location within the district should provide a minimum of two affordable dwellings onsite; and		
		 Development proposing (or land of 0.5ha or more in size) 15 or more dwellings (net gain) at any location within the district should provide a minimum of 22 per cent affordable dwellings on-site. 		
		For development proposing of 15 or more dwellings, as a starting point approximately 30 per cent of the affordable housing provision shall be shared equity and 70 per cent of the affordable housing to be provided shall be affordable housing for rent/social rent. For sites under this threshold, the proportion of affordable housing tenures will be negotiated on a site-by-site basis.		
		Provision should be made on-site unless off-site provision through a financial contribution of broadly equivalent value can be robustly justified. Where a site-specific viability assessment is provided with an individual planning application and it can be demonstrated to the reasonable satisfaction of the Council that the proposed development would not be viable with the full affordable housing requirement, the Council will give consideration to allowing an appropriate level of relaxation of the requirements.		

Main Modification	Policy / Paragraph	Proposed Main Modification		
		Affordable housing developments will be allowed at sustainable rural settlements as an exception to policies of rural development restraint where it <u>can be</u> has been demonstrated that there is a requirement in terms of local need and <u>the proposed site is suitable for this purpose.</u> a suitable site. Provision of affordable housing within individual sites and settlements should <u>so far as possible be dispersed</u> not be concentrated in one location, and must be designed to integrate in <u>terms of</u> function and appearance with <u>the market housing.</u> private housing and existing properties.		
MM12	Supporting text: Paragraph 5.8	5.8 Full account will be taken of viability in achieving these targets where a site specific viability assessment is provided with individual planning applications.		
MM13	Policy CSD2: District Residential Needs	Policy CSD2 District Residential Needs Residential development and new accommodation should be designed and located in line with the spatial strategy's approach to managing demographic and labour market changes and meeting the specific requirement of vulnerable or excluded groups. Within developments of 15 or more dwellings (net gain), where viable and practical: • A range of housing tenures should be provided including owner-occupied and private rented and affordable housing in accordance with CSD1. The council's Strategic Housing		

Main Modification	Policy / Paragraph	Propo	Proposed Main Modification		
		 Market Assessment (SHMA) will be tenures; and A range of size of new dwellings shareflect the mix identified in the SHM 	nould be provided.		·
		Tenure	One bed (per cent)	Two to three bed (per cent)	Four bed + (per cent)
		Owner-occupied / private rent	5 – 20	65 - 70	15 - 30
		Affordable tenures (shared ownership / affordable rent / social rent as defined in the National Planning Policy Framework)	20 – 25	50 – 60	20 - 25
		Specialist units for older people (Class allocations as part of a new garden seand expansion at Sellindge (Policy CSI Elsewhere, residential accommodation elderly or other individuals in need above and where: a. It does not lead to an over-conneighbourhood, and	ettlement in the No D9). providing an eler of supervised c	orth Downs Area (l ment of care <u>for, c</u> <u>are</u> will be permitt	Policies SS6-SS9) or supervision of, ed in line with the

Main Modification	Policy / Paragraph	Proposed Main Modification	
		 b. It makes a suitable contribution as necessary to the community and sustainable transport infrastructure needs associated with residents, and c. It is shown to be designed to provide facilitate the provision of a high quality of care. The accommodation needs of specific groups will be addressed on suitable sites based on evidence of local need, including appropriate provision for Gypsies, Travellers and Travelling Showpeople. 	
MM14	Policy CSD3: Rural and Tourism Development	Policy CSD3 Rural and Tourism Development Proposals for new development in locations outside the settlements identified in the settlement hierarchy may enly be allowed if a rural or coastal location is essential, and or to protect or enhance meet green infrastructure assets in line with Policy CSD4 requirements. Development in these locations will enly be acceptable in principle if forming a site for: a. aAffordable housing (rural exceptions in accordance with CSD1, or allocated sites); b. Accommodation to provide for an essential need for a rural worker (including a person who is in majority control of a farm business) to live permanently at or near their place of work in the countryside; b.c. aAgriculture, forestry or equine development; e.d. eSustainable rural diversification, and tourism enterprises as set out below;	

Main Modification	Policy / Paragraph	Proposed Main Modification		
		d.e. lLocal public or essential services and community facilities in line with policies SS3/4;		
		e. <u>f.</u> rReplacement buildings (on a like-for-like basis) and the subdivision of existing residential dwellings;		
		g. The re-use of a redundant or disused building and the enhancement of its immediate setting;		
		f.h. Building conversions of buildings that contribute to the character of their location;		
		g. <u>i.</u> s <u>S</u> ustainable rural transport improvements <u>;</u>		
		h. <u>i.</u> e <u>E</u> ssential flood defences or strategic coastal recreation- <u>; or</u>		
		k. Development that makes optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of a heritage asset.		
		To underpin maintain the sustainable development sustainability of rural communities of the countryside, the loss of community facilities (including local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) in the centre of any village will be resisted unless appropriately demonstrated to be unviable in line with Places and Policies Plan C2. and rural economic diversification will be supported, especially through the re-use or refurbishment of redundant rural buildings. Tourist, recreation and rural economic uses will be appropriately protected and new		
		development allowed within defined settlements in the settlement hierarchy. Where sites are unavailable within settlements – and development is proportionate in scale/impact and also		

Main Modification	Policy / Paragraph	Proposed Main Modification		
		accessible by a choice of means of transport – it may also be acceptable on the ed Strategic Towns and Service Centres, and failing that, Rural Centres and Primary Village		
		Rural economic development must be consistent with <u>the</u> green infrastructure (GI) and coastal and water environmental principles <u>set out in Policies CSD4 and CSD5.</u>		
MM14	Supporting text: Paragraphs 5.32 and 5.33	5.32 As a rural district with places of particular interest to visitors specifically because of their unique environments (for example, Dungeness), rural and coastal development must be appropriately managed. Planning for rural areas should therefore sympathetically utilise and enrich the beauty and character of the countryside. Therefore this policy should be read in parallel with national policy and environmental and coastal policy, particularly with green infrastructure provisions (CSD4) and Habitats Regulations Assessment findings on recreational uses and impact. Given the characteristics of the district, the scope of this policy is wide.		
		[New paragraph break]		
		5.33 In the countryside, rural services and infrastructure for residents and visitors alike may be found in a range of locations and serve far afield. It is an important principle that the stock of rural economic or social uses should be managed for the benefit of the countryside as a whole. National policy requires that services and facilities found within settlements should be retained and protected. In applying Policy CSD3 the council will have regard to the National Planning Policy Framework which states that planning policies should enable "the retention and development of accessible local services and community facilities, such as local shops, meeting places,		

Main Modification	Policy / Paragraph	Proposed Main Modification
		sports venues, open space, cultural buildings, public houses and places of worship."
MM15	Supporting text: Green Infrastructure of Natural Networks, Open Spaces and Recreation Green box before paragraph 5.34	 Green Infrastructure of Natural Networks, Open Spaces and Recreation Primary aims: B1, B3, B4, B6, B7 C4, D4, D5, D8 (see section 3.1). Main local evidence base studies: Sustainability Appraisal, Habitats Regulations Assessment (sites other than Dungeness complex), Habitats Regulations Assessment (Dungeness SAC, Dungeness to Pett Level SPA), Green Infrastructure Report, Open Space Strategy (2017), Play Area Review (2017), Play Area Strategy (2017). Dungeness Complex Sustainable Access and Recreation Management Strategy (SARMS) (2017).
MM15	Supporting text: Paragraph 5.42	As a funder of the Romney Marsh Countryside Partnership, the council has long supported work to sustainably manage tourism and recreation at Dungeness and will continue to do so. By working with stakeholders including Natural England, the Royal Society for the Protection of Birds (RSPB), the Environment Agency, landowners and neighbouring authorities, including Rother District Council, the council is developing has developed a sSustainable aAccess and Recreation Management sStrategy (SARMS) for the area. This includes—which may include proposals to support sustainable visiting to monitor impacts on the Dungeness Natura 2000 series sites. Given the breadth of its membership and its cross-boundary scope, the Romney Marshes Living Landscape project, the Dungeness National Nature Reserve partner

Main Modification	Policy / Paragraph	Proposed Main Modification
		group or a similar grouping would appear to offer a good vehicle to achieve such a strategy.
MM15	Policy CSD4: Green Infrastructure of Natural Networks, Open Spaces and Recreation	Policy CSD4 Green Infrastructure of Natural Networks, Open Spaces and Recreation Improvements in green infrastructure (GI) assets in the district will be actively encouraged as will increase in the quantity of GI delivered by the council working with partners and developers in and around the sub-region, including through pursuing opportunities to secure net gains in biodiversity, and positive management of areas of high landscape quality or high coastal/recreational potential. 1. The council will require development proposals over their lifetime: i. To provide net gains in biodiversity at least to comply with statutory and/or national policy requirements (assuming no residual loss); ii. To demonstrate that they protect and enhance valued landscapes, sites of biodiversity or geological value and soils, commensurate to their status and quality; iii. So far as possible, to deliver improvements in green infrastructure (GI) assets in the district and ensure positive management of areas of high landscape quality or high costal/recreational potential identified in the Green Infrastructure Report (2011) (or any updates to this report).

Main Modification	Policy / Paragraph	Proposed Main Modification	
allowed, or significant that the area.		2. Green infrastructure will be protected and enhanced and the loss of GI uses will not be allowed, other than where demonstrated to be in full accordance with national policy, or a significant quantitative or qualitative net GI benefit is realised or it is clearly demonstrated that the aims of this strategy are furthered and outweigh its impact on GI. Moreover:	
		a. Development must avoid a net loss of biodiversity, achieve net gain over and above residual loss.	
		b. i. The highest level of protection in accordance with statutory requirements will be given to protecting the integrity of sites of international nature conservation importance.	
		e. <u>ii.</u> A high level of protection will be given to nationally designated sites (Sites of Special Scientific Interest and Ancient Woodland) where development will avoid any significant impact-;	
		d. <u>iii.</u> Appropriate and proportionate protection will be given to habitats that support higher-level designations and sub-national and locally designated wildlife/geological sites. to include Local Wildlife Sites (LWS), (including Kent Biodiversity Action Plan habitats, and other sites of nature conservation interest).:	
		e. <u>iv.</u> Planning decisions will have close regard to the need for conservation and enhancement of <u>landscape and scenic beauty</u> natural beauty in the Kent Downs Area of Outstanding Natural Beauty (AONB) and its setting, <u>which will be given</u> the highest status of protection in relation to these issues.	
		other planning considerations. Development within the setting of the AONB should be sensitively located and avoid or minimise adverse impacts on the	

Main Modification	Policy / Paragraph	Proposed Main Modification
		AONB. Elsewhere development must not jeopardise the protection and enhancement of the district's distinctive and diverse local landscapes (especially where these support the setting of the AONB), and must reflect the need for attractive and high-quality open spaces throughout the district-: and
		v. Planning applications will need to be supported by ecological surveys, mitigation strategies (when required) and enhancement plans, in order to follow and apply the mitigation hierarchy, as appropriate.
		3. The GI network shown in Figure 5.2 and identified in supporting evidence, and other strategic open space, will be managed with a focus on:
		i. Adapting to and managing climate change effects-;
		<u>ii.</u> Protecting and enhancing biodiversity and access to nature, particularly in green corridors and other GI strategic opportunities in Figure 5.2, with appropriate management of public access (including the Sustainable Access <u>and Recreation Management</u> Strategy for Dungeness and together with a strategic approach to the international sites as detailed above); and also avoiding development which results in significant fragmentation or isolation of natural habitats-;
		<u>iii.</u> Identifying opportunities to expand the GI functions of greenspaces and their contribution to a positive sense of place (including enhancements to public open spaces and outdoor sports facilities).: <u>and</u>
		<u>iv.</u> Tackling network and qualitative deficiencies in the most accessible, or ecologically or visually important GI elements, including improving the GI strategic fringe zones in

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Main Modification	Policy / Paragraph	Proposed Main Modification
		Figure 5.2 through landscape improvements or developing corridors with the potential to better link greenspaces and settlements.
MM16	Supporting text: New paragraphs following paragraph 5.48	5.48 It is particularly important for green infrastructure that development is consistent with coastal management plans. Proposals must not adversely affect dynamic coastal processes and should avoid unnecessarily exacerbating 'coastal squeeze' impacts as recognised in the Habitats Regulations Assessment and elsewhere.
		[New para.] In coastal areas local planning authorities are required by National Planning Policy Framework paragraph 170 to take account of the UK Marine Policy Statement and marine plans in planning for coastal areas. The district council has worked with the Marine Management Organisation (MMO) in developing this Core Strategy Review and will liaise with the MMO in assessing development proposals that could affect marine interests. [New para.] Developers putting forward proposals in the coastal area of the district should have regard to the Marine Policy Statement, the South Inshore and Offshore Marine Plan (Department for Environment, Food and Rural Affairs, July 2018) and the district's Places and Policies Local Plan, particularly policies NE8: Integrated Coastal Zone Management and NE9: Development Around the Coast.

Main Modification	Policy / Paragraph	Proposed Main Modification
MM16	Supporting text: Green box 'Appropriate Assessment Key Findings: Dungeness' before paragraph 5.51	Appropriate Assessment Key Findings: Dungeness The Sustainable Access and Recreation Management Strategy for Dungeness (2017) will be used to identify resources, oversee the update of surveys of visitor usage and activity, and decide on appropriate management interventions (which may include increased stewardship, surveillance, education and further targeted controls on public access).
MM16	Supporting text: Paragraphs 5.65 and 5.66 Water and Coastal Environmental Management	All new homes already have to meet the mandatory national standard for water usage set out in Building Regulations of 125 litres per person per day. As set out in national Planning Practice Guidance, where there is a clear local need, local planning authorities can set out local plan policies requiring new dwellings to meet tighter standards set out in Building Regulations of 110 litres per person per day. Most of the district's recent residential planning permissions have required Code for Sustainable Homes standards, predominately at what was level 3. This level (and Code level 4) required design features to enable a maximum consumption of 105 litres per person per day. Since the adoption of the 2013 Core Strategy there have been significant changes to the planning and building regulations systems relating to energy efficiency and low carbon development. Following the Housing Standards Review, the Code for Sustainable Homes was withdrawn (effective from 26 March 2015). As a result of this, local planning authorities can no longer stipulate compliance with Code levels or require. Code assessments in planning policy. In place of this, the government

Policy / Paragraph	Proposed Main Modification
	introduced a number of changes to building regulations standards, along with some new standards. These included for water (Part G), a new optional standard (110 litres per person per day) for water stressed areas that has been added to the baseline standard of Part G (125 litres per person per day).
	Given the area's Water Scarcity Status, the council requires that all new homes development meets the new optional standard of water use of 110 litres per person per day. Proposals that achieve the water-related elements of good design standards and exceed the optional standard will be encouraged, and will be required for the new garden town to ensure it fully meets the principles at the heart of the garden settlement movement. For non-residential developments, the Building Research Establishment's Environmental Assessment Method (BREEAM) is the most commonly accepted assessment tool by which to judge and require increased sustainability standards. In relation to water, non-residential developments will be expected to reach a minimum of the BREEAM 'Outstanding Excellent' standard, with the aspiration to reach 'Outstanding' where meeting this standard would be feasible and viable.
Policy CSD5: Water and Coastal Environmental Management	Policy CSD5 Water and Coastal Environmental Management Development will be permitted where the following criteria are met:
	Paragraph Policy CSD5: Water and Coastal Environmental

Main Modification	Policy / Paragraph	Proposed Main Modification
		b. For non-residential development, the development achieves BREEAM 'excellent outstanding' standard addressing maximum water efficiencies under the mandatory water credits, where technically feasible and viable; and
		c. New buildings and dwellings must be delivered in line with wastewater capacity, and designed so as to ensure that, in relation to greenfield development, peak rate of surface water runoff from the site is not increased above the existing greenfield surface water runoff rate, incorporating appropriate sustainable drainage systems (SuDS) where feasible and water management features, with full consideration given to integration of water management. The quality of water passed on to watercourses and the sea must be maintained or improved, and flood risk must not be increased by developments within the district; and
		 d. Development which could have an impact on water quality in the Stodmarsh European-designated sites through increased nutrient levels from wastewater discharges will be required to provide evidence of nutrient impacts through a nutrient budget approach at the point of submission of the planning application. This requirement will apply to development within the Stour Operational Catchment, or within the catchment areas of Wastewater Treatment Works discharging into the Stour Operational Catchment, as identified on the Policies Map. Planning permission will only be granted if: i. The applicant can demonstrate, subject to meeting the tests of the Habitat Regulations, that the development would not have a significant effect on the

Main Modification	Policy / Paragraph	Proposed Main Modification	
		Stodmarsh European sites either alone or in combination with other plans and projects; and	
		ii. The applicant can demonstrate that the development will provide all requisite mitigation measures to avoid any likely significant effect on the Stodmarsh European sites as may be necessary through a Design and Implementation Plan. The Design and Implementation Plan will set out the proposed nutrient neutrality mitigation measures, how the measures will be implemented and how they will be secured for the lifetime of the development. This plan will be required to be submitted to and approved by the Council before planning permission can be granted. The mitigation measures in the Design and Implementation Plan shall be secured by planning condition or planning obligation as appropriate.	

MM16	Supporting text: Paragraphs 5.72 – 5.73 and new
	Paragraphs 5.72
	- 5.73 and new
	paragraphs
	paragraphs following

Water and Coastal Environmental Management

- 5.72 Most of district's water supply comes from groundwater sources. Water resources must be maintained, and proposed developments must not have a negative impact on public water supplies or their associated Source Protection Zones and ground source protection zones must be effective. Pollution prevention measures are required in areas of high groundwater (in consultation with the Environment Agency and Natural England). A key target of the Water Framework Directive is to aim for a 'good' status for all water bodies by 2015, where this is not possible the aim is to achieve 'good' status by 2021 or 2027. The aim is also to achieve 'good' ecological potential and 'good' surface water chemical status for heavily modified water bodies and artificial water bodies.
- 5.73 New developments should explore options other than a reliance on tank storage; for example the incorporation of open water storage and conveyance (including swales and wetlands) as a positive design feature of developments.

Nutrient Neutrality

[New para.] New development in the North Downs area of the district has the potential to increase nutrient flows into the River Stour, flowing into the Stodmarsh system of European designated sites (Special Area of Conservation, Special Protection Area and Ramsar site), north east of Canterbury. Damage to the water quality of these sites (eutrophication) has been caused by high nutrient levels, particularly phosphorus but also nitrogen. The likely extent of the affected catchments within the administrative boundary of the Folkestone and Hythe district, and within identified Wastewater Treatment Works discharging into this catchment, is shown in Figure 5.4 and on the Policies Map.

[New para.] The council will work with Natural England to assess the likely impacts of development proposals, in line with the Conservation of Habitats and Species Regulations 2017. In assessing proposals, the council will have regard to Natural England's 'Advice on Nutrient Neutrality for New Development in the Stour Catchment in Relation to Stodmarsh Designated Sites' (November 2020, or subsequent updates) and applicants should follow this advice in developing their proposals.

[New para.] In implementing Policy CSD5 d. the council will have regard to Natural England's Advice Note which sets out a four-stage methodology which involves calculating:

- The total nutrients that would be discharged into the catchment (Stage 1);
- Existing nutrient discharges from the current land use without the proposed development (Stage 2);
- Nutrient discharges from the future land use(s) proposed for the development (Stage 3); and
- The change in total nutrients as a result of the proposed development (Stage 4).

If this methodology identifies that additional nutrients will be generated, then mitigation will be required.

[New para.] In assessing which types of development are likely to generate additional nutrient discharge, the Advice Note states that (paragraphs 4.9-4.12):

- All types of development that would result in a net increase in population served by a wastewater system, including new homes, student accommodation, tourist attractions and tourist accommodation will have inevitable wastewater implications;
- Commercial development not involving overnight accommodation is not likely to have wastewater implications, as it is assumed that anyone working in, or making use of, the commercial development also lives in the catchment, and therefore wastewater generated by that person can be calculated using the population increase from new homes and other accommodation. This removes the potential for double-counting of wastewater arising from different planning uses;
- Tourist attractions and tourist accommodation are likely to attract people into the
 catchment and therefore generate additional wastewater and consequential
 nutrient loading on the Stodmarsh designated sites. This includes self-service
 and serviced tourist accommodation such as hotels, guest houses, bed and
 breakfast and self-catering holiday chalets and static caravan sites. Other
 developments, such conference facilities, would need to be considered on their
 merits; and
- There may be other types of development, such as waste management facilities or road schemes, which could result in the discharge of additional nitrogen and/or phosphorus into the catchment.
- [New para.] Natural England's Advice Note adds that, where a development is outside the Stour Operational Catchment but discharges into a wastewater treatment works covered by the guidance, then the total quantity of nutrients will still need to be calculated, in line with Stage 1 of the methodology. The net change in the

total nitrogen and phosphorus load that will result from the development will then need to be calculated, following Stage 4 of the methodology, and, where appropriate, mitigation will need to be provided (paragraph 4.7 of the Advice Note). The identified wastewater treatment works are listed in Table A1.2 of the Advice Note; within Folkestone & Hythe district these are:

- <u>Chartham Wastewater Treatment Works covering a very small area to the north</u> of the district, north of Stelling Minnis; and
- <u>Sellindge Wastewater Treatment Works covering an area around Sellindge and</u> southwards to Lympne.

In identifying which developments within the district, outside the Stour Operational Catchment, are affected, the council will have regard to the wastewater treatment works catchment areas shown on the Policies Map and Figure 5.4. As Figure 5.4 shows, the area covered by the catchments of the Chartham and Sellindge wastewater treatment works not already covered by the Stour Operational Catchment is extremely limited in extent.

[New para.] Developers will need to demonstrate, either that their proposals will not have a significant effect on the Stodmarsh sites, or that mitigation measures can be delivered on-site, or secured off-site, to avoid any impact. Under the Conservation of Habitats and Species Regulations (2017 as amended) there are significant responsibilities conferred on the council as a 'competent authority', most importantly that the council only approves plans or projects (including planning applications) if there is no likelihood of a significant effect on any European-designated nature conservation site.

- [New para.] In order to assess whether a planning application would lead to a 'likely significant effect' a Habitats Regulations Assessment (HRA), generally including an Appropriate Assessment (AA), needs to be carried out.
- [New para.] A potential effect would be considered 'likely' if it cannot be ruled out, based on available information. When moving to the Appropriate Assessment stage, an established principle is that the AA must use the 'precautionary principle'. A planning application may only be granted if the competent authority (the district council) has made certain that there would be no adverse effect on the integrity of the site and where no reasonable scientific doubt remains. It must be shown that there would be no likelihood of a significant effect for the council to lawfully grant planning permission.
- [New para.] To meet its obligations under the Habitats Regulations, Policy CSD5: Water and Coastal Environmental Management requires applicants of proposals within the identified catchment areas to provide evidence of the nutrient impacts of their schemes through a nutrient budget approach, using the methodology set out in Natural England's Advice Note.
- [New para.] <u>Developers are encouraged to enter into pre-application discussions with Natural England and the district council before submitting their proposals. On submission, the applicant will be required to provide a nutrient budget calculation to determine whether mitigation is required.</u>
- [New para.] This approach applies to applicants for full and outline planning permissions for the applicable uses listed in the Advice Note and summarised above.

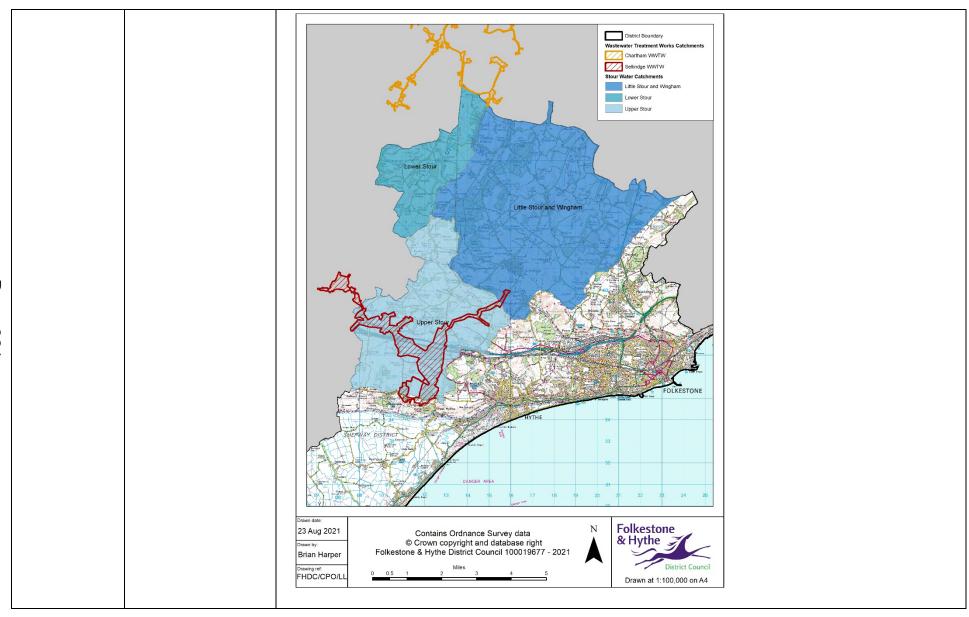
- [New para.] Applicants for full planning permission or reserved matters will be required to submit a nutrient budget with their application. Where the nutrient budget calculation identifies that additional nutrients will be discharged into the affected catchments, the applicant will also be required to submit a Design and Implementation Plan, setting out proposed nutrient neutrality mitigation measures, how these measures will be implemented and how they will be secured for the lifetime of the development; this plan will need to be submitted to and approved by the Council before planning permission can be granted.
- [New para.] Mitigation measures are likely to be delivered on-site and Natural England's Advice Note provides examples of these measures. There may be opportunities for developers to put forward off-site mitigation measures; in these circumstances it will need to be established that there is a clear scientific link between the proposed development and the mitigation and that the mitigation package ensures that the proposed development will be nutrient neutral.
- [New para.] Applicants for outline planning permission will be required to submit a nutrient budget with their application. Where the nutrient budget calculation identifies that additional nutrients will be discharged into the affected catchments, the applicant will also be required to submit an outline Design and Implementation Plan, setting out, in broad terms, proposed nutrient neutrality mitigation measures, how these measures will be implemented and how they will be secured for the lifetime of the development, before planning permission can be granted. Although some details may not be available at outline planning application stage, the council will need sufficient information to be confident that there would be no adverse effect on the integrity of the Stodmarsh sites with no

reasonable scientific doubt remaining, to meet its duties under the Habitats Regulations.

[New para.] Where sufficient supporting information has been provided, the planning application can then be validated. The development management case officer will carry out a Habitats Regulations Assessment, incorporating where necessary an Appropriate Assessment, and consult on the HRA and AA with Natural England and other organisations as appropriate. Natural England must be consulted on the findings of an HRA and the council has a duty to consider Natural England's response in reaching its decision.

[New para.] Where planning permission is granted, the council will need to ensure that any mitigation is secured for the lifetime of the development; the council will secure the mitigation by condition or planning obligation as appropriate.

Main Modification	Policy / Paragraph	Proposed Main Modification		
MM16	New Figure 5.4 to show extent of Stour Operational Catchments and Chartham and Sellindge Wastewater Treatment Works Catchments	Figure 5.4: Stour Operational Catchments and Chartham and Sellindge Wastewater Treatment Works Catchments		



Page 321

Main Modification	Policy / Paragraph	Proposed Main Modification		
MM16	Supporting text: New sub-heading before paragraph 5.74	Coastal management 5.74 Coastal areas face issues of specific economic development pressures and opportunities, and risks from changing physical conditions. Beaches along the district's central and eastern coastline are important for leisure and fishing. Elsewhere, there are a number of prominent coastal areas in addition to Dungeness, for example the Dover-Folkestone Heritage Coast, requiring flexible management that balances conservation and public access.		
MM17	Policy CSD7: Hythe Strategy	Policy CSD7 Hythe Strategy Hythe should develop as the high-quality residential, business, service, retail and tourist centre for the central district in line with the vision in paragraph 3.15. New development All new development, including that on the former Nickolls Quarry site (identified in Figure 5.5) should respect the historic character of the town and the established grain of the settlement in line with the place-shaping principles set out in policy SS3.		
MM17	Paragraph 5.107	5.107 Strategic development at Hythe is consistent with its demographic characteristics, housing need and good accessibility and range of services (policies SS3 and SS4). The primary area of change is to the west of the town, at the former Nickolls Quarry, where which has planning permission for a mixed-use development is underway		

Main Modification	Policy / Paragraph	Proposed Main Modification		
		including 1,050 dwellings, employment and a new halt on the light railway., at the former Nickolls Quarry. Construction is underway with 124 dwellings completed prior to the start of the Core Strategy Review plan period in 2019/20. The remaining 926 homes are anticipated to be completed by the end of the plan period. There is also the potential for significant green infrastructure facilities, including water-based recreation.		
MM18	Policy CSD8: New Romney Strategy	Policy CSD8 New Romney Strategy		
		Development of the broad location should meet the following criteria:		
		 a. The development as a whole should provide around 300 dwellings (Class C3) and a range and size of residential accommodation, including 22% 30% affordable housing, subject to viability. 		

Main Modification	Policy / Paragraph Supporting text: Paragraphs 5.156 and 5.157 Sellindge	Proposed Main Modification		
MM19		5.156	As of early 2017, there is no spare capacity for further development at either the doctor's surgery or school, and land with potential for the future expansion of the school is in separate ownership. The existing permission granted for 250 homes includes a requirement for land and funding to increase the primary school from 0.5 to 1 form of entry, however further capacity will be required to accommodate the additional growth proposed. Given this, any proposals will have to provide land and funding for the expansion of the primary school to 2 1.5 forms of entry (2 1.5 FE). Additionally, new or expanded health care will be required; however it may be that this can be delivered as part of a new facility within the nearby garden town.	
		5.157	With regard to infrastructure, the Growth Options Study highlights that there will be impacts on the B2068 and A20 and these should be considered as part of the development proposal and policy formation process. Any further improvements to the A20 or other roads should consider the findings of the Sellindge Rural Masterplan and applicants are encouraged to discuss their proposals with the Parish Council and highways authority at an early stage. Furthermore, there are no cycleways in this area, especially to Westenhanger Station to the east of Sellindge, with opportunity for footpath upgrades to be delivered to allow safe access to rail services from the village. Improvements to the Public Rights of Way (PROW) network adjacent to, or crossing, the broad locations will also be sought to improve connectivity. The key PROW are HE273, HE271A, HE274, HE310 and HE301.	
MM19	Supporting text: Paragraph 5.159	5.159	There are a number of listed buildings within Sellindge such as Rhodes House and Little Rhodes and buildings of local interest such as Grove House and Potten Farm,	

Main Modification	Policy / Paragraph	Proposed Main Modification
		the setting of which will need to be considered in any proposals. The retention of mature trees will also be sought where possible, to soften the built environment and to mitigate the impact on the wider views from the Kent Down AONB. The broad location to the west may contain a protected crash site and an area of medieval archaeology, and evaluation and mitigation of archaeological remains will need to be undertaken in accordance with a specification and programme of work submitted and approved by the council in advance of development commencing, as set out in Places and Policies Local Plan HE2.
MM19	Policy CSD9: Sellindge Strategy	Policy CSD9 Sellindge Strategy Land to the south and north east of Ashford Road in Sellindge forms a broad location for development to create an improved village centre with a mix of uses, a village green/common, pedestrian and cycle enhancements to Ashford Road and other community facilities together with new residential development of up to circa 600 dwellings. The first phase has planning permission for approximately 250 dwellings. The second phase for the remaining dwellings hereby allocated comprising Site A (land to the west of Phase 1) and Site B (land to the east of phase 1) as identified in Figure 5.7 is the subject of this policy. Planning permission will not be granted for any development pursuant of this policy unless and until the Council is satisfied that the requirements of Policy CSD5 d. are met.

Main Modification	Policy / Paragraph	Proposed Main Modification
		1. The first phase (land located in the centre of Sellindge) of any major residential led development in Sellindge parish should meet all of the following criteria:
		a. Proposals must be properly masterplanned (following extensive community engagement) and the full area included in a single outline application;
		b. Development must ensure the delivery of a core area (bulk of identified land south of the A20) in parallel with/advance of any development to the west, north or east of it;
		c. Total residential development will not exceed approximately 250 dwellings (Class C3), with around 30% affordable housing subject to viability.
		d. Development should provide timely delivery of a village green/common south of the A20 that:
		i. Is of at least 1.5-2ha in size, or greater;
		ii. Provides a range of facilities (including allotments) and type of landscaping identified through consultation with local residents and complementing the existing facilities located at the sports club;
		iii. Is of the highest quality and incorporates robust and durable lighting and furniture; and
		iv. Provides new habitats for priority nature conservations species;

Main Modification	Policy / Paragraph	Proposed Main Modification
		e. Proposals must include satisfactory arrangements for the timely delivery of necessary local community facilities including:
		i. A primary school extension to 1 form entry (1FE);
		ii. The expansion of the Doctor's surgery; and
		iii. Administrative accommodation for the Parish Council.
		2. Proposals for Tthe second phase (Site A land to the west of phase 1 and Site B land east of phase 1) for any the residential-led development should be accompanied by a masterplan for Sites A and B which shows how the sites will be integrated with Phase 1 and the existing settlement. Development shall meet all the following criteria:
		a. The residential development element shall not commence until the <u>primary</u> school <u>extension (to 1 FE)</u> , <u>doctors surgery</u> and <u>the</u> Parish Council administrative accommodation to be provided by <u>in</u> phase 1 are under construction with a programmed completion date;
		 Total residential development within phase 2 of approximately circa 350 dwellings (including Classes C2 and C3) with 22 per cent affordable housing subject to viability and a minimum of 10 per cent of dwellings designed to meet the needs of the ageing population;
		c. A minimum of 10 per cent of dwellings to be self-build or custom build;

Main Modification	Policy / Paragraph	Proposed Main Modification
		d.c. Development shall be designed to minimise water usage, as required by the Water Cycle Study. Total water use per dwelling shall not exceed 90 110 litres per person per day of potable water (including external water use);
		e. Energy efficiency standards are agreed with the local planning authority that meet or exceed prevailing best practice;
		f.d. Proposals must include provide: satisfactory arrangements for the timely delivery of necessary local community facilities including:
		i. Provision of Prior to the commencement of development, land and an appropriate level of funding to upgrade enable the upgrading of Sellindge Primary school to 2 1.5 forms of entry (2 1.5 FE);
		ii. Provision of new or upgraded sports grounds, open and play space or upgraded facilities in the village;
		iii.ii. Provision of Prior to first occupation, new nursery facilities of sufficient size to meet the needs of the residents;
		iv.iii. Provision of Prior to the completion of the second phase, a replacement village hall to a specification that to meets the prospective local needs of future residents; and
		v. Provision of new allotment facilities; and

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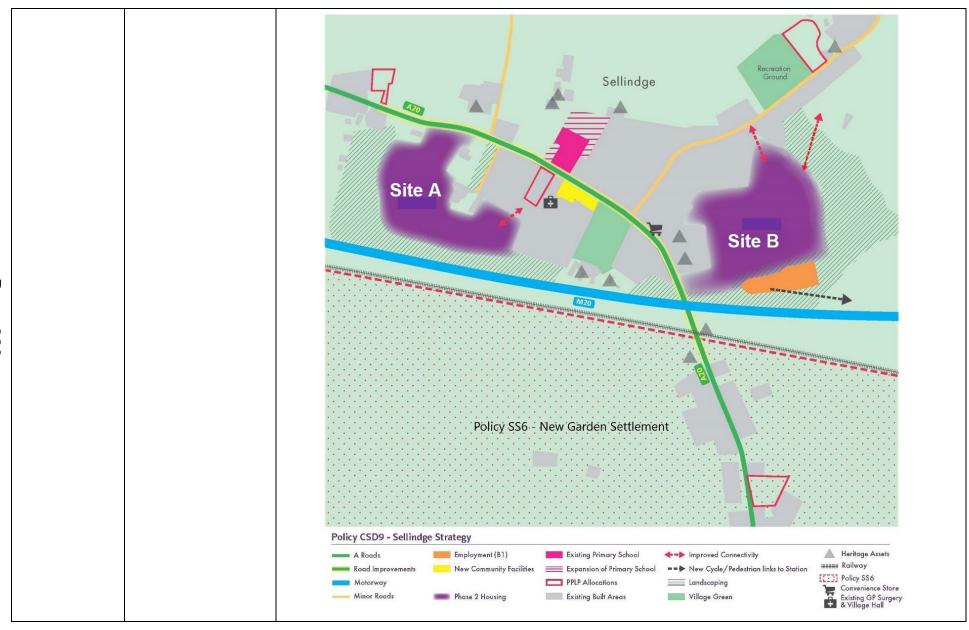
Main Modification	Policy / Paragraph	Proposed Main Modification
		Prior to the commencement of development, a proportionate Geontributions towards the upgrading and/or expansion of existing local medical facilities or otherwise towards a new healthcare facility to meet the needs of the residents development; Geo. The design and layout of the development shall be landscape-led and include within it structural Appropriate landscaping, including with woodland planting, shall to be provided on the rural edge of the development, particularly around the western boundary of Site A, to retain the rural character, and on the eastern boundary of Site B, to avoid or minimise adverse impacts on due to the possible visual impact on the setting of the Kent Downs AONB and views into and out of the AONB. All landscaping shall be planted at an early stage of the development and provide new habitats for priority nature conservation species. Applications shall be accompanied by a landscape and visual impact assessment that should inform the landscaping scheme and address structural and local landscape matters;
		h. The eastern development area will provide improved pedestrian and cycle access along the northern boundary (Public Right of Way HE273);
		i. <u>f.</u> Approximately 1,000sqm of business (B1 Class) floorspace shall be provided achieving BREEAM 'outstanding excellent' rating;
		j.g Site A land to the west of Sellindge in Phase 2 must be masterplanned and the full area included in a single outline application. The masterplan must include Proposals should protect and conserve consideration for the setting of non-

Main Modification	Policy / Paragraph	Proposed Main Modification
		designated built and natural heritage assets such as Grove House and Potten Farm, protect and where possible enhance important historic natural heritage assets, such as hedgerows, in accordance with their particular significance; and k-h. Any archaeological remains should be evaluated and potential impact mitigated in accordance with Places and Policies Local Plan Policy HE2-;
		3. Both phases of the development shall: a.i. Provide, or contribute to, convenient and safe wherever possible internal links within the sites itself and externally links to neighbouring sites to ensure there is ease of access by a range of transport modes to new and existing development and facilities within the village and cycle and pedestrian access to Westenhanger Station;
		b.j Deliver pedestrian and cycle enhancements to the A20 through (as a minimum) informal traffic-calming features at key locations, and perceived narrowing of the carriageway outside Sellindge primary school and associated highways improvement. Phase 2 shall extend the highways improvement area to be delivered by phase 1 extending the principles of the Rural Masterplan;
		c. Contribute to the provision of a safe, lit, surfaced cycle and pedestrian access to Westenhanger Station from Sellindge through the upgrade of existing bridleways and public rights of way (HE217A and HE274);

Main Modification	Policy / Paragraph	Proposed Main Modification
		d.k. Provide noise and air pollution mitigation measures such as distance buffers between the M20/High Speed 1 transport corridor and the built development, as well as landscaping within the buffers designed to integrate with other structural planting and habitat creation delivered through the comprehensive masterplan; and
		e <u>.l.</u> Contribute to improvements in the local wastewater infrastructure and other utilities as required to meet the needs of the development <u>including:</u> ;
		f. <u>i.</u> Ensure occupation of the development is phased to align with t <u>T</u> he delivery of sewage infrastructure, in liaison with the service provider, aligned with occupation of the development; and
		g. <u>ii.</u> Plan layout to ensure f <u>F</u> uture access to existing sewage infrastructure for maintenance and upsizing purposes <u>.</u> ;and
		h. Provide a high standard of design, siting and layout of development to reflect the sites' proximity to the Kent Downs AONB.
MM19	Supporting text: New paragraph following paragraph 5.163	5.163 An indicative strategy for Sellindge is set out below to show how residential development can meet needs for central facilities in a location near the junction with Swan Lane. Figure 5.7 is indicative only; proposals should be developed collectively by landowners with further community input to accord with the criteria of CSD9.
		[New para.] Policy CSD9 should be read in conjunction with the other policies in the development plan, in particular Places and Polices Local Plan Policy HB4: Self-

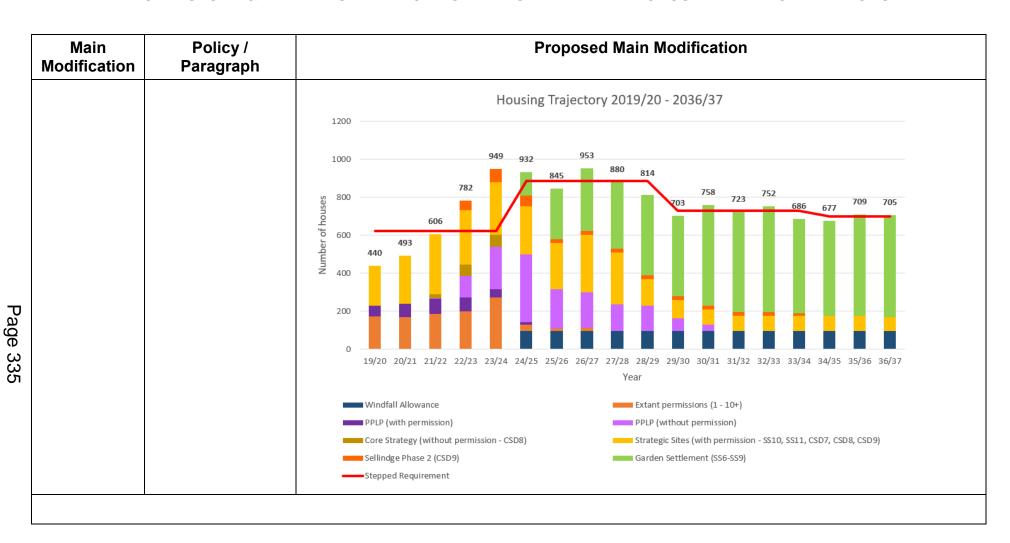
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Main Modification	Policy / Paragraph	Proposed Main Modification
		build and Custom Housebuilding Development; Policy C3: Provision of Open Space, regarding allotments and sports facilities; Policy C4, regarding play space provision; and Policy CC1, regarding energy efficiency.
MM19	Figure 5.7: Sellindge Strategy	Figure 5.7: Sellindge Strategy



Page 333

Main Modification	Policy / Paragraph	Proposed Main Modification
MM20	Appendix 3: Indicative Housing Trajectory Insert new Housing trajectory Figure 6.1 Insert new Table 6.1 Insert explanatory notes to Table 6.1	6.3 Appendix 3: Indicative Housing Trajectory The diagram below shows an indicative housing delivery trajectory for the Core Strategy Review plan period, from 2018/19 2019/20 to 2036/37. This will be kept under regular review and updated as developments progress and new information becomes available.



MM20 Table 6.1: Indicative Housing Trajectory		2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	<u>Total</u>
1	Windfall allowance	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>95</u>	<u>95</u>	<u>95</u>	<u>95</u>	<u>95</u>	<u>95</u>	<u>95</u>	<u>95</u>	<u>95</u>	<u>95</u>	<u>95</u>	<u>95</u>	<u>95</u>	<u>1,235</u>
2	Extant permissions (1-10+)	<u>173</u>	168	<u>185</u>	<u>201</u>	272	<u>33</u>	<u>14</u>	<u>17</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	1,063
<u>3</u>	PPLP (with permission)	<u>56</u>	<u>70</u>	82	<u>73</u>	<u>45</u>	<u>15</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>341</u>
4	PPLP (without permission)	<u>0</u>	<u>0</u>	<u>4</u>	<u>111</u>	222	<u>357</u>	206	<u>187</u>	142	<u>136</u>	<u>68</u>	<u>35</u>	<u>o</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	1,468
<u>5</u> P	2013 Core Strategy (without permission)	<u>0</u>	<u>0</u>	<u>17</u>	<u>60</u>	<u>65</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>o</u>	<u>0</u>	<u>o</u>	<u>0</u>	<u>o</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>o</u>	<u>0</u>	<u>142</u>
∾Рад е •33	2013 Core Strategy strategic sites (with permission)	<u>211</u>	<u>255</u>	318	<u>287</u>	<u>275</u>	<u>254</u>	246	303	<u>273</u>	<u>140</u>	<u>97</u>	<u>80</u>	<u>80</u>	<u>80</u>	<u>80</u>	<u>80</u>	<u>80</u>	<u>76</u>	3,215
ი <u>7</u>	Core Strategy Review - Sellindge Phase 2 (CSD9)	<u>0</u>	<u>0</u>	<u>0</u>	<u>50</u>	<u>70</u>	<u>57</u>	<u>20</u>	<u>20</u>	<u>20</u>	<u>20</u>	<u>20</u>	<u>20</u>	<u>20</u>	<u>20</u>	<u>13</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>350</u>
<u>8</u>	Garden settlement	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>121</u>	<u>264</u>	<u>331</u>	<u>350</u>	<u>423</u>	<u>423</u>	<u>528</u>	<u>528</u>	<u>557</u>	<u>498</u>	<u>502</u>	<u>534</u>	<u>534</u>	<u>5,593</u>
9	Total delivery	<u>440</u>	<u>493</u>	<u>606</u>	<u>782</u>	<u>949</u>	932	<u>845</u>	<u>953</u>	<u>880</u>	<u>814</u>	<u>703</u>	<u>758</u>	<u>723</u>	<u>752</u>	<u>686</u>	<u>677</u>	<u>709</u>	<u>705</u>	13,407
		Phase 1: 2019-23				Phase 2: 2024-28					Phase 3: 2029-33					Phas	e 4: 203			
<u>10</u>	<u>Stepped</u> <u>requirement</u>	<u>622</u>	<u>622</u>	<u>622</u>	<u>622</u>	<u>622</u>	<u>885</u>	<u>885</u>	<u>885</u>	<u>885</u>	<u>885</u>	<u>730</u>	<u>730</u>	<u>730</u>	<u>730</u>	<u>730</u>	<u>700</u>	<u>700</u>	<u>700</u>	

MM20

Explai	Explanatory Notes to Table 6.1					
Row	<u>Notes</u>					
<u>1.</u>	Windfall allowance - 95 homes a year; early years discounted to avoid double-counting with sites with planning permission.					
<u>2.</u>	Extant permissions – All extant full planning permissions from unallocated sites (as at 31 March 2021).					
<u>3.</u>	PPLP (with permission) – Sites allocated in the Places and Policies Local Plan with full planning permission (as at 31 March 2021).					
<u>4.</u>	PPLP (without permission) – Sites allocated in the Places and Policies Local Plan without full planning permission: Policy CSD8: New Romney (part) (as at 31 March 2021).					
<u>5.</u>	2013 Core Strategy (without permission) – Sites allocated in adopted 2013 Core Strategy without full planning permission (as at 31 March 2021).					
<u>6.</u>	2013 Core Strategy Strategic sites (with outline and full permission) – Sites allocated in adopted 2013 Core Strategy with part reserved matters planning permission: Policy SS10: Folkestone Seafront; Policy SS11: Shorncliffe Garrison, Folkestone; Policy CSD7: Hythe Strategy; Policy CSD8: New Romney Strategy (part); Policy CSD9: Sellindge Strategy (existing phase 1) (as at 31 March 2021).					
<u>7.</u>	Core Strategy Review – Policy CSD9 Sellindge (Phase 2) – without full permission (as at 31 March 2021).					
<u>8.</u>	Garden settlement – New garden settlement allocated in Core Strategy Review Policies SS6 – SS9.					
<u>9.</u>	Total delivery – Sum of above sources of dwellings.					
<u>10.</u>	Stepped requirement – Annual average requirement in four phases under Core Strategy Review Policy SS2: Housing and Economy Growth Strategy.					

Main Modification	Policy / Paragraph	Proposed Main Modification
MM21	Appendix 5: New Garden Settlement – Indicative Infrastructure Delivery, Phasing and Management Schedule Insert new Appendix 5: Schedule as set out on following pages	Appendix 5: Indicative Infrastructure Delivery, Phasing and Management Schedule Appendix 5 provides an indicative infrastructure delivery schedule. It shows the potential infrastructure required for the new garden settlement: • Table 1 – Strategic Road Network - M20 Junction 11 'Monitor and Manage' Framework • Table 2 – Strategic Road Network – M20 Junction 12-Junction 13 Merge and Diverge Improvements 'Monitor and Manage' Framework • Table 3 – Strategic Road Network – Junction 13 Improvements 'Monitor and Manage' Framework • Table 4 – Strategic Road Network – A20 / Spitfire Way / Alkham Valley Road Interchange 'Monitor and Manage' Framework • Table 5 – Local Highway Network – 'Monitor and Manage' Framework (Non-Strategic Road Network Interactions) • Table 6 – Local Highway Network – M20 Junction 11 'Monitor and Manage' Framework

Main Modification	Policy / Paragraph	Proposed Main Modification
		 <u>Table 7 – Local Highway Network – M20 Junction 13 Improvements 'Monitor and Manage' Framework</u>
		<u>Table 8 – Local Highway Network – A20 / Spitfire Way / Alkham Valley Road Interchange 'Monitor and Manage' Framework</u>
		<u>Table 9 – Other Infrastructure - Delivery, Phasing and Management Framework</u> (Within Plan Period)
		Table 10 – Other Infrastructure - Delivery, Phasing and Management Framework (Up to 10,000 Homes)

Page 340

MM21 Appendix 5: Indicative Infrastructure Delivery and Phasing Schedule

Table 1: Strategic Road Network - M20 Junction 11 'Monitor and Manage' Framework

Junction requiring mitigation	Trigger point for improvement	Indicative point in build out (housing numbers) based on trajectory	Cost estimate and source of funding	Delivery body (Otterpool Park LLP/KCC/HE)	Mitigation response
M20 J11- Intervention 1: M20 J11 Southbound Diverge	25% (or equivalent trips) of Otterpool Park 6,500 to 2037	1,625 dwellings = approximately Year 8 of delivery	£3.9m Otterpool Park represents 64% of traffic growth to 2037.		Undertake intervention 1 if the 'monitor and manage' approach shows the number of movements at Junction 11 is consistent with the trajectory profiling and modelling assumptions then a design would need to be shared with Highways England in year 6 of build out, with a commitment to complete the works no later than between years 8 and 10 of build out.
M20 J11 - Intervention 2: M20 J11 Northbound Diverge	45% (or equivalent trips) of Otterpool Park 6,500 to 2037	2,925 dwellings = towards end of year 12 of delivery	£4.3m Otterpool Park represents 64% of traffic growth to 2037.		To come forward as a package of mitigation to include intervention 3. If the 'monitor and manage' approach shows the number of

Junction requiring mitigation	Trigger point for improvement	Indicative point in build out (housing numbers) based on trajectory	Cost estimate and source of funding	Delivery body (Otterpool Park LLP/KCC/HE)	Mitigation response
					movements at Junction 11 is consistent with the trajectory profiling and modelling assumptions then a design would need to be shared with Highways England in year 10 of build out, with a commitment to complete the works no later than between years 12 and 14 of build out.
M20 J11 - Intervention 3: M20 J11 Southbound Merge, Northbound merge, Gyratory and in/out to services	70% (or equivalent trips) of Otterpool Park 6,500 to 2037	4,550 dwellings = year 16 of delivery	£5.6m Otterpool Park represents 64% of traffic growth to 2037.		Combine this improvement with intervention 2.
M20 J11 - Intervention 4: A20 Ashford Road/ Road Junction	92% (or equivalent trips) of Otterpool Park 6,500 to 2037	5,980 dwellings = year 18 of delivery	£3.5m Otterpool Park represents 64% of traffic growth to 2037.		If the 'monitor and manage' approach shows the number of movements at Junction 11 is consistent with the trajectory profiling and modelling assumptions, then a design would need to be shared with

Junction requiring mitigation	Trigger point for improvement	Indicative point in build out (housing numbers) based on trajectory	Cost estimate and source of funding	Delivery body (Otterpool Park LLP/KCC/HE)	Mitigation response
					Highways England in year 15 of build out, with a commitment to complete the works no later than between years 18 and 20 of build out.

³age 343

<u>Table 2: Strategic Road Network - M20 Junction 12 - Junction 13 Merge and Diverge Improvements 'Monitor and Manage'</u>
<u>Framework</u>

Junction requiring mitigation	Trigger point for improvement	Indicative point in build out (housing numbers) based on trajectory	Cost estimate and source of funding	Delivery body (Otterpool Park LLP/KCC/HE)	Mitigation response
Junction 12 Eastbound Merge and Junction 13 Eastbound Diverge	2031 based on traffic growth forecasts, equivalent to Year 12 of delivery.	2,968 dwellings	£24.3m Otterpool Park represents 29% of traffic growth to 2037.		If the 'monitor and manage' approach shows the number of movements at M20 Junction 12-13 is consistent with the trajectory profiling and modelling assumptions, then a design would need to be shared with Highways England (to be formally agreed) in year 10 of build out, with a commitment to complete the works no later than between years 12 and 14 of build out.
Junction 13 Westbound Merge and Junction 12 Westbound Diverge	2034 based on traffic growth forecasts, equivalent to Year 15 of delivery.	4,525 dwellings	£28.4m Otterpool Park represents 29% of traffic growth to 2037.		Combine this improvement with intervention 1.

Table 3: Strategic Road Network - M20 Junction 13 Improvements 'Monitor and Manage' Framework

Junction requiring mitigation	Trigger point for improvement	Indicative point in build out (housing numbers) based on trajectory	Cost estimate and source of funding	Delivery body (Otterpool Park LLP/KCC/HE)	Mitigation response
Junction 13 South Roundabout: Widen the entry width on the Churchill Avenue approach and localised widening on the A20 Castle Hill Bridge approach.	2024 based on traffic growth forecasts, equivalent to Year 6 of delivery.	385 dwellings	£0.19m Otterpool represents 13% of the traffic growth to 2037.		If the 'monitor and manage' approach shows the number of movements at M20 Junction 13 is consistent with the trajectory profiling and modelling assumptions, then a design would need to be shared with Highways England (to be formally agreed) in year 4 of build out, with a commitment to complete the works no later than between years 4 and 6 of build out.

<u>Table 4: Strategic Road Network – A20 / Spitfire Way / Alkham Valley Road Interchange 'Monitor and Manage' Framework</u>

Junction requiring mitigation	Trigger point for improvement	Indicative point in build out (housing numbers) based on trajectory	Cost estimate and source of funding	Delivery body (Otterpool Park LLP/KCC/HE)	Mitigation response
A20 / Spitfire Way / Alkham Valley Road interchange	An improvement is needed by 2024 based on traffic growth forecasts, equivalent to Year 6 of delivery. The scheme included is the ultimate solution to 2037 (to cater for traffic levels forecast to be on the network in 2037).	385 dwellings = after year 6 of delivery	£4.6m Otterpool Park represents 35% of the traffic growth to 2037.		If the 'monitor and manage' approach shows the number of movements at the A20/ Alkham Valley interchange is consistent with the trajectory profiling and modelling assumptions, then a design would need to be shared with Highways England and KCC (to be formally agreed) in year 4 of build out, with a commitment to complete the works no later than between years 4 and 6 of build out. This would not prejudice the ability of KCC and Highways England to take forward an alternative scheme.

<u>Table 5: Local Highway Network - 'Monitor and Manage' Framework - Non-Strategic Road Network</u>

Junction requiring mitigation	Trigger point for improvement	Indicative point in build out (housing numbers) based on trajectory	Cost estimate and source of funding	Delivery body (Otterpool Park LLP/KCC/HE)	Mitigation response
Re-alignment of the A20 from south of the M20 J11	Prior to first occupation of Otterpool Park 6,500 to 2037	Prior to first occupation	<u>£ 2.71m</u>	Otterpool Park LLP	<u>n/a</u>
Newingreen signalisation scheme	Prior to first occupation of Otterpool Park 6,500 to 2037	Prior to first occupation	<u>£3.3 m</u>	Otterpool Park LLP	<u>n/a</u>
Dualling of A20 south of the roundabout	85% (or equivalent trips) of Otterpool Park 6,500 to 2037	5,500 dwellings = towards end of year 17 of delivery	£6.15 m (G&T cost)	Otterpool Park LLP	To come forward as a package of mitigation to include the signalisation scheme.
					If the 'monitor and manage' approach shows the number of movements interacting with the A20 is consistent with the trajectory profiling and modelling assumptions
					then a design would need to be shared with KCC in

Junction requiring mitigation	Trigger point for improvement	Indicative point in build out (housing numbers) based on trajectory	Cost estimate and source of funding	Delivery body (Otterpool Park LLP/KCC/HE)	Mitigation response
					year 16 of build out, with a commitment to complete the works no later than between years 17 and 18 of build out.
Signalisation of southern arm of new roundabout at northern end of new dualling	85% (or equivalent trips) of Otterpool Park 6,500 to 2037	5,500 dwellings = towards end of year 17 of delivery	£0.5 m (G&T cost)		To come forward as a package of mitigation to include the A20 dualling scheme.
					If the 'monitor and manage' approach shows the number of movements interacting with the A20 is consistent with the trajectory profiling and
					modelling assumptions then a design would need to be shared with KCC in year 16 of build out, with a commitment to complete
					the works no later than between years 17 and 18 of build out.

Junction requiring mitigation	Trigger point for improvement	Indicative point in build out (housing numbers) based on trajectory	Cost estimate and source of funding	Delivery body (Otterpool Park LLP/KCC/HE)	Mitigation response
A20 signals on the approach to Sellindge	<u>tbc</u>	<u>tbc</u>	<u>£0.2m</u>	KCC	<u>tbc</u>
A259 / Dymchurch Road / Military Road double yellow line scheme	<u>tbc</u>	<u>tbc</u>	£20,000	<u>KCC</u>	
M20 Junction 9 – Improvements to Trinity Road and Fougeres Way	<u>tbc</u>	<u>tbc</u>	£373,000	<u>LLP</u>	

<u>Table 6: Local Highway Network – M20 Junction 11 'Monitor and Manage' Framework</u>

Junction requiring mitigation	Trigger point for improvement	Indicative point in build out (housing numbers) based on trajectory	Cost estimate and source of funding	Delivery body (Otterpool Park LLP/KCC/HE)	Mitigation response
M20 J11- Intervention 1: M20 J11 Southbound Diverge*	25% (or equivalent trips) of Otterpool Park 6,500 to 2037*	1,625 dwellings = approximately Year 8 of delivery*	£3.9m* Otterpool Park represents 64% of traffic growth to 2037.*		Undertake intervention 1 if the 'monitor and manage' approach shows the number of movements at Junction 11 is consistent with the trajectory profiling and modelling assumptions then a design would need to be shared with Highways England in year 6 of build out, with a commitment to complete the works no later than between years 8 and 10 of build out.*
M20 J11 – Intervention 2: M20 J11 Northbound Diverge*	45% (or equivalent trips) of Otterpool Park 6500 to 2037*	2,925 dwellings = towards end of year 12 of delivery*	£4.3m* Otterpool Park represents 64% of traffic growth to 2037.*		To come forward as a package of mitigation to include intervention 3.* If the 'monitor and manage' approach shows the number of movements at Junction

Junction requiring mitigation	Trigger point for improvement	Indicative point in build out (housing numbers) based on trajectory	Cost estimate and source of funding	Delivery body (Otterpool Park LLP/KCC/HE)	Mitigation response
					11 is consistent with the trajectory profiling and modelling assumptions then a design would need to be shared with Highways England in year 10 of build out, with a commitment to complete the works no later than between years 12 and 14 of build out.*
M20 J11 - Intervention 3: M20 J11 Southbound Merge, Northbound merge, Gyratory and in/out to services	70% (or equivalent trips) of Otterpool Park 6,500 to 2037	4,550 dwellings = year 16 of delivery	£5.6m Otterpool Park represents 64% of traffic growth to 2037.		Combine this improvement with intervention 2.
M20 J11 - Intervention 4: A20 Ashford Road/ Road Junction	92% (or equivalent trips) of Otterpool Park 6,500 to 2037	5,980 dwellings = year 18 of delivery	£3.5m Otterpool Park represents 64%		If the 'monitor and manage' approach shows the number of movements at Junction 11 is consistent with the

rage 350

Junction requiring mitigation	Trigger point for improvement	Indicative point in build out (housing numbers) based on trajectory	Cost estimate and source of funding	Delivery body (Otterpool Park LLP/KCC/HE)	Mitigation response
			of traffic growth to 2037.		trajectory profiling and modelling assumptions, then a design would need to be shared with Highways England and Kent County Council in year 15 of build out, with a commitment to complete the works no later than between years 18 and 20 of build out.

*Notes: for clarity all components of the junction scheme have been included. Text within the shaded boxes applies to the Strategic Road Network (and is the subject of agreement with Highways England).

rage 33

<u>Table 7: Local Highway Network – M20 Junction 13 Improvements - 'Monitor and Manage' Framework</u>

Junction requiring mitigation	Trigger point for improvement	Indicative point in build out (housing numbers) based on trajectory	Cost estimate and source of funding	Delivery body (Otterpool Park LLP/KCC/HE)	Mitigation response
Junction 13 South Roundabout: Widen the entry width on the Churchill Avenue approach and localised widening on the A20 Castle Hill Bridge approach.	2024 based on traffic growth forecasts, equivalent to Year 6 of delivery.	385 dwellings	£0.19m Otterpool represents 13% of the traffic growth to 2037.		If the 'monitor and manage' approach shows the number of movements at M20 Junction 13 is consistent with the trajectory profiling and modelling assumptions, then a design would need to be shared with Highways England (to be formally agreed) in year 4 of build out, with a commitment to complete the works no later than between years 4 and 6 of build out.

<u>Table 8: Local Highway Network – A20 / Spitfire Way / Alkham Valley Road Interchange - 'Monitor and Manage' Framework</u>

Junction requiring mitigation	Trigger point for improvement	Indicative point in build out (housing numbers) based on trajectory	Cost estimate and source of funding	Delivery body (Otterpool Park LLP/KCC/HE)	Mitigation response
A20 / Spitfire Way / Alkham Valley Road interchange	An improvement is needed by 2024 based on traffic growth forecasts, equivalent to Year 6 of delivery. The scheme included is the ultimate solution to 2037 (to cater for traffic levels forecast to be on the network in 2037).	385 dwellings = after year 6 of delivery	£4.6m Otterpool represents 35% of the traffic growth to 2037.		If the 'monitor and manage' approach shows the number of movements at the A20/ Alkham Valley interchange is consistent with the trajectory profiling and modelling assumptions, then a design would need to be shared with Highways England and KCC (to be formally agreed) in year 4 of build out, with a commitment to complete the works no later than between years 4 and 6 of build out. This would not prejudice the ability of KCC and Highways England to take forward an alternative scheme.

<u>Table 9: Other Infrastructure - Delivery, Phasing and Management (Within Plan Period)</u>

<u>Description</u>	Estimated Delivery Based on Housing Triggers	Delivered By
ON-SITE HIGHWAYS	Where the works will be offered for adoption, they will be undertaken via a S38 Agreement. The costs of the works listed below are included within the scheme costs.	
Upgrading Otterpool Lane	<u>1,900 units</u>	Otterpool Park LLP with KCC
Westenhanger Station enhancement works	<u>0 - 325 units</u>	Otterpool Park LLP with KCC
New Primary Access Junctions	Delivered throughout construction of the development	Otterpool Park LLP with KCC
Primary Roads	Delivered throughout construction of the development	Otterpool Park LLP with KCC
Secondary Roads	Delivered throughout construction of the development	Otterpool Park LLP with KCC
Vehicular Bridge over East Stour River	<u>1,000 units</u>	Otterpool Park LLP with Environment Agency (EA)
Enhancements for high street sections	<u>1,600 units</u>	Otterpool Park LLP with KCC and FHDC
Newingreen Link	<u>2,000 units</u>	Otterpool Park LLP with KCC
Upgrading works to A20 (at either end of new site location)	<u>4,600 units</u>	Otterpool Park LLP with KCC

<u>Description</u>	Estimated Delivery Based on Housing Triggers	<u>Delivered By</u>		
Additional New Primary Access Junctions	2,500 units	Otterpool Park LLP with KCC		
Business Park Access	4,000 units	Otterpool Park LLP with KCC		
Strategic Street (A20)	2,500 units	Otterpool Park LLP with KCC		
Strategic Street (B2067)	2,500 units	Otterpool Park LLP with KCC		
Vehicular bridges (2 number) over East Stour River	4,000 units	Otterpool Park LLP with EA		
ON-SITE PEDESTRIAN / CYCLE ROU	ON-SITE PEDESTRIAN / CYCLE ROUTES (AWAY FROM SPINE ROADS)			
Temporary diversions of Pedestrian / cycle routes within the site	Delivered throughout construction of the development	Otterpool Park LLP with FHDC		
Non-Spine Road Cycleways	Delivered throughout construction of the development	Otterpool Park LLP with FHDC		
Upgrade works to existing network	Delivered throughout construction of the development	Otterpool Park LLP with FHDC		
Pedestrian Bridges over swales	Delivered throughout construction of the development	Otterpool Park LLP with FHDC		
STRATEGIC SURFACE WATER (SW) DRAINAGE Highway drainage will be to the approval of KCC via S278/S38 and other drainage will be to the approval of the regulated Water Company				

<u>Description</u>	Estimated Delivery Based on Housing Triggers	Delivered By
SW Drainage to Strategic Streets	Delivered throughout construction of the development	Otterpool Park LLP with KCC and regulated Water Company
SW Drainage Strategic Primary Roads	Delivered throughout construction of the development	Otterpool Park LLP with KCC and regulated Water Company
SW Drainage Strategic Secondary Roads	Delivered throughout construction of the development	Otterpool Park LLP with KCC and regulated Water Company
SW Drainage in Public Open Space	Delivered throughout construction of the development	Otterpool Park LLP with KCC and regulated Water Company
Attenuation Basins	Delivered throughout construction of the development	Otterpool Park LLP with KCC and regulated Water Company
Mitigation for Nutrients - wetlands	Prior to first occupation	Otterpool Park LLP with regulated Water Company
Existing Ditches, Pipes and Culverts	Delivered throughout construction of the development	Otterpool Park LLP with KCC and regulated Water Company
FOUL WATER DRAINAGE	Drainage will be to the approval of the regulated Wa	iter Company
<u>Wastewater Treatment – interim</u> <u>measures</u> ¹	<u>0 – 400 units</u>	Otterpool Park LLP with regulated Water Company

The on-site wastewater treatment works require a minimum of 400 units to be connected for there to be sufficient flow through the works. An interim measure such as tankering off-site or the installation of a package treatment works will be required to treat the foul waste from the development prior to the occupation of 400 units. The interim measures will be agreed with the relevant regulated water company and the appropriate statutory bodies.

		<u></u>
<u>Description</u>	Estimated Delivery Based on Housing Triggers	Delivered By
On-Site Wastewater Treatment – First 2 Phases	Phase 1 – 400 units Phase 2 – 3,000 units.	Otterpool Park LLP with regulated Water Company
Mitigation for Nutrients - wetlands	0 - 400 units subject to agreed interim option	Otterpool Park LLP with regulated Water Company
UTILITIES		
<u>Telecommunications</u>		
TELECOMS – Builder's work in connection (BWIC) to on-site highways	Delivered throughout construction of the development	Otterpool Park LLP
TELECOMS - Diversions	Delivered throughout construction of the development	Otterpool Park LLP with Telecoms provider
TELECOMS – Provision of Broadband	Delivered throughout construction of the development	Otterpool Park LLP with Telecoms provider
<u>Water</u>		
WATER - BWIC & Main to on-site highways	Delivered throughout construction of the development	Otterpool Park LLP with regulated Water Company
WATER - Diversions	Delivered throughout construction of the development	Otterpool Park LLP with regulated Water Company
WATER - Reinforcement	<u>1,500 units</u>	Otterpool Park LLP with regulated Water Company

<u>Description</u>	Estimated Delivery Based on Housing Triggers	Delivered By
Electricity		
ELECTRICITY - BWIC to on-site highways	Delivered throughout construction of the development	Otterpool Park LLP
ELECTRICITY - On-site mains	Delivered throughout construction of the development	Otterpool Park LLP with regulated network provider
ELECTRICITY - Diversions	Delivered throughout construction of the development	Otterpool Park LLP with regulated network provider
ELECTRICITY - Reinforcement	From first occupation	Otterpool Park LLP with regulated network provider and UK Power Networks (UKPN)
GREEN INFRASTRUCTURE INCLUDII	NG PLAY / SPORTS PROVISION	
Public Open Space	Provided in unison with residential phasing throughout the construction of the development to secure open space(s) for future residents and in the interest of place-making	Otterpool Park LLP. This will be secured through the S106 associated with the outline planning application.
Sports Pitches – 10.3ha and 2 No Sports Pavilions	From 750 units	Otterpool Park LLP. This will be secured through the S106 associated with the outline planning application.
Play Provision (NEAPs, LEAPs, etc)	Provided in unison with residential phasing throughout the construction of the development to secure open space(s) for future residents and	Otterpool Park LLP. This will be secured through the S106 associated with the outline

<u>Description</u>	Estimated Delivery Based on Housing Triggers	<u>Delivered By</u>
	in the interest of place-making	planning application.
EDUCATION		
Nursery A nursery in every primary school plus 3 to 4 private/charitable settings.	Nursery schools co-located with primary schools well be brought forward using the same triggers as primary schools (see below) Building or land suitable for private/charitable settings will be brought forward incrementally e.g. likely alongside other town centre uses, with one setting on average every 1,500 homes.	KCC (with the option for Otterpool Park LLP to deliver). This will be secured through the S106 associated with the outline planning application. Tenancy made available by Otterpool Park LLP, occupation and fit-out by private or charitable operator. This will be secured through the S106 associated with the outline planning application.
Primary Schools 6 to 7 Forms of Entry	 The first primary school will be in the first phase and 2FE is likely to be triggered September after the first occupation of homes. Thereafter, every form of entry is likely to be triggered at a maximum of every 500 homes and a minimum of every 800 homes. Forms of Entry may be brought forward one at a time, in 2FE or in 3FE phases. 	KCC (with the option for Otterpool Park LLP to deliver). This will be secured through the S106 associated with the outline planning application.

<u>Description</u>	Estimated Delivery Based on Housing Triggers	Delivered By
Secondary Schools A maximum of two secondary schools, one to be capped at 8FE and one to be capped at 6FE.	 The first secondary school phase of 4FE will likely be triggered at between 2,000 and 3,000 homes, subject to monitoring. Off-site contributions may be required up to this point (including transport) subject to agreed S106 strategy. KCC has indicated that it would require least 2 FE of expansion at an existing Grammar School, which will help to address demand for the first homes. Thereafter, secondary school expansion will take place in phases of 2-4 FE, subject to monitoring, likely at a rate of 2 FE every 1,600 homes, subject to monitoring. Secondary schools will likely open at Year 7 and fill from the bottom up. 	KCC (with the option for Otterpool Park LLP to deliver). This will be secured through the S106 associated with the outline planning application.
Sixth Form Provided in proportion to secondary places.	Sixth form will be triggered with Secondary School places.	KCC (with the option for Otterpool Park LLP to deliver). This will be secured through the S106 associated with the outline planning application.
Special Educational Need Is likely to be brought forward in a single school in later phases, by indicatively 30 to 40 places.	Phasing not yet known. It is, however, likely to be late in the development, alongside second secondary school at c. 6,000 homes but may be required in temporary or permanent form earlier subject to need.	KCC (with the option for Otterpool Park LLP to deliver). This will be secured through the S106 associated with the outline planning application.

<u>Description</u>	Estimated Delivery Based on Housing Triggers	<u>Delivered By</u>
HEALTHCARE		
1,200 to 1,350sqm gross external area (GEA) of floorspace is proposed for health care (potentially one large practice and/or a combination of smaller sites)	 GPs will be required roughly at the rate of 1 per 830 homes. Phasing options are likely to include (subject to detailed agreement with the CCGs): Prior to circa 1,000 homes, a GP could operate temporarily from another building (e.g. a suitable community or commercial building) provided that the facilities and setting are appropriate to provide the quality of service and care required. Between circa 1,000 and 4,000 homes, a portion of the health centre could be built, with space that is not required for healthcare to be let out on a short-term lease to other retail or commercial uses. At circa 4,000 to 6,000 homes and above the full GP surgery would be delivered, and any additional services. 	 Clinical Commissioning Groups and NHS Estates (additional facilities beyond General Practice may be privately or charitably delivered and operated). Partnership with Sellindge Surgery is one option the CCG is exploring. This will be secured through the S106 associated with the outline planning application.
COMMUNITY USES		
Floorspace is proposed for community uses (such as community halls, places of worship,	Detail not yet determined; the detailed planning process will require Otterpool Park LLP to engage with FHDC, KCC, local parish councils and other	Community uses will be secured through the S106 associated with the outline planning application.

<u>Description</u>	<u>Description</u> <u>Estimated Delivery Based on Housing Triggers</u>	
youth centres, library/training centre, exhibition or archive space)	local stakeholders and future operators to understand specific needs at the time of delivery.	

<u>Table 10: Other Infrastructure - Delivery, Phasing and Management (Up to 10,000 Homes)</u>

<u>Description</u>	Estimated Delivery Based on 10,000 Homes	<u>Delivered By</u>
ON-SITE HIGHWAYS	Where the works will be offered for adoption, they will be undertaken via a Section 38 Agreement. The cost of the works listed below are included within the scheme cost plan.	
Highway works to Barrow Hill	<u>5,700 units</u>	Otterpool Park LLP with KCC
ON-SITE PEDESTRIAN / CYCLE ROU	TES (AWAY FROM SPINE ROADS)	
Temporary diversions of Pedestrian / cycle routes within the site	Delivered throughout construction of the development	Otterpool Park LLP with FHDC
Non-spine Road Cycleways	Delivered throughout construction of the development	Otterpool Park LLP with FHDC
Upgrade works to existing network	Delivered throughout construction of the development	Otterpool Park LLP with FHDC
Pedestrian Bridges over swales	Delivered throughout construction of the development	Otterpool Park LLP with FHDC

<u>Description</u>	Estimated Delivery Based on 10,000 Homes	Delivered By	
STRATEGIC SURFACE WATER DRAINAGE	Highway drainage will be to the approval of KCC via S278/S38 Agreement and other drainage will be to the approval of the regulated Water Company.		
SW Drainage Strategic Primary Roads	Delivered throughout construction of the development	Otterpool Park LLP with KCC and regulated Water Company	
SW Drainage Strategic Secondary Roads	Delivered throughout construction of the development	Otterpool Park LLP with KCC and regulated Water Company	
SW Drainage in Public Open Space	Delivered throughout construction of the development	Otterpool Park LLP with KCC and regulated Water Company	
Attenuation Basins	Delivered throughout construction of the development	Otterpool Park LLP with KCC and regulated Water Company	
Mitigation for Nutrients - wetlands	Prior to first occupation	Otterpool Park LLP with regulated Water Company	
Existing Ditches, Pipes and Culverts	Delivered throughout construction of the development	Otterpool Park LLP with KCC and regulated Water Company	
FOUL WATER DRAINAGE	Drainage will be to the approval of the regulated Water Company		
On-Site Wastewater Treatment Final Phase – 6,600 units		Otterpool Park LLP with regulated Water Company	
UTILITIES		I	

<u>Description</u>	Estimated Delivery Based on 10,000 Homes	Delivered By
TELECOMS - BWIC to on site highways	Delivered throughout construction of the development	Otterpool Park LLP
TELECOMS - Diversions	Delivered throughout construction of the development	Otterpool Park LLP with Telecoms provider
TELECOMS – Provision of Broadband	Delivered throughout construction of the development	Otterpool Park LLP with Telecoms provider
WATER - BWIC and main to on-site highways	Delivered throughout construction of the development	Otterpool Park LLP with regulated Water Company
WATER - Diversions	Delivered throughout construction of the development	Otterpool Park LLP with regulated Water Company
ELECTRIC - BWIC to on-site highways		
ELECTRIC - On-site mains	Delivered throughout construction of the development	Otterpool Park LLP with regulated network provider
ELECTRICITY - Diversions	Delivered throughout construction of the development	Otterpool Park LLP with regulated network provider
ELECTRICITY - Reinforcement	From first occupation	Otterpool Park LLP with regulated network provider and UKPN
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GREEN INFRASTRUCTURE INCLUDING PLAY / SPORTS PROVISION

<u>Description</u>	Estimated Delivery Based on 10,000 Homes	Delivered By
Public Open Space	Provision in unison with residential phasing throughout the construction of the development to secure open spaces for future residents and in the interest of place-making.	Otterpool Park LLP. This will be secured through the S106 associated with the outline planning application.
Sports Pitches - 2.9ha and a Sports Pavilion	Beyond plan period to 10,000 homes.	Otterpool Park LLP. This will be secured through the S106 associated with the outline planning application.
Play Provision (NEAPs, LEAPs, etc)	Provided in unison with residential phasing throughout the construction of the development to secure open space(s) for future residents and in the interest of place-making	Otterpool Park LLP. This will be secured through the S106 associated with the outline planning application.
EDUCATION		
Nursery A nursery in every primary school plus up to 6 private/charitable settings.	Nursery schools co-located with primary schools well be brought forward using the same triggers as primary schools (see below) Building or land suitable for Private/charitable settings will be brought forward incrementally e.g. likely alongside other town centre uses, with one setting on average every 1,500 homes.	KCC (with the option for Otterpool Park LLP to deliver). This will be secured through the S106 associated with the outline planning application. Tenancy made available by Otterpool Park LLP, occupation and fit-out by private or charitable operator. This will be secured through the S106 associated with the outline planning application.

<u>Description</u>	Estimated Delivery Based on 10,000 Homes	Delivered By
Primary Schools 12 Forms of Entry (with flexibility up to 15 Forms of Entry)	 The first primary school will be in the first phase and 1 or 2FE is likely to be triggered the September after the first occupation of homes. Thereafter, every form of entry is likely to be triggered at a maximum of every 500 homes and a minimum of every 800 homes. Forms of Entry may be brought forward one at a time, in 2FE or in 3FE phases. 	KCC (with the option for Otterpool Park LLP to deliver). This will be secured through the S106 associated with the outline planning application.
Secondary Schools 12 Forms of Entry (with flexibility up to 14 Forms of Entry) (with some provision off-site)	 The first secondary school phase of 4FE will likely be triggered at between 2,000 and 3,000 homes, subject to monitoring. Off-site contributions may be required up to this point (including transport) subject to agreed S106 strategy. KCC has indicated they would want at least 2 FE of expansion at an existing Grammar School, which will help to address demand for the first homes. Thereafter, secondary school expansion will take place in phases of 2-4 FE, subject to monitoring, likely at a rate of 2 FE every 1,600 homes, subject to monitoring. Secondary schools will likely open at Year 7 and fill from the bottom up. 	KCC (with the option for Otterpool Park LLP to deliver). This will be secured through the S106 associated with the outline planning application.

<u>Description</u>	Estimated Delivery Based on 10,000 Homes	Delivered By
Sixth Form To be provided in proportion to secondary places up to a likely cap of 70 to 80 per cent of year 11 population	Sixth form will be triggered with Secondary School places.	KCC (with the option for Otterpool Park LLP to deliver). This will be secured through the S106 associated with the outline planning application.
Special Educational Need 60-80 places	Phasing not yet known; likely to be late in the development, alongside second secondary school at circa 6,000 homes but may be required in temporary or permanent form earlier subject to need.	KCC (with the option for Otterpool Park LLP to deliver). This will be secured through the S106 associated with the outline planning application.
<u>HEALTHCARE</u>		
2,500sqm (with flexibility up to 3,000sqm) GEA of floorspace is proposed for healthcare (potentially one large practice and/or a combination of smaller sites)	The likely need required as a minimum to provide primary care facilities is 2,000-3,000sqm GIA (for 10,000 homes). GPs will be required roughly at the rate of 1 per 830 homes. Phasing options are likely to include (subject to detailed agreement with the CCGs): at circa 4,000 to 6,000 homes and above the full GP surgery would be delivered, and any additional services.	 Clinical Commissioning Groups and NHS Estates (additional facilities beyond General Practice may be privately or charitably delivered and operated). Partnership with Sellindge Surgery is one option the CCG is exploring. This will be secured through the S106 associated with the outline planning application.

<u>Description</u>	Estimated Delivery Based on 10,000 Homes	<u>Delivered By</u>
COMMUNITY USES		
Floorspace is proposed for community uses (such as community halls, places of worship, youth centres, library/training centre, exhibition or archive space)	Detail not yet determined; the detailed planning process will require Otterpool Park LLP to engage with FHDC, KCC, local parish councils and other local stakeholders and future operators to understand specific needs at the time of delivery.	Community uses will be secured through the S106 associated with the outline planning application.



Folkestone & Hythe Core Strategy Review

Sustainability Appraisal Assessment Addendum - Main Modifications to the Proposed Submission Folkestone & Hythe Core Strategy Review

Prepared by LUC September 2021

Contents

Sustainability Appraisal Addendum	3
Introduction	3
Core Strategy Review examination	4
Proposed main modifications to the Core Strategy Review	4
Reasonable alternatives to the proposed main modifications to the Core Strategy Review	4
Significant effects of the proposed modifications to the Core Strategy Review	5
Cumulative effects of the proposed modifications to the Core Strategy Review	79
Monitoring indicators	79
Appendix 1	80
Consultation Representations on Core Strategy Review SA Report 2019	80
Appendix 2	91
SA Framework for the Folkestone & Hythe Core Strategy Review	91
Appendix 3	98
Baseline and Plans, Programmes and Policies Updates	98

Sustainability Appraisal Addendum

Introduction

- 1.1 Folkestone & Hythe District Council commissioned LUC in October 2016 to carry out a Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) and Habitat Regulations Assessment (HRA) of the Review of the Core Strategy Local Plan. There have been five stages in the Sustainability Appraisal of the Core Strategy Review to date:
 - An SA Scoping Report¹ for the Shepway Core Strategy was published for consultation in 2007. In 2017, an SA Scoping Report² for the Core Strategy Review was published.
 - An initial SA Report³ was prepared and consulted upon with the Draft Shepway Core Strategy Review in February 2018.
 - A full SA Report⁴ was prepared and consulted upon with the Proposed Submission Core Strategy Review in January 2019.
 - An SA Addendum⁵ to the full report was prepared to accompany the publication of an updated Core Strategy Review containing a new housing need figure following the publication of the Government's new standard methodology for calculating housing need in February 2020. It considered the implications of the new calculated housing need for the SA findings reported previously.
 - A second SA Addendum⁶ was prepared during the examination of the updated Core Strategy Review at the request of the Planning Inspectors examining the Core Strategy Review. This addendum appraised the likely significant effects of Core Strategy Review policies SS5, SS10, SS11, CSD3, CSD4, CSD6, CSD7 and CSD8.⁷
- 1.2 Following each stage of consultation, all representations relating to the SA process were reviewed. Appendix 1 of the SA Report, consulted upon alongside the Proposed Submission Core Strategy Review in January 2019, contains a summary of the representations received during the consultations on the Scoping Report and initial SA Report. **Appendix 1** in this SA Addendum contains a summary of the representations received during the consultation on the Proposed Submission Core Strategy SA Report. This consultation summary includes SA responses to representations received; however, no updates to the 2019 SA Report were considered necessary. No consultation comments were received with regards to the two published SA addenda.
- 1.3 This current, third SA Addendum has informed all the Council's proposed modifications to the Proposed Submission Core Strategy Review (February, 2020) (referred to hereafter as the SA Addendum). It includes:
 - A summary of the Plan examination process to date, including the Inspector's initial findings.

¹ SA of Shepway District Council Local Development Framework Scoping Report, Scott Wilson for Shepway District Council, 2007.

² Sustainability Appraisal Scoping Report for Core Strategy Review, LUC, 2017. Available <u>here</u>.

³ SA of Shepway Draft Core Strategy Review, LUC, 2018. Available <u>here</u>.

⁴ SA of the Folkestone & Hythe Proposed Submission Core Strategy Review, LUC, 2018 Available here.

⁵ SA Addendum for the Proposed Changes to the Proposed Submission Folkestone & Hythe Core Strategy Review, LUC, 2019. Available <u>here</u>.

 $^{^6}$ SA Addendum for the Core Strategy Review Policies SS5, SS10, SS11, CSD3, CSD4, CSD6, CSD7 and CSD8, LUC, 2020. See Appendix 1 <u>here</u>.

⁷ The effects of these policies were not reported in detail in the full SA Report at an individual policy level because it was considered that the policies had not changed enough to generate new significant effects not previously identified. The effects of these polices were instead reported in Chapter 8 of the full SA Report as part of the assessment of cumulative effects. The Inspectors requested that for the SA to clearly meet the requirements of Section 19(5) of the Planning and Compulsory Purchase Act 2004 it must 'carry out an appraisal of the sustainability of the proposals in each Development Plan Document', i.e. the effects of every component of the Core Strategy Review (the proposals of the Plan) and their reasonable alternatives should be set out clearly in the SA Report.

- A summary of changes in the Plan baseline, including updates to its evidence base since the full SA Report was prepared for consultation with the Proposed Submission Core Strategy Review in late 2019.
- A summary of the new plans, policies and programmes published of direct and indirect relevance to the Core Strategy Review since the full SA Report was prepared and consulted upon with the Proposed Submission Core Strategy Review in February 2020.
- A detailed schedule of all the proposed main modifications to the Proposed Submission Core Strategy Review (February 2020) and an SA of their likely effects.
- 1.4 **Appendix 2** contains a copy of the SA Framework used to appraise the effects of the Plan.
- 1.5 **Appendix 3** summaries notable updates to the baseline evidence and Plans, Programmes and Policies used as the baseline for the SA of the Core Strategy Review.

Core Strategy Review examination

- 1.6 Folkestone & Hythe District Council submitted the Proposed Submission Core Strategy Review to the Secretary of State for Housing, Communities and Local Government for formal examination on 10th March 2020. Hearing sessions for the examination were held between 15th December 2020 and 13th January 2021, followed by additional hearing sessions focussing on the proposed New Garden Settlement between the 29th June and the 1st July 2021.
- 1.7 Following completion of the Hearing sessions the Inspectors then published a letter⁸ stating that 'subject to main modifications concerning detailed policy wording, we consider that the District Spatial Strategy, the overall approach to the three character areas and settlements within them is sound.'

Proposed main modifications to the Core Strategy Review

- 1.8 Following the examination hearings, the Council submitted a schedule of suggested main modifications to the Core Strategy Review⁹ to the Inspectors. The Inspectors promptly responded with an outline of suggested main modifications for the Plan to be found sound and instructing the Council to prepare a final schedule of proposed main modifications for publication for full consultation for at least six weeks¹⁰. The Inspectors' note highlights the need for a Sustainability Appraisal of the main modifications to be published alongside the main modifications schedule and the potential need for a Habitats Regulations Assessment of the main modifications also.
- 1.9 **Table 1** sets out all the proposed modifications to the Proposed Submission Core Strategy Review (February 2020) and their sustainability implications.

Reasonable alternatives to the proposed main modifications to the Core Strategy Review

- 1.10 The SEA Regulations require the consideration of reasonable alternatives to the published proposed modifications.
- 1.11 The main modifications to the proposed submission Plan provide further details relating to infrastructure in the new settlement and landscape-led masterplanning, in addition to factual updates in response to the revised National Planning Policy Framework (July 2021) and new Business Use Classes Order (September 2020). There have also been factual updates in response

⁸ Inspectors' Letter to Council regarding the Outline of Main Modifications, Planning Inspectorate, July 2021. Available <u>here</u>.

⁹ Suggested Main Modifications Submitted to the Inspectors, Folkestone and Hythe District Council, July 2021. Available <u>here</u>.

¹⁰ Inspectors' Letter to Council regarding the Outline of Main Modifications, Planning Inspectorate, July 2021. Available here.

to updates to the evidence base. Given the reasons for the main modifications, there are not considered to be notable any reasonable alternatives.

Significant effects of the proposed modifications to the Core Strategy Review

- The proposed modifications to the Plan have been appraised individually and as part of the Plan as a whole, taking into account the previously identified effects set out in the SA. The likely effects of each proposed modification are set out in the final column of **Table 1**. Where a main modification further contributes towards a positive effect already identified in the SA, the relevant text contributing to the positive change is highlighted in green. If the main modification is judged to change the positive effect, for example a main modification has resulted in a policy going from previously making a negligible effect to a minor positive effect, the green highlighted text is in **bold**. Where a main modification adversely influences a negligible, positive or minor negative effect of a policy towards an SA objective, the text is highlighted in amber. Where a main modifications is judged to result in a negative change in a previously recorded effect on an SA objective, for example a main modification has resulted in a policy going from previously making a negligible effect to a minor negative effect, the amber highlighted text is in **bold**.
- 1.13 Most of the proposed main modifications will not alter the findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020) because they correct factual errors or represent minor updates to the wording of policies and supporting text for clarity rather than meaning.
- 1.14 Most of the main modifications at the very least enforce, strengthen or temper some of the effects already identified through the SA without changing the significance of the effects previously recorded, for example through clarifications on quantities or additional details with regards to measures designed to protect or enhance the environment.
- 1.15 Only three main modifications generated different or changes in the recorded significance of the effects identified previously through the SA:
 - Main modification 14 and 15 generate a new minor positive (+) effect for Policies CSD3
 (Rural and Tourism Development) and CSD4 (Green Infrastructure of Natural Networks, Open
 Spaces and Recreation) against SA objective 7 (Efficient Use of Land). This is due to the
 addition of Policy CSD3's encouragement for the re-use of redundant or disused buildings and
 Policy CSD4's requirement that development proposals demonstrate that they will protect
 soils commensurate to their status and quality.
 - Main modification 19 generates a new minor positive (+) effect for Policy CSD9 (Sellindge Strategy) against SA objective 4 (Historic Environment), changing the overall effect of this policy to this SA objective from minor negative (-) to a mixed minor positive and minor negative (+/-) effect. This is due to the modified policy requiring the protection and conservation of the setting of non-designated heritage assets and where possible the enhancement of important historic natural heritage assets. Further to this, the supporting text to Policy CSD9 requires an evaluation of archaeological remains to the west of the broad location to inform an appropriate mitigation strategy.

Table 1: Detailed schedule of proposed main modifications and implications for SA findings

	Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
Page 374	MM01	Policy SS1: District Spatial Strategy	Policy SS1 District Spatial Strategy Housing will be delivered through a new sustainable, landscape-led settlement, with supporting town centre and community uses, based on garden town principles in the North Downs Area, in accordance with policies SS6-SS9. The garden town will maximise opportunities arising from the location, access to London and continental Europe and strategic infrastructure. Housing and supporting community uses will also be delivered through growth in Sellindge (policy CSD9). Elsewhere in the district, priority will continue to be given to previously developed land in the Urban Area in Folkestone, for main town centre uses and housing, to enhance the town's role as a sub-regional centre, with opportunity for increased densities within the town centre and maximisation of employment opportunities at key locations. Development in the Urban Area will be led through strategically allocated developments at Folkestone Seafront (policy SS10) and Shorncliffe Garrison, Folkestone (policy SS11), and the delivery of strategic mixed-use development at Hythe (policy CSD7). Remaining development needs should be focused on the most sustainable towns and villages as set out in policy SS3. Development outside the new settlement and identified centres in the open countryside and on the coast (defined as anywhere outside settlements within Table 4.3 4.4 Settlement Hierarchy) will only be allowed exceptionally, where a rural or coastal location is essential (policy CSD3). This is supported by the following strategic priorities for the three character areas of the district:	This change would further contribute towards the significant positive effect identified against SA objective 2 (Employment) because retaining Dungeness A for a mix of employment uses, and supporting small-scale operational development associated with the airport, would support the creation of new employment opportunities. It is also expected that this modification would further contribute towards the minor positive effects identified against SA objective 8 (Water quality) and minimise the negative effects recorded against SA objective 3 (Landscape) (as part of a mixed effect) and SA objective 5 (Biodiversity) (as part of a mixed effect) because development must avoid or minimise adverse impacts on the AONB, not result in adverse effects on biodiversity and the water quality of nationally and internationally designated sites of biodiversity value. However, there would be no change in the significance of these effects.

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
D305 375		 Urban Area - The future spatial priority for new development in the Urban Area (Folkestone and Hythe) is on promoting the development of vacant previously developed land, central Folkestone and the north of the town, and other locations within walking distance of Folkestone Central railway station; securing new accessible public green space, plus regenerating western Hythe. Romney Marsh Area - The future spatial priority for new development in the Romney Marsh Area is on accommodating development at the towns of New Romney and Lydd, and at sustainable villages; improving communications; protecting and enhancing the coast and the many special habitats and landscapes, especially at Dungeness; and avoiding further co-joining of settlements and localities at the most acute risk to life and property from tidal flooding. North Downs Area - The future spatial priority for new development in the North Downs area is on the creation of a landscape-led sustainable new settlement based on garden town principles outside the Kent Downs Area of Outstanding Natural Beauty (AONB) boundary, and without material impact designed to avoid or minimise adverse impacts on the AONB, and the expansion of Sellindge. Within the Kent Downs AONB development will be limited to consolidating Hawkinge's growth and sensitively meeting the needs of communities at better-served settlements. Major development will be refused with the AONB other than exceptional circumstances and where it can be demonstrated that the development is in the public interest, in accordance with the National Planning Policy Framework. All proposed development in the North Downs area will have to satisfy the requirements of policy CSD5 d. in order to avoid any significant impact on the water quality of the Stodmarsh European designated sites. 	
		market town to fulfill its potential to sustainably provide for the bulk of the housing,	

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
D305 376		community infrastructure and commercial needs of the Romney Marsh Area. Development will also be planned at other identified settlements in line with the Settlement Hierarchy sufficient to ensure the achievement of growth requirements. In particular, development which helps to maintain and support the local role of the market town of Lydd can meet priority needs. Dungeness A should be retained for: offices (within class E), general industrial (within class B2) and storage or distribution (within class B8) and research and development employment uses; employment-related training and educational purposes; and operations and uses associated with the decommissioning of the nuclear power station. Should redevelopment plans come forward for alternative uses unrelated to the function of the nuclear power station (including other energy generation sector uses), the council will work with the Nuclear Decommissioning Authority, local community and other stakeholders to prepare and adopt an Area Action Plan for part or the whole of the site. Should development proposals come forward for the further material expansion of London Ashford Airport at Lydd (beyond the existing permissions and permitted development rights), the council will work with the airport, local community and other stakeholders to prepare and adopt an Action-Area Action Plan for the site. The council will support small-scale operational development integral to, and required to maintain, the airport use, subject to being satisfied that there would be no significant adverse impacts to the integrity of the nationally and internationally designated sites of biodiversity value. The preparation of Area Action Plan(s) for the Dungeness A, or London Ashford Airport sites will be accompanied by Habitats Regulations Assessment(s) (including Appropriate Assessment) to assess the potential effect of the Area Action Plan proposals on sites within the Natura 2000 network that are protected under the European Birds and Habitats Directives. The Habitats	

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
		Regulation Assessment(s) must show that development would not result in significant adverse effects on these sites of biodiversity value, either alone or in combination with other projects and plans. Within identified settlements, development as agreed by the local community in neighbourhood plans will be encouraged where well-related in scale and location to the Settlement Hierarchy, and in line with the strategic policies of the Core Strategy Review and Places and Policies Local Plan. In all locations throughout the district, development should be designed to directly contribute to the sense of place and sustainable design as set out in policy SS3.	
	Supporting text: Insert new paragraphs to follow paragraph 4.36	Dungeness Power Station [New para.] For over 50 years, Dungeness Power Stations (A & B) have been a cornerstone of the Romney Marsh economy. Dungeness A ceased generation in 2006 and is currently undergoing decommissioning. Initially it was expected that from 2019 the site would enter a period of Care and Maintenance (C&M) lasting some 85 years pending final site clearance. The commencement of C&M would have had a serious impact on employment (in December 2019 approximately 220 people were employed on the site) as well as the local economy. It is now likely that the C&M phase will be replaced with decommissioning work continuing instead over the coming decades. This could mean that skilled staff are retained, employment is increased, and land is released for new economic uses, or for clearance, earlier that would happen through the C&M approach. [New para.] The Nuclear Decommissioning Authority is expected to announce its decision on whether this approach will be adopted for Dungeness A in the near term. EDF's Dungeness B station is expected to continue generating electricity until 2028, following which it will be decommissioned over a lengthy period. The EDF Director's Report Dungeness B June 2017 reported that the station employs over 550 employees, which is supplemented by over 200 contract partners, so	As modified text supporting policy, the changes referenced here are covered through the appraisal of main modifications to Policy SS1: District Spatial Strategy.

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
Daga 378		its closure would have major socio-economic impacts although, as with Dungeness A, these would be experienced gradually. It is important to recognise that there is likely to be a significant impact on jobs in the latter stages of the plan period. In the wider context of other current economic challenges and uncertainties, the decommissioning of the Dungeness Power Stations will create significant economic and social challenges for Romney Marsh. In addition to jobs being lost, businesses will find it increasingly difficult to operate successfully in an area which already has some pockets of significant deprivation and therefore the case for supporting local employmentopportunities and the future of the Dungeness Power Stations site becomes an important consideration. 4.37 Opportunities also exist for employment development at London Ashford Airport at Lydd, through the implementation of the existing planning permission. The council acknowledges the positive impact that Lydd Airport could deliver in supporting the regeneration of Romney Marsh and surrounding areas, accordingly Sshould further material development proposals arise, beyond the existing permissions and permitted development rights, the council will seek to work with the airport, local community and other stakeholders to agree a framework by preparing an Action Area Action Plan for the site. The further development of the Mountfield Road Industrial Estate and investment within the nuclear and tourism industries also present opportunities for job creation.	
ммо2	Section 4.2 Housing and the Economy Growth Strategy Supporting text: Paragraphs 4.42 Approach to housing provision Approach to housing provision 4.42 Section 4.1 sets out the government's methodology for assessing how many homes councils need to plan for. Using the latest household projections and affordability figures, the government methodology requires the provision of a minimum of: 738 new homes a year on average over the period 2019/20 to 2036/37 (18 years) or 13,284 additional homes in total.		As modified text supporting policy, the changes referenced here are covered through the appraisal of main modifications to Policy SS2: Housing and the Economy Growth Strategy.

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
		4.43 This requirement will be delivered by development of the new garden settlement, other strategic sites, sites with planning permission and a number of small- and medium-sized site allocations in the Places and Policies Local Plan. An indicative housing trajectory is given in Appendix 3. All types of homes will be counted towards this requirement, including family homes and flats (C3 use class) and specialist accommodation for the elderly (C2 use class). [New para.] The National Planning Policy Framework states that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements. However, local authorities should make a realistic assessment of likely rates of delivery, given the lead-in times for large-scale sites (NPPF, paragraph 73). The delivery of large-scale developments may need to extend beyond an individual plan period and anticipated rates of delivery should be kept under review (NPPF, footnote 37). [New para.] National Planning Practice Guidance (PPG) recognises that a 'stepped' housing requirement (where the housing requirement is phased to reflect the level of housing expected to be delivered across the plan period) may be justified in certain circumstances. The PPG states that this approach may be appropriate where there is a significant change in the level of housing required and/or where strategic sites will have a phased delivery or are likely to be delivered later in the plan period. The Core Strategy Review will deliver a significant change in the numbers of new homes being built in the district, compared to the 2013 Core Strategy and allocates a major strategic site in the form of a new garden town as the focus for future growth. The council considers that a stepped housing requirement is justified and appropriate, and will ensure that the housing requirement is met fully within the plan period.	

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
Page 380		 Phase 1 - 2019/20 to 2023/24 (five years) - an average of 622 dwellings a year, or 3,110 dwellings in total; Phase 2 - 2024/25 to 2028/29 (five years) - an average of 885 dwellings a year, or 4,425 dwellings in total; Phase 3 - 2029/30 to 2033/34 (five years) - an average of 730 dwellings a year, or 3,650 dwellings in total; and Phase 4 - 2034/35 to 2036/37 (three years) - an average of 700 dwellings a year, or 2,100 dwellings in total. This phased approach will deliver a minimum of 13,284 dwellings, an average of 738 homes a year over the 18 years of the Core Strategy Review plan period. Approach to employment provision As part of the preparation of the Core Strategy Review Places and Policies Local Plan, the Employment Land Review (ELR) (Lichfields, 2017) assessed the future requirements for office and industrial employment uses to 2026. The 2017-ELR considered three different scenarios for office and industrial uses (labour demand, pastcompletion rates and labour supply). For office uses, the labour demand and supply scenarios indicated that there is was a need to plan for approximately 19,000 sqm of office space. The past completion scenario suggestsed a declining requirement which reflectsed recent losses in office space as a consequence of changes to permitted development rights allowing the conversion of office space to residential use; and For industrial uses, the labour demand and supply scenarios indicated that there is was no requirement for further industrial space. However, 	

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
Dage 381		notwithstanding the long-term decline of industrial jobs in the district, recent development activity indicateds that there remainsed a requirement for some industrial floorspace at a relatively modest level (around 15,500 sqm based on the past completion scenario). 4.49 Regarding the existing supply, the ELR finds found that generally thedistrict's employment sites showed good activity and low vacancy rates. In particular, a low level of vacancy was evident among industrial sites, demonstrating that much of the current industrial stock was is meeting a need in the market. This includesd good occupancy at lower quality sites, with high demand at the lower end of the rental market. Overall, occupancy levels in the office market appeared to be lower than the industrial market. 4.50 The ELR concludeds that, based on the current supply of employment space from planning permissions and allocated sites (some 50,825 sqm of office development and 97,745 sqm of industrial development), there is was a sufficient supply of space to meetthe estimated office and industrial requirements under all scenarios to at least 2031. 4.51 Nevertheless, the ELR also stresseds that the district's strategic employment allocations need to be well connected with key motorway junctions and/or transport hubs in order to maximise opportunities for their delivery. There are were also some concerns around: • The balance between limited supply in Folkestone, which exhibits the strongest demand, and the rest of the district; and • The quality of available employment sites. 4.52 These considerations will be closely monitored to see if further intervention, beyond the protection and allocation of land through Places and Policies Local Plan policies E1 and E2 is necessary. The ELR particularly recommendeds the regular assessment of sites and	

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D 2000		the preparation of an employment land trajectory through the council's Authority Monitoring Report (AMR). 4.54 An updated Employment Land Needs Assessment (ELNA) has been completed (2018) to supplement the conclusion and recommendations of the 2017 ELR and Otterpool Park Employment Opportunities Study and inform the preparation of the Core Strategy Review. The update sets out district-wide growth projections and employment land requirements over the period to 2037 by drawing on the latest population projections and economic forecasts. It also provides estimates of employment land needs for the district and the garden town specifically, based on different assumptions about where growth and demand could come from. 4.55 In terms of new jobs growth, the update forecasts a much lower level of job growth onan 'average per annum basis' than the 2017 study, albeit covering different periods of time and an end year of 2037. The latest forecasts imply growth of 237 jobs a year (between 2018 and 2037) compared with 445 jobs a year (between 2006 and 2026) inthe 2017 ELR. Translated into net floorspace requirements, baseline jobs growth forecasts district-wide indicate a total demand for all 'B-class' employment uses non-retail employment uses (e.g., falling within use class E, B2 and B8 and sui generis categories) of 16,360 sqm net. This figure is based on a requirement for 24,750 sqm of office floorspace, offset by an 8,390 sqm reduction in manufacturing and distribution floorspace. [New para.] Given that recent development activity has indicated that there remains a requirementfor some industrial floorspace, the council intends to plan positively for manufacturing and distribution uses within the district. Therefore, the Core Strategy Review will seek to meet non-retail employment uses of 40,250 sqm based on the 24,750 sqm of office floorspace identified by the ELNA (2018) and 15,500 sqm industrial floorspace identified by the ELNA (2018) and 15,500 sqm industrial floorspace identified by the ELNA (2018)	

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		through the implementation of Policies E1 and E2 of the Places and Policies Local Plan. 4.56 As outlined in the Employment Opportunities Study, however, the creation of a new garden settlement offers a clear opportunity to plan for a higher level of employment growth to accommodate wider growth and inward investment opportunities that exist across the wider district, elsewhere in Kent and beyond. Adopting a labour supply scenario for the new settlement indicates that 4,770 new jobs should be planned for by 2037, leading to a requirement for around 36,760 sqm of the same types of 'B class' employment floorspace or 8.1ha of employment land.	
D300 383	Supporting text: Paragraph 4.57 - 4.61	Approach to retail provision 4.57 The Folkestone & Hythe Retail and Leisure Needs Assessment (Lichfields, 2018) undertook a partial update of the Town Centres Study (PBA, 2015). This took account of changing retail trends, particularly the increase in online shopping and other 'special forms of trading', and the growth of population to provide district-wide retail capacity projections and needs assessment for the Core Strategy Review plan period to 2036/37. The council has completed an update to the recent Town Centre Retail Study (PBA, 2015) to take account of changing retail trends, particularly the increase in online shopping and other 'special forms of trading', and the growth of population over the Core Strategy Review plan period to 2037. 4.58 New retail space needs to be planned for to meet the changing demands of the existing population and the needs of new households. This will ensure that the district's retail centres retain existing trade and generate new jobs and economic activity, so that this spending is not lost to competing centres elsewhere. It also helps to reduce journeys, so that local people can meet their needs close to where they live and are not forced to travel long distances for shopping.	As modified text supporting policy, the changes referenced here are covered through the appraisal of main modifications to Policy SS2: Housing and the Economy Growth Strategy.
		4.59 The Retail and Leisure Needs Assessment (2018) was revised by the Retail and Leisure Needs Assessment (2019) which applied higher population growth	

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main r	nodificatio	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?				
		sqm (gross) of retared this is bro (although over a ditems, including for food/beverage is 4.60 Policy SS2 setailis, however, highstreet names the district every find planning application trigger a partial research.	adly simil different time od), and consistent out in seeks to make a highly with recent your years: for and, if wiew of poleed will be tone town of additional and the seeks to make a highly we years: for and, if wiew of poleed will be tone town of additional and the seeks to make a highly with a	te within the lar with the lar with the me period). It comparison Table 4.1 be the set this embedding sector of the studies icies within met by deventre (identarden settles).	e district over the need of the need of floorspace elow. ployment: or, as shown ouncil will the es will be not indicate matched the plan. velopments tified as a significant of the plan.	ver the plan per lentified by the for convenience (occasional a and retail need the by the failure therefore reviet material considuation changes in within existing trategic town in	around 31,200 35,700 priod, a reduction of the second 2013 Core Strategy are floorspace (everyday and special items) and and are dover the plan period. The second are second a	
		Convenience goods	439 1,100	1,784 2,700	3,185 4,600	4,620 6,500	-	
		Comparison goods	4,578 1,500	11,105 6,900	18,570 14,700	26,585 23,300	-	

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
		Food/bevera ge 900 2,500 4,100 5,900 Totals 5,017 3,500 12,100 21,755 23,400 35,700	
Page 385	Policy SS2: Housing and the Economy Growth Strategy	Policy SS2 Housing and the Economy Growth Strategy The core long-term requirement is to deliver 738 dwellings (Class C2/C3) a year on average from 2019/2020 to 2036/37, a total requirement of 13,285 13,284 new homes over the plan period. This will be achieved by major strategic growth in the district including the delivery of a new garden town, as well as a number of small- and medium-sized sites as allocated in the Places and Policies Local Plan. In order to meet the total housing requirement over the plan period, a stepped approach to housing delivery will be implemented encompassing four phases, as set out in Table 4.2; this acknowledges the significant change in the level of housing requirement and the phased delivery of the new garden town. Allied to this rate of housing delivery, business activity and the provision of jobs will be facilitated through supporting employment opportunities in the garden settlement, existing town centres, the protection of sufficient employment land across the district, allocations and delivering rural regeneration (especially in the south and west of the district). Use	This change would further contribute towards the significant positive effect identified against SA objectives 2 (Employment) and 14 (Community Vibrancy and Social Cohesion) because an increase in retail floorspace would further support the creation of employment opportunities and access to services and facilities for all members of the community with beneficial effects on community vibrancy and social cohesion. It is not anticipated that the minor change to the housing requirement figure would affect the findings of the SA, but the provision of a more detailed phasing plan is likely only to serve to improve the deliverability of the growth strategy over the plan period.

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main mod		Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?		
Page 386		Housing (Classes C2/C3)	Minimum of 13,284 dwellings delivered in four phases as set out in the right hand column.	A requirement is set to deliver land for an average of 738 dwellings a year over the plan period (18 years). This is to be delivered in four phases as follows: • 2019/20 to 2023/24 - 622 dwellings a year • 2024/25 to 2028/29 - 885 dwellings a year • 2029/30 to 2033/34 - 730 dwellings a year • 2034/35 to 2036/37 - 700 dwellings a year		

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?	
Page 387		Employment Uses (B Classes) (offices, research and development, light industry, Class B2 and Class B8) Goods Retailing (Class A1 A5, excluding A2 services) (retail and food/beverage uses excluding financial and professional services) Figure 1 Services (Services) Figure 2 Approximately (36,760 sqm floorspace) Employment (36,760 sqm floorspace) Employment sites in Places and Policies Local Plan Policies E1 and E2 Approximately 31,205 35,700 sqm gross, comprising: 4,620 6,500 sqm convenience goods floorspace; and 5,900sqm food/beverage floorspace	employment / retail needs to be reviewed every five years. Any future studies will be a material planning consideration and may trigger a review of relevant plan policies.	

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	dification		
Page 388	Supporting text: Paragraphs 4.62 - 4.64	Provisions to ensure the effective implementation of this 4.62 SS2 primarily addresses Core Strategy Review a Needs: A, C and D. 4.63 The table below shows how the housing requirer to the scale of strategic allocations (policies SS6-SS infrastructure, they will play a medium- and long-term resource Delivery through the allocated garden settlement over the plan period 2018/19 2019/20 to 2036/37 (1) Delivery through the further expansion of Sellindge (2) Delivery through allocated development sites (remaining Core Strategy Policies CSD8 and Places and Policies Local Plan allocations) without planning permission (3) 'Windfall' sites – allowance of 95 units per annum for	ment to 2036/37 will be met. Due 511) and need for phasing with ole in maintaining housing supply. Contribution (net dwellings) 5,925 5,593 188 350 1,703 1,610	As modified text supporting policy, the changes referenced here are covered through the appraisal of main modifications to Policy SS2: Housing and the Economy Growth Strategy.	

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
		Delivery (minimum) through extant planning permissions and sites under construction (4) (5)	
		Total 2019/2020 – 2036/37 (minimum) 13,515 13,407	
		Table 4.3 How the housing minimum requirement will be delivered through the plan period (1) Core Strategy Review Policies SS6-SS9. (2) Core Strategy Review Policy CSD9. Remaining part of proposed allocation without planning permission (second phase). (3) 5 per cent deducted from Places and Policies allocations without planning full permission to take account of non-delivery (excludes Core Strategy Review Policy CSD8). (3) (4) Windfall development accounts for the housing delivery arising from small and medium sites of one to nine dwellings. Evidence from the years 2012/13 to 2018/19 indicates an average of 97 dwellings from windfall development per annum. Early years have been discounted to avoid double counting with existing planning permissions. (4) (5) 5 per cent deducted from sites where construction has not started to take account of non-delivery (excludes strategic allocations). 4.64 Table 4.3 shows the different components of the housing land supply over the Co Strategy Review plan period, including allocations in the Places and Policies Local Pla	re n,
		existing planning permissions, 'windfall' delivery (small sites of 1 to 9 dwellings) and the strategic allocations in this plan. A cautious approach has been taken, with deductions made for the possible non-delivery of sites (where planning permissions lapse, sites are developed for fewer homes than anticipated or some homes are completed beyond the plan period and a conservative estimate has been made for windfall development. It is estimated the a minimum 13,515 13,407 new homes will be delivered over the plan period, exceeding the requirement of 13,284 currently set by the Government's national formula for housing need.	de ed e

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
ммоз	Supporting text: Paragraph 4.78	4.78 Close attention will be paid to minimising hazards and flood risks in line with national policy using the sequential approach. It is critical that, where possible, development is directed away from those areas identified as facing greatest hazards in the Strategic Flood Risk Assessment (SFRA) should a flooding event occur. A high priority will be placed on upgrading flood defence infrastructure (see SS5). The sequential approach is to take into account all forms of flooding.	As modified text supporting policy, the changes referenced here are covered through the appraisal of main modifications to Policy SS3: Place-Shaping and Sustainable Settlements Strategy.
Page 300	Policy SS3: Place- Shaping and Sustainable Settlement s Strategy	Policy SS3 Place-Shaping and Sustainable Settlements Strategy Development within the district is directed towards existing sustainable settlements and a new sustainable garden settlement south of the M20 near Westenhanger to protect the open countryside and the coastline, in accordance with policy SS1. Change in settlements will be managed to contribute to their role within the settlement hierarchy (Table 4.43) and local place-shaping objectives, to promote the creation of sustainable, vibrant and distinctcommunities. The principle of development is likely to be acceptable on previously developed and within defined settlements, provided it is not of high environmental value. All development must also meet the following requirements: a. The proposed use, scale and impact of development should not be of a size, scale and nature that is disproportionate to the level of services which the settlement is capable of providing and should preserve the character of the settlement and maintain its status in the settlement hierarchy proportionate and consistent with the settlement's status and its identified strategic role (see Table 4.4) within the district. b: Consideration of alternative options within the appropriate area should be evident, with a sequential approach taken as required for applicable uses set out in national policy, for example to inform decisions against clause (c) below on flood risk. In	This change would minimise the negative effects recorded against SA objectives 3 (Landscape) and 4 (Historic Environment) (as part of mixed effects) because the policy has been amended to explicitly reference the need to preserve the character of the settlement and historic features. In line with the updated supporting text, the policy requires a site-specific flood risk assessment for other sources of flood risk as identified within EA surface water flood mapping. This serves to emphasises the importance of protecting against all sources of flood risk, in line with the NPPF. This is likely to contribute positively to the minor positive effect identified against SA objectives 9 (Flood Risk and Climate Change Adaptation), although it is not anticipated that the additional wording on flooding would affect the significance of the effect recorded in the SA.

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
		considering appropriate site options, proposals should identify locational alternatives with regard to addressing the need for sustainable growth applicable to the Romney Marsh Area, or Urban Area or North Downs Area. b. e. For development located within zones identified by the Environment Agency (FA) as being at risk from flooding, or at risk of wave over-topping in immediate proximity to the coastline (within 30 metres of the crest of the sea wall or equivalent), site-specific evidence will be required in the form of a detailed flood risk assessment. This will needto demonstrate that the proposal is safe and meets with the sequential approach within the applicable character area (Urban Area, Romney Marsh Area or North Downs Area), and where applicable, the (if required) exception tests set out in national policy. It will utilise utilising the current applicable Strategic Flood Risk Assessment (SFRA) and provide further information. A site-specific flood risk assessment may be required for other sources of flood risk as identified within EA surface water flood mapping. Development must also meet the following criteria as applicable: i) no residential development, other than replacement dwellings, should take place within areas identified at "extreme risk" as shown on the SFRA 2115 climate change hazard maps; and ii) all applications for replacement dwellings, should, via detailed design and the incorporation of flood resilient construction measures, reduce the risk to life of occupants and seek provisions to improve flood risk management: and iii) strategic-scale development proposals should be sequentially justified against district-wide site alternatives.	

	Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
Page 392			infrastructure (particularly walking/cycling). Efficient use should be made of central land in town centres or in easy walking distance of rail and bus stations, with appropriate redevelopment of complementary uses above ground floor retail, leisure or other active uses, to directly support the vitality of centres. d. e. Proposals should be designed to contribute to local place-shaping and sustainable development by: i) preserving and wherever possible respecting and enhancing statutory and non-statutory listed buildings, monuments and conservation areas and other key historic features of conservation interest and their setting; and ii) including through appropriate sustainable construction measures, measures to optimise including water efficiency and (in cases of newbuild development), measures to optimise a proportion of energy usage from renewable and low carbon sources on new build development. e. f. Development must address social and economic needs in the neighbourhood and not result in the loss of community, cultural, voluntary or social facilities (unless it has been demonstrated that there is no longer a need or alternative social/community facilities are made available in a suitable location).	
	MM04	Table 4.5	Location and Urban Area Romney North Downs Area Purpose Area	As modified text supporting policy, the changes referenced here are covered through the appraisal of main modifications to Policy SS4: Priority Centres of Activity Strategy.

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main r	modification			Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?		
Page 393		Employment Sites: To protect existing and provide further industrial (B class and similar sui generis uses) premises for light industrial, Class B2 and Class B8 type uses suitable to the needs of the district's businesses and inward investors. Town Centres: To accommodate	Folkestone and Hythe Folkestone (main town centre) and Hythe	Site at New Romney, sites in Lydd	Site at Lympne, site at Hawkinge, sites within new garden settlement			

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	olicy/ aragraph/ able/		Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?	
Page 304		to improve their vitality, public realm, mix of uses, and daytime and evening economy. District Centres: To accommodate appropriate development to maintain their mix of uses and improve their vitality, viability and public realm. Local Centres: To protect crucial services and accommodate development that maintains their viability for residents and visitors. Table 4.5: Priority Cent	ther rhoo 5	Lyminge, Elham, Sellindge, sites within new garden settlement	

No. Po	ection/ olicy/ aragraph/ able/ iagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
Pi Ce Ac	olicy SS4: riority entres of ctivity trategy	Priority Centres of Activity Strategy In focal points for maintaining and developing jobs and services, as represented by the Priority Centres of Activity, development will be encouraged where it complies with national policy and contributes to continued centre viability. Major commercial and employment development, including A and B class uses, should be located in accordance with the Priority Centres of Activity network as shown on the Policies Map and should reinforce the role of the centre. Development in Priority Centres of Activity will be allowed where it does not result in a net loss of on-site non-retail employment B-Class uses, and it does not jeopardise the identified commercial purpose of areas set out in the Priority Centres of Activity network (see Table 4.5). Strategic objectives will be delivered through the following principles: a. A 'town centre first' policy will operate for applicable uses in line with national policy. Potential town centre activities or those creating significant transport demand, including retail, leisure and major office uses, should be located: i) Sequentially, looking firstly at locations within town centres, then on the edge ofcentres, and only then out of centre with a preference given to accessible sites which are well connected to the town centre; and ii) With regard to their impact on the vitality and viability of, and existing, committed and planned investment in, the defined town, district and local centres. b. For other employment-generating (non-town centre) activities, investment should alternatively be directed to designated Major Employment Sites. If suitable sites	It is not considered that these changes will alter the findings of the SA because they represent minor wording changes to aid understanding and future-proofing of Policy SS4: Priority Centres of Activity Strategy.

Paragraph/ Table/ Diagram		alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
	development for employment-generating uses will only be acceptable where it accords with Policies SS1, SS3 and CSD3. • In accordance with policies SS1, SS3 and CSD3; and • Where demonstrated to be in locations suffering longstanding deprivation (and subject to directly contributing to local workforce up skilling, sustainable transportprovisions and an acceptable environmental impact on the locality). c. Sustainable employment development proposals will be encouraged in appropriate locations in areas suffering longstanding deprivation where they increase employmentopportunities in the area and contribute to local workforce up-skilling. d. To deliver commercial regeneration objectives, mixed-use development on employment land may be acceptable in line with the above principles where appropriate new non-retail employment B-class premises are provided, and the proposals provide a net gain of suitable local job opportunities, and where it can also be demonstrated that a following criterion is also satisfied (subject to the satisfaction of unless other site specific policies) apply: i) At appropriate older Major Employment Sites, it directly delivers a range of small new and replacement industrial premises more appropriate to local needs; or ii) In and on the edge of Town Centres, it provides a significant quantum of small incubation premises/offices designed to meet the needs of indigenous start-upbusinesses. All development in Town and District Centres should contribute to a mix of active ground floor uses, with predominantly retail goods (A1) frontage shopping retained at the core of	

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
		centres. Elsewhere in Town Centres an appropriate mix of offices (A2/B1), cultural, community and voluntary facilities, and other shop uses will be permitted; with a limited increase in the proportion of restaurants (A3) where they add to the shown to be adding to the choice, vitality, tourist appeal and evening economy of Town Centres.	
MM05	Policy SS5: District Infrastructur e Planning	Policy SS5 District Infrastructure Planning Development should provide, contribute to or otherwise address the district's current and future infrastructure needs. Infrastructure that is necessary to support development must exist already, or a reliable mechanism must be available to ensure that it will be provided at the time it is needed. The Community Infrastructure Levy (CIL) has been introduced to ensure that, alongside Section 106 contributions, resources are in place sufficient to meet the infrastructure needs of the district in line with the growth provisions of this strategy. CIL applies to all qualifying forms of development across the district, and a meaningful proportion of levy revenues raised in each neighbourhood will be used to deliver infrastructure within that neighbourhood. Developer contributions through specific legal requirements will continue to be negotiated taking appropriate account of the development's viability for required local infrastructure (including facilities essential for development to take place or to mitigate the immediate impact of development). CIL and developer contributions will be used to secure resources contributing towards essential infrastructure needs. Potential infrastructure requirements of this Core Strategy Review are identified in the council's Infrastructure Delivery Plan. Planning permissions will only be granted where suitable developer contributions are secured or are accompanied by a CIL liability notice, and where: a. The design of a development aims to reduce unnecessary or unsustainable demands on physical and social/community infrastructure, and environmental or utility	This change would further contribute towards the significant positive effect identified against SA objective 13 (Sustainable Transport and Congestion) because requiring tailored solutions and financial contributions (e.g. infrastructure provision) to limit car use generated by new developments would help to alleviate road congestion and encourage uptake of more active and sustainable travel modes.

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
MM06	Policy SS6: New Garden Settlement Development Requirement s	b. Development does not jeopardise current or planned physical infrastructure; and c. The location, design or management of development provides a choice of means of transport and allows sustainable travel patterns, for pedestrians, cyclists and/or public transport. The travel demand of new development proposals will be considered and managed and tailored solutions will be developed to limit car use generated by new developments. All major trip-generating uses will provide Travel Plans. Where the provision of infrastructure is necessary to facilitate and/or mitigate the impacts of development (including the cumulative impacts of planned development), developers will be required, where necessary, to make a proportionate contribution on a retrospective basis towards such infrastructure as may have been forward-funded from other sources. Policy SS6 New Garden Settlement Development Requirements Land in allocated within the North Downs are for a new garden settlement as shown on the Policies Map. The settlement will be developed on garden town principles and will have a distinctive townscape and outstanding accessible landscape, both of which will be informed by the historic character of the area. It will be planned to be sustainable, providing new homes with a broad mix of tenures, employment opportunities and community facilities within easy walking and cycling distance. It will be a landscape-led development that responds to its location within the setting within of the Kent Downs AONB landscape and the adjacent Lympne Escarpment with an emphasis on a network of green and blue spaces including woodland and other planting, open space and recreation that supports healthy living, encourages interaction between residents, enhances local biodiversity and	It is not considered that these changes will alter the findings of the SA of Policy SS6: New Garden Settlement Development Requirements. However, it is acknowledged that the additional wording on the Kent Downs AONB has greater potential to minimise the minor negative effect identified against SA objective 3 (Landscape) (as part of a mixed effect).

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
Do		mitigates impacts on views from the scarp of the Kent Downs. Environmentally the settlement will be a beacon of best practice, making best use of new technologies, and will be designed to achieve a low carbon, low waste and highly water efficient development. Given the location of the proposed new settlement and its relationship with the Kent Downs AONB, it is essential that the landscape-led proposals include appropriate structural landscaping in order to avoid or minimise adverse impacts on the AONB and views in and out of the AONB in accordance with policy SS7. Outline planning permission will be granted for a comprehensive proposal that is supported by a masterplan prepared by the site promoters. The masterplan shall be prepared in partnership and in consultation with the local planning authority, stakeholders, partner organisations, local people and interest groups, in accordance with the three-tier approval structure and include a detailed phasing and delivery strategy.	
	Policy SS6: New Garden Settlement Developme nt Requireme nts	 a. The settlement shall provide for a minimum of 5,925 circa 5,600 new homes in a phased manner within this plan period (2019/20 to 2036/37) with potential for future growth to provide a total of 8,000-10,000 homes (subject to detailed masterplanning) within the site allocation area beyond the plan period (subject to detailed masterplanning and an assessment of potential impacts on the Kent Downs AONB in line with Policy SS7); b. The mix of tenure and size if new homes shall be in accordance with Policies CSD1 and CSD2 and evidence in the Strategic Housing Market Assessment, Parts 1 and 2 (PBA, 2016/2017) (or subsequent revision to the evidence base) and shall include build for rent provision to meet identified need. A minimum of 22 per cent of all dwellings should be provided as affordable homes, subject to viability; 	There has been a reduction in the number of homes to be delivered at the garden settlement to reflect revised trajectories in the planning applications for Otterpool Park. However, this change would not alte the significant positive effect identified against SA objective 1 (Housing) as a significant number of new homes would still be provided. The modification offers the possibility of delivering planned phases of the new garden settlement early where sustainable to do so. It is expected that the additional wording on achieving low carbon and high water efficiency standards in self-build and custom-build homes would further

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
Page 400		 c. All homes shall meet the adopted Nationally Described Space Standards in accordance with Policy HB3 of the Places and Policies Local Plan (or any revision to that policy); d. Within the early phases, development shall provide homes in neighbourhoods in and around the new town centre (Policy SS7 (2)), well connected to the centre by a walking, cycling and public transport network. Close to the town centre there shall be a higher proportion of smaller residential units serving all age groups. Other phases of development may come forward in tandem if they are well-connected to an existing rural centre or primary village with capacity to provide for the day-to-day needs of new residents, are in accordance with the masterplan for the garden town, maintain its quality and do not prejudice its overall delivery; (2) Self-build and custom-build homes a. A proportion of proposed dwellings shall be provided as self-build or custom-build plots, having regard to the need identified by the council, with each substantial phase contributing a proportion of self-build and custom-build housing; b. Innovative self-build and custom-build designs will be encouraged that are flexible and incorporate new technologies, particularly those that achieve carbon and water neutrality. In small or single unit schemes the objective will be to achieve low carbon and high water efficiency; and (3) Employment development 	contribute towards the significant positive effects identified against SA objectives 10 (Energy Efficiency) and 11 (Water Efficiency) in the SA.

	lef lo.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
Page 401			a. The settlement shall provide approximately 36,770 36,760 sqm net of employment floorspace (B use classes which may include office, research and development and light industrial uses within Class E, and uses falling within Class B2 and B8) by 2037. Development beyond the plan period has the potential to provide for approximately 57,600 sqm of employment floorspace in total within the site allocation area. A different delivery rate or quantum of employment development will need to demonstrate that employment provision aligns with population growth to ensure that the town grows in a sustainable way following garden town principles. Other employment opportunities will be created by the retail and other town centre development set out in Policy SS7(2)(b) as well as community uses. The settlement's location near the gateway to Europe (Channel Tunnel) provides the opportunity to deliver employment and town centre development that complements other centres including Folkestone town centre, Hythe and other growth areas across East Kent;	
M	1M07	Supporting text: Paragraphs 4.178 - 4.180	New Garden Settlement – Place Shaping Principles 4.178 Landscape-led masterplanning and the high quality design and layout of the town (its 'townscape') will be key to the success of the settlement, with particular regard to the impact on views from the AONB. Each neighbourhood should have a distinctive character with different densities of development. The masterplan should show the relationship of different land uses, the height and massing of buildings, the legibility of streets and how the development will make use of high quality materials that are sensitive to, and sit comfortably alongside, the local environment. There is existing design guidance that can be drawn on, including the Kent Design Guide (Kent Design Initiative) and the Kent Downs Area of Outstanding Natural Beauty Landscape Design Handbook (Kent Downs AONB Unit), but the development will need to be informed by detailed design codes drawn up with the participation of the local community. The area's heritage assets, in particular Westenhanger Castle and its setting, together with other non-designated	As modified text supporting policy, the changes referenced here are covered through the appraisal of main modifications to Policy SS7: New Garden Settlement – Place Shaping Principles.

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
Page 402	Diagram	heritage assets, can make a significant contribution to the character of the new settlement, that can help attract future residents, businesses and visitors and create a strong sense of place from the outset. Proposals must be accompanied by a comprehensive Landscape and Visual Impact Assessment prepared in accordance with the Landscape Institute's and Institute of Environmental Management & Assessment's 'Guidelines for Landscape and Visual Impact Assessment' (Third Edition) or updates to this guidance. 4.179 At the heart of the development will be a vibrant town centre that will meet the needs of residents, workers and visitors with attractive cultural, community, shopping and leisure facilities, as well as spaces for events and meetings to foster community cohesion. The Retail and Leisure Need Assessment 2018 Update indicates that the new garden settlement can support approximately 12,900 sqm (gross) (June 2019 update) projections suggest the new town and local centres within the new Otterpool Park settlement could provide between 10,800 and 16,700 sqm gross of retail (convenience and comparison) and food and beverage floorspace by 2017. Service uses (class A1 non-retail and class A2 financial and professional services) could increase this requirement to 15,500 sqm (gross) the garden settlement overall floorspace projection to 13,000 to 20,000 sqm gross by 2037. This will need to be carefully planned and phased, particularly any proposals above these indicative requirements, to avoid any detrimental impacts on nearby town centres (such as Folkestone, Hythe, New Romney, Ashford and Dover) or shops and facilities in nearby villages, yet also meet the everyday needs of the settlement and nearby communities. Each neighbourhood in the garden settlement will also need to be supported by educational, recreational and community facilities. It is expected that the retail provision will be provided as part of the new town centre, which should be located at the heart of the garden	
		settlement, within easy walking distance of the station. Other small-scale retail development would be expected to be provided at 'local centres' in neighbourhoods through the separate phases of the development. It is expected that the individual units provided for comparison retail, will not exceed in the region of 500sqm, unless justified by a retail impact assessment, and that the	

No. P	Section/ Policy/ Paragraph/ Pable/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
		majority of retail development will be provided as small local stores. Details of the retail development is proposed to be phased across the development, to align with residential development, should be submitted with the application. 4.180 The settlement presents a major opportunity to secure a high speed rail service between Westenhanger and London St Pancras. The council is pursuing this with the train operating companies, which are bidding for the new South Eastern franchise, infrastructure providers and also with Network Rail and other stakeholders. A transport hub should be provided, located at Westenhanger station, allowing easy transfer between walking, cycling, bus and train journeys. The railway station upgrade and hub will potentially deliver: • Lengthening of the existing platforms; • New and refurbished station buildings with improved customer facilities; • A new footbridge between platforms; and • Car parking to meet the needs of the new town and nearby villages. • Ways of integrating the station improvements with other land uses and facilities should also be explored. [New para.] In order to meet the demand for increased rail patronage on the high speed rail service from the increasing population of the garden settlement, and other development in the Folkestone & Hythe District and the rest of East Kent, there will be a need to engage with the relevant rail stake holders including Network Rail, the rail franchise of concession operator, and the Department for Transport to encourage sufficient capacity to support the future population. Whilst the Council has limited direct control over this issue, it will work together with Ashford Borough Council, Kent County Council and other East Kent authorities to lobby the relevant stakeholders to increase the capacity on the high speed service,	

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		to ensure that the capacity exists to serve the additional demand created from the new development.	
	Policy SS7: New Garden Settlement - Place- Shaping Principles	Policy SS7 New Garden Settlement - Place Shaping Principles (1) A landscape-led approach a. The design and layout of the development shall be landscape-led and include within it structural landscaping in order to avoid or minimise adverse impacts on the Kent Downs AONB and views into and out of the AONB. Where required to mitigate any such impacts arising from the development, structural planting shall be carried out at an appropriate stage in relation to each phase in order to optimize its effectiveness, and include the provision of new habitats for priority nature conservation species. Applications shall be accompanied by a landscape and visual impact assessment that should inform the landscaping scheme at a structural and local level. Proposals shall demonstrate a landscape led approach that respects topography and views, particularly from the Kent Downs Area of Outstanding Natural Beauty and helps mitigate impact on views from the scarp of the Kent Downs, guided by a Landscape and Visual Impact Assessment. The assessment should consider the proposal itself and any cumulative impacts arising from developments in the vicinity of the proposal; and b. A green and blue infrastructure strategy shall be developed that enhances existing green and blue infrastructure assets in accordance with Policy CSD4. Additionally the strategy shall deliver:	This change increases the likelihood that any adverse effects of the new garden settlement on SA objectives 3 (Landscape) would be minimised because the policy and its supporting text have been amended to explicitly reference the requirement for a Landscape and Visual Impact Assessment as part of a landscape-led approach to new garden settlements. This change would further contribute towards the minor positive effects identified against and 5 (Biodiversity and Geodiversity) (as part of mixed effects) because the policy now requires the provision of new habitats for priority nature conservation species. However, there would be no change in the significance of these effects. It is also expected that this modification would further contribute towards the significant positive effects identified against SA objectives 2 (Employment) and 14 (Community Vibrancy and Social Cohesion) because retail provision within new garden settlements would support the creation of employment opportunities and access to services and facilities for all members of
		 i. Advanced woodland planting and habitat creation using native species to benefit later phases of development, particularly from prominent locations visible from the Kent Downs Area of Outstanding Natural Beauty, and to 	the community, with beneficial effects on community vibrancy and social cohesion.

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
Page 405		avoid as far as possible temporary loss of biodiversity value when construction begins. Advanced woodland planting, habitat creation and community green space shall also be designed to relate to local landscape character and to prevent the coalescence of the new settlement with Lympne and to separate neighbourhoods within the settlement itself. Planting and habitat creation should also be used to provide distance buffers between the M20/High Speed transport corridor for noise and air quality mitigation purposes; ii. Clear net biodiversity gains over and above residual losses through the planting of native species and the creation of green ecological corridors to improve species' ability to move through the environment in response to predicted climate change, and to prevent isolation of significant populations of species. The strategy shall enhance nearby Harringe Brooks ancient woodlands, (including ecological connections, future management and community access) Local Wildlife Sites, Otterpool Quarry Site of Special Scientific Interest and other sensitive ecological features, including the existing pond at the former Folkestone Racecourse. Enhancements may include improvements to ecological connections both within and outside the allocation boundary, their future management and community access, where appropriate. Proposals must demonstrate that there will be no impact on the Lympne Escarpment Site of Special Scientific Interest, unless exceptional circumstances can be demonstrated, in line with Places and Policies Local Plan Policy NE2; iii. A pollinator network throughout the settlement with connection to the wider countryside, with the aim of providing all-year round support for pollinators, through the use of native species;	The supporting text to the policy requires this to be delivered at the heart of the settlement within easy walking distance of the station as well as appropriately distributed local centres elsewhere. It is expected that the additional wording on sustainable drainage systems (SuDS) would further contribute towards the minor positive effect identified against SA objective 9 (Flood Risk) (as part of a mixed effect) because avoiding any increase in, and reducing flooding downstream, would help minimise flood risk. Although there are other modifications to Policy SS7, they are not considered to have a notable effect on the likelihood or significance of the effects identified for Policy SS7 in the SA.

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
Page 406		 iii-iv. A new country park, easily accessible from the town centre and beyond and supported by and linked to other areas of strategic open space, that enhances the historic landscape setting of Westenhanger Castle; iv.v. Playing fields and sports provision, play areas, informal open spaces, allotments and woodland located to maximise use and meet the sporting, leisure and recreational needs of the garden settlement as informed by the council's Playing Pitch and Sports Facilities Strategies; v.vi. Publicly accessible, well-managed and high quality open spaces, which are linked to the open countryside and adjoining settlements. This shall be informed by an access strategy that seeks to protect and enhance existing public rights of way, and create new public rights of way. The strategy shall balance demands for public access with ecological and landscape protection, taking into account the impacts of increased access on the Kent Downs AONB and Folkestone to Etchinghill Escarpment Special Area of Conservation and other protected areas, which might necessitate the need for mitigation to be secured; vi.vii. Sustainable drainage systems (SuDS) to maximise landscape and biodiversity values and to prevent avoid any increase in, and where possible reduce, downstream flooding of the East Stour River, developed as part of an integrated water management solution; and vii.viii A long-term security and management plan of the Green Infrastructure estate which ensures community involvement and custodianship. (2) A vibrant town centre 	

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
Page 407		b. Food shopping (convenience retail) shall be provided within the town centre to allow choice and variety as well as reducing the need to travel for day-to-day needs. The Retail and Leisure Need Assessment 2018 Update (June 2019 update) indicates that the new garden settlement can support approximately 3,150sqm up to 4,284sqm (gross) of convenience retail floorspace within the plan period to 2037. A range of other shopping floorspace (comparison retail) shall also be provided to create a vibrant town centre. The 2018 Update Retail and Leisure Need Assessment (June 2019 update) indicates that the new garden settlement can support approximately 7,300sqm up to 9,108sqm (gross) of comparison retail floorspace within the plan period. A mix of other town centre uses should be provided, including food and beverage space (approximately 2,450sqm gross) (up to 3,305sqm gross) and non-retail and financial and professional services (approximately 2,600 sqm gross 3,300sqm gross). An impact assessment shall be undertaken The stated floorspace projections by use class type (baseline values) as drawn from the Retail and Leisure Need Assessment (June 2019 update) are to represent the upper limit of floorspace provision within the garden settlement across the plan period, so that it only meets the needs generated by the development itself. Should any phase of development propose a provision of floorspace that, when considered cumulatively to take account of the total floorspace provision across the garden settlement, would lead to the exceedance of one or more of the floorspace values stated within this policy, or if any individual comparison retail unit were to exceed 500sqm gross floorspace, then the promoter shall have to submit an impact assessment to demonstrate that there would be no detrimental significant impacts on the vitality and viability (including local consumer choice and trade) of nearby local village centres and other town centres including Folkestone, Hythe, New Romney, Dover and Ashford, by the scale and/or p	

Diagram		SA Report (2019) and associated Addenda (2019 and 2020)?
	development particularly where provision above these indicative thresholds is proposed; and (6) Sustainable access and movement c. The capacity of M20 junction 11 shall be upgraded and other key junctions on the road network will be redesigned and improved in partnership with Highways England and Kent County Council. Where improvements are required to junctions or links outside of Folkestone and Hythe District, consultation shall take place with the relevant local authority prior to the proposals being agreed;	
Policy SS8: New Garden Settlement – Sustainability and Healthy New Town Principles	Policy SS8 New Garden Settlement – Sustainability and Healthy New Town Principles (1) A sustainable new town b. All new build housing shall be built to water efficiency standards that exceed the current building regulations so as to achieve a maximum use of 90 110 litres per person per day of potable water (including external water use). The development shall be informed by a Water Cycle Strategy which includes detail of:	The modification weakens the water efficiency standard from a new dwelling maximum of 90 litres per person per day to 110 litres per person per day. Although this reduces the positive contribution of the Policy to SA objective 11 (Water Efficiency), the effect of achieving a 110 litre standard is still considered to generate significant positive effect, given it delivers efficiencies over and above the Building Regulations Standards in a water stressed area. It is also expected that this modification
	New Garden Settlement - Sustainability and Healthy New Town	(6) Sustainable access and movement c. The capacity of M20 junction 11 shall be upgraded and other key junctions on the road network will be redesigned and improved in partnership with Highways England and Kent County Council. Where improvements are required to junctions or links outside of Folkestone and Hythe District, consultation shall take place with the relevant local authority prior to the proposals being agreed; Policy SS8: New Garden Settlement – Sustainability and Healthy New Town Principles (1) A sustainable new town b. All new build housing shall be built to water efficiency standards that exceed the current building regulations so as to achieve a maximum use of 90 110 litres per person per day of potable water (including external water use). The development

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		(i.e. through the use of 'grey' water) across the settlement, utilising integrated water management solutions; ii. The need to maintain the integrity of water quality, how it will be protected and improved, and how the development complies with the Water Framework Directive; iii. Surface water management measures to avoid increasing, and where possible to reduce, flood risk through the use of Sustainable Drainage Systems (SuDS); and iv. Water services infrastructure requirements and their delivery having regard to Policy CSD5, and as agreed with the relevant statutory providers, and the Environment Agency's guidance on Water Cycle Studies; c. All proposed development will have to satisfy the requirements of policy CSD5 (d). in order to avoid any significant impact on the water quality of the Stodmarsh European designated sites. e.d. For non-residential development, development shall achieve BREEAM 'excellent Outstanding' standard including addressing maximum water efficiencies under the mandatory water credits;	the significant positive effect identified against SA objective 10 (Energy Efficiency) because the policy now seeks to achieve BREEAM 'excellent' instead of 'outstanding', which is a high standard but lower than the original standard and therefore not as efficient. The collective benefits of other forms of energy efficiency combine to result in no change to the overall significance of the positive effect originally recorded against this SA objective. The additional wording on reducing surface water flood risk through the use of SuDS would further contribute towards the minor positive effect identified against SA objective 9 (Flood Risk) (as part of a mixed effect). Lastly, development proposals now have to satisfy the requirements of Policy CSD5: Water and Coastal Environmental Management. The modifications to Policy CSD5(d) have been appraised separately.
ММ09	Supporting text: New paragraphs following existing	New Garden Settlement – Infrastructure, Delivery and Management Delivery of critical and necessary infrastructure	As modified text supporting policy, the changes referenced here are covered through the appraisal of main modifications to Policy SS9: New Garden Settlement –

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
Page 410	paragraph 4.190	 4.189 The creation of a new garden settlement will be a long-term initiative, lasting 20 to 30 years and delivered through a phased approach. Initial development will focus on new housing in and around a town centre (Policy SS7(2)) and additional village neighbourhoods will grow around this core. 4.190 The creation of a new settlement generates economies of scale that can be used to deliver critical and necessary infrastructure at the earliest opportunity and throughout the town's development. The uplift in land value that will be created by the granting of planning permission will be captured to provide: The highest quality townscape and landscape; High standards of energy and water efficiency; Early investment in infrastructure; and A sustainable funding stream for the management and maintenance of the community facilities and public realm over the long-term. [New para.] Policies for the new garden settlement are supported by the infrastructure delivery schedule set out in Appendix 5. This is intended to give adequate certainty to quide a development of this scale, given that will be built out over several decades with some development beyond the plan period, while recognising that it is not possible to fix every element of the scheme before the development commences. Some elements of infrastructure provision will be affected by new technologies, for example, or wider changes in society such as the ability to work from home, that cannot be predicted with certainty looking several decades ahead. [New para.] The National Planning Policy Framework recognises this issue. Paragraph 72 states that the supply of large numbers of new homes can often be best achieved through planning for larger scale development such as new 	Infrastructure, Delivery, Phasing and Management below.

Ref Section/ No. Policy/ Paragrap Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the ful SA Report (2019) and associated Addenda (2019 and 2020)?
	settlements or significant extensions to existing towns and villages. However, the NPPF add that the delivery of large-scale developments may need to extend beyond an individual plan period, and the associated infrastructure requirements may not be capable of being identified fully at the outset (footnote 35). Anticipated rates of development and infrastructure requirements should, therefore, be kept under review and amended as policies are updated. [New para.] There will therefore need to be some flexibility regarding phasing and this will be kept under through detailed monitoring. A three-tiered approach to approval and delivery has been agreed to allow for this, building on the national best practice for large scale developments. Each phase of development will be supported by a sequence of submissions to the local planning authority to provide a progressive layering of increasingly detailed information from the over-arching and site-wide strategy (Tier 1), through substantive key phases (Tier 2) to detailed reserved matters application for sub-phases within a specific phase and on individual development sites (Tier 3). The precise extent, components and location of each key phase must be agreed with the local planning authority as delivery of the scheme progresses. Reserved matters applications can only be submitted for approval for any part of the site where the relevant key phase has been defined and all of the key phase framework documents have been approved. Limited exceptions may be allowed where necessary to provide critical or enabling infrastructure. [New para.] Southern Water has indicated that there is some, but limited, capacity within the existing system, which could accommodate the very early phase of development. However there is a need to develop a more holistic solution for the phasing and development of wastewater infrastructure.	

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	[New para.] In this regard there are currently three potential options for the provision of waste water infrastructure to support the needs of the development. The off-site option (upgrading Sellindge WWTW, option 1) and on-site option (on-site WWTW, option 2) are both viable options and these should be developed further to establish a preferred solution. Southern Water has confirmed that a second off-site option, to connect via Range Road Pumping Station, Hythe to the West Hythe Wastewater Treatment Works located approximately 7km to the south-east of the garden settlement, is not viable and should not be taken further. To ensure that there will be no negative impacts upon the surrounding communities, water quality or flood risk as a result of the development, including upon the neighbouring authority of Ashford Borough, the provision of wastewater infrastructure will be controlled through appropriate trigger point(s) relating to the occupation of development, to reflect the required timing of the wastewater infrastructure, and secured through the Section 106 agreement. Proposals for wastewater treatment should meet the requirements of Policy CSD5 regarding nutrient neutrality. 'Monitor and manage' approach to highways infrastructure – Strategic Road Network [New para.] A traffic monitoring and management strategy is to be prepared by the applicant(s) for development within the site allocation for the new garden settlement for submission to (and consideration by) the local planning authority in consultation with Highways England, taking account of wider transport changes that may come forward throughout the plan period and reflecting traffic levels at the point of delivery.	

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		Enable the benefits of the anticipated modal shift to determine the requirement for, and most appropriate form of, highway mitigation; and Ensure that there is an appropriate safeguard in place to monitor whether the distribution and volume of traffic generated by occupied development is as predicted by modelling work carried out to inform the position agreed by Highways England and the district council in the signed Statement of Common Ground dated June 2021 (or updates to this statement). In this manner, any mitigation scheme is subject to a 'monitor and manage' approach to implementation. [New para.] Traffic volumes are to be monitored throughout the plan period to inform when, or if, the mitigation to be implemented in relation to the Strategic Road Network, and specifically M20 Junction 11, M20 Junction 12 to 13 proposals and the Alkham Valley interchange (A20/A260) is required. [New para.] The schemes of mitigation agreed with Highway England to appropriately mitigate planned growth to 2037 represents a 'worst-case' scenario, and it is entirely possible that, under the monitor and manage framework, the mitigation that is required will be the subject of refinement and revision. In addition, the timing as to when a specific scheme of highway mitigation is required relative to housing completions at the new garden settlement could be subject to change. The mitigation solutions will be kept under review, through the monitor and manage approach, on the basis that the transport modelling that supports the Core Strategy Review has demonstrated that the majority	

Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
of interventions to the Strategic Road Network will not be required until towards the end of the plan period, or beyond. [New para.] The approach is appropriately robust to provide certainty about what transport infrastructure is needed, and by when, to ensure that development does not proceed until the impacts are understood and accounted for. 'Monitor and manage' approach to highways infrastructure – Local Road Network [New para.] The traffic monitoring and management strategy will also consider the local road network, as a means of controlling off-site traffic movements such that they do not bring about unacceptable impacts on nearby communities. A key requirement of the monitoring strategy, therefore, is that it will need to include actions for intervention should the monitoring show that traffic levels from the new garden settlement exceed what was predicted from the transport modelling and shown in the Transport Assessment. [New para.] If the need for intervention is triggered, it will be contingent on the associated developer(s) to implement traffic calming and other sustainable transport measures as a means to encourage modal shift and act as a deterrent to seek to reduce traffic to the distribution shown within the modelling. [New para.] The legal agreement will need to secure a sustainable transport funding agreement with the applicant for sustainable transport and off-site traffic calming measures, subject to the appropriate legislative tests relating to planning obligations, which can be drawn down in the	
	of interventions to the Strategic Road Network will not be required until towards the end of the plan period, or beyond. [New para.] The approach is appropriately robust to provide certainty about what transport infrastructure is needed, and by when, to ensure that development does not proceed until the impacts are understood and accounted for. Monitor and manage' approach to highways infrastructure – Local Road Network [New para.] The traffic monitoring and management strategy will also consider the local road network, as a means of controlling off-site traffic movements such that they do not bring about unacceptable impacts on nearby communities. A key requirement of the monitoring strategy, therefore, is that it will need to include actions for intervention should the monitoring show that traffic levels from the new garden settlement exceed what was predicted from the transport modelling and shown in the Transport Assessment. [New para.] If the need for intervention is triggered, it will be contingent on the associated developer(s) to implement traffic calming and other sustainable transport measures as a means to encourage modal shift and act as a deterrent to seek to reduce traffic to the distribution shown within the modelling. [New para.] The legal agreement will need to secure a sustainable transport and off-site traffic calming measures, subject to the appropriate legislative

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
Page 415		applicant will need to provide costed examples of the type of traffic calming or other sustainable transport measures that could be implemented as part of a monitoring strategy from which the secured capital sum is to be calculated. Where impacts relate to the road network outside Folkestone & Hythe district, consultation shall take place with the relevant local authority on the proposals. [New para.] Policy SS9 requires that highways mitigation measures are provided through planning obligations. Section 278 is part of the Highways Act 1980 that enables a highway authority to enter into an agreement with a third party to deliver improvements on the existing public highway. Works on the local highway network will require an agreement between the developer and Kent County Council. Improvements to the strategic road network require approval from Highways England, acting on behalf of the Secretary of State for Transport. Section 278 is a mechanism that allows highways improvements required as a result of a development to be implemented directly by either the developer or the highway authority, or through a developer contribution for future works on the wider highway network.	
	Policy SS9: New Garden Settlement – Infrastructur e, Delivery and Management	Policy SS9 New Garden Settlement – Infrastructure, Delivery, Phasing and Management (1) Delivery of infrastructure and phasing	It is also expected that this main modification would further contribute towards the significant positive effect identified against SA objective 13 (Sustainable Transport and Congestion) because the policy and supporting text to the policy have been amended to explicitly reference the requirement for a Traffic Monitoring and Management Strategy and for proposals to demonstrate that

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
Page 416		 a. The settlement should be self-sufficient regarding education, health, community, transport and other infrastructure, where necessary allowing for the expansion and improvement of nearby facilities such as secondary education and waste; b. Critical and necessary infrastructure, such as including primary education, highways mitigation and wastewater infrastructure should be provided in the first phase of development to support investment and community development in accordance with the indicative infrastructure delivery schedule at Appendix 5 and a delivery strategy which sets out broadly how the development is to be phased and delivered, unless it can be demonstrated that: i) Relevant infrastructure capacity is readily available to service the quantum of development proposed; 	necessary highways capacity is available at each stage of development. Traffic volumes are to be monitored throughout the Plan period to establish whether mitigation is required, with development proposals required to contribute towards highway mitigation works and improvements. These measures will help reduce traffic congestion, in line with SA objective 13. The policy now makes reference to the indicative infrastructure delivery schedule at Appendix 5 and will therefore help ensure the successful delivery of infrastructure at each stage of development.
נע		 ii) The relevant infrastructure will be provided in advance of the proposed development; or iii) Alternative provision can be secured and agreed with the relevant provider and the local planning authority to meet the relevant requirement. Proposals will be required to accord with the three-tier approval structure. Proposals which would deliver unsustainable, disconnected and isolated development will be refused. c. A traffic monitoring and management strategy shall be submitted for approval by the local planning authority in consultation with the local highway authority, Highways England and other relevant authorities in 	This change contribute towards minimising the potential for negative effects identified against SA objective 8 (Water Quality) (as part of a mixed effect) because reference is now made in the policy to the provision of wastewater infrastructure. The supporting text to Policy SS9: New Garden Settlement – Infrastructure, Delivery and Management (see previous row) also explores three potential options for the provision of waste water infrastructure to support the needs of development. The supporting text also states that water quality or flood risk as a result of development, in addition to the provision of wastewater infrastructure, will be controlled through appropriate trigger

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		relation to traffic movement and impact on the surrounding road network; d. Proposals will be required to demonstrate that necessary highways capacity is available for each quantum of development, taking into account cumulative development of the garden settlement, set within the monitor and manage framework relating to both the Strategic Road Network and Local Highways Network. e. Traffic volumes shall be monitored through the plan period to inform when, or if, mitigation shall be required and implemented in relation to the Strategic Road Network, and specifically M20 Junction 11, M20 Junction 12 to Junction 13 and the Alkham Valley Interchange (A20/A260) Mitigation will be delivered in accordance with schemes approved by Highways England and the relevant local highway authority, and the mitigation frameworks for the Strategic and Local Highway Networks set out in Appendix 5, as appropriate in order to achieve net zero harm in terms of highway capacity and highway safety; f. Development proposals will be required to be supported by planning obligations that provide for the payment of proportionate contributions towards the carrying out and/or implementation of strategic and other necessary highway mitigation works and improvements, or by direct delivery of the works at any stage during the lifetime of the development and which cannot otherwise be managed. Where necessary and appropriate, the occupation of the development shall be regulated by reference to the completion of any such works;	point(s) relating to the occupation of development. This is expected to help avoid adverse effects upon surrounding communities but will not alter any of the existing effects identified in the SA. Although there are other modifications to Policy SS9, they are not considered to have a notable effect on the likelihood or significance of the effects identified for Policy SS9 in the SA.

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D200 A18		g. Where highway improvements are required to other junctions or links outside the Folkestone & Hythe District, consultation shall take place with the relevant local authority prior to the proposals being agreed; h. A degree of overlap between one phase and another one may be acceptable, providing it can be demonstrated that this The provision of infrastructure should be phased in a way that does not disadvantage early residents or neighbouring communities through placing pressure on existing infrastructure in the local area. The creation of a post of community development worker should be explored, to serve the early phases until the town is established, secured through the Section 106 agreement; e-i_i. The nearby communities of Lympne, Barrow Hill, Sellindge, Westenhanger, Saltwood, Stanford and Postling should have appropriate access to and benefit from the infrastructure provided. If it is appropriate for infrastructure to be shared with existing communities then this shall be decided through local consultation as part of the masterplanning process; and d-i_i. Infrastructure provision will be secured and/or funded through Section 106 and Section 278 legal agreements, or secured by conditions, to ensure it is delivered at the appropriate phase of the development. (2) A smart town d. Ducting for the fibre-optic and other cabling, energy and other service infrastructure shall be provided in multi-service corridors outside the public highway (where this is defined to be trafficked surface, i.e. not inclusive	

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		 of pavement) that are easily accessible to statutory undertakers to avoid unnecessary highway works and surface repairs. e 	
MM10	Policy SS10: Spatial Strategy for Folkestone Seafront	Policy SS10 Spatial Strategy for Folkestone Seafront Folkestone Seafront is allocated for mixed-use development, providing up to 1,000 homes, in the region of 10,000 sqm of floorspace comprising small shops and retail services (A use classes), offices (within class E B1) and other community and leisure (C1, D1, D2 and sui generis) uses: together with beach sports and sea sports facilities and with associated and improved on-site and off-site community and physical infrastructure. Planning permission will only be granted where:	The modification weakens the water efficiency standard from a new dwelling maximum of 90 litres per person per day to 110 litres per person per day. Although this reduces the positive contribution of the Policy to SA objective 11 (Water Efficiency), the effect of achieving a 110 litre standard is still considered to generate significant positive effect, given it delivers efficiencies over and above the Building Regulations Standards in a water stressed area.
		 h. Development delivers 22% 300 affordable housing dwellings for central Folkestone, subject to viability (or if total residential quantum is less than 1,000 units, a 30 per cent contribution). i. Residential buildings achieve a minimum water efficiency of 110 90—litres per/person/day. All development must be designed and constructed to achieve high standards of environmental performance, and buildings should be designed to allow convenient waste recycling. 	It is also expected that the proposed modifications to Policy SS10 would make a lower contribution towards the significant positive effect identified against SA objective 1 (Housing) because the minimum affordable housing figure has been replaced by a percentage that would result in a lower number of affordable homes being delivered. The significant positive effect has not been downgraded to a minor positive effect because a significant number of affordable homes would still be delivered.

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			Although there are other modifications to Policy SS10, they are not considered to have a notable effect on the likelihood or significance of the effects identified for Policy SS10 in the SA.
MM11	Green box before paragraph 4.207	A hybrid permission, including full planning permission for phases 1A and 1B at Shorncliffe Garrison, Folkestone (14/0300/SH) was granted in 17 December 2015, totalling 1,200 homes. Development started on site in 2016 and 233 homes had been completed by the start of the Core Strategy Review plan period in 2019/20. is progressing on site, with subsequent Reserved Matters approval in place for phases 1D and 2B of the development. Construction is continuing on site and, with further reserved matters applications being approved, around three quarters of the strategic site is now complete, under construction or has detailed planning permission awaiting start on site. A further 967 homes are expected to be completed by the end of the plan period in 2036/37, completing the development of the strategic site. Policy SS11: Spatial Strategy for Shorncliffe Garrison, Folkestone is retained from the 2013 Core Strategy to guide the remaining phases of development.	As modified text supporting policy, the changes referenced here are covered through the appraisal of main modifications to Policy Policy SS11: Spatial Strategy for Shorncliffe Garrison, Folkestone.
	Policy SS11: Spatial Strategy for Shorncliffe	Policy SS11 Spatial Strategy for Shorncliffe Garrison, Folkestone The Shorncliffe Garrison complex is allocated for a predominantly residential development of around 1,000 dwellings to 2026 (up to 1,200 dwellings by 2031) and an improved military establishment, together with a hub of new community facilities, associated	The modification weakens the water efficiency standard from a new dwelling maximum of 90 litres per person per day to 110 litres per person per day. Although this reduces the positive contribution of the Policy to SA objective 11 (Water

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	Garrison, Folkestone	enhancements to sports and green infrastructure, and on- <u>site</u> and off-site travel infrastructure upgrades. Planning permission will also only be granted where:	Efficiency), the effect of achieving a 110 litre standard is still considered to generate significant positive effect, given it delivers efficiencies over and above the Building Regulations Standards in a water stressed area.
		 i. Development delivers 360 22% affordable housing dwellings for the Urban Area subject to viability (or if the total residential quantum is less than 1,200 units, 30 per cent). j. Residential buildings achieve a minimum water efficiency of 110 90 litres/person/day. All development must be designed and constructed to achieve high standards of environmental performance, and buildings should be designed to allow convenient waste recycling. 	It is also expected that this modification would make a lower contribution towards the significant positive effect identified against SA objective 1 (Housing) because the minimum affordable housing figure has been replaced by a percentage that would result in a lower number of affordable homes being delivered. The significant positive effect has not been downgraded to a minor positive effect because a significant number of affordable homes would still be delivered.
			Although there are other modifications to Policy SS11, they are not considered to have a notable effect on the likelihood or significance of the effects identified for Policy SS11 in the SA.
MM12	Policy CSD1: Balanced Neighbourh oods	Policy CSD1 Balanced Neighbourhoods Development resulting in new housing (class C3) will be allowed in line with policy SS3 (optimising distinctiveness, appeal, sustainability, and accessibility of places) where it	It is expected that this modification would make a lower contribution towards the significant positive effect identified against SA objective 1 (Housing) because where it can be demonstrated by an applicant that it is not viabile to meet the full affordable housing requirement, the Council will give

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
Page 422		contributes to the creation of balanced neighbourhoods through high-quality design proposals which address identified affordable housing needs. All housing development should include a broad range of tenures incorporating market housing for sale and affordable housing (affordable housing for rent, starter homes, discounted market sales housing and other affordable routes to home ownership including rent to buy and shared ownership), where practicable and subject to viability as follows: • Development proposing (or land capable of accommodating) 6 to 10 dwellings (net gain) within the Kent Downs Area of Outstanding Natural Beauty should provide financial contributions towards the provision of affordable housing equivalent to one affordable dwelling on-site; • Development proposing (or land capable of accommodating) 11 to 14 dwellings (net gain) at any location within the district should provide a minimum of—two affordable dwellings on-site; and • Development proposing (or land of 0.5ha or more in size) 15 or more dwellings (net gain) at any location within the district should provide a minimum of—two affordable dwellings on-site; and • Development proposing of 15 or more dwellings, as a starting point approximately 30 per cent of the affordable housing provision shall be shared equity and—70 per cent of the affordable housing to be provided shall be affordable housing tenures will be negotiated on a site-by-site basis. Provision should be made on-site unless off-site provision through a financial contribution of broadly equivalent value can be robustly justified. Where a site-specific viability assessment is provided with an individual planning application and it can be	level of relaxation of the requirements. The significant positive effect has not been downgraded because a significant number of affordable homes are still likely to be delivered and the amendment will help preserve the viability of allocations, most likely contributing to the delivering of more homes over the Plan period. Although there are other modifications to Policy CSD1, they are not considered to have a notable effect on the likelihood or significance of the effects identified for Policy CSD1 in the SA.

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Page 423			demonstrated to the reasonable satisfaction of the Council that the proposed development would not be viable with the full affordable housing requirement, the Council will give consideration to allowing an appropriate level of relaxation of the requirements. Affordable housing developments will be allowed at sustainable rural settlements as an exception to policies of rural development restraint where it can be has been demonstrated that there is a requirement in terms of local need and the proposed site is suitable for this purpose. a suitable site. Provision of affordable housing within individual sites and settlements should so far as possible be dispersed not be concentrated in one location, and must be designed to integrate in terms of function and appearance with the market housing. private housing and existing properties.	
423		Supporting text: Paragraph 5.8	5.8 Full account will be taken of viability in achieving these targets where a site specific viability assessment is provided with individual planning applications.	As modified text supporting policy, the changes referenced here are covered through the appraisal of main modifications to Policy CSD1: Balanced Neighbourhoods.
	MM13	Policy CSD2: District Residential Needs	Policy CSD2 District Residential Needs Residential development and new accommodation should be designed and located in line with the spatial strategy's approach to managing demographic and labour market changes and meeting the specific requirement of vulnerable or excluded groups. Within developments of 15 or more dwellings (net gain), where viable and practical: • A range of housing tenures should be provided including owner-occupied and private rented and affordable housing in accordance with CSD1. The council's Strategic	It is not considered that these changes will alter the findings of the SA because they represent minbor wording changes to aid understanding and future-proofing of Policy CSD2: District Residential Needs.

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Page 424		Housing Market Assessment (SHMA) will be used as a starting point for determining the mix of tenures; and • A range of size of new dwellings should be provided. As a starting point, this range should reflect the mix identified in the SHMA as follows: Tenure	

	tef Io.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
			 b. It makes a suitable contribution as necessary to the community and sustainable transport infrastructure needs associated with residents, and c. It is shown to be designed to provide facilitate the provision of a high quality of care. The accommodation needs of specific groups will be addressed on suitable sites based on evidence of local need, including appropriate provision for Gypsies, Travellers and Travelling Showpeople. 	
Page 425	1M14	Policy CSD3: Rural and Tourism Developme nt	Proposals for new development in locations outside the settlements identified in the settlement hierarchy may only be allowed if a rural or coastal location is essential, and or to protect or enhance meet green infrastructure assets in line with Policy CSD4 requirements. Development in these locations will only be acceptable in principle if forming a site for: a. aAffordable housing (rural exceptions in accordance with CSD1, or allocated sites); b. Accommodation to provide for an essential need for a rural worker (including a person who is in majority control of a farm business) to live permanently at or near their place of work in the countryside;	Yes. A minor positive effect is now expected against SA objective 7 (Efficient Use of Land) because the policy supports the re-use of redundant or disused buildings. It is expected that this modification would further contribute towards the minor positive effects identified against SA objectives 4 (Historic Environment) and 6 (Green Infrastructure) because the policy supports development that makes optimal viable use of a heritage asset or enables development to secure the future of a heritage asset, in addition to supporting the protection and enhancement of green infrastructure assets. However, there
			b. <u>c.</u> a <u>A</u> griculture, forestry or equine development;	would be no change in the significance of these effects.
			e.d. sSustainable rural diversification, and tourism enterprises as set out below; d.e. lLocal public or essential services and community facilities in line with policies SS3/4;	Although the modification removes reference to rural diversification and strengthens the wording relating to the preventative loss of community facilities,

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		e.f. *Replacement buildings (on a like-for-like basis) and the subdivision of existing residential dwellings; g. The re-use of a redundant or disused building and the enhancement of its immediate setting;	this change is not anticipated to affect the findings recorded in the SA. This is because the policy still outlines a number of ways in which to diversify development in rural locations.
		f. <u>h.</u> Building conversions of buildings that contribute to the character of their location; g. <u>i.</u> s <u>S</u> ustainable rural transport improvements;	Although there are other modifications to Policy CSD3, they are not considered to have a notable effect on the likelihood or significance of the effects identified for Policy CSD3 in the SA.
Dage 426		 h.j. eEssential flood defences or strategic coastal recreation-; or k. Development that makes optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of a heritage asset. 	
		To underpin maintain the sustainable development sustainability of rural communities of the countryside, the loss of community facilities (including local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) in the centre of any village will be resisted unless appropriately demonstrated to be unviable in line with Places and Policies Plan C2. and rural economic diversification will be supported, especially through the re-use or refurbishment of redundant rural buildings. Tourist, recreation and rural economic uses will be appropriately protected and new development allowed within defined settlements in the settlement hierarchy. Where sites	
		are unavailable within settlements – and development is proportionate in scale/impact and also accessible by a choice of means of transport – it may also be acceptable on the	

Ref No.		Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
Page 427	Supporting text: Paragraphs 5.32 and 5.33	edge of Strategic Towns and Service Centres, and failing that, Rural Centres and Primary Villages. Rural economic development must be consistent with the green infrastructure (GI) and coastal and water environmental principles set out in Policies CSD4 and CSD5. 5.32 As a rural district with places of particular interest to visitors specifically because of their unique environments (for example, Dungeness), rural and coastal development must be appropriately managed. Planning for rural areas should therefore sympathetically utilise and enrich the beauty and character of the countryside. Therefore this policy should be read in parallel with national policy and environmental and coastal policy, particularly with green infrastructure provisions (CSD4) and Habitats Regulations Assessment findings on recreational uses and impact. Given the characteristics of the district, the scope of this policy is wide. [New paragraph break] 5.33 In the countryside, rural services and infrastructure for residents and visitors alike may be found in a range of locations and serve far afield. It is an important principle that the stock of rural economic or social uses should be managed for the benefit of the countryside as a whole. National policy requires that services and facilities found within settlements should be retained and protected. In applying Policy CSD3 the council will have regard to the National Planning Policy Framework which states that planning policies should enable "the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open	As modified text supporting policy, the changes referenced here are covered through the appraisal of main modifications to Policy CSD3: Rural and Tourism Development.
ММ	Supporting text: Green Infrastructur e of Natural Networks,	 space, cultural buildings, public houses and places of worship." Green Infrastructure of Natural Networks, Open Spaces and Recreation Primary aims: B1, B3, B4, B6, B7 C4, D4, D5, D8 (see section 3.1). Main local evidence base studies: Sustainability Appraisal, Habitats Regulations Assessment (sites other than Dungeness complex), Habitats Regulations Assessment (Dungeness SAC, Dungeness to Pett Level SPA), Green 	As modified text supporting policy, the changes referenced here are covered through the appraisal of main modifications to Policy CSD4: Green Infrastructure of

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
Daga 428	Open Spaces and Recreation Primary Aims 'green box'	Infrastructure Report, Open Space Strategy (2017), Play Area Review (2017)., <u>Dungeness Complex Sustainable</u> <u>Access and Recreation Management Strategy</u> (SARMS) (2017).	Natural Networks, Open Spaces and Recreation.
	Supporting text: Paragraph 5.42	5.42 As a funder of the Romney Marsh Countryside Partnership, the council has long supported work to sustainably manage tourism and recreation at Dungeness and will continue to do so. By working with stakeholders including Natural England, the Royal Society for the Protection of Birds (RSPB), the Environment Agency, landowners and neighbouring authorities, including Rother District Council, the council is developing has developed a sSustainable aAccess and Recreation Management sStrategy (SARMS) for the area. This includes—which may include proposals to support sustainable visiting to monitor impacts on the Dungeness Natura 2000 series sites. Given the breadth of its membership and its cross-boundary scope, the Romney Marshes Living Landscape project, the Dungeness National Nature Reserve partner group or a similar grouping would appear to offer a good vehicle to achieve such a strategy.	As modified text supporting policy, the changes referenced here are covered through the appraisal of main modifications to PolicyCSD4: Green Infrastructure of Natural Networks, Open Spaces and Recreation.
	Policy CSD4: Green Infrastructur e of Natural Networks, Open Spaces and Recreation	Policy CSD4 Green Infrastructure of Natural Networks, Open Spaces and Recreation Improvements in green infrastructure (GI) assets in the district will be actively encouraged as will increase in the quantity of GI delivered by the council working with partners and developers in and around the sub-region, including through pursuing opportunities to secure net gain in biodiversity, and positive management of areas of high landscape quality or high coastal/recreational potential. 1. The council will require development proposals over their lifetime:	Yes. A minor positive effect is now expected against SA objective 7 (Efficient Use of Land) because the policy requires development proposals to demonstrate that they will protect soils commensurate to their status and quality. It is expected that this modification would further contribute towards the significant positive effects identified against SA objectives 3 (Landscape), 5 (biodiversity and geodiversity) and 6 (Green infrastructure) because development proposals must conserve and enhance the natural environment, with planning

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
Page 420		 i. To provide net gains in biodiversity at least to comply with statutory and/or national policy requirements (assuming no residual loss); iii. To demonstrate that they protect and enhance valued landscapes, sites of biodiversity or geological value and soils, commensurate to their status and quality; iii. So far as possible, to deliver improvements in green infrastructure (GI) assets in the district and ensure positive management of areas of high landscape quality or high costal/recreational potential identified in the Green Infrastructure Report (2011) (or any updates to this report). 2. Green infrastructure will be protected and enhanced and the loss of GI uses will not be allowed, other than where demonstrated to be in full accordance with national policy, or a significant quantitative or qualitative net GI benefit is realised or it is clearly demonstrated that the aims of this strategy are furthered and outweigh its impact on GI. Moreover: a. Development must avoid a net loss of biodiversity, achieve net gain over and above residual loss. b. 1. The highest level of protection in accordance with statutory requirements will be given to protecting the integrity of sites of international nature conservation importance.; e. ii. A high level of protection will be given to nationally designated sites (Sites of Special Scientific Interest and Ancient Woodland) where development will avoid any significant impact.; 	applications supported by ecological surveys, mitigation strategies and enhancement plans, in addition to delivering improvements in Green Infrastructure. Development proposals must also now demonstrate that they protect and enhance valued landscapes and sites of biodiversity or geological value, in addition to ensuring the positive management of areas of high landscape quality. The AONB will be given the highest status of protection in relation to landscape and scenic beauty and therefore development within the setting of the AONB must be sensitively located to avoid adverse impacts on the AONB.

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Dage 430		 d.iii. Appropriate and proportionate protection will be given to habitats that support higher-level designations and sub-national and locally designated wildlife/geological sites, to include Local Wildlife Sites (LWS), (including Kent Biodiversity Action Plan habitats, and other sites of nature conservation interest); e.iv. Planning decisions will have close regard to the need for conservation and enhancement of landscape and scenic beauty natural beauty in the Kent Downs Area of Outstanding Natural Beauty (AONB) and its setting, which will be given the highest status of protection in relation to these issues. take priority over other planning considerations. Development within the setting of the AONB should be sensitively located and avoid or minimise adverse impacts on the AONB. Elsewhere development must not jeopardise the protection and enhancement of the district's distinctive and diverse local landscapes (especially where these support the setting of the AONB), and must reflect the need for attractive and high-quality open spaces throughout the district-; and v. Planning applications will need to be supported by ecological surveys, mitigation strategies (when required) and enhancement plans, in order to follow and apply the mitigation hierarchy, as appropriate. The GI network shown in Figure 5.2 and identified in supporting evidence, and other strategic open space, will be managed with a focus on: Adapting to and managing climate change effects; Protecting and enhancing biodiversity and access to nature, particularly in green corridors and other GI strategic opportunities in Figure 5.2, with appropriate 	

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		management of public access (including the Sustainable Access <u>and Recreation</u> <u>Management</u> Strategy for Dungeness and together with a strategic approach to the international sites as detailed above); and also avoiding development which results in significant fragmentation or isolation of natural habitats;	
		<u>iii.</u> Identifying opportunities to expand the GI functions of greenspaces and their contribution to a positive sense of place (including enhancements to public open spaces and outdoor sports facilities); <u>and</u>	
		iv. Tackling network and qualitative deficiencies in the most accessible, or ecologically or visually important GI elements, including improving the GI strategic fringe zones in Figure 5.2 through landscape improvements or developing corridors with the potential to better link greenspaces and settlements.	
MM16	Supporting text: New paragraphs following paragraph	5.48 It is particularly important for green infrastructure that development is consistent with coastal management plans. Proposals must not adversely affect dynamic coastal processes and should avoid unnecessarily exacerbating 'coastal squeeze' impacts as recognised in the Habitats Regulations Assessment and elsewhere.	As modified text supporting policy, the changes referenced here are covered through the appraisal of main modifications to Policy CSD4: Green Infrastructure of Natural Networks, Open Spaces and
	5.48	[New para.] In coastal areas local planning authorities are required by National Planning Policy Framework paragraph 166 to take account of the UK Marine Policy Statement and marine plans in planning for coastal areas. The district council has worked with the Marine Management Organisation (MMO) in	Recreation.
		developing this Core Strategy Review and will liaise with the MMO in assessing development proposals that could affect marine interests. [New para.] Developers putting forward proposals in the coastal area of the	
		district should have regard to the Marine Policy Statement, the South Inshore and Offshore Marine Plan (Department for Environment, Food and Rural Affairs, July 2018) and the district's Places and Policies Local Plan, particularly policies NE8: Integrated Coastal Zone Management and NE9: Development Around the Coast.	

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	Supporting text: Green box 'Appropriate Assessment Key Findings: Dungeness' before paragraph 5.51	Appropriate Assessment Key Findings: Dungeness The Sustainable Access and Recreation Management Strategy for Dungeness (2017) will be used to identify resources, oversee the update of surveys of visitor usage and activity, and decide on appropriate management interventions (which may include increased stewardship, surveillance, education and further targeted controls on public access).	It is not considered that these changes will alter the findings of the SA because they represent minor wording changes to aid understanding and future-proofing of Policy CSD4: Green Infrastructure of Natural Networks, Open Spaces and Recreation.
	Supporting text: Paragraphs 5.65 and 5.66 Water and Coastal Environment al Management	5.65 All new homes already have to meet the mandatory national standard for water usage set out in Building Regulations of 125 litres per person per day. As set out in national planning practice guidance, where there is a clear local need, local planning authorities can set out local plan policies requiring new dwellings to meet tighter standards set out in Building Regulations of 110 litres per person per day. Most of the district's recent residential planning permissions have required Code for Sustainable Homes standards, predominately at what was level 3. This level (and Code level 4) required design features to enable a maximum consumption of 105 litres per person per day. Since the adoption of the 2013 Core Strategy there have been significant changes to the planning and building regulations systems relating to energy efficiency and low carbon development. Following the Housing Standards Review, the Code for Sustainable Homes was withdrawn (effective from 26 March 2015). As a result of this, local planning authorities can no longer stipulate compliance with Code levels or require Code assessments in planning policy. In place of this, the government introduced a number of changes to building regulations standards, along with some new standards. These included for water (Part G), a new optional standard (110 litres per person per day) for water	As modified text supporting policy, the changes referenced here are covered through the appraisal of main modifications to Policy CSD5: Water and Coastal Environmental Management. Proposed changes to Policy CSD5 are appraised separately below.

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Pa		stressed areas that has been added to the baseline standard of Part G (125 litres per person per day). 5.66 Given the area's Water Scarcity Status, the council requires that all new homes development meets the new optional standard of water use of 110 litres per person per day. Proposals that achieve the water-related elements of good design standards and exceed the optional standard will be encouraged, and will be required for the new garden town to ensure it fully meets the principles at the heart of the garden settlement movement. For non-residential developments, the Building Research Establishment's Environmental Assessment Method (BREEAM) is the most commonly accepted assessment tool by which to judge and require increased sustainability standards. In relation to water, non-residential developments will be expected to reach a minimum of the BREEAM 'Outstanding Excellent' standard, with the aspiration to reach 'Outstanding' where meeting this standard would be feasible and viable.	
Page 433	Policy CSD5: Water and Coastal Environment al Management	Policy CSD5 Water and Coastal Environmental Management Development will be permitted where the following criteria are met:	The modification weakens the water efficiency standard from a new dwelling maximum of 90 litres per person per day to 110 litres per person per day. Although this reduces the positive contribution of the Policy to SA objective 11 (Water Efficiency), the effect of achieving a 110
		 b. For non-residential development, the development achieves BREEAM 'excellent outstanding' standard addressing maximum water efficiencies under the mandatory water credit, where technically feasible and viable; and c. New buildings and dwellings must be delivered in line with wastewater capacity, and designed so as to ensure that, in relation to greenfield development, peak rate of surface water runoff from the site is not increased above the existing greenfield surface water runoff rate, incorporating appropriate sustainable drainage systems (SuDS) where feasible and water 	litre standard is still considered to generate significant positive effect, given it delivers efficiencies over and above the Building Regulations Standards in a water stressed area. It is expected that this modification would contribute towards minimising adverse effects against the minor positive effect
		management features, with full consideration given to integration of water management. The quality of water passed on to watercourses and the sea must	recorded against SA objective 5 (Biodiversity) and contribute to the significant positive effects identified against

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
D200 /32/		be maintained or improved, and flood risk must not be increased by developments within the district; and d. Development which could have an impact on water quality in the Stodmarsh European-designated sites through increased nutrient levels from wastewater discharges will be required to provide evidence of nutrient impacts through a nutrient budget approach. This will apply to development within the Stour Operational Catchment, or within the catchment areas of Wastewater Treatment Works discharging into the Stour Operational Catchment, as identified on the Policies Map. Planning permission will only be granted if: i. The applicant can demonstrate, subject to meeting the tests of the Habitat Regulations, that the development would not have a significant effect on the Stodmarsh European sites either alone or in combination with other plans and projects; and ii. The applicant can demonstrate that the development will provide all requisite mitigation measures to avoid any likely significant effect on the Stodmarsh European sites as may be necessary for the life of the development through a design and implementation plan to be submitted to and approved by the Council.	SA objective 8 (Water Quality) because development which could have an impact on water quality in the Stodmarsh European-designated sites through increased nutrient levels from wastewater discharges must submit evidence of nutrient impacts through a nutrient budget approach. Further to this, planning permission will only be granted if development does not have a significant effect on the Stodmarsh European sites and mitigation measures are provided so as to avoid any likely significant effect on the Stodmarsh European sites. The policy now seeks to achieve BREEAM 'excellent' instead of 'outstanding' but this is unlikely to affect the findings of the SA because the policy specifically focuses on the water aspect of BREEAM standards, rather than building efficiency.
	Supporting text: Paragraph 5.72	5.72 Most of district's water supply comes from groundwater sources. Water resources must be maintained, and proposed developments must not have a negative impact to public water supplies or their associated Source Protection Zones and ground source protection zones must be effective. Pollution prevention measures are required in areas of high groundwater (in consultation with the Environment Agency and Natural England). A key target of the Water Framework Directive is to aim for a 'good' status for all water bodies by 2015, where this is not possible the aim is to achieve 'good' status by 2021 or 2027. The	As modifications to text supporting policy, the changes referenced here are covered through the appraisal of main modifications to Policy CSD5: Water and Coastal Enviornmental Management.

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
		aim is also to achieve 'good' ecological potential and 'good' surface water chemical status for heavily modified water bodies and artificial water bodies.	
Page 435	Supporting text: New paragraphs to follow paragraph 5.73	5.73 New developments should explore options other than a reliance on tank storage; for example the incorporation of open water storage and conveyance (including swales and wetlands) as a positive design feature of developments. Nutrient Neutrality [New para.] New development in the North Downs area of the district has the potential to increase nutrient flows into the River Stour, flowing into the Stodmarsh system of European designated sites (Social Area of Conservation, Special Protection Area and Ramsar site), north east of Canterbury. Damage to the water quality of these sites (eutrophication) has been caused by high nutrient levels, particularly phosphorus but also nitrogen. The likely extent of the affected catchments and the administrative boundary of the Folkestone and Hythe district is shown in Figure 5.4 and on the Policies Map. [New para.] The council will work with Natural England to assess the likely impacts of development proposals, in line with the Conservation of Habitats and Species Regulations 2017. In assessing proposals, the council will have regard to Natural England's 'Advice on Nutrient Neutrality for New Development in the Stour Catchment in Relation to Stodmarsh Designated Sites' (July 2020, or subsequent updates) and applicants should follow this advice in developing their proposals. [New para.] In operating Policy CSD5 d. the council will have regard to Natural England's advice note which stated (paragraphs 4.9-4.12): • All types of development that would result in a net increase in population served by wastewater system, including new homes, student accommodation and residential institutions will have inevitable wastewater implications:	As modified text supporting policy, the changes referenced here are covered through the appraisal of main modifications to Policy CSD5: Water and Coastal Enviornmental Management. Proposed changes to Policy CSD5 ae appraised separately above.

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
Page 436		Tourism attraction and tourism accommodation attract people into the catchment and are likely to generate additional wastewater and consequential nutrient loading on the designated sites. This includes self-service and serviced tourist accommodation such as hotels, quest houses, bed and breakfast and self-catering holiday chalets and static caravan sites. Other developments that generate overnight stays, such conference facilities would need to be considered on their merits; and Commercial development not involving overnight accommodation is not likely to have wastewater implications, as it is generally assumed that anyone working in, or making use of, the commercial development also lives in the catchment, and therefore wastewater generated by that person can be calculated using the population increase from new homes and other accommodation. This removes the potential for double-counting of wastewater arising from different planning uses. [New para.] Developers will need to demonstrate, either that their proposals will not have a significant effect on the Stodmarsh sites, or that mitigation measures can be delivered on-site, or secured off-site, to avoid any impact. Developers are encouraged to have early discussions with Natural England and the district council when preparing their proposals.	
	New Figure to show extent of Stour Operational Catchment s Extend also to be shown on	Figure 5.4: Stour Operational Catchments	It is not considered that this new figure will alter the findings of the SA because its purpose is to aid understanding of policy by clearly showing the extent of Stour Operational Catchments.

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
MM17	Policy CSD7: Hythe Strategy	Policy CSD7 Hythe Strategy Hythe should develop as the high-quality residential, business, service, retail and tourist centre for the central district in line with the vision in paragraph 3.15. New development All new development, including that on the former Nickolls Quarry site (identified in Figure 5.5) should respect the historic character of the town and the established grain of the settlement in line with the place-shaping principles set out in policy SS3.	It is not considered that this change will alter the findings of the SA because it represents a minor wording clarification to aid understanding and future-proofing of Policy CSD7: Hythe Strategy.
Page 438	Paragraph 5.107	5.107 Strategic development at Hythe is consistent with its demographic characteristics, housing need and good accessibility and range of services (policies SS3 and SS4). The primary area of change is to the west of the town, at the former Nickolls Quarry, where which has planning permission for a mixed-use development is underway including 1,050 dwellings, employment and a new halt on the light railway., at the former Nickolls Quarry. Construction is underway with 124 dwellings completed prior to the start of the Core Strategy Review plan period in 2019/20. The remaining 926 homes are anticipated to be completed by the end of the plan period. There is also the potential for significant green infrastructure facilities, including water-based recreation.	As modified text supporting policy, the changes referenced here are covered through the appraisal of main modifications to Policy CSD7: Hythe Strategy.
MM18	Policy CSD8: New Romney Strategy	Policy CSD8 New Romney Strategy Development of the broad location should meet the following criteria: a. The development as a whole should provide around 300 dwellings (Class C3) and a range and size of residential accommodation, including 22% 30% affordable housing, subject to viability.	This change would make a lower contribution towards the significant positive effect identified against SA objective 1 (Housing) because the minimum affordable housing figure has been replaced by a percentage that would result in a lower number of affordable homes being delivered. The significant positive effect has not been downgraded to a minor positive effect because a significant

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
			number of affordable homes would still be delivered.
MM19	Supporting text: Paragraphs 5.156 and 5.157	5.156 As of early 2017, there is no spare capacity for further development at either the doctor's surgery or school, and land with potential for the future expansion of the school is in separate ownership. The existing permission granted for 250 homes includes a requirement for land and funding to increase the primary school from 0.5 to 1 form of entry, however further capacity will be required to accommodate the additional growth proposed. Given this, any proposals will have to land and funding for the expansion of the primary school to 2 1.5 forms of entry (2 1.5 FE). Additionally, new or expanded health care will be required; however it may be that this can be delivered as part of a new facility within the nearby garden town. 5.157 With regard to infrastructure, the Growth Options Study highlights that there will be impacts on the B2068 and A20 and these should be considered as part of the development proposal and policy formation process. Any further improvements to the A20 or other roads should consider the findings of the Sellindge Rural Masterplan and applicants are encouraged to discuss their proposals with the Parish Council and highways authority at an early stage. Furthermore, there are no cycleways in this area, especially to Westenhanger Station to the east of Sellindge, with opportunity for footpath upgrades to be delivered to allow safe access to rail services from the village. Improvements to the Public Rights of Way (PROW) network adjacent to, or crossing, the broad locations will also be sought to improve connectivity. The key PROW are HE271A, HE271A, HE271A, HE310 and HE301.	As modified text supporting policy, the changes referenced here are covered through the appraisal of main modifications to Policy CSD9: Sellindge Strategy.
	Supporting text: Paragraph 5.159	5.159 There are a number of listed buildings within Sellindge such as Rhodes House and Little Rhodes and buildings of local interest such as Grove House and Potten Farm, the setting of which will need to be considered in any proposals. The retention of mature trees will also be sought where possible, to soften the built environment and to mitigate the impact on the wider views from the Kent Down AONB. The broad location to the west may contain a protected crash site and an area of medieval archaeology, and evaluation and mitigation of archaeological remains will need to be undertaken in accordance with a specification and programme of work submitted and approved	As modified text supporting policy, the changes referenced here are covered through the appraisal of main modifications to Policy CSD9: Sellindge Strategy.

Ref Section/ No. Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
	by the council in advance of development commencing, as set out in Places and Policies Local Plan HE2.	
Policy CSD9: Sellindge Strategy	Policy CSD9 Sellindge Strategy Land to the south and north east of Ashford Road in Sellindge forms a broad location for development to create an improved village centre with a mix of uses, a village green/common, pedestrian and cycle enhancements to Ashford Road and other community facilities together with new residential development of up to circa 600 dwellings. The first phase has planning permission for approximately 250 dwellings. The second phase for the remaining dwellings hereby allocated comprising Site A (land to the west of Phase 1) and Site B (land to the east of phase 1) as identified in Figure 5.7 is the subject of this policy. Planning permission will not be granted for any development pursuant of this policy unless and until the Council is satisfied that the requirements of Policy CSD5 d. are met. 1. The first phase (land located in the centre of Sellindge) of any major residential led development in Sellindge parish should meet all of the following extensive community engagement) and the full area included in a single outline application; b. Development must ensure the delivery of a core area (bulk of identified land south of the A20) in parallel with/advance of any development to the west, north or east of it:	The modification weakens the water efficiency standard from a new dwelling maximum of 90 litres per person per day. 110 litres per person per day. Although this reduces the positive contribution of the Policy to SA objective 11 (Water Efficiency), the effect of achieving a 110 litre standard is still considered to generat significant positive effect, given it delivers efficiencies over and above the Building Regulations Standards in a water stressed area. The minor negative effect recorded against SA objective 4 (Historic Environment) has been changed to a mixed minor positive and minor negative effect because the amended policy requires the protection and conservation of the setting of non-designated heritage assets and where possible enhance important historic natural heritage assets, which will help protect and enhance the historic environment. Further to this, the supporting text to Policy CSD9: Sellindge Strategy (see previous row) requires an evaluation of archaeological remains to the

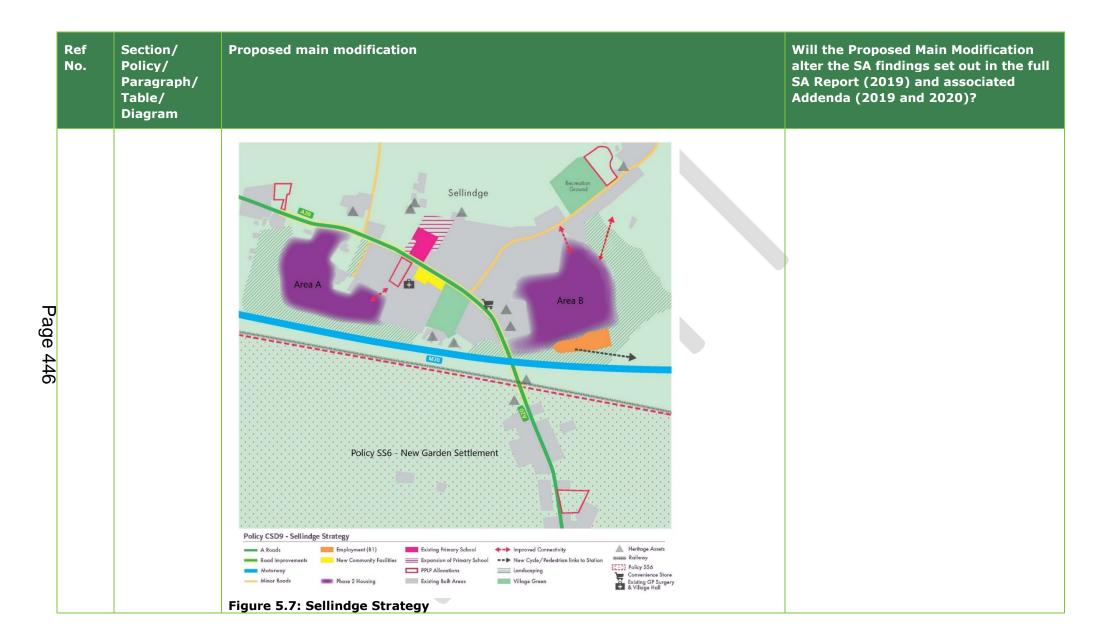
Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
		c:—Total residential development will not exceed approximately 250 dwellings (Class C3), with around 30% affordable housing subject to viability. d: Development should provide timely delivery of a village green/common south of the A20 that: i: Is of at least 1.5-2ha in size, or greater; ii: Provides a range of facilities (including allotments) and type of landscaping identified through consultation with local residents and complementing the existing facilities located at the sports club; iii. Is of the highest quality and incorporates robust and durable lighting	It is expected that the proposed modifications to this policy would further contribute towards the minor positive effects identified against SA objectives 3 (Landscape) and 5 (Biodiversity and Geodiversity) (as part of mixed effects) because the policy has been amended to explicitly reference the landscape-led approach that is being taken to the development of Sellindge, in addition to supporting the protection and enhancement of historic natural heritage assets, such as hedgerows.
		iv. Provides new habitats for priority nature conservations species;	It is also expected that the proposed modifications to this policy would make a lower contribution towards the significant positive effects identified against SA
		e.—Proposals must include satisfactory arrangements for the timely delivery of necessary local community facilities including:	objectives 1 (Housing) and 10 (Energy efficiency) because there is no longer a requirement for 10 per cent of the
		i. A primary school extension to 1 form entry (IFE);	dwellings to be self-build and custom-built which would otherwise have enabled people to design their home in a way that
		ii. The expansion of the Doctor's surgery; and iii. Administrative accommodation for the Parish Council. 2. Proposals for Tthe second phase (Site A land to the west of phase 1 and Site B	suits their needs. The policy also now seeks to achieve BREEAM 'excellent' instead of 'outstanding'. These effects have not been downgraded in acknowledgement of the other positive contributions other
		land east of phase 1) for any the residential-led development should be accompanied by a masterplan for Sites A and B which shows how the sites will be integrated with Phase 1 and the existing settlement. Development shall meet all the following criteria:	elements of the policy make to both the provision of needed homes and energy efficiency and carbon reduction.

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
Page 442		a. The residential development element shall not commence until the primary school extension (to 1 FE), doctors surgery and the Parish Council administrative accommodation to be provided by in phase 1 are under construction with a programmed completion date; b. Total residential development within phase 2 of approximately circa 350 dwellings (including Classes C2 and C3) with 22 per cent affordable housing subject to viability and a minimum of 10 per cent of dwellings designed to meet the needs of the ageing population; e. A minimum of 10 per cent of dwellings to be self-build or custom build; d.c. Development shall be designed to minimise water usage, as required by the Water Cycle Study. Total water use per dwelling shall not exceed 90 110 litres per person per day of potable water (including external water); e. Energy efficiency standards are agreed with the local planning authority that meet or exceed prevailing best practice; f.d. Proposals must include provide: satisfactory arrangements for the timely delivery of necessary local community facilities including: i. Provision of Prior to the commencement of development , land and an appropriate level of funding to upgrade enable the upgrading of Sellindge Primary school to 2 1.5 forms of entry (2 1.5 FE); ii. Provision of new or upgraded sports grounds, open and play space or upgraded facilities in the village;	With regard to the supporting text to Policy CSD9: Sellindge Strategy (see previous two rows), improvements to the PROW network are sought, which will improve connectivity and support more sustainable and active travel choices. This will further contribute towards the significant positive effect against SA objective 13 (Sustainable Transport) (as part of a mixed effect). The first phase of development at Sellindge has been delivered and therefore the effects generated by this phase and recorded in the original SA of Policy CSD9 have also been delivered. There are other modifications to Policy CSD9, including clarity of key points and the deliver and phasing of development, which increase the certainty of the positive effects already acknowledged in the SA.

No. Po	ection/ olicy/ aragraph/ able/ iagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
		iii-ii. Provision of Prior to first occupation, new nursery facilities of sufficient size to meet the needs of the residents; iv-iii. Provision of Prior to the completion of the second phase, a replacement village hall to a specification that to meets the prospective local needs of future residents; and; v: Provision of new allotment facilities; and vi-iv. Prior to the commencement of development, a proportionate equity of the commencement of development, a proportionate expension of existing local medical facilities or otherwise towards a new healthcare facility to meet the needs of the residents development; g-e. The design and layout of the development shall be landscape-led and include within it structural Appropriate landscaping, including with woodland planting, shall to be provided on the rural edge of the development, particularly around the western boundary of Site A, to retain the rural character, and on the eastern boundary of Site B, to avoid or minimise adverse impacts due to the possible visual impact on the setting of the Kent Downs AONB and views into and out of the AONB. All landscaping shall be planted at an early stage of the development and provide new habitats for priority nature conservation species, Applications shall be accompanied by a landscape and visual impact assessment that should inform the landscaping scheme and address structural and local landscape matters; h: The eastern development area will provide improved pedestrian and cycle access along the northern boundary (Public Right of Way HE273); i-f. Approximately 1,000sqm of business (B1 Class) floorspace shall be provided achieving BREEAM 'outstanding excellent' rating;	

No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
		j.g Site A land to the west of Sellindge in Phase 2 must be masterplanned and the full area included in a single outline application. The masterplan must include Proposals should protect and conserve consideration for the setting of non-designated built and natural heritage assets such as Grove House and Potten Farm, protect and where possible enhance important historic natural heritage assets, such as hedgerows, in accordance with their particular significance; and k-h. Any archaeological remains should be evaluated and potential impact mitigated in accordance with Places and policies Local Plan Policy HE2-; 3. Both phases of the development shall: a-i. Provide, or contribute to, convenient and safe wherever possible internal links within the sites itself and externally links to neighbouring sites to ensure there is ease of access by a range of transport modes to new and existing development and facilities within the village and cycle and pedestrian access to Westenhanger Station; b-i Deliver pedestrian and cycle enhancements to the A20 through (as a minimum) informal traffic-calming features at key locations, and perceived narrowing of the carriageway outside Sellindge primary school and associated highways improvement. Phase 2 shall extend the highways improvement area to be delivered by phase 1 extending the principles of the Rural Masterplan; c. Contribute to the provision of a safe, lit, surfaced cycle and pedestrian access to Westenhanger Station from Sellindge through the upgrade of existing bridleways and public rights of way (HE217A and HE2774);	

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
Page 445		d-k. Provide noise and air pollution mitigation measures such as distance buffers between the M20/High Speed 1 transport corridor and the built development, as well as landscaping within the buffers designed to integrate with other structural planting and habitat creation delivered through the comprehensive masterplan; and e.l. Contribute to improvements in the local wastewater infrastructure and other utilities as required to meet the needs of the development including: f.i. Ensure occupation of the development is phased to align with tThe delivery of sewage infrastructure, in liaison with the service provider, aligned with occupation of the development; and g-ii. Plan layout to ensure fEuture access to existing sewage infrastructure for maintenance and upsizing purposes, and h. Provide a high standard of design, siting and layout of development to reflect the sites' proximity to the Kent Downs AONB	
	Supporting text: New paragraph following paragraph 5.163	5.163 An indicative strategy for Sellindge is set out below to show how residential development can meet needs for central facilities in a location near the junction with Swan Lane. Figure 5.7 is indicative only; proposals should be developed collectively by landowners with further community input to accord with the criteria of CSD9. [New para.] Policy CSD9 should be read in conjunction with the other policies in the development plan, in particular Places and Polices Local Plan Policy HB4: Selfbuild and Custom Housebuilding Development; Policy C3: Provision of Open Space, regarding allotments and sports facilities; Policy C4, regarding play space provision; and Policy CC1, regarding energy efficiency.	As modified text supporting policy, the changes referenced here are covered through the appraisal of main modifications to Policy CSD9: Sellindge Strategy.



Cumulative effects of the proposed modifications to the Core Strategy Review

1.16 The effects recorded in the SA of the Core Strategy Review broadly identified significant positive effects against the majority of the SA objectives. The SA of the main modifications to the Core Strategy Review set out in **Table 1** broadly identifies additional positive effects that contribute to the significant positive effects previously identified. Although some main modifications lessen the contribution of certain policies in delivering positive effects on certain SA objectives (for example, the weakening of affordable housing, water efficiency and energy efficiency standards), the modified policies still deliver significant benefits over and above equivalent national standards. Therefore, these negative changes are not considered to result in changes to the significance of effects previously recorded, including the cumulative effects of the Core Strategy Review as a whole.

Habitats Regulations Assessment (HRA)

- 1.17 The HRA Report of the Proposed Submission Core Strategy Review (2019) concluded that, subject to implementation of safeguards, the Folkestone & Hythe Proposed Submission Core Strategy Review would not result in adverse effects on European sites, either alone or in-combination with other plans and projects.
- 1.18 The two HRA Addenda published in February and December 2020 concluded that the findings of the HRA report remained the same subject to the provisions listed in the HRA Report and Addenda.
- 1.19 The latest HRA Addendum has assessed whether the main modifications to the Core Strategy Review. It has concluded that the main modifications would not result in adverse effects on European sites, either alone or in-combination with other plans and projects.

Monitoring indicators

1.20 In light of the above, the proposed monitoring indicators for monitoring the effects of the Core Strategy Review in the SA Report which accompanied the Proposed Submission Core Strategy Review consultation remain unchanged.

Appendix 1

Consultation Representations on Core Strategy Review SA Report 2019



Table A1.1: Regulation 19 consultation comments received in relation to the SA for the Proposed Submission Folkestone & Hythe Core Strategy Local Plan Review (2019)

Consultee	Consultation comments – summarised where appropriate	Response and any action taken to address consultation comment in the updated SA Report
Natural England	1. Introduction	Support noted.
	Following our previous advice to the Reg 18 consultation, the CSR now contains strengthened policy wording for the garden settlement policies, in particular to mitigate impacts on views from the AONB. In light of this, Natural England concurs with the conclusions drawn in the SA.	
Bilsington Parish	4. Baseline information	Noted.
Council	The appraisal states "the review offers an opportunity to tailor policies that would address private vehicle use within the District, and encourage the use of more sustainable modes of transport in specific areas".	
	Policy SS5 only calls for travel plans for trip generating uses it fails to address the fact that paragraph 4.123 quotes the aim of delivering 8,000 dwellings. This increase will generate additional traffic movements which need the infrastructure to support it.	
	Policy SS5 needs to be strengthened to ensure that the transport infrastructure is in place before development commences. Otherwise there will be a significant increase in private car movement which is unlikely to decrease when alternative transport becomes available.	

Consultee	Consultation comments – summarised where appropriate	Response and any action taken to address consultation comment in the updated SA Report
Aldington & Bonnington Parish Council	1. Introduction, Paragraph 1.13 Whilst the sustainability Appraisal has been undertaken in accordance with the National Planning Policy Framework there is no evidence included to suggest that there has been compliance with a Duty to Co-operate. Throughout the document, reference is made only (but multiple times) to even the smallest neighbouring villages and towns within the Folkestone and Hythe District, whilst, in contrast, there is not a single mention of the immediately neighbouring parish of Aldington, which, while located within the Parliamentary constituency of Folkestone & Hythe, for administrative purposes is located within the neighbouring Borough of Ashford. Similarly, the other two Ashford Borough parishes that border Folkestone & Hythe District are not mentioned in the Sustainability Appraisal. A full appraisal needs to be carried out on the effects of the core strategy on all the parishes adjoining the District, including those in the neighbouring administrative area, as they too are enduring growth and they too will be impacted by the proposed developments in Sellindge and at the new garden town. 1. Introduction, Paragraph 1.12 The growth options used to inform the Core Strategy Review are flawed in that the high level options tested, whilst relevant, are based on assumptions that are open to interpretation and not necessarily reliable. In terms of the major developments proposed for Sellindge and the new Garden Town the commuting patterns and travel to work areas have not been adequately publicised to enable a true aspect to be seen. Neither of these major developments show large-scale employment opportunities, it could be assumed that at Sellindge a development of 600 dwellings could lead to employment needs for at least 1,200 and the Garden Town of 6,375 dwellings an employment need of upwards of 12,750. This will result in commuting patterns outside of the development and potentially outside of the area.	The SA of the CSR has considered effects on neighbouring plan areas throughout the appraisal of CSR policies and site allocations and their reasonable alternatives and consideration of the cumulative effects of the Plan. Chapter 8 considers the effects of the Proposed Submission Core Strategy Review in combination with the other policies within the Core Strategy in 2013, the District Council's Proposed Submission Places and Policies Local Plan (PPLP) and finally the wider regional cumulative effects of delivering the growth set out in the Core Strategy Review and Proposed Submission PPLP in combination with the planned growth in the neighbouring authorities of Ashford Borough, Canterbury City, Dover District and Rother District. This assessment acknowledges the potential for significant negative effects against the following SA objectives in the SA framework: 2 (employment), 3 (Landscape), 5 (Biodiversity), 7 (Efficient Use of Land), 9 (Flood Risk) and 14 (Community Cohesion, Services and Facilities), and significant positive effects against SA objectives 2 (Employment), 14 (Community Cohesion, Services and Facilities) and 13 (Sustainable Transport).
		at each stage of its development, including

Consultee	Consultation comments – summarised where appropriate	Response and any action taken to address consultation comment in the updated SA Report
	The increased commuting patterns will lead to traffic congestion and other transport infrastructure issues, not just on main roads but also on rural roads, including those in neighbouring parishes within Ashford Borough.	statutory consultees and neighbouring planning authorities and organisations.
	There is no evidence of the duty to cooperate with neighbouring authorities having been effectively applied.	
	To be fully effective, the Sustainability Appraisal should be more detailed in terms of numbers so as to highlight potential conflicts with other policies and show collaboration with adjoining local planning authorities who are also under pressure to deliver new homes.	
	4. Baseline Information, Paragraph 4.137 The commentary of this paragraph on deprivation and social inclusion is inappropriate in that the area of the North Downs where the majority of the development for Folkestone and Hythe District is planned is currently an area of low deprivation. Given the large number of residents likely to be moving into this area, no evidence is provided to suggest that a similar or larger number of jobs is likely to be created for them, particularly within the North Downs area itself. With the strategy as prepared, the levels of deprivation could potentially increase	The baseline information relating to deprivation and social inclusion was collected from the 2015 English Index of Multiple Deprivation. According to Paragraph 4.131 (fifth bullet point), the majority of least deprived SOAs in Folkestone & Hythe are located in the north of the District, in the vicinity of the M20 motorway, the Kent Downs and on the
	as the number of potential workers moving into the area and the neighbouring planning authority is far in excess of any likely increases in the employment market. Greater emphasis needs to be placed on the provision of employment in the locality rather than reliance upon commuting, which places additional burdens on the road infrastructure and the already stretched public transport services. No clear evidence has been provided within the Core Strategy to show that the provision of a high-speed service from Westenhanger can become a reality.	outskirts of Folkestone/Hythe. The Proposed Submission Core Strategy Review states a significant number of jobs will be created within the garden town, which will provide employment opportunities for nearby towns and the wider area. Policy SS2 states that the CSF will deliver approximately 20 ha industrial warehousing and office space and 35,000 sqm of retail space. Policy SS6 states that the new garden settlement must aspire to

Consultee	Consultation comments – summarised where appropriate	Response and any action taken to address consultation comment in the updated SA Report
		in the creation of a minimum of 6,375 new jobs in the new garden settlement.
	5. Sustainability Appraisal Framework, Table 5.1 SA Objective 13 The SA 13 objective to "reduce the need to travel, increase opportunities to choose sustainable transport modes and avoid development that will result in significant traffic congestion and poor air quality" has only partly been considered, especially in respect of the proposals for Sellindge and Otterpool Park Garden Town, both of which border onto Aldington. With regard to the traffic-modelling exercise, there is no mention of the A20 exit from Sellindge towards Ashford, the neighbouring borough. All statistics have been calculated on the assumption that all traffic will head towards Folkestone to join the M20 when heading towards Ashford. This is disingenuous: Ashford-bound traffic will likely flow west along the A20; and London-bound traffic, likewise west to J10/10A of the M20, rather than going east to J11. Local residents all know of the significant delays that already occur at J10, which are supposedly being reduced with the construction of J10A; this has taken years from initial planning to construction, and it is as yet unknown as to whether it will have the desired effect. When bus travel is mentioned, again this is focused in the opposite direction, away from Ashford. The Core Strategy and its associated Appraisals are written as though the District's western border is at the edge of the world, and not adjoining several rural villages which happen to be located in another administrative district. In summary, the Sustainability Appraisal is unsound as it has been completely blind to parishes in the neighbouring borough of Ashford and the growth options considered appear only to relate to the Folkestone and Hythe District. To support this contention: Sellindge is referenced in the document 520 times; Lympne 140 times; while the parish of Aldington, which adjoins both, is not mentioned once. A full appraisal needs to be carried out on the effects of the core strategy on all the	The SA of the CSR has considered effects on neighbouring plan areas throughout the appraisal of CSR policies and site allocations and their reasonable alternatives and consideration of the cumulative effects of the Plan. Chapter 8 considers the effects of the Proposed Submission Core Strategy Review in combination with the other policies within the Core Strategy in 2013, the District Council's Proposed Submission Places and Policies Local Plan (PPLP) and finally the wider regional cumulative effects of delivering the growth set out in the Core Strategy Review and Proposed Submission PPLP in combination with the planned growth in the neighbouring authorities of Ashford Borough, Canterbury City, Dover District and Rother District. This assessment acknowledges the potential for significant negative effects against the following SA objectives in the SA framework: 2 (employment), 3 (Landscape), 5 (Biodiversity), 7 (Efficient Use of Land), 9 (Flood Risk) and 14 (Community Cohesion, Services and
	parishes adjoining the District, including those in the neighbouring administrative area, as they too are enduring growth and they too will be impacted by the proposed developments in Sellindge and at the new garden town.	Facilities), and significant positive effects against SA objectives 2 (Employment), 1

Consultee	Consultation comments – summarised where appropriate	Response and any action taken to address consultation comment in the updated SA Report
		(Community Cohesion, Services and Facilities) and 13 (Sustainable Transport).
		Furthermore, the SA has been consulted on at each stage of its development, including statutory consultees and neighbouring planning authorities and organisations.
Highways	6. Appraisal of High Level Growth Options	Noted.
England	The accompanying Sustainability Appraisal (SA) of the Review of the Core Strategy sets out the context and framework for the SA of the Core Strategy Review and reports the appraisal findings of growth options tested to inform the preferred Core Strategy Review policies, as well as the appraisal findings of the policies in the Proposed Submission Core Strategy Review.	The SA Framework was developed and consulted on at the scoping stage in December 2016 an7d subsequently during consultation on the draft and proposed submission CSR and associated SA Reports.
	We have reviewed the Sustainability Appraisal (SA) and have the following comments. Our comments are related only to issues that we consider will affect the SRN.	
	The SA Review of the Core Strategy uses a framework of 15 SA objectives; of these, SA13 is most relevant to Highways England's interests. The SA13 objective is "Reduce the need to travel, increase opportunities to choose sustainable transport modes and avoid development that will result in significant traffic congestion and poor air quality".	
	• SA2 is also relevant to our interests due to the way locations have been considered against it. SA2 is "Support the creation of high quality and diverse employment opportunities". As detailed below, this has some implications for the SRN in the way it has been applied.	
	The findings against these SA objectives are summarised for six "character areas":	
	Character area 1: Kent Downs.	
	Character area 2: Folkestone and Surrounding Area.	

Consultee	Consultation comments – summarised where appropriate	Response and any action taken to address consultation comment in the updated SA Report
	 Character area 3: Hythe and Surrounding Area. 	
	 Character area 4: Sellindge and Surrounding Area (which is further divided into four sub-areas). 	
	 Character area 5: Romney Marsh and Walland Marsh. 	
	o Character area 6: Lydd, New Romney and Dungeness	
	 The character area findings for the SA objectives are given in Section 6. These are limited in detail at this stage, but appear to have a reasonable overall approach. However, a few areas for improvement are noted: 	
	o Paragraph 6.48, regarding SA2, suggests that access to existing strategic road infrastructure is expected to have a positive effect on this objective (the creation of high quality and diverse employment opportunities). While it is accepted that SRN access can reduce congestion on lower-order roads which are less able to accommodate heavy traffic, Highways England aims to encourage development in locations that are or can be made sustainable, that allow for uptake of sustainable transport modes and support wider social and health objectives. As such, while limiting congestion is important, this should not be achieved in a way that could potentially encourage an increase in overall car use, even if the road network could accommodate such traffic in that location.	
	 Similarly, Paragraphs 6.65 and 6.66, regarding SA13, attribute a similarly positive effect to proximity to the SRN (notwithstanding that these paragraphs also attribute a positive effect to access to sustainable modes also, which is welcomed). 	
	 These comments also apply to the SA scoring of locations in Appendices 3 and 4. 	
Kent Downs	6. Appraisal of High Level Growth Options, Table 6.2 and Paragraph 6.37	The effects recorded against SA objective 3 during the appraisal of the six Character
AONB Unit	The Kent Downs AONB Unit disagrees with many of the scores assigned in relation to the North Downs Character Area, and it is considered that the impacts of	Areas and associated Character Area 4 sub areas (see Appendix 2) drew on the findings

Consultee	Consultation comments – summarised where appropriate	Response and any action taken to address consultation comment in the updated SA Report
	strategic scale development on SA Objective 3b, Landscape is significantly underestimated in respect of potential impacts on the Kent Downs AONB.	of the District's High Level Landscape Appraisal (2017).
	Table 6.2 – The Kent Downs AONB Unit disagrees with the SA Score for Area B of Character Area in respect of SA Objective 3: landscape, where proximity to and visibility from the AONB means that much of this sub area would be highly visible from the nationally protected landscape of the Kent Downs AONB. 6.37 – We would contend that the majority of Area B forms the setting for the	The subsequent appraisal of the draft policies set out in the Draft Core Strategy Review (March 2018), including Policy SS6, drew on the same evidence acknowledging that "the development of the new
	AONB, rather than 'some' of Area B as stated. It forms the setting not just because it borders the AONB (as stated), but because of the inter visibility between this area and the AONB, principally from the escarpment of the Kent Downs to the north. We also query the contention that 'portions of Area B have been identified	undeveloped greenfield land and as such would have an adverse impact on the openness and rural character of the countryside". In response to concerns raised by the Ken Downs AONB Unit and Natural England at the Regulation 18 consultation stage in March 2018 regarding landscape, addition text was added to policies within the Proposed Submission version of the Core
	as capable of accommodating strategic development without the need for extensive landscape mitigation'. The AONB Unit does not consider that this is the case, with the majority of area B being visible from large swathes of the AONB. It is considered an LVIA is required at this stage to justify such a contention. In view of this we consider a significant negative effects would be more appropriate than the minor negative effect that has been assigned to Area B.	
	7. Appraisal of Special Options at Otterpool & Sellindge, Table 7.1 and Paragraph 7.20	Strategy Review. Policy SS6 now requires that the new garden town's distinctive townscape and outstanding accessible
	The AONB Unit disagrees with findings for Otterpool A site in respect of SA3 and consider both sites A and B would have significant negative effects, in view of the visibility of the site from the highly sensitive Kent Downs landscape. The topography of the site means that the higher parts of the slope at the western end of the site, immediately north of Aldington Road would be particularly visible in views from the north.	landscape must be informed by the historic character of the area, respond to its setting within the Kent Downs AONB landscape and mitigate impact in views from the scarp of the Kent Downs. Similar text was added to policies SS7, SS9 and CSD9 (Sellindge).

Consultee Consultation comments – summarised where appropriate Response and any action taken to address consultation comment in the updated SA Report 8. Appraisal of Proposed Submission Core Strategy Review, Tables 8.2 and The effects recorded against SA objective 3 8.3 during the appraisal of Area B drew on findings of the District's Growth Options Table 8.2 – We disagree with the mixed minor effects assigned to SA Objective Study Phase Two Report (2017) and High SA3 in respect of policies SS1, SS2, SS3 and SS4. Allocating strategic large scale Level Landscape Appraisal (2017). In the development on land in the setting of the Kent Downs AONB is likely to result in appraisal matrix for Area B in Character significant detrimental effects on the landscape. It is acknowledged that the policy Area 4, we state that Area B is bordered by would have some benefits in restricting development in other sensitive areas, but a the Kent Downs AONB. In line with the SA significant impact on the landscape would nevertheless occur. Framework, Area B scores a minor negative effect. Table 8.3 - We disagree with the 'mixed minor effects' assigned in respect of SA3 for policies SS6, SS7, SS8 and SS9. Large areas of the strategic allocation are The Growth Options Study Phase Two visible from the AONB without any landscape mitigation, but notwithstanding this, Report (2017) states that land within Area we do not consider a development of the scale and density proposed is capable of B located west of Barrowhill, between being satisfactorily mitigated in views from the AONB. Barrowhill and Westenhanger on the site of the former racecourse, would be suitable strategic development without need for extensive mitigation. As stated in Paragraph 6.21, the effects against SA objective 3 are expected to be more significant where development would take place within or in close proximity to the AONB, including areas which make up its setting as well as in areas which have been identified as having high sensitivity in terms of landscape character in Folkestone & Hythe's High Level Landscape Appraisal (2017). According to the High Level Landscape Appraisal, the Landscape Character Area in which Area B falls is described as having medium landscape sensitivity.

Consultee	Consultation comments – summarised where appropriate	Response and any action taken to address consultation comment in the updated SA Report
Kent County Council – Growth, Environment and Transport	Appendix 2 Reference to the Energy White Paper: Our Energy Future (2003) echoes the policy to reduce carbon emissions by 60% by 2050. It should be noted that this policy is slightly outdated, and the current policy is to reduce carbon emissions by 80% by 2050. This target is being reviewed in light of current understanding and may lead to a zero carbon target by 2050.	Noted.
Sellindge Parish Council	Appendix 4 Sellindge B should not be considered until well after 2050. Sellindge C is totally unacceptable as it includes the nature reserve provided by site B in policy CSD9 plus blatant backfilling to Swan Lane. Sellindge D is also totally unacceptable due to the same reason for Sellindge C plus it will introduce a built environment to the east boundary to the village.	Sellindge site allocation options C and D both scored a significant negative effect against SA objective 5: biodiversity, due to the fact it contains areas of BAP priority habitat and falls within 40m of Gibbin's Brook SSSI. The appraisal of CSD9 acknowledges that the development on land to the south and east of the exiting village will be located on greenfield land, resulting in the potential for habitat loss and fragmentation. Furthermore, development to the east of the village is located within 450m of Gibbins Brook SSSI, generating the potential for increased recreational pressures on the SSSI. However the SA also acknowledges that the supporting text of the policy requires that impacts on the SSSI should be minimised and funding provided for its enhancement and protection. Furthermore, the policy requires that the growth be incorporated within and bordered by appropriate landscape, including a new village green/common, substantial woodland planting at the rural edges of the village, all of which have the potential to

Consultee	Consultation comments – summarised where appropriate	Response and any action taken to address consultation comment in the updated SA Report
		deliver new habitats for priority nature conservation species. Overall, a mixed effect (minor positive/minor negative) is therefore expected on this SA objective.



Appendix 2

SA Framework for the Folkestone & Hythe Core Strategy Review



SA Objective Reference	SA Objective	Appraisal questions: will the Plan/option lead to?	Relationship with the SEA Topics / District's Health and Well Being
SA1	Improve the provision of	Create strategic-scale developments that make significant contributions to local housing needs in the short, medium and long term?	Population, Human Health and Material Assets
	homes, including affordable housing, having	Provision of a high-quality mix of housing developments suitable for the full range of ages and abilities in need of affordable accommodation?	
	regard to the needs of all sections of society, including the elderly.	The provision of the range of types and tenure of housing as identified in the housing market assessment?	
SA2	Support the creation of high quality and diverse employment opportunities.	An adequate supply of land, skills and infrastructure (such as ICT and high speed broadband) to meet the requirements of sectors targeted for economic growth and diversification, including those set out in the District's Economic Strategy?	Population, Human Health and Material Assets
		New and improved education facilities which will support raising attainment and the development of skills, leading to a work ready population of school and college leavers?	
		The promotion of the development of education services which retain young people through further and higher education in order to develop and diversify the skills needed to make Folkestone & Hythe prosper?	
		Improved access to jobs for local people from all sectors of the community that will lift standards of living?	
		Enhanced vitality and vibrancy of town centres?	
		Expansion or upgrading of key visitor attractions to support the visitor economy?	
		Employment opportunities which address the economic consequences of the decommissioning of Dungeness nuclear power station? ¹¹	
		Provision of high quality employment sites and associated infrastructure suitable for the likely continuation in a shift from manufacturing to higher skill, service industries?	

¹¹ Power generation at Dungeness 'A' finished in 2006; that at Dungeness 'B' is currently scheduled for 2018 but EDF has applied to extend this to 2028; employment levels at the site are typically maintained for several years after operation ceases to carry out de-commissioning.

SA Objective Reference	SA Objective	Appraisal questions: will the Plan/option lead to?	Relationship with the SEA Topics / District's Health and Well Being
SA3	Conserve, and where relevant	Areas of the highest landscape sensitivity (i.e. Kent Downs AONB) being protected from adverse impacts on character and setting?	Landscape, Biodiversity, Flora and Fauna
	enhance, the quality, character and local distinctiveness of the landscape and townscape.	Development which considers the existing character, form and pattern of the District's landscapes, buildings and settlements?	
		The protection and enhancement of local distinctiveness and contribution to a sense of place?	
SA4	Conserve and enhance the fabric and setting of historic assets.	Development that avoids negative effects on listed buildings, conservation areas, scheduled ancient monuments, registered historic parks and gardens, and registered battlefields and their settings?	Cultural Heritage, including architectural and archaeological heritage
		Provision of appropriately scaled, designed and landscaped developments that relate well to and enhance the historic character of the District and contribute positively to its distinctive sense of place?	
		Promotes the enhancement of the District's archaeological resource and other aspects of heritage, such as, parks and open spaces, and areas with a particular historical or cultural association?	
		Promotes access to as well as enjoyment and understanding of the local historic environment for people including the District's residents?	
		Improves participation in local cultural activities?	
		Helps to foster heritage-led regeneration and address heritage at risk?	
		Improves existing and provides new leisure, recreational, or cultural activities related to the historic environment?	
SA5	Conserve and enhance biodiversity, taking into account the effects of climate change.	Protect and where possible enhance internationally and nationally designated biodiversity sites and species?	Biodiversity, Flora and Fauna
		Avoidance of net loss, damage to, or fragmentation of locally designated and non-designated wildlife sites, habitats and species (including biodiverse brownfield sites)?	

SA Objective Reference	SA Objective	Appraisal questions: will the Plan/option lead to?	Relationship with the SEA Topics / District's Health and Well Being
		Opportunities to enhance and increase the extent of habitats for protected species and priority species identified in the Kent BAP or the England Biodiversity Strategy 2020?	
		Opportunities for people to come into contact with resilient wildlife places whilst encouraging respect for and raising awareness of the sensitivity of these sites?	
		Development which includes the integration of ecological habitats and contributes to improvements in ecological connectivity and ecological resilience to current and future pressures, both in rural and urban areas?	
		Maintenance and enhancement of the ecological networks in the District?	
		N.B. Climate change is likely to impact upon habitats and thereby biodiversity. Plan policies which achieve the goals listed above should all help to enhance the ability of wildlife to adapt to a changing climate.	
SA6	Protect and enhance green infrastructure and ensure that it meets strategic needs.	Provision, stewardship and maintenance of green infrastructure assets and networks (including green open space, river/canal corridors and the coastline), ensuring that this is linked into new and existing developments, to improve the connectivity of green spaces and green networks?	Landscape, Biodiversity, Flora and Fauna
		N.B. The East Kent Green Infrastructure (GI) Working Group has identified an East Kent GI Typology which encompasses the following GI types:	
		- Biodiversity e.g. Natura 2000 sites, SSSIs, LNRs, Local Wildlife Sites.	
		- Civic Amenity e.g. parks, allotments, cemeteries.	
		- Linear features e.g. the Royal Military Canal, railway corridors.	
		The full list of GI components of this typology is available from the District's GI Report, 2011.	
SA7	Use land	Development that avoids high quality agricultural land?	Soil, Climatic Factors and
	efficiently and safeguard soils,	Remediation of contaminated sites?	Landscape
	geology and	Re-use and re-development of brownfield sites?	
	economic mineral reserves.	Efficient use of recycled/ secondary materials?	

SA Objective Reference	SA Objective	Appraisal questions: will the Plan/option lead to?	Relationship with the SEA Topics / District's Health and Well Being
		Protection of mineral resources and infrastructure?	
		Development that protects sites valued for their geological characteristics?	
		Development that avoids sterilising local mineral reserves and can be accommodated by existing or planned local mineral reserves?	
SA8	Maintain and improve the quality of groundwater, surface waters and coastal waters and the hydromorphologic al (physical) quality of rivers and coastal waters.	Development that will not lead to the deterioration of groundwater, surface water, river or coastal water quality, i.e. their Water Framework Directive status?	Water, Biodiversity, Fauna and Flora
		Development where adequate foul drainage, sewage treatment facilities and surface water drainage are, or can be made, available?	
		Development which incorporates SuDS (including their long-term maintenance) to reduce the risk of combined sewer overflows and to trap and break down pollutants?	
SA9	Reduce the risk of flooding, taking into account the effects of climate change.	Avoid development in locations at risk from flooding or that could increase the risk of flooding elsewhere having regard to the District's Strategic Flood Risk Assessment, taking into account the impacts of climate change? Create development which incorporates SuDS (including their long-term maintenance) to reduce the rate of run-off and reduce the risk of surface water flooding and combined sewer overflows?	Water, Soil, Climatic Factors and Human Health
SA10	Increase energy efficiency in the built environment and the proportion of energy use from	Create strategic-scale developments that make significant and lasting contributions to the UK's national carbon target of reducing emissions by at least 80% from 1990 levels by 2050? Create connected energy networks that provide local low carbon and renewable	Air, Climatic Factors, and Human Health
		electricity and heat?	

SA Objective Reference	SA Objective	Appraisal questions: will the Plan/option lead to?	Relationship with the SEA Topics / District's Health and Well Being
	renewable sources.		
SA11	Use water resources efficiently.	Development where adequate water supply is, or can be made, available? Water efficient design and reduction in water consumption (e.g. rainwater recycling/grey water reuse and BREEAM)?	Water and Climatic Factors
SA12	To reduce waste generation and disposal, and achieve the sustainable management of waste.	Will it promote sustainable waste management practices through a range of waste management facilities? Will it reduce hazardous waste? Will it increase waste recovery and recycling? Will it protect existing waste facilities and infrastructure or support the delivery of new facilities or infrastructure?	Soil, Climatic Factors and Material Assets
SA13	Reduce the need to travel, increase opportunities to choose sustainable transport modes and avoid development that will result in significant traffic congestion and poor air quality.	A complementary mix of land uses within compact communities that minimises the length of journeys to services and facilities and employment opportunities, increases the proportion of journeys made on foot or by cycle, and are of a sufficient density to support and enhance local services and public transport provision? Development in locations well served by public transport, cycle paths and walking routes? Development of new and improved sustainable transport networks, including cycle and walking routes, to encourage active travel and improve connectivity to local service centres, transport hubs, employment areas and open/green spaces?	Air, Climatic Factors, Population and Human Health
SA14	Promote community vibrancy and social cohesion; provide opportunities to	Create well-designed developments that contain compact communities with a sufficient critical mass or density to support local services and public transport provision?	Population, Human Health and Material Assets

SA Objective Reference	SA Objective	Appraisal questions: will the Plan/option lead to?	Relationship with the SEA Topics / District's Health and Well Being
	access services, facilities and environmental assets for all ages and abilities and avoid creating inequalities of opportunity for access.	Create new opportunities to improve educational attainment, qualification levels and participation in education and training through access to existing or the provision of new educational infrastructure?	
		Provision of new or enhancement of existing leisure facilities for young people, where thresholds/standards require these?	
		Create opportunities to lead healthier lifestyles, including development that enhances existing and /or makes provision for and maintenance towards open spaces, sports and recreational facilities e.g. publicly available pitches, allotments, swimming pools, courts, etc.?	
		Provision of new or enhanced local health services to support new and growing communities?	
		Improvements to strategic public transport infrastructure?	
		Reintegration of physically divided or highly linear villages or neighbourhoods through, for example, provision of central social infrastructure?	
		Provision for the specific needs of disabled and older people?	
SA15	Reduce crime and the fear of crime.	Reduced levels of crime, anti-social behaviour and the fear of crime through high quality design and intervention, i.e. street layout, public space provision, passive surveillance, lighting etc.?	Population and Human Health

Appendix 3

Baseline and Plans, Programmes and Policies Updates



Baseline and evidence updates

Since the publication of the full Proposed Submission Core Strategy Review SA Report and subsequent Proposed Changes SA Addendum in 2019, the following additional key evidence documents have been produced by the Council and have informed the proposed modifications to the Core Strategy Review. All evidence relating to the Core Strategy Review is available on the Council's website.

• Folkestone & Hythe Retail and Leisure Need Assessment (June 2019)¹²: Amended in June 2019, this document provides an update of the Shepway Town Centres Study¹³, incorporating emerging garden settlement development proposals at Otterpool Park. The report updates the District wide retail capacity projections and need assessments.

It concludes that the new town and local centres within Otterpool Park new settlement should support between 10,800 and 16,700sqm gross of retail and food/ beverage floorspace by 2037, excluding Class A1 non-retail services and Class A2 financial/ professional services, with the potential for service use to increase the new garden settlement's overall floorspace projection to between 13,000 and 20,000sqm gross (Class A1 to A5) by 2037. Furthermore, the emerging Otterpool Park Masterplan phasing was found to suggest that a total of 20,400sqm gross Class A1 to A5 floorspace will be delivered by 2037. This scale of retail and leisure provision was judged to be more than sufficient to meet the need generated by the new Garden Settlement, and could also accommodate residual growth from other parts of the District, if required.

It is noted that since this document was produced, changes have been made the Business Use Classes Order. A1-A3 and B1 are now treated as Class E.

• Revised Housing Need and Supply Evidence Paper (November 2019)¹⁴ Produced in response to the introduction of a national standard method for calculating housing need in July 2018. Using the national standard, the District's housing need was updated to 13,284 new homes over the plan period to 2036/37 (738 new dwellings per year).

Bringing together the different sources of housing supply across the District, the document identifies an anticipated supply of 13,515 new homes over the plan period and a list of specific sources to meet the needs of the first 5.17 years of the Plan period. The document concluded that there is no need to identify additional housing sites for allocation in the Core Strategy Review. The document was published alongside the Sustainability Appraisal Addendum of the Proposed Changes to the Proposed Submission Folkestone & Hythe Core Strategy Review in November 2019.

Authority Monitoring Report 2019 (2020)¹⁵: Published in 2020, this document reports on the monitoring year 1st April 2018 to 31st March 2019. The contents of this document highlight similar trends to those outlined in previous Authority Monitoring Reports, including population growth (100,300 in 2006 to 108,00 in 2011), falling rates of unemployment (3.6% which is down 0.8% from the previous monitoring year), a 10-year decline in carbon emissions and an increase in vacancy levels within Town and District Centres. Folkestone & Hythe has an ageing population with a median age of over 43 years, which is the oldest average age of residents in the Kent districts. There are 53,400 'economically active' people in the District aged 16 or over, either in employment or unemployed, and of this figure, 82% fall within the 16 to 64 'working age' group, which brings the District above the regional (81.6%) and national (78.9%) averages.

In the previous monitoring year there was a recorded decrease in average gross weekly pay for residents in full-time employment but this has now increased. However, average weekly pay in the District (£556.10) still remains below the Kent and UK averages of £636.00 and £587.00 respectfully. With regard to education, there has been a significant drop in residents

¹² Folkestone & Hythe Retail and Leisure Need Assessment, Lichfields, 2019. Available <u>here</u>.

¹³ Shepway Town Centres Study, Peter Breet Associates, 2015. Available <u>here</u>.

¹⁴ Revised Housing Need and Supply: Evidence Paper, Folkestone & Hythe District Council, 2020. Available <u>here</u>.

 $^{^{15}}$ Authority Monitoring Report 2019, Folkestone & Hythe District Council, 2020. Available <u>here</u>.

with qualifications at NVQ Level 4 and above compared to the previous monitoring year where there had been an increase in residents with qualifications at NVQ Level 4 and above. This places Folkestone & Hythe in the bottom 5% of authorities for the proportion of people with NVQ4+.

- Technical Note: Nutrient Budget (August 2020)¹⁶: Produced in August 2020, this note contains a nutrient budget for the Folkestone & Hythe Local Plan, including all development conferred by the Plan which drains into the Stour catchment either directly via land use run off or indirectly via the effluent of a wastewater treatment works (WWTW). It reports a number of options which could be used to mitigate a nitrogen and phosphorus surplus in the District to demonstrate no adverse effect to the integrity of the Stodmarsh internationally designated sites. Direct measures include the creation of wetlands which act as interceptors and remove a proportion of the nitrogen/phosphorus in water through natural processes, in addition to WWTW upgrades to increase nutrient removal capacity and thereby reduce effluent nutrient loading. Indirect measures are the removal of land within the District from nitrogen/phosphorus intensive uses, such as crops or intensive livestock systems. The technical note informed the definition of new mitigation measures to be included as main modifications to the Core Strategy Review new settlement and Sellindge allocations, covering the provision of roughly 25ha of new interceptor wetland habitat, 35ha of new woodland planting in current high nutrient land use areas, the provision of a new WWTW and conversion of agricultural land uses to lower nutrient uses. Nutrient budget calculations generated by Arcadis demonstrate that these measures would deliver nutrient neutrality, resulting in the HRA concluding that a modified Core Strategy Review will not result in an adverse effect on the integrity of the Stodmarsh SAC, SPA and Ramsar either alone or in combination with other plans and projects.
- Evidence to support deliverability and viability of Core Strategy Examination of Additional Sites (October 2020) ¹⁷: Published in October 2020, this report provides a review of the financial viability of development at various sites allocated within the Core Strategy Review. The report finds the majority of site allocations, notably those in New Romney, Sellindge and Shorncliffe Garrison to be financially viable, but raises questions with regards to the allocation at Folkestone Sea Front.

Statements of Common Ground

Statements of common ground have been agreed with the following consultees on strategic policy matters:

- Highways England
- Kent County Council
- Ashford Borough Council
- Dover District Council
- Canterbury City Council
- Rother District Council
- Affinity Water
- Environment Agency
- Marine Management Organisation
- Natural England
- London Ashford Airport

In order for Folkestone & Hythe District Council and Highways England to agree on a Statement of Common Ground, further work was undertaken and presented as appendices to the Statement

¹⁶ Technical Note: Nutrient Budget, Urban Edge, August 2020. See Appendix C, available <u>here</u>.

¹⁷ Evidence to support deliverability and viability of: Core Strategy Examination of Additional Sites, Gerald Eve, 2020. Available <u>here</u>.

of Common Ground between Folkestone & Hythe District Council and Highways England. Key documents include:

- Otterpool Park Future Mobility: Monitoring & Evaluation Framework (September 2020) ¹⁸: Published in September 2020, this document sets out the monitoring and evaluation approach for the new garden settlement at Otterpool, focussing on the first phase of development (up to 2,500 homes). The Framework supplements a traditional travel plan, seeking to enable a continuously improving mobility offer at Otterpool Park that meets users' needs.
- Otterpool Park Future Mobility: User-Centric Travel (September 2020)¹⁹: Published in September 2020, this report outlines the people-centric assessment to support the future mobility strategy at the new garden settlement Otterpool Park. The report outlines the benefits and linkages between a traditional transport planning approach and future mobility thinking to ensure the full potential of a low carbon vision is achieved. The findings of the report will help influence Phase 1 of the development by influencing design relating to active travel, walking and cycling routes, micromobility, mobility hubs, freight consolidation centres and associated services, parking provision and layout, and interventions that reduce the need to travel.
- Otterpool Park: Mobility Vision Report (September 2020)²⁰: Published in September 2020, this report outlines the mobility vision that both Kent County Council and Folkestone & Hythe District Council would be willing to support at Otterpool Park. The vision is to make Otterpool Park a low-car and net zero destination.
- Local Plan Traffic Analysis: Highways England Road Network (December 2020)²¹: Published in December 2020, this document was produced to enable Folkestone & Hythe District Council and Highways England to agree on a Statement of Common Ground regarding mitigation of impacts related to the Core Strategy Review on the road network. According to the report, the weaving segments on the M20 between Junction 12 and Junction 13 (both directions) would require upgrading according to the design standard, but such a situation corresponds to a worst case scenario which is unlikely to occur in practice. The report concludes by stating that the M20 Junction 11, M20 Junction 13 and the A20/ Spitfire Way/ Alkham Valley Road interchange require physical upgrades by 2037.
- M20 J12 to J13 Weaving Assessment: Highways England Road Network (April 2021)²²: Published in April 2021, the purpose of this document is to present a revised traffic forecast and Design Manual for Roads and Bridges (DMRB) traffic analysis to support the identification of suitable road geometry. According to the report, the DMRB provides sufficient flexibility to adjust the existing road layout without the need for a link road or motorway mainline widening.
- Monitor and Manage Framework to Provide Mitigation for the Strategic Road
 Network and Local Road Network (June 2021)²³: Published in June 2021, this document
 sets out the roads and junctions requiring mitigation and what mitigation will be
 implemented. The roads and junctions requiring mitigation are as follows: (1) M20 J11; (2)
 Churchill Avenue; (3) A20 Castle Hill Bridge; and (4) A20/Spitfire Way/Alkham Road
 Interchange.

Together these documents have informed the proposed main modifications to the Core Strategy Review appraised in the main body of the addendum above.

¹⁸ Otterpool Park Future Mobility: Monitoring & Evaluation Framework, WSP, 2020. Available <u>here</u>.

 $^{^{19}}$ Otterpool Park Future Mobility: User-Centric Travel, WSP, 2020. Available $\underline{\text{here.}}$

²⁰ Otterpool Park: Mobility Vision Report, WSP, September 2020. Available <u>here</u>.

²¹ Local Plan Traffic Analysis: Highways England Road Network, Arcadis, 2020. Available <u>here</u>.

²² M20 J12 to J13 Weaving Assessment: Highways England Road Network, Arcadis, 2021. Available <u>here</u>.

²³ Monitor and manage framework to provide mitigation foe the Strategic Road Network and local road network, Folkestone & Hythe District Council, 2021. Available <u>here</u>.

Review of the SA Report Baseline

A review has also been undertaken of the baseline set out in the 2019 full SA Report, which covers a range of topics including the landscape and historic environment of the District, biodiversity, soil and minerals, water quality and resources, transport, climate change and flood risk, population and health, housing, the economy and labour market, deprivation and education. Since the publication of the full SA Report in 2019, the following events have taken place which add greater uncertainty to the future environmental, social and economic baseline of the District:

- **Brexit** The UK left the European Union (EU) on 31st January 2020 and entered a transition period up to 31st December 2020. From 1st January 2021, directly applicable EU law no longer applied to the UK and the UK is free to repeal EU law that has been transposed into UK law. The EU Directives listed in the 2019 full SA Report are no longer relevant but their corresponding national legislation (i.e. Acts and Regulations) remain relevant until such time as they are replaced.
- **COVID-19** The COVID-19 pandemic has led to far-reaching changes to society in the UK and around the world. It is not clear at this point in time whether the full range and significance of these changes will continue in the long term. Much will depend on the effectiveness of worldwide vaccine programmes against future variants of the virus. Potential implications for planning and development include Government measures to re-start the economy via support for housebuilding and infrastructure development, changes to permitted development rights, increased remote working and reduced commuting and related congestion and air pollution, increased prioritisation of walking and cycling over public transport, and increasing pressure to ensure satisfactory living standards are set and enforced.

It is also possible that UK and sub-national climate change policy may change as public awareness and prioritisation of the threat of climate change grows, as illustrated by the increasing number of local authorities, including Folkestone & Hythe District Council, that have declared a climate emergency.

In light of the objectives of the Core Strategy Review and its contents, there are considered to be no clear significant changes to the key issues and opportunities reported in the 2019 full SA Report. The new evidence bases listed in this appendix have informed the main modifications to the Proposed Submission Core Strategy Review and their SA.

Review of plans, policies and programmes

Since the publication of the Proposed Submission Core Strategy Review SA Report and Proposed Changes SA Addendum in 2019, the following relevant national plans, policies and programmes have been updated/published. The Core Strategy Review was submitted for examination before the publication of these new national planning updates; however, they provide an important context for the future of relationship of the Core Strategy Review with plans, policies and programmes:

National

- **Planning for the Future White Paper (February 2021)**²⁴: Sets out a series of potential reforms to the English planning system, to deliver growth faster. The White Paper focuses on the following:
 - Simplifying the role of Local Plans and the process of producing them.
 - o Digitising plan-making and development management processes.
 - o Focus on design, sustainability and infrastructure delivery.
 - Nationally determined, binding housing requirements for local planning authorities to deliver through Local Plans.

²⁴ Planning for the Future White Paper, MHCLG, 2020. Available <u>here</u>.

- National Planning Practice Guidance (NPPG) (June 2021)²⁵: The NPPG is an online resource that is continuously being updated. The latest updates include:
 - 24 May 2021 new information on 'First Homes'.
 - 24 June 2021 new information on 'Fire safety and high-rise residential buildings '(from 1 August 2021).
- National Planning Policy Framework (July 2021)²⁶: The NPPF sets out the government's planning policies for England and how these are expected to be applied. The original NPPF was published in March 2012, before being updated in July 2018, February 2019 and June 2019. The latest version of the NPPF was published in July 2021. Notable changes made since the publication of the second 2019 version include:
 - Pursuit of the UN's 17 Global Goals for Sustainable Development in the period to 2030, addressing social progress, economic well-being and environmental protection.
 - Measures to improve design quality, including a new requirement for councils to produce local design codes or guides, in response to the findings of the government's Building Better, Building Beautiful Commission.
 - Local plan policies are now required to set a vision that looks further ahead (at least 30 years) for larger scale developments such as new settlements or significant extensions to existing villages and towns.
 - The use of Article 4 directions to remove national permitted development rights should be limited to situations where an Article 4 direction is necessary to avoid wholly unacceptable adverse impacts.
 - Local authorities are required to work proactively and positively with promoters, delivery partners and statutory bodies in order to plan for required infrastructure facilities, including further education colleges, hospitals and criminal justice accommodation.
 - New streets must now be tree-lined, with opportunities also taken to incorporate trees elsewhere in developments (such as parks and community orchards).
 - Aspects of policy concerning planning and flood risk have been clarified, with the Flood Risk Vulnerability Classification previously set out in the national Planning Practice Guidance now included as an appendix in the NPPF.
 - 10% of all major housing schemes should comprise affordable home ownership properties.
 - o Policies on improving biodiversity have been strengthened.
 - Neighbourhood Plans are now encouraged to allocate large sites, as well as small and medium-sized sites.
 - In considering applications to remove or alter a historic statue, plaque, memorial or monument, LPAs should have regard to the importance of their retention in situ and, where appropriate, of explaining their historic and social context rather than removal.
- National Model Design Code (August 2021)²⁷: Provides detailed guidance on the production of design codes, guides and policies for local authorities and communities, to promote successful design that is good quality. The National Model Design Code forms part of the government's Planning Practice Guidance and expands on the ten characteristics of good design set out in the National Design Guide, which reflects the government's priorities and provides a common overarching framework for design.

²⁵ National Planning Practice Guidance, MHCLG, 2021. Available <u>here</u>.

²⁶ National Planning Policy Framework, MHCLG, 2021. Available <u>here</u>.

 $^{^{27}}$ National Model Design Code, MHCLG, 2021. Available <u>here</u>.

Neighbouring authorities' Local Plans

The Ashford Local Plan 2030 was adopted in February 2019. This Plan sets out the land that needs to be provided in Ashford Borough to accommodate new homes and jobs up to 2040. It contains a number of sites across the Borough proposed for development as well as establishing planning policies and guidance to ensure local development is built in accordance with the principles of sustainable development. There are no development sites within Ashford Borough that are close to Folkestone & Hythe District.

Canterbury City Council (CCC) adopted a new Local Plan in July 2017 which sets out policies and proposals for the development of land in the District until 2031. There are no development sites close to the boundary with Folkestone & Hythe district. The City Council has started a review of this plan and consulted on the future issues facing the District between July and September 2020 and a draft vision and high-level preferred options between May and August 2021. The vision for Canterbury is to provide 14,000 to 17,000 new homes by 2040, with most growth supported within Canterbury City.

Dover District Council (DDC) adopted its Core Strategy in February 2010 which allocates a number of strategic sites. The Land Allocations Local Plan was adopted in January 2015 and allocates specific sites for employment, retail and housing development to deliver the aims of the Core Strategy. DDC is currently producing a new Local Plan to cover the period 2020 to 2040. DDC consulted on the Regulation 18 draft Dover District Local Plan between January and March 2021 and is expected to consult on the Regulation 19 draft Local Plan in Winter 2021/22, with a view to adopt in February 2023. There are no development sites close to the boundary with Folkestone & Hythe District.

Rother District Council (RDC) adopted its Core Strategy in September 2014, which sets out the overall vision and objectives for development in the District to 2028. Part 2 of the Local Plan, the Development and Site Allocations Local Plan (DaSA), was adopted in December 2019 and allocates specific sites in line with the Core Strategy. There are no development sites close to the boundary with Folkestone & Hythe District. RDC is now undertaking a review of the Core Strategy Local Plan to produce a new Local Plan that covers the period 2019-2039. A Draft Local Plan will be consulted upon in late 2021 / early 2022.

This Report will be made public on 14 September 2021



Report Number: C/21/33

To: Cabinet

Date: 22nd September 2021 Status: Non Key Decision

Director: Ewan Green, Director of Place

Cabinet Member: Councillor John Collier, Portfolio holder for

Property Management and Grounds Maintenance

SUBJECT: Folca Redevelopment - New Health Centre Heads of Terms

Summary: This report sets out the proposed Heads of Terms for the delivery of the Health Centre by the Premier Primarycare Ltd following a disposal to it from the Council on the basis of a ground lease.

REASONS FOR RECOMMENDATIONS

The Council is seeking to deliver a new Health Centre as Phase 1 of the redevelopment of the Folca building. This paper seeks agreement to the proposed Heads of Terms which will guide the disposal and the development agreement.

RECOMMENDATIONS:

- 1. To receive and note report C/21/33.
- 2. Note that the provision of a new health centre is a key priority for the Council.
- 3. That the proposed Heads of Terms are agreed.
- 4. That a 150 year lease is agreed for the disposal as a Health Centre for the area proposed for a Ground Rent or Premium.
- 5. That a Premium is the proposed preferred receipt, not a Ground Rent.
- 6. To authorise the Director of Place and Director of Housing and Operations, in consultation with the Portfolio holder for Property Management and Grounds Maintenance, to complete the Heads of Terms, lease agreement and all legal agreements as required to bring forward the Health Centre.
- 7. Note that any substantive proposed change in the disposal terms will be reported back to Cabinet for a decision before proceeding.

1. Background

1.1 It is recognised that Folkestone Town Centre requires to adapt and diversify to meet the changing role of town centres and that redevelopment of Council owned assets can be a catalyst for transformation. There are 3 key strategic drivers that seek to enable this to happen:

1. The Council's Corporate Plan: Creating Together Tomorrow Folkestone

The Corporate Plan Service Ambition 3: A Vibrant Economy set out the priority action to reinvigorate high streets through investigating opportunities for diversification, attracting investment into non-retail uses, such as creative workspace, leisure, housing, cultural and heritage-related activities. The redevelopment of Folca is a priority action within the plan.

The Corporate Plan also recognises the Council's role to facilitate improvement in physical and mental health & wellbeing through working closely with the NHS Kent and Medway Clinical Commissioning Group (CCG) to identify sites for new health facilities which are modern and fit for purpose, with Folca a priority.

2. The Folkestone and Hythe Core Strategy Review 2020

The Core Strategy Review identifies the following strategic considerations for town centres:

- The challenge to improve employment, education attainment and economic performance
- The challenge to enhance maintenance and management of natural and historic assets
- The challenge to improve the quality of life and sense of place, vibrant and social mix in neighborhoods, particularly where this minimises disparities
- The challenge to plan for strategic development which fosters high quality place making with an emphasis on sustainable movement, buildings and green space.

3. The Folkestone Town Centre Place Plan (2021)

The Place Plan sets the direction for a sustainable and vibrant future for Folkestone Town Centre. Redevelopment of Folca is identified as a priority project within the Place Plan, with particular reference to interventions within the core town centre action area.

2. Folca Development - Phase 1 Proposal

- 2.1 The Council purchased Folca in 2020 on the basis that it is a significant building in the town centre and would be a catalyst to drive transformation and diversification. The purchase was based on a range of proposed uses for the building, including a new health centre, and a mixed use investment, which would add value to the town centre offer through a potential mix of new housing, retail and commercial leisure offer.
- 2.2 The objectives for the Folca building are:

- To create uses which will help bring vitality to Folkestone town centre.
- To accommodate a new Health Centre which will bring modern, state of the art facilities and help to stimulate footfall in the town centre.
- To help revitalise the town centre through links and improvements with Bouverie Place and improve the sense of place within it.
- To help make Folkestone a more attractive place to live, work and visit, so retaining local spend in the town and attracting more visitors.
- To develop an attractive building which builds on the town's history, ensuring it is of a high quality design, improving the urban aesthetic of the town.
- 2.3 The Council has progressed the development of a new medical practice in partnership with the CCG and Premier Primarycare Ltd (including 2 local GP practices at Manor Road and Guildhall Street).
- 2.4 This paper sets out the proposed Terms for the disposal of part of the Folca building to Premier Primarycare Ltd in order that a new health centre is developed.
- 2.5 The Guildhall and Manor medical practices are proposing to come together to form a large facility on the site, which will provide modern, state of the art health facilities. This will be on the site of the Victorian building (yellow on plan below), with Phase 2 being the Art Deco building to be progressed separately as a future commercial development. There is potential to include health related services (e.g. pharmacy) in the phase 2 project and this would be part of a separate commercial proposition.



2.6 The new facility will comprise:

- Primary care facility for circa 30,000 patients
- Diagnostic centre (e.g. MRI, X-Ray)
- Laboratory facilities
- Training facilities
- 2.7 The provision of a new health facility will achieve the Council's strategic objectives through:
 - Positive repurposing of a Council asset
 - Diversifying the range of uses in the town centre
 - Generating additional footfall
 - Attracting private investment
- 2.8 In taking the site forward the Council considered options with advice from Colliers Chartered Surveyors. This included granting a developer a leasehold interest in the site to generate a ground rent/premium for the Council for the new Health Centre at market rates.
- 2.9 The cost of delivering Phase 1 for the new Health Centre is estimated to be in the region of £16m and will be the responsibility of Premier Primarycare Ltd.

3. Heads of Terms

- 3.1 The proposed Heads of Terms is detailed in Appendix A (Exempt). The following is summary of the non-exempt provisions:
 - 1) Council to grant 150 year lease for occupation. Premier Primarycare Ltd may grant under lease to a third party developer but obligations to the Council will remain, such obligations the Premier Primarycare Ltd may pass on the developer partner as appropriate to ensure they are met.
 - 2) The leasehold interest cannot be assigned, sublet or transferred to any party other than FHDC without first giving the Council the first option to purchase at market value.
 - 3) Lease is contracted out of Landlord and Tenant legislation in relation to renewal at the end of the term.
 - 4) The acquisition will be subject to the following items:
 - The grant of full planning permissions for the development of the primary care centre.
 - The District Valuer (DV) undertaking a market assessment in order to confirm the rent / premium.
 - NHS Kent and Medway Clinical Commissioning Group approving the full business case and confirming the rent re-imbursement.
 - Council sign-off independently provided that the Council's requirement for best value is being secured.
 - 5) Premier Primarycare Ltd to agree with the Council the design and delivery of the building and ensure it does not impact to the detriment on the wider Folca development.

- 6) There will be termination provisions in the Agreement for Lease to ensure project delivery.
- 7) All of the terms included bear the proviso that the council, as a public authority is bound to secure market value, and more generally, 'best value' for example in relation to rent, which would be reviewed by the District Valuer and the Council's advisers.
- 8) The works to be undertaken in a way which minimises disruption on local residents and businesses as well as the future development of the wider Folca development.
- 9) The agreement is contingent upon Full Business Case being secured via the NHS Kent and Medway Clinical Commissioning Group and evidence of sufficient funding to deliver the project.
- 3.2 The disposal of the Victorian building for a new health centre seeks to drive the improvement of the town centre by helping bring vitality to the town centre, and help attract visitors and investment. To achieve this, the council is facilitating the use of the building as a new Health Centre with the proviso that it remains in this use, unless there should be an unlikely turn in the use of health facilities and it is no longer viable, in which case the Council will have first refusal to buy back the property at market value.
- 3.3 The Council will retain the freehold so as to ensure some control over the building, with the grant of a long lease of 150 years but without an automatic right to renew under the Landlord and Tenant Act.
- 3.4 It is essential that the Council's agreement with the Premier Primarycare Ltd ensures that the Council has a strong input to the design and some sign off given the importance of it to the development of the rest of Folca and indeed the town centre. This will be worded strongly to protect the Council's position in the legal documents.

4. Finances

4.1 Please refer to Appendix B (Exempt).

5. Risk Management

Perceived risk	Seriousness	Likelihood	Preventative action
Delays due to scheme complexity	Medium	Medium	GPs have specialist healthcare consultants appointed (Invicta).
Lack of stakeholder support	Low	Medium	Consultation strategy and early engagement
Project slows due to being caught up in the wider Folca/	Medium	Medium	Set the terms for any development of the town centre to require that the Folca

town centre			timetable is not
improvement			delayed.
Design risk	Medium	Medium	Planning Performance Agreement to be established.
Construction risk with linked building	Medium	Medium	Developer required to address in detailed design.
Project has detrimental impact on Folca Phase 2	Medium	Medium	Council to be involved in design/sign off and work with GP team to protect a landmark development in Folca Phase 2. Critical to project.
Agreement not reached/GPs withdraw/delay	High	Low	HoT agreed. Liaison with GPs. FHDC part of the Panel for developer selection.
Insufficient funding provided by CCG	High	Low	GPs and FHDC- regular dialogue with NHS, outline business case agreed.
Market in health collapses-GPs dispose	High	Low	Council to have first option to buy back at market value.
GPs do not complete initial tasks to allow the project to remain on track.	Medium	Low.	Deadlines set and tasks largely complete. Appointment of developer partner will allow PPA in particular to progress.

5.1 The biggest risk to date has been the GPs not confirming their procurement strategy and delivering in a timeframe which meets the Council's requirements. This has now been confirmed and the risk lowered. The main risks now relate to areas such as project complexity, design and funding which are being addressed. Stakeholder support is important due to the importance of the current building to local people and proposals to redevelop the site for healthcare use.

6. Next Steps

- Once the Heads of Terms is agreed the Primary Care Ltd will continue their procurement of a delivery partner. An Agreement to Lease subject to planning between the Council and Primary Care Ltd will be put in place based upon the agreed HoT.
- 6.2 The proposed timescale for the project is as follows, recognising that this a complex project:

Cabinet Approval to proceed with Heads	Sept 2021
of Terms	
GP's Appoint Development Partner	Sept 2021
PPA with Council LPA	Oct 2021
Agreement to Lease subject to Planning	Nov 2021
Submit planning application	Jan 2022
Planning permission	May - July 2022
Complete lease	June - Aug 2022
CCG approval	Autumn 2022
Start on site	Winter 2022 - Spring 2023
Completion	Autumn - Winter 2024

6.3 Premier Primarycare Ltd have secured advice on its delivery approach from Invicta consultants, a specialist healthcare adviser. The proposal is to deliver the facility with a 3rd party developer. The detailed design would be undertaken by a developer to meet the facility requirements.

7. IMPLICATIONS

7.1 Legal Officer's Comments (NM)

There are no legal implications arising directly from this report but when the heads of terms are agreed the legal team will assist with the instruction of external solicitors to include the involvement of a construction solicitor and the legal team will assist the external lawyers and will continue to be involved in the project as and when needed.

7.2 Finance Officer's Comments (LW)

The key financial implications arising from this report are outlined in Appendix B.

7.3 Equalities Officer's Comments (GE)

There no equality and diversity implications directly arising from this report. The proposal for Folca phase 1 provides an opportunity to bring about improved healthcare facilities for local residents to access as part of the wider vision for Folkestone Town Centre.

7.4 Climate Change Officer Comments (AT)

No direct impacts arising from this report.

The decision sits within the council's wider objective to secure the regeneration of Folkestone town centre, which would help to minimise the carbon emissions associated with new building. The revival of the town centre will also help to bring shops and services back to Folkestone which could help to reduce the need to travel and the emissions arising from travel.

8. Contact Officer and Background Documents

Councilors with any questions arising out of this report should contact the following officers prior to the meeting:

Ewan Green, Director of Place

E-mail: ewan.green@folkestone-hythe.gov.uk

Appendix A - Folca Health Centre Heads of Terms Appendix B - Folca Health Centre Finance

This report includes appendices A and B which are exempt from the public on the grounds that it is likely to disclose exempt information, as defined in paragraph 3 of Part 1 of Schedule 12A to the Local Government Act 1972:

'Information relating to the financial or business affairs of any particular person (including the authority holding that information). "Financial or business affairs" includes contemplated as well as current activities'.

Agenda Item 12

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A of the Local Government Act 1972.

Document is Restricted



By virtue of paragraph(s) 3 of Part 1 of Schedule 12A of the Local Government Act 1972.

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