

Places and Policies Local Plan

Issues and Options

Representation Form

The council is in the initial stages of producing a Places and Policies Local Plan. The first public consultation on the 'Issues and Options' stage will start on **29 January 2015** until **5pm on 11 March 2015**. We are really keen to hear your views!

The consultation documents including a summary document are available to view on the council's website <http://www.shepway.gov.uk/planningpolicy-latest-news> or hard copies will be available to view at the district council offices and public libraries throughout the district. You can make a representation directly on the consultation portal or by using this form. **Please note representations cannot be confidential.**

During the consultation period there will be the opportunity to go along to a number of staffed information points which will be spread out across the district. Details of these are on the web link above.

In order for us to process your comments most effectively please ensure that you use a separate form for each comment you wish to make and clearly reference your comment to the document.

CONTACT INFORMATION

Your details:

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Details of the organisation/individual you are representing (*if applicable*):

Person:

Organisation (*if applicable*): CPRE Kent

Address: Queens Head House, Ashford Road, Charing, Ashford, Kent, TN27 0AD

Telephone Number: 01233 714543

E-mail: brian.lloyd@cprekent.org.uk

Question Number: 1

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

Comment

CPRE Kent does not consider that the approach proposed is a sound basis on which to guide the allocation of housing across the district.

We agree that the allocation of sites should accord with the agreed settlement hierarchy and that the focus of development should be at Folkestone. However, by simply dividing proposed housing quantities by the number of settlements to arrive at a number for each settlement is mechanistic and gives no regard to the opportunities and constraints that relate to individual settlements. The approach should be more bottom-up and the council should engage directly with each of the communities to discuss with them what levels of development they would like to achieve and are prepared to accept, for example by following the approach used by Ashford Borough Council in preparing its new local plan.

It is unclear from the approach proposed how this accords with the objective set in Policy SS2 of the Core Strategy, which states that at least 65% of the proposed houses will be provided on brownfield land. Furthermore, paragraph 4.45 of the Core Strategy states that from completions and identified sources it is expected that: *“At least c. 7,500 dwellings will be on previously developed ('brownfield') land”*. This is 85.7% of the total. It is unclear how, and if, the proposed distribution meet this objective.

It is also unclear to us how the total figure of 3,355 dwellings to be accommodated in the plan is derived, as it does not tally with the information provided in the most recently published KCC Housing Information Audit (HIA). In our analysis, existing housing supply is as follows:

Housing delivered in the first years of the Plan period (2006/07 – 2013/14)	2,000
Housing to be delivered at Strategic Sites & Nickolls Quarry	3,250
Housing to be delivered from windfall sites (2018/19 – 2030/31)	975
Housing to be delivered from extant planning permissions & saved local plan	<u>1,640</u>
Total current supply	7,865

This means that to achieve the (maximum) Core Strategy target of 8,750 new homes by 2031, just 885 dwellings need to be accommodated on sites not yet identified. On

the assumption that the 1,640 new homes that already have planning permission or comprise existing saved allocations are actually included in the 3,355 dwelling target in the proposed Policy 1 (which seems to be the case from the explanation given in the consultation document), then the 3,355 figure is too high. This should in fact be 2,525 (i.e. 885 + 1,640). If the existing planning permissions/saved allocations are not included in the 3,355 figure, then where are they actually accounted for in the calculation of current supply?

So, in conclusion, we consider that:

1. the mechanistic top-down approach is wrong, and the council should engage with the individual communities to determine how much housing each community is prepared to accept having regard to opportunities available and constraints that exist;
2. the council must seek to achieve its Core Strategy objective of focusing development on brownfield sites; and
3. clarity is needed on how the total number of dwellings to be accommodated on new allocations has been determined having regard to all existing sources of supply (i.e. completions, existing planning permissions, windfalls, strategic sites allocated in the Core Strategy and allocations remaining in the saved local plan). The plan needs to be clear on how many dwellings it is seeking to accommodate on new sites.

Please return your completed form by **5pm on 11th March 2015** to planning.policy@shepway.gov.uk or by post to: Planning Policy Team, Shepway, District Council, Civic Centre, Castle Hill Avenue, Folkestone, Kent, CT20 2QY.

Question Number: 2

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

Comment

CPRE Kent has no sites it wishes to submit.

As we explain in our response to question 1, in considering sites for inclusion in the plan the council needs to ensure that the objectives for using brownfield site opportunities should be achieved and undertake genuine engagement with local communities.

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Question Number: 3

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

Comment

- a) CPRE Kent agrees that allocations for modern office development should be focussed in Folkestone town centre as suggested.
- b) CPRE Kent considers that it would be appropriate to promote employment development on the Affinity Water site at the Junction 13, this being within the defined urban area and already developed. We do not, though, consider that it would be appropriate to promote mixed use development at Junction 11. Development here, in planning terms, would be located in the open countryside completely unrelated to and detached from any existing settlement. Consequently it is an unsustainable location – its location next to a motorway junction does not mean that it is sustainable location.
- c) CPRE Kent supports the provision of small units to stimulate the creation of business start-ups, and that these should be focused at the urban areas. However, there may be opportunities for such units at other settlements in the district, and the provision of such units should be considered alongside housing proposals in discussions with local communities.
- d) No comment

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Question Number: 4

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

Comment

- a) CPRE Kent agrees that it would be appropriate to consider alternative uses for these sites.
- b) No comment
- c) No comment
- d) No comment

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Question Number: 5

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

Comment

No comment

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Question Number: 6

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

Comment

No comment

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Question Number: 7

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

Comment

CPRE Kent would agree that additional retail provision would be desirable at Hawkinge and Lydd if there was appropriate demand and a suitable site could be found within the villages. This should be discussed with the respective communities.

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Question Number: 8

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

Comment

No comment

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Question Number: 9

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

Comment

- a) CPRE Kent supports initiatives for urban and town centre regeneration.
- b) No comment
- c) No comment
- d) CPRE Kent considers that the goal of the plan should be to create sustainable communities to ensure that, as far as possible, the day-to-day needs of the local population are met. Therefore, wherever it is proposed to promote housing development it will be important to ensure that local services and facilities are available to serve an expanded population. This may require intervention as suggested.

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Question Number: 10

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

Comment

CPRE Kent considers that the housing needs of all people should be planned for. With regard to the options presented, we consider that the first preference should be to extend existing sites where this is feasible. The second preference should be to consider which, if any, of the unauthorised sites could be formalised. The third preference should be to consider providing pitches as part of the larger development sites, though we consider that it would be inappropriate to apply a specific site threshold and that the suitability of sites should be considered on a site-by-site basis depending on their location and ability to accommodate provision. Only after these three opportunities have been explored should consideration be given to new sites, and the selection of these should be considered in accordance with the criteria that are included in proposed Policy H4. We have no sites in mind.

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Question Number: 11

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

Comment

CPRE Kent would make the following points on infrastructure:

1. Drainage in the Marsh is inadequate with frequent back-ups of foul sewers in wet weather. Further housing development in this area should not proceed without improvements to this.
2. Although the recent improvements to sea defences along almost the entire Shepway coast have reduced the probability of a devastating flood in the Marsh, there still needs to be a contingency plan for dealing with widespread inundation. Such a plan would likely highlight the inadequacy of the area's roads for emergency evacuation. This would suggest improvements to the A259 (e.g. at Hammonds Corner and Brenzett) and other roads which in any case struggle to cope at peak times at present.
3. As quoted from Core Strategy Policy SS5 in paragraph 6.1 of this document *"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 Strategic Town of New Romney has been allocated for 300 plus dwellings in the Cockreed Lane Broad Location and an additional number of dwellings on other sites around the Parish which have been identified for development in the future. The present infrastructure is inadequate to cope with this level of new development. Traffic congestion easing measures are needed now without further population growth. The roads in the town are already deteriorating with the present volume of traffic. Rolfe Lane (close to the Cockreed Lane site) has collapsed leaving a sink hole with fractured sewage pipes and other utilities, that can't be repaired until the water table goes down. The junction of Ashford Road and the A259 the main route to Ashford and Folkestone is dangerous, with numerous accidents occurring at that corner with the present volume of traffic using the roads.

Medical facilities are now close to breaking point with patients waiting up to three weeks for a non-emergency appointment with their doctor. There is no Walk-In Centre or Minor Injuries Unit in the area, therefore the choice for patients are local doctor's surgeries or the Emergency Department at acute hospitals in

Ashford and Folkestone and these are all under unacceptable pressure from the present population levels.

The local schools are nearing their capacity at present population levels without further development of the type (3 bedrooms) which has been suggested, encouraging families to the area. Sufficient local educational places will be needed which will not require pupils to have to travel unacceptable distances to school.

These issues all need to be addressed given the new development proposed for the town.

4. There should be provision for a cemetery on the Marsh. Hawkinge is a prohibitive distance to travel for people without their own transport as public transport is poor.

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Question Number: 12

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

Comment

a) CPRE Kent does not consider that there needs to be any variation to the general guidance provided in the NPPF – each case/proposal should be considered on its merits against the criteria included in the NPPF.

b) No, CPRE Kent does not consider it necessary to define the term ‘close proximity’. Different types of local green spaces will be viewed differently by people depending on their typology and function, for example an area of amenity space may be of very local value whilst an area of common land may be held to be of wider value to the well-being of the community more generally.

c) No, for the same reason as given for b) above.

We note that the consultation document ask for people to put sites forward, which we welcome. We consider, though, that this should also be part of the wider engagement with local communities on the scale and location of potential development sites, as we suggest in our response to question 1.

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Question Number: 13

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

Comment

CPRE Kent does not agree with the approach proposed. The value of local green space is intrinsically a subjective one and relates to the typology of the green space, its function and, perhaps most importantly, how the community values it in the context of where it is. It is not an asset that lends itself to a process that seeks to apply a standardised assessment.

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Question Number: 14

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

Comment

CPRE Kent does not agree with the list presented. Whilst the categories listed include a wide range of areas that could be designated as local green spaces, it is not exhaustive. For example, the categories listed would essentially be seen as 'green' in nature, but rather like land in the Green Belt land so designated does not need to be 'green' as such. So, for example, a square within a town could be designated.

We consider that the council needs to have an open mind when considering potential designations and should not find itself in a position of having to reject a proposal simply because it may not comprise a category of green space included on a predetermined list. Every case needs to be considered on its merits.

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Question Number: 15

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

Comment

CPRE Kent is very keen to see the establishment of a Local List of heritage assets, with appropriate protections enshrined in policies. Please refer to our answer to question 25 (Policy HE3) below.

We support all ways to conserve and enhance heritage assets and the settings in which they can be fully appreciated. We do not in principle object to change of use if it can be implemented without removing or altering features which help people understand a building's history. The same applies to extensions and curtilage development but only if essential to achieving viable re-use.

A short list of heritage themes would be:

- Roman
- Medieval
- Military
- Maritime and Cinque Ports
- Agriculture and associated drainage and land reclamation
- Railway era (Victorian/Edwardian) including tramways.

There are, of course, overlaps for example at Folkestone Harbour.

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Question Number: 16

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

GD1

Comment

GD1: The difference in approach between options A and B is not entirely clear to us. We would not support over-prescription of design criteria and would cautiously welcome “do not necessarily respond to local characteristics”. Too many architects seem to consider responding to local characteristics means tall-roofed, clap-boarded buildings, and it would be good to see a bit more creativity in urban areas. We would, however, like to retain more conservative design in the countryside.

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Question Number: 16

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

GD2

Comment

GD2: We have no view on the provision of internal space within dwellings or minimum external distances. In principle, CPRE favours maximum use of existing urban areas over development in the countryside. Nevertheless, option C is supported if the area is otherwise poorly served by urban open space or access to the countryside and provided no great reduction in density is implied.

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Question Number: 16

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

GD3

Comment

GD3: All of the options are supported. We are particularly keen on re-development of brownfield sites and this should be the priority.

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Question Number: 16

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

GD4

Comment

GD4: Option A is supported. As drafted, option B appears less onerous than the NPPF - consideration should not be limited to downstream effects and should not be limited to mere reduction of the effect of the development. No development should be allowed to increase the flood risk to any other flood-sensitive areas – upstream or downstream (NPPF: “elsewhere”). Policies should go further to require new drainage systems to reduce the risk of flooding elsewhere where appropriate, for example where an existing impermeable site which contributes to flood risk downstream can be improved with SUDS.

At least a desk study should be submitted with an application. More detailed work may be necessary on a case-by-case basis with advice from EA.

Although required in the NPPF, it would be useful to emphasise the importance of resilient design in local policy. In this respect, we are concerned about the number of buildings in flood-risk areas being built much taller than their older neighbours. Policy should require a balance to be struck between maximising the area of resilient accommodation and minimising the impact on the street-scene.

We would urge you to develop a SUDS strategy for which a useful model might be that adopted in Ashford. It will, however, need to consider the special circumstances in some areas of Romney Marsh with a high water table where the more commonly-used SUDS techniques may be inappropriate. In some cases, additional infrastructure outside the site may deliver the lowest risk of flooding in the vicinity for the least overall cost.

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Question Number: 16

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

GD5

Comment

GD5: No comment

Please return your completed form by **5pm on 11th March 2015** to planning.policy@shepway.gov.uk or by post to: Planning Policy Team, Shepway, District Council, Civic Centre, Castle Hill Avenue, Folkestone, Kent, CT20 2QY.

Question Number: 16

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

GD6

Comment

GD6: Supported. CPRE is against the use of overhead cables and policies should also discourage unsightly telecommunications masts in rural areas.

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Question Number: 17

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

H1

Comment

H1: CPRE Kent considers that, in accordance with the NPPF, the plan (together with the Core Strategy) should seek to meet the needs of the district as identified in the SHMA. Therefore, to reflect this we consider that none of the options presented fit the bill. The approach should be to set a district-wide policy on the mix of dwelling sizes, reflecting the needs identified – though we accept that the SHMA may suggest that the mix may vary for place to place so perhaps consideration should be given to variations in the mix for each of the three district character areas as defined in the Core Strategy. Sites, either individually or collectively, should therefore be planned on the basis of the mix defined either for the district or the character area in which it sits.

We do not consider that the mix should be artificially skewed towards family housing if the evidence suggests that it is smaller properties that should be provided.

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Question Number: 17

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

H2

Comment

H2: CPRE Kent considers that Option A should be the preferred approach. We do not consider that in principle the development of back gardens should be ruled out, nor do we consider that it should be promoted either generally or in specific areas. Consequently, Options B & C should be rejected. We consider that Option A enables proposals to be considered on their merits.

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Question Number: 17

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

H3

Comment

H3: CPRE Kent considers that the council should seek to identify sites in the plan. See our response to question 10.

Please return your completed form by **5pm on 11th March 2015** to planning.policy@shepway.gov.uk or by post to: Planning Policy Team, Shepway, District Council, Civic Centre, Castle Hill Avenue, Folkestone, Kent, CT20 2QY.

Question Number: 17

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

H4

Comment

H4: Whilst CPRE Kent considers that the best approach to meeting the needs of gypsies and travellers is to identify sites, it will be prudent to include a general policy against which applications can be considered. Of the two options presented, we would favour Option B but we would wish the words "*inside and outside*" to be changed to "*within or adjoining*" as used in Option A. We would also question why in the two options criterion b is expressed differently, i.e. "*appropriately landscaped*" versus "*appropriately screened*". Does the council see one of these being lesser than the other?

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Question Number: 17

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

H5

Comment

H5: CPRE Kent considers that the plan should provide general guidance on density across the district, which we would expect to be highest in the town centres, and then decreasing sequentially outwards. The objective should be to maximise densities throughout the district, not just in the urban areas, though having regard to local character.

In setting yields from individual sites we would expect these to make the most efficient use of land.

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Question Number: 17

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

H6

Comment

H6: No comment

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Question Number: 17

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

H7

Comment

H7: CPRE Kent would favour Option A.

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Question Number: 17

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

H8

Comment

H8: CPRE Kent would favour Option A

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Question Number: 17

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

H9

Comment

H9: No comment

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Question Number: 18

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

E1

Comment

E1: CPRE Kent accepts both options

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Question Number: 18

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

E2

Comment

E2: CPRE Kent would not object to either option

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Question Number: 18

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

E3

Comment

E3: CPRE Kent would favour Option A. In particular the policy should seek to ensure that new economic development incorporates proposals for renewable energy, for example by way of roof top solar panels.

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Question Number: 18

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

E4

Comment

E4: CPRE Kent would favour a hybrid of Options A & B so that sites are designated for economic development for a particular type of use (and size, for example if the site is being proposed for starter units), but allowing some flexibility in alternative employment generating development if evidence shows that the site cannot be developed as proposed.

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Question Number: 18

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

E5

Comment

E5: CPRE Kent accepts Option B provided clear evidence is provided to demonstrate that the site is no longer viable or suitable for any form of employment development.

We do not agree with Option A, as in order to ensure that sites designated for employment development are actually developed encouragement should not be given to employment development elsewhere. Indeed, the plan should make it clear that planning permission will not be given for employment development outside of the designated areas.

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Question Number: 18

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

E6

Comment

E6: CPRE Kent would generally agree with all the options. The plan needs to make sure that in order to ensure that communities are sustainable, employment development should go hand-in-hand with housing development.

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Question Number: 18

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

E7

Comment

E7: CPRE Kent considers that the objective should be to provide a range of opportunities on sites, but that this should not be prescriptive. Therefore, we consider that options B & C are preferable.

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Question Number: 18

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

E8

Comment

E8: CPRE Kent agrees that the plan needs to have a policy that protects the vitality and viability of town centres and that they continue to be seen as the centre of the community. To this end, and of the options presented, we would support Option A.

Please return your completed form by **5pm on 11th March 2015** to planning.policy@shepway.gov.uk or by post to: Planning Policy Team, Shepway, District Council, Civic Centre, Castle Hill Avenue, Folkestone, Kent, CT20 2QY.

Question Number: 18

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

E9

Comment

E9: CPRE Kent would favour Option A

Please return your completed form by **5pm on 11th March 2015** to planning.policy@shepway.gov.uk or by post to: Planning Policy Team, Shepway, District Council, Civic Centre, Castle Hill Avenue, Folkestone, Kent, CT20 2QY.

Question Number: 18

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

E10

Comment

E10: No comment

Please return your completed form by **5pm on 11th March 2015** to planning.policy@shepway.gov.uk or by post to: Planning Policy Team, Shepway, District Council, Civic Centre, Castle Hill Avenue, Folkestone, Kent, CT20 2QY.

Question Number: 18

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

E11

Comment

E11: No comment

Please return your completed form by **5pm on 11th March 2015** to planning.policy@shepway.gov.uk or by post to: Planning Policy Team, Shepway, District Council, Civic Centre, Castle Hill Avenue, Folkestone, Kent, CT20 2QY.

Question Number: 18

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

E12

Comment

E12: No comment

Please return your completed form by **5pm on 11th March 2015** to planning.policy@shepway.gov.uk or by post to: Planning Policy Team, Shepway, District Council, Civic Centre, Castle Hill Avenue, Folkestone, Kent, CT20 2QY.

Question Number: 18

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

E13

Comment

E13: CPRE Kent would favour Option A and the first *'and/or'*.

Please return your completed form by **5pm on 11th March 2015** to planning.policy@shepway.gov.uk or by post to: Planning Policy Team, Shepway, District Council, Civic Centre, Castle Hill Avenue, Folkestone, Kent, CT20 2QY.

Question Number: 18

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

E14

Comment

E14: CPRE Kent would favour the second option, though we would support up-grading of existing sites

Please return your completed form by **5pm on 11th March 2015** to planning.policy@shepway.gov.uk or by post to: Planning Policy Team, Shepway, District Council, Civic Centre, Castle Hill Avenue, Folkestone, Kent, CT20 2QY.

Question Number: 19

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

C1

Comment

C1: CPRE Kent considers that the proposed policy should embrace both options

Please return your completed form by **5pm on 11th March 2015** to planning.policy@shepway.gov.uk or by post to: Planning Policy Team, Shepway, District Council, Civic Centre, Castle Hill Avenue, Folkestone, Kent, CT20 2QY.

Question Number: 19

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

C2

Comment

C2: CPRE Kent would support options A & B. However, we consider that development on existing open space should only be sanctioned if there is a positive net benefit for the community and that it is supported by the community.

Option C would seem to be a matter covered by proposed policies E8 & E9.

Please return your completed form by **5pm on 11th March 2015** to planning.policy@shepway.gov.uk or by post to: Planning Policy Team, Shepway, District Council, Civic Centre, Castle Hill Avenue, Folkestone, Kent, CT20 2QY.

Question Number: 19

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

C3

Comment

C3: CPRE Kent considers that both options should be incorporated into the proposed policy. In addition, the policy should make it clear that all developments should seek to provide additional open space on-site to meet the needs of the residents but that if this is not possible commuted payments will be made towards provision off-site.

Please return your completed form by **5pm on 11th March 2015** to planning.policy@shepway.gov.uk or by post to: Planning Policy Team, Shepway, District Council, Civic Centre, Castle Hill Avenue, Folkestone, Kent, CT20 2QY.

Question Number: 19

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

C4

Comment

C4: CPRE Kent favours Option A. However, the criteria should not be based on the Kent Downs AONB good practice guidance – they should be applied in full.

Please return your completed form by **5pm on 11th March 2015** to planning.policy@shepway.gov.uk or by post to: Planning Policy Team, Shepway, District Council, Civic Centre, Castle Hill Avenue, Folkestone, Kent, CT20 2QY.

Question Number: 19

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

C5

Comment

C5: CPRE Kent support Option A. This should highlight in particular landscape considerations and the retention of tranquillity.

Please return your completed form by **5pm on 11th March 2015** to planning.policy@shepway.gov.uk or by post to: Planning Policy Team, Shepway, District Council, Civic Centre, Castle Hill Avenue, Folkestone, Kent, CT20 2QY.

Question Number: 19

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

C6

Comment

C6: CPRE Kent considers that the proposed policy should incorporate all three options presented.

Please return your completed form by **5pm on 11th March 2015** to planning.policy@shepway.gov.uk or by post to: Planning Policy Team, Shepway, District Council, Civic Centre, Castle Hill Avenue, Folkestone, Kent, CT20 2QY.

Question Number: 19

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

C7

Comment

C7: CPRE Kent would favour the second option, but amended to read as follows:

“The Council will protect and safeguard the extent of the district’s designated Local Green Spaces, as shown on the Policies Map, by applying the same level of protection afforded to Green Belts in national planning policy which will ensure their continued openness, permanence and special quality. Other than in very special circumstances development affecting a designated Local Green Space will not be permitted.”

Please return your completed form by **5pm on 11th March 2015** to planning.policy@shepway.gov.uk or by post to: Planning Policy Team, Shepway, District Council, Civic Centre, Castle Hill Avenue, Folkestone, Kent, CT20 2QY.

Question Number: 19

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

C8

Comment

C8: CPRE Kent agrees that a policy on Public Rights of Way (PROW) should be included in the plan. We consider that such a policy should give a commitment to protecting and maintaining the existing network and a commitment to expanding the network. With regard to delivering the latter commitment, Option B should be included in the policy. With regard to Option A, though, whilst we would fully support this we consider that it is unlikely that the council will have the ability to deliver such proposals. Therefore, we would support the identification of specific proposals if they can be delivered but we think a more general commitment to looking for opportunities might be the more realistic approach.

Please return your completed form by **5pm on 11th March 2015** to planning.policy@shepway.gov.uk or by post to: Planning Policy Team, Shepway, District Council, Civic Centre, Castle Hill Avenue, Folkestone, Kent, CT20 2QY.

Question Number: 19

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

C9

Comment

C9: CPRE Kent is opposed to the major development proposed at Princess Parade, and so we reject the first option. Whilst there might be some scope for minor development here, as suggested in the third option, we consider that the Council needs to look for alternative site for the major development proposed as suggested in the second option.

Please return your completed form by **5pm on 11th March 2015** to planning.policy@shepway.gov.uk or by post to: Planning Policy Team, Shepway, District Council, Civic Centre, Castle Hill Avenue, Folkestone, Kent, CT20 2QY.

Question Number: 19

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

Cemetery provision

Comment

CPRE Kent considers that if there is an identified need for a new cemetery in the district then the plan should make a specific allocation rather than present a general policy setting down criteria.

Please return your completed form by **5pm on 11th March 2015** to planning.policy@shepway.gov.uk or by post to: Planning Policy Team, Shepway, District Council, Civic Centre, Castle Hill Avenue, Folkestone, Kent, CT20 2QY.

Question Number: 19

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

Any other policies?

Comment

CPRE Kent would wish to see a policy included in the plan that recognises the importance of historic rural lanes and that they should be protected from development impacts that would undermine their intrinsic character.

Please return your completed form by **5pm on 11th March 2015** to planning.policy@shepway.gov.uk or by post to: Planning Policy Team, Shepway, District Council, Civic Centre, Castle Hill Avenue, Folkestone, Kent, CT20 2QY.

Question Number: 20

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

T1

Comment

T1: CPRE Kent would prefer Option B: produce new Shepway adopted parking standards based on local circumstances which should include providing parking wherever possible in new developments.

Also using section 106 contributions to make improvements to public transport and safe walking and cycling.

We would also support options C and D.

Please return your completed form by **5pm on 11th March 2015** to planning.policy@shepway.gov.uk or by post to: Planning Policy Team, Shepway, District Council, Civic Centre, Castle Hill Avenue, Folkestone, Kent, CT20 2QY.

Question Number: 20

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

T2

Comment

T2: CPRE Kent would support Option A for non-car based modes of transport. We would also support Option C maximizing permeability and enhancing pedestrian and cycle access. However sufficient parking must be provided, in order to minimize the impact of parking in adjacent areas.

Provision of home zones and other pedestrian priority roads and spaces (Option E) is commendable, but sufficient parking is required, particularly in rural areas and where there is poor public transport.

Please return your completed form by **5pm on 11th March 2015** to planning.policy@shepway.gov.uk or by post to: Planning Policy Team, Shepway, District Council, Civic Centre, Castle Hill Avenue, Folkestone, Kent, CT20 2QY.

Question Number: 20

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

T3

Comment

T3: CPRE Kent considers that the policy should include all three options. We consider that all developments of over 10 dwellings or over 1000sq metres gross of commercial floor space should incorporate facilities for charging plug in vehicles and encourage use of ultra-low emission vehicles. They must also include a travel plan demonstrating how the development will achieve the objectives of sustainable development, and make provision for disabled, cycle and motor cycle parking.

Please return your completed form by **5pm on 11th March 2015** to planning.policy@shepway.gov.uk or by post to: Planning Policy Team, Shepway, District Council, Civic Centre, Castle Hill Avenue, Folkestone, Kent, CT20 2QY.

Question Number: 20

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

T4

Comment

T4: CPRE Kent considers that the proposed policy should include both options

Please return your completed form by **5pm on 11th March 2015** to planning.policy@shepway.gov.uk or by post to: Planning Policy Team, Shepway, District Council, Civic Centre, Castle Hill Avenue, Folkestone, Kent, CT20 2QY.

Question Number: 20

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

T5

Comment

T5: CPRE Kent favours Option A. As said before all major residential, commercial and mixed use development should:

- Promote measures to increase the use of public transport, cycling and walking.
- Provide direct investment to improve the above, including provision in the layout to allow penetration by buses.
- Have a positive impact on sustainable travel and on safety for other road users including pedestrians

Please return your completed form by **5pm on 11th March 2015** to planning.policy@shepway.gov.uk or by post to: Planning Policy Team, Shepway, District Council, Civic Centre, Castle Hill Avenue, Folkestone, Kent, CT20 2QY.

Question Number: 20

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

T6

Comment

T6: CPRE Kent would favour the continuation of Policy TR15. There is no basis for a new policy because nothing has changed apart from the airport being able to operate larger aircraft when the runway is extended. The airport itself has said in the past the airport land would only be for aviation activity.

Please return your completed form by **5pm on 11th March 2015** to planning.policy@shepway.gov.uk or by post to: Planning Policy Team, Shepway, District Council, Civic Centre, Castle Hill Avenue, Folkestone, Kent, CT20 2QY.

Question Number: 20

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

T7

Comment

T7: CPRE Kent favours Option B. Proposals for small lorry parks will only be approved where it can be demonstrated that they:

- Provide good access to the M20, without disruption to minor roads
- No impact on the AONB or other landscape designations, natural or ecological features.
- Have no impact on villages or small settlements in the vicinity.

The Policy should also include a criterion which protects high quality agricultural land.

Lorry parking must be accessible, unobtrusive, and enforceable. It should provide facilities for the drivers especially waste disposal which would improve the litter problem encountered wherever there are lorries.

We do not support concreting over large areas of the countryside to provide lorry parking, particularly for operation stack which does not occur frequently enough to justify the expense. Brownfield sites should be used where possible.

Please return your completed form by **5pm on 11th March 2015** to planning.policy@shepway.gov.uk or by post to: Planning Policy Team, Shepway, District Council, Civic Centre, Castle Hill Avenue, Folkestone, Kent, CT20 2QY.

Question Number: 21

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

NE1

Comment

NE1: CPRE Kent is unclear what exactly the intention of this policy is. We would support a policy that seeks to ensure greater accessibility for pedestrians and cyclists both within the urban areas between open spaces and also from the urban areas into the countryside.

Please return your completed form by **5pm on 11th March 2015** to planning.policy@shepway.gov.uk or by post to: Planning Policy Team, Shepway, District Council, Civic Centre, Castle Hill Avenue, Folkestone, Kent, CT20 2QY.

Question Number: 21

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

NE2

Comment

NE2: CPRE Kent does not support the principle of biodiversity off-setting, as the priority should be to ensure that development does not take place on areas designated for their biodiversity interest. If biodiversity off-setting is considered appropriate, we cannot see why the proposed policy cannot incorporate both options.

Please return your completed form by **5pm on 11th March 2015** to planning.policy@shepway.gov.uk or by post to: Planning Policy Team, Shepway, District Council, Civic Centre, Castle Hill Avenue, Folkestone, Kent, CT20 2QY.

Question Number: 21

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

NE3

Comment

NE3: CPRE Kent considers it vitally important that the plan includes a comprehensive policy approach that protects the district's landscapes and countryside generally. We consider that the council needs to pursue all three options. In option C, however, the policy should seek to protect all the landscapes of the district, not just those that abut the AONB, though the Policy must recognise that the setting of the AONB must be specifically protected.

Please return your completed form by **5pm on 11th March 2015** to planning.policy@shepway.gov.uk or by post to: Planning Policy Team, Shepway, District Council, Civic Centre, Castle Hill Avenue, Folkestone, Kent, CT20 2QY.

Question Number: 21

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

NE4

Comment

NE4: CPRE Kent considers that to ensure the protection of important habitats and biodiversity generally a comprehensive policy approach is needed that embraces all levels of nature conservation importance. To this end all three options should be pursued.

Please return your completed form by **5pm on 11th March 2015** to planning.policy@shepway.gov.uk or by post to: Planning Policy Team, Shepway, District Council, Civic Centre, Castle Hill Avenue, Folkestone, Kent, CT20 2QY.

Question Number: 21

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

NE5

Comment

NE5: CPRE Kent considers that all four options should be incorporated into plan policies.

Please return your completed form by **5pm on 11th March 2015** to planning.policy@shepway.gov.uk or by post to: Planning Policy Team, Shepway, District Council, Civic Centre, Castle Hill Avenue, Folkestone, Kent, CT20 2QY.

Question Number: 21

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

NE6

Comment

NE6: CPRE Kent considers that both options should be addressed by the plan.

Please return your completed form by **5pm on 11th March 2015** to planning.policy@shepway.gov.uk or by post to: Planning Policy Team, Shepway, District Council, Civic Centre, Castle Hill Avenue, Folkestone, Kent, CT20 2QY.

Question Number: 21

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

NE7

Comment

NE7: CPRE Kent considers that the first option should be pursued in the plan.

Please return your completed form by **5pm on 11th March 2015** to planning.policy@shepway.gov.uk or by post to: Planning Policy Team, Shepway, District Council, Civic Centre, Castle Hill Avenue, Folkestone, Kent, CT20 2QY.

Question Number: 21

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

Any other policies?

Comment

CPRE Kent considers that there are two additional policies that need to be included in the Plan:

Tranquillity

The need to retain tranquillity should be specifically recognised as an issue in the plan. Pioneering work undertaken by CPRE nationally shows that the rural part of Shepway shows a high degree of tranquillity, especially in the Romney Marsh – see: <http://www.cpre.org.uk/resources/countryside/tranquil-places/item/download/325>.

We would refer you to how Swale Borough Council addresses the issues of tranquillity in its pre-submission plan (see pages 219-220 of http://swale-consult.limehouse.co.uk/events/24481/3235702_accessible.pdf).

Dark Skies

The importance of ‘dark skies’ should be acknowledged in the plan and we would urge the Council to work towards developing a dark skies policy along similar lines to that adopted by Ashford Borough Council – see:

<http://www.ashford.gov.uk/?page=dark-skies-spd-2014>

Please return your completed form by **5pm on 11th March 2015** to planning.policy@shepway.gov.uk or by post to: Planning Policy Team, Shepway, District Council, Civic Centre, Castle Hill Avenue, Folkestone, Kent, CT20 2QY.

Question Number: 22

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

CP1

Comment

CP1: CPRE Kent supports the first option, but considers that coastal change management plans (option 2) would more sensibly be prepared as Supplementary Planning Documents to enable the necessary level of detail to be presented.

Please return your completed form by **5pm on 11th March 2015** to planning.policy@shepway.gov.uk or by post to: Planning Policy Team, Shepway, District Council, Civic Centre, Castle Hill Avenue, Folkestone, Kent, CT20 2QY.

Question Number: 22

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

CP2

Comment

CP2: CPRE Kent considers that all three options should be incorporated in the proposed policy.

Please return your completed form by **5pm on 11th March 2015** to planning.policy@shepway.gov.uk or by post to: Planning Policy Team, Shepway, District Council, Civic Centre, Castle Hill Avenue, Folkestone, Kent, CT20 2QY.

Question Number: 22

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

CP3

Comment

CP3: CPRE Kent considers that the plan should continue to protect the defined undeveloped coasts as per the first and third options. If there are other areas of undeveloped coast that need to be identified, then this should also be done. We would support the designation of additional areas of Heritage Coast.

Please return your completed form by **5pm on 11th March 2015** to planning.policy@shepway.gov.uk or by post to: Planning Policy Team, Shepway, District Council, Civic Centre, Castle Hill Avenue, Folkestone, Kent, CT20 2QY.

Question Number: 23

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

CC1

Comment

CC1: CPRE Kent supports Option A, but the policy should also require the installation of domestic scale renewable energy – e.g. roof top solar.

Please return your completed form by **5pm on 11th March 2015** to planning.policy@shepway.gov.uk or by post to: Planning Policy Team, Shepway, District Council, Civic Centre, Castle Hill Avenue, Folkestone, Kent, CT20 2QY.

Question Number: 23

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

CC2

Comment

CC2: CPRE Kent considers that in accordance with Option B the Council should carry out a study to identify those parts of the district that could be suitable for wind turbine development. This will narrow the area of search for potential applicants and avoid speculative applications in unacceptable locations. However, this study needs to be supported by a policy in the plan that sets out the criteria against which schemes will be assessed. We consider that Option A would present the basis for this, both for new proposals and extensions to existing sites. The policy, though, should also refer to efficiency requirements and also include requirements for sites to be re-instated to their original state following decommissioning.

With regard to proposals in the AONB we consider that there should be a presumption against the development of any wind turbines unless it can be clearly demonstrated that they would not undermine scenic beauty and the purpose of the AONB. Specific regard will need to be given to the guidance prepared by the Kent Downs AONB Unit.

Please return your completed form by **5pm on 11th March 2015** to planning.policy@shepway.gov.uk or by post to: Planning Policy Team, Shepway, District Council, Civic Centre, Castle Hill Avenue, Folkestone, Kent, CT20 2QY.

Question Number: 23

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

CC3

Comment

CC3: CPRE Kent favour Option B, though this should additionally include a criterion related to distance from the built development. It should be the objective that turbines are located as close as possible to the built development they serve but away from neighbouring development and avoiding impact any sensitive receptors.

As a point of fact, ground source heating is not renewable energy. A better example would be roof-top solar.

Please return your completed form by **5pm on 11th March 2015** to planning.policy@shepway.gov.uk or by post to: Planning Policy Team, Shepway, District Council, Civic Centre, Castle Hill Avenue, Folkestone, Kent, CT20 2QY.

Question Number: 23

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

CC4

Comment

CC4: CPRE Kent favour Option B, but the policy should additionally explain that:

- It is the council's preference for solar provision to be made on brownfield land or on roof-tops;
- In criterion 1, that there should not be any adverse effect on the setting of the AONB;
- In criterion 4, there should be ecological enhancements; and
- If the site does involve good quality agricultural land, then any soil removed is stored so that it can be replaced when the site is de-commissioned.

Please return your completed form by **5pm on 11th March 2015** to planning.policy@shepway.gov.uk or by post to: Planning Policy Team, Shepway, District Council, Civic Centre, Castle Hill Avenue, Folkestone, Kent, CT20 2QY.

Question Number: 23

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

CC5

Comment

CC5: CPRE Kent notes that no alternative options are presented here. Notwithstanding this, we consider that the Council should produce a renewable energy strategy, which promotes a range of opportunities. However, we do not consider it appropriate to identify sites as other policies in the Plan, e.g. CC2 & CC4, will provide general guidance.

Please return your completed form by **5pm on 11th March 2015** to planning.policy@shepway.gov.uk or by post to: Planning Policy Team, Shepway, District Council, Civic Centre, Castle Hill Avenue, Folkestone, Kent, CT20 2QY.

Question Number: 23

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

CC6

Comment

CC6: See our response to proposed Policy T3, which seems to have the same scope.

Please return your completed form by **5pm on 11th March 2015** to planning.policy@shepway.gov.uk or by post to: Planning Policy Team, Shepway, District Council, Civic Centre, Castle Hill Avenue, Folkestone, Kent, CT20 2QY.

Question Number: 23

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

CC7

Comment

CC7: No comment

Please return your completed form by **5pm on 11th March 2015** to planning.policy@shepway.gov.uk or by post to: Planning Policy Team, Shepway, District Council, Civic Centre, Castle Hill Avenue, Folkestone, Kent, CT20 2QY.

Question Number: 23

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

CC8

Comment

CC8: CPRE Kent favours Option A.

Please return your completed form by **5pm on 11th March 2015** to planning.policy@shepway.gov.uk or by post to: Planning Policy Team, Shepway, District Council, Civic Centre, Castle Hill Avenue, Folkestone, Kent, CT20 2QY.

Question Number: 23

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

CC9

Comment

CC9: CPRE Kent would support either Option A or B, with a preference for the target to be set as low as possible. Option C should be rejected.

Please return your completed form by **5pm on 11th March 2015** to planning.policy@shepway.gov.uk or by post to: Planning Policy Team, Shepway, District Council, Civic Centre, Castle Hill Avenue, Folkestone, Kent, CT20 2QY.

Question Number: 24

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

HW1

Comment

HW1: No comment

Please return your completed form by **5pm on 11th March 2015** to planning.policy@shepway.gov.uk or by post to: Planning Policy Team, Shepway, District Council, Civic Centre, Castle Hill Avenue, Folkestone, Kent, CT20 2QY.

Question Number: 24

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

HW2

Comment

HW2: No comment

Please return your completed form by **5pm on 11th March 2015** to planning.policy@shepway.gov.uk or by post to: Planning Policy Team, Shepway, District Council, Civic Centre, Castle Hill Avenue, Folkestone, Kent, CT20 2QY.

Question Number: 24

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

HW3

Comment

HW3: CPRE Kent supports Option A, but it could also additionally highlight the benefits to health of an accessible countryside.

Please return your completed form by **5pm on 11th March 2015** to planning.policy@shepway.gov.uk or by post to: Planning Policy Team, Shepway, District Council, Civic Centre, Castle Hill Avenue, Folkestone, Kent, CT20 2QY.

Question Number: 25

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

General

Comment

CPRE Kent welcomes the proposal to commission a Heritage Strategy. We trust that in addition to the archaeological, architectural, artistic and historic significance the project will take note of the social and communal value of heritage assets as recommended by English Heritage (Historic England from 1 April 2015).

Please return your completed form by **5pm on 11th March 2015** to planning.policy@shepway.gov.uk or by post to: Planning Policy Team, Shepway, District Council, Civic Centre, Castle Hill Avenue, Folkestone, Kent, CT20 2QY.

Question Number: 25

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

HE1

Comment

HE1: CPRE Kent supports the proposed Option A.

Please return your completed form by **5pm on 11th March 2015** to planning.policy@shepway.gov.uk or by post to: Planning Policy Team, Shepway, District Council, Civic Centre, Castle Hill Avenue, Folkestone, Kent, CT20 2QY.

Question Number: 25

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

HE2

Comment

HE2: We recognise the potential value in creating modern buildings sympathetic in style to nearby heritage assets so we support in principle Option B as an addition to A. We are however uncomfortable with the wording which implies that modern architecture is particularly welcome where the existing character is “poorly defined”. In fact, the reverse is true; a more sensitive design will be needed to bring out the best in the existing buildings in these cases. Please also refer to our comments on local architectural features and materials under General Development.

Please return your completed form by **5pm on 11th March 2015** to planning.policy@shepway.gov.uk or by post to: Planning Policy Team, Shepway, District Council, Civic Centre, Castle Hill Avenue, Folkestone, Kent, CT20 2QY.

Question Number: 25

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

HE3

Comment

HE3: CPRE Kent strongly supports Option A. The production of a Local List of heritage assets should enable better-informed planning decisions and importantly let the public have their say about what they consider of value in their district. The policy should also make clear that omission of any building from a local list does not necessarily imply its heritage significance may be neglected in any development proposals. Option B should also apply as a minimum requirement as specified in the NPPF. Option C is also supported.

Please return your completed form by **5pm on 11th March 2015** to planning.policy@shepway.gov.uk or by post to: Planning Policy Team, Shepway, District Council, Civic Centre, Castle Hill Avenue, Folkestone, Kent, CT20 2QY.

Question Number: 25

Development Management Policy Number (where applicable) - Please refer to pages 22-24 of the Executive Summary for clarification.

Any other policies?

Comment

CPRE Kent considers that a detailed policy on development affecting listed buildings and their setting should be included in the plan.

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