

**Appendix 2**

The table below sets out comments made by Folkestone and Hythe District Council on the Kent Downs AONB Draft Management Plan 2020 – 2025 during the public consultation in 2020:

<b>Section/ Question</b>	<b>Council’s Comment</b>	<b>AONB Unit Response (where applicable)</b>
The vision for the Kent Downs AONB in 2030	Folkestone and Hythe District Council broadly support the draft plan.	
The principles for management of the Kent Downs AONB	It is important to note that although the district authority will give ‘high priority to the AONB Management Plan vision, aims and principles in taking forward their relevant functions’ (MM2), in regard to planning applications, each development will be looked at on its own merits. The Plan forms a material consideration, however this will need to be balanced alongside other planning considerations in accordance with the councils duties under Section 85 of the 2000 CROW Act and to achieve sustainable development.	Noted and understood – we think this is covered in the narrative of the plan
The principles for sustainable development	<p>We note the changes in regard to the setting of the AONB to reflect national guidance (NPPF Para 172). The extent to which the AONB setting is relevant for planning purposes depends on the development proposed.</p> <p>However, a number of factors are relevant in determining the setting:</p> <ul style="list-style-type: none"> <li>• Natural and man-made barriers;</li> </ul>	Noted, we think that the section on the setting covers most of the issues in the bullet points – the section on the setting also no longer specifically highlights views from the escarpment relying instead on referencing ‘qualities of the AONB which were instrumental in reasons for its designation’

Kent Downs AONB Management Plan

	<ul style="list-style-type: none"> <li>• Contrast between higher and lower ground;</li> <li>• Distance from the AONB boundary;</li> <li>• The nature of the proposed change;</li> <li>• The scale, height, siting, use, materials and design of the development;</li> <li>• Other related effects, such as increased traffic, loss of tranquillity, lighting, noise, dust, vibration and loss or harm to biodiversity, heritage assets and the natural landscape.</li> </ul> <p>The Council will continue to work closely with AONB unit on developing our plans, the planning application for the Otterpool Park garden settlement and changes to the national planning system as set out in the Government’s White Paper.</p>	<p>The section on the setting points to the setting position statement which covers the points in further detail we think</p> <p>We are keen to continue to work with the Council over the Otterpool Park and other planning matters – we think the Sustainable Development and Management Sections of the plan cover this kind of positive working relationship with local authority partners</p>
<p>The sustainable management of woodlands and trees</p>	<p>The final AONB Management Plan will need to take account of the proposals emerging from the Government’s England Tree Strategy and the Environment Bill. Of particular importance will be the Government’s intention to:</p> <p>“... bring together the energies of local communities, local government, businesses, farmers, other land managers and investors in empowered and informed local partnerships. These partnerships could decide local priorities for woodland creation, identifying the best places to plant the right trees. For example, they could map and plan tree planting to protect, create and connect habitats as a contribution to the Nature</p>	<p>Agreed – the plan is amended to reflect.</p>

Kent Downs AONB Management Plan

	<p>Recovery Network, safeguard pre-historic and historic features, provide access for people, and naturally manage water flow and quality as part of a catchment based approach.”</p> <p>The AONB Management Plan will need to consider how it can contribute to this partnership approach.</p>	
<p>Vision for historic and cultural heritage</p>	<p>The council strongly agrees with the vision for the AONB’s historic and cultural heritage but believes it could be strengthened by referring to the importance of finding viable uses for heritage assets. The council has completed a heritage strategy which contains a comprehensive assessment of the district’s heritage and recommendations for its conservation and enhancement, covering the AONB, its wider setting and other parts of Folkestone &amp; Hythe district. The NPPF states that plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect and decay. A key way of achieving this is to put them to viable uses consistent with their conservation, as the district council is doing with Westenhanger Castle, just outside the AONB, by integrating it into the proposed new garden settlement.</p> <p>Reference to the environmental performance of historic buildings in the vision may need to be revisited in light of current proposals in the</p>	<p>Reference to supporting local heritage strategies has been added</p> <p>There appears to be uncertainty about the status of the planning White Paper and so we have not amended the plan,</p>

## Kent Downs AONB Management Plan

	<p>Government's planning White Paper which states:</p> <p>“We will, therefore, review and update the planning framework for listed buildings and conservation areas, to ensure their significance is conserved while allowing, where appropriate, sympathetic changes to support their continued use and address climate change. In doing so, we want to explore whether there are new and better ways of securing consent for routine works, to enable local planning authorities to concentrate on conserving and enhancing the most important historic buildings. This includes exploring whether suitably experienced architectural specialists can have earned autonomy from routine listed building consents.”</p>	<p>the adopted plan will operate in the context of any new legislation however</p>
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In February 2021 the Council requested a further clarification on the final draft plan regarding the wording used around the support of the AONB Partnership to Kent Nature Partnerships proposal for 20% Biodiversity Net Gain, asking that it is made clearer that the support for the 20% is still subject to further evidence and testing and any requirement will ultimately be decided and set out in individual authorities' local plans.