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Strategic Housing Land Availability Assessment (SHLAA) 2009/2010

Consolidated Document

Folkestone
Hythe & Romney Marsh
Shepway District Council
www.shepway.gov.uk

Shepway Local Development Framework

Shepway Planning Policy Team

Strategic Housing Land Availability Assessment (SHLAA) 2009/2010

Consolidated Document

SHEPWAY LOCAL DEVELOPMENT FRAMEWORK

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Shepway LDF
Strategic Housing Land Availability Assessment (SHLAA) 2009/10

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LOCAL DEVELOPMENT FRAMEWORK (LDF)

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IMPORTANT SHLAA NOTE:

SHLAA evidence is produced to inform the district's Local Development Framework (LDF) and is not considered material to any planning application. The SHLAA cannot 'allocate sites' for development. For any development to be delivered, additional examination of - and public consultation on - sites will take place through planning applications and LDF processes.
Views expressed are officer opinion only.

April 2010

SHEPWAY DISTRICT COUNCIL

Introduction to this Consolidated Document version

This document is intended to be a comprehensive guide to Shepway's Strategic Housing Land Availability Assessment (SHLAA), applicable from 2009/2010. For ease of use the separate sections on overall evaluation, the findings reported, and the process, may be read individually; although they may not be fully freestanding (although as the pre-published results, Section B generally provides a good SHLAA overview).

The document brings together Assessment findings and documents published in 2009, together with further explanation, evaluation and mapping. (Previously published information in Sections B, C and the Appendices are shown in italics).

The Shepway LDF SHLAA Project Methodology has not been included within this document and remains the main local methodological guide. Further details on individual sites and completed forms are available through examination of Assessment files, containing completed forms.

Glossary of terms and abbreviations

Achievable	The third set of Shepway *SHLAA* criteria, which are generally financial considerations: marketing factors, development and private infrastructure costs, and delivery rates.
Adj.	Adjacent to.
Affordable Housing	Affordable housing includes social rented and intermediate housing, provided to specified eligible households whose needs are not met by the market.
AMR	Annual Monitoring Report: an analysis of the performance of planning policies, in particular taking account of core indicators set out in terms of existing policies. It also refers to the *LDS* and the milestones contained within the scheme.
Available	The second set of Shepway *SHLAA* criteria, such as: legal or ownership constraints.
Community Plan	Formally known as the 'Sustainable Communities Strategy'. Prepared under the Local Government Act 2000 by a Local Strategic Partnership. The Community Plan referred to in *SHLAA Suitability* forms was a district-wide overarching document, with the aim of improving the social, environmental and economic well being of the area. The formal Sustainable Communities Strategy for Shepway is now a document from 2009 also covering Canterbury, Dover and Thanet.
Core Strategy	Sets out the long-term vision for the district's development, the spatial objectives and strategic policies to deliver that vision. It is the *LDF*'s primary *Development Plan Document*
DCLG	Department for Communities and Local Government: the central government department that is responsible for policy on local government, housing and urban regeneration.
Deliverable	A site that is available, in a suitable location with a reasonable prospect of delivery within 5 years. 'Successful' sites from the SHLAA may be deliverable (or *developable*).
Developable	A site that is in a suitable location with a reasonable prospect of development within a given timescale. 'Successful' sites from the SHLAA may be developable (or *deliverable*).
Development Plan	The development plan is made up of the Regional Spatial Strategy, which for Shepway is the *South East Plan* (2009), and *Development Plan Documents* produced by local planning authorities within the *LDF.*
Development Plan Document	Key spatial planning documents prepared by a plan making authority and subject to independent examination. Policies in these plans form the starting point for all decision making on planning applications.
Environment Agency (EA)	A national public body delivering the environmental, water management and flood risk priorities of central government.
Evidence base	A collection of information supporting *Development Plan Documents*. Choices made by a plan in the LDF must be backed up by fact.
Index of multiple deprivation	The Index of Multiple Deprivation combines a number of indicators, chosen to cover a range of economic, social and housing issues, into a single deprivation score for each small area in England.
The (Kent) Protocol	The Kent Planning Officers Group Policy Forum prepared, in consultation with national public and private sector representatives, a document for undertaking *SHLAA*s in Kent to ensure consistency in the interpretation of the Practice Guidance and to help in the preparation of a sound *evidence*

	base for subsequent *LDF* documents. This includes various Suitability, Availability and Achievability criteria, required to determine whether a site is *deliverable*/*developable* or not.
LDF	Local Development Framework: this is best visualised as a 'folder for local planning policy' containing a number of different documents such as *Development Plan Documents*, which will form the spatial planning strategy for the district setting out how development is to be managed.
LDS	Local Development Scheme: the programme for the *LDF*, outlining the formal timetable for preparing planning policies and public engagement periods.
LHMA	Local Housing Market Area: Geographical areas within east Kent defined in the *SHMA* by economic household demand and preferences. Housing markets do not respect administrative boundaries and may comprise smaller, more local sub-markets and neighbourhoods.
(The) Local Plan saved policies	The Shepway District Local Plan Review was adopted by the council on 16 March 2006. As part of the transitional arrangement (set out in the Planning and Compulsory Purchase Act 2004) for the move over to *LDFs,* the council made a request to the central government to continue to use (most) specific policies. These policies 'saved' in 2009 remain part of the Development Plan and will remain saved until they are replaced by specific LDF policies.
N (or S etc.)	North, East, West and South.
Opp.	Opposite.
PPS 3	Planning Policy Statement 3: Housing (PPS3) sets out the national planning policy framework for delivering the Government's housing objectives.
PPS12	Planning Policy Statement 12 Local Spatial Planning (PPS12) sets out the Government's policy on local spatial planning through outlining requirements for *LDF*s and sound *Development Plan Documents*.
PPS 25	Planning Policy Statement 25: Development and Flood Risk (PPS25): sets out Government policy on development and flood risk. Its aims are to ensure that flood risk is taken into account at all stages in the planning process to avoid inappropriate development in areas at risk of flooding, and to direct development away from areas of highest risk. Where new development is, exceptionally, necessary in such areas, policy aims to make it safe, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall.
South East (SE) Plan	The Secretary of State published the final version of the South East Plan (also known as the Regional Spatial Strategy for the South East) May 2009. This sets out how national policy and wider strategy should be taken forward in planning decisions in Kent (and other counties as far west as Hampshire and as far north as Buckinghamshire, but not including London).
Preferred Options	This is a non-statutory phase of public participation mid-way through *Core Strategy* formulation.
R/ O	Rear of.
SDC	Shepway District Council
SFRA	Strategic Flood Risk Assessment: This study, required under *PPS25*, provides an analysis of the main sources of flood risk to the District, together with a detailed means of appraising development allocations and existing planning policies against the risks posed by coastal flooding over this coming century.
SHLAA	Strategic Housing land Availability Assessment: The process, covered in Shepway by this Consolidated Document and the Shepway LDF SHLAA

	Project Methodology, is required under *PPS3.* Local authorities and their partners assess the scale of potential housing land opportunities over 15 year (or more) period. It cannot allocate land or grant planning permissions, but leads to a pool of possible key future housing sites to inform future planning decisions and the *LDF* through further public consultation and additional evidence.
SHMA	Strategic Housing Market Assessment: Provides an understanding of how housing markets operate within a given area, showing housing need and demand. For Shepway, the applicable SHMA, as required by *PPS3,* was produced for the East Kent Housing Market Partnership (which also included Canterbury, Dover, Swale and Thanet Councils and organisations from other sectors). Kent County Council also chose to produce a broader document, which they called a SHMA, a draft of which is referred to in this Consolidated Document as the Draft 'DTZ Assessment'.
Suitable	The first set of Shepway *SHLAA* criteria: sustainability, key policy restrictions, physical problems or limitations, major potential impact, environmental conditions for prospective residents.
Sustainability Appraisal (SA)	A legal requirement examining the social, economic and environmental impacts of policies and proposals contained within the *LDF*. Shepway's SA is under preparation by Scott Wilson.
Sustainable Development / sustainability	PPS1: Delivering Sustainable Development uses the definition drawn up by the World Commission on Environment and Development in 1987: "development that meets the needs of the present without compromising the ability of future generations to meet their own needs."
Windfalls / windfall sites	Windfalls are seen as those (generally smaller) land parcels which have not been specifically identified as available for residential development in *LDF* work. They are now defined as comprising previously-developed sites that have unexpectedly become available.

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SHEPWAY LDF (LOCAL DEVELOPMENT FRAMEWORK)

Consolidated Strategic Housing Land Availability Assessment (SHLAA) 2009/10

A. EVALUATION OF RESULTS

SECTION A: INTRODUCTION

The Shepway SHLAA has produced a very large amount of information. However the conclusions are clear: the identified pool of possible housing sites is more than sufficient to allow a genuine range of strategic options to be considered.

This section looks at the results of strategic housing research overall, rather than individual sites. It firstly investigates the wider East Kent housing need picture, and includes an executive summary of SHLAA results. The second chapter examines sites that proceeded through all the criteria ('successful sites') against issues such as their current planning status. It then (Chapter 3) outlines - in terms of location and quantity - unsuccessful sites.

None of this section has been previously published.

1. Summary of Strategic Housing Research in the Area

1.1 Strategic housing research requirements

1.1.1 National policy[1] sets out that taking an evidence-led approach is one of the key principles in planning for housing:

- *Local Development Documents and Regional Spatial Strategies policies should be informed by a robust, shared evidence base, in particular, of housing need and demand, through a Strategic Housing Market Assessment and land availability, through a Strategic Housing Land Availability Assessment.* (Paragraph 11).

[1] DCLG (2006) Planning Policy Statement 3: Housing.

Shepway's Strategic Housing Land Availability Assessment (SHLAA) is therefore accompanied by Strategic Housing Market Assessment (SHMA).

1.1.2 Whilst SHLAAs focus on land options and the local availability of potential housing sites, SHMA provides important complementary information about the market in which housing would be delivered. This SHLAA Consolidated Document therefore introduces its findings on potential specific sites, and provides independent context, by referring to findings from SHMA.

1.1.3 The SHMA commissioned for, and agreed by, the district was undertaken in 2009 by consultants Ecotec. This was on behalf of the East Kent Strategic Housing Market Partnership, and also covers other districts in the sub-region. This Shepway SHMA[2] work overlapped with SHLAA preparation, which commenced in 2008 (as detailed later in this document).

1.1.4 The district SHMA document instigated investigation of strategic housing requirements in East Kent with stakeholders (see Appendix VIII for examples), and provides hard data about the varying nature of development needs. SHMA information is used later in this SHLAA Consolidated Document, for example to provide appropriate ward groupings for SHLAA sites (local housing market areas within Shepway).

1.1.5 Other evidence may also be of relevance to strategic planning for housing. For example, The Kent Partnership opted to commission research. This study[3] was also labelled a SHMA, but is called the "Draft DTZ Draft Assessment" here, after the appointed consultants.

[2] Ecotec (2009) Strategic Housing Market Assessment for the East Kent Sub-region, final Report.
[3] DTZ (2010) Kent & Medway Strategic Housing Market Assessment: Draft Executive Report.

1.1.6 This Draft DTZ Assessment is only referred to in this section, and for purely illustrative purposes. It commenced after SHLAA findings had been produced, and had not been agreed at the time of writing.[4]

1.1.7 The Draft DTZ Assessment identifies the following key strategic housing themes for the future in Kent: an ageing population, household income (and inequality), affordability and accessibility of housing, housing need, regeneration and renewal, cross-cutting sustainability, and delivery of housing. SHLAA studies primarily focus on the latter factor, delivery options; however SHMAs can be referred to for detailed evidence in relation to other key issues.

1.1.8 Later chapters of this Consolidated SHLAA Document draw from "the SHMA" for further details, and this means the East Kent 2009 study[5] (as the document that has been produced for Shepway and local partners in compliance with national guidance). However both studies provide useful additional strategic context, having wider spatial coverage and collectively examine a range of salient issues. These are outlined in the following sub-section.

1.2 Strategic Housing Market Assessments in the sub-region

1.2.1 The following excerpt from the district's SHMA[6] (paragraphs 1.4.7-1.4.11) provides an overview of development and housing in Shepway:

- *The population of Shepway is 100,400 (CLG mid year estimate 2007) and includes the centres of Hythe and Folkestone. The district is predominantly rural in nature (70% of the area is classified as such), although the majority of residents live in the district's towns of Folkestone, Hythe, New Romney and Lydd. Large parts of Dungeness and Romney Marsh are Sites of Special Scientific Interest.*
- *The economy of Shepway is mainly agriculture and tourism; however there are several military establishments, along with Dungeness B nuclear power station and the SAGA group who are large and growing employers in the area.*

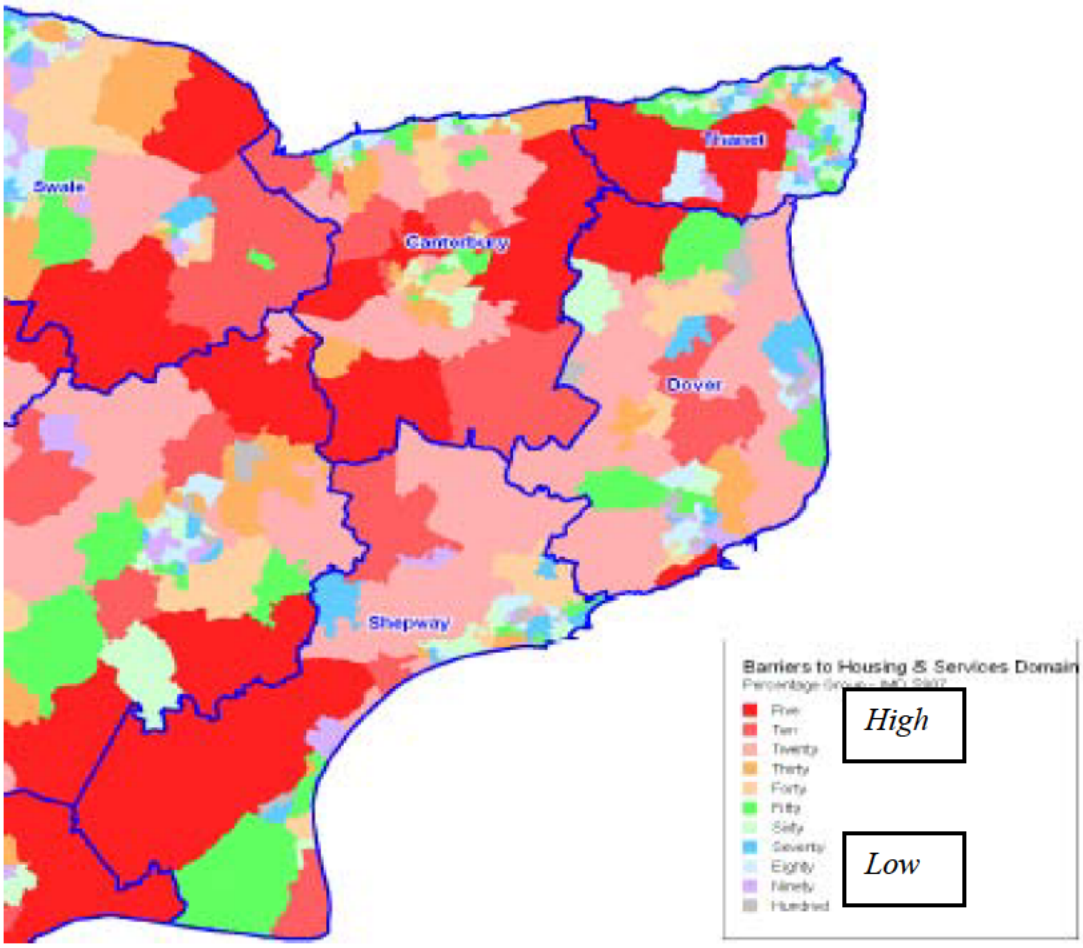
[4] March 2010: Shepway District Council has not endorsed the DTZ Draft Assessment and does not vouch for its compliance with national guidance. Similarly DTZ/KCC was not involved in interpretation here.
[5] Ecotec (2009) Strategic Housing Market Assessment for the East Kent Sub-region, final Report.
[6] Ecotec (2009) Strategic Housing Market Assessment for the East Kent Sub-region, final Report.

- *The rurality of Shepway presents it with considerable housing challenges. These include: the impact of proximity to the Kent Downs AONB and associated development restrictions (and upward price pressure); options for development of affordable housing where there are unlikely to be large sites where substantial S106 contributions could be expected; linked to this, issues about affordable housing thresholds and development viability for smaller sites; and the use of exception sites policy, and partnerships with landowners and developers.*
- *In terms of existing urban areas, there are regeneration plans for Folkestone Harbour and the seafront area, and possible development to the west. Substantial growth has been seen in Hawkinge, as well as in Hythe.*

1.2.2 The SHMA also considers Shepway housing in terms of socio-economic and transport issues. The following map shows the housing access/services sub-domain to the index of multiple deprivation in 2007. This is relevant to the SHLAA, as the statistical indicators used to produce this map are housing factors, or key services (and all the services - apart from post offices - are also key suitability criteria used in assessing SHLAA sites in Shepway[7]).

[7] See Appendix I on Kent Protocol criteria forming the basis of the assessment, and SHMA paragraphs 6.6.4-6.6.5 for further details of deprivation factors.

Map 1: Barriers to housing and services in East Kent



Source:

Strategic Housing Market Assessment for the East Kent Sub-region, final Report (Map 14).

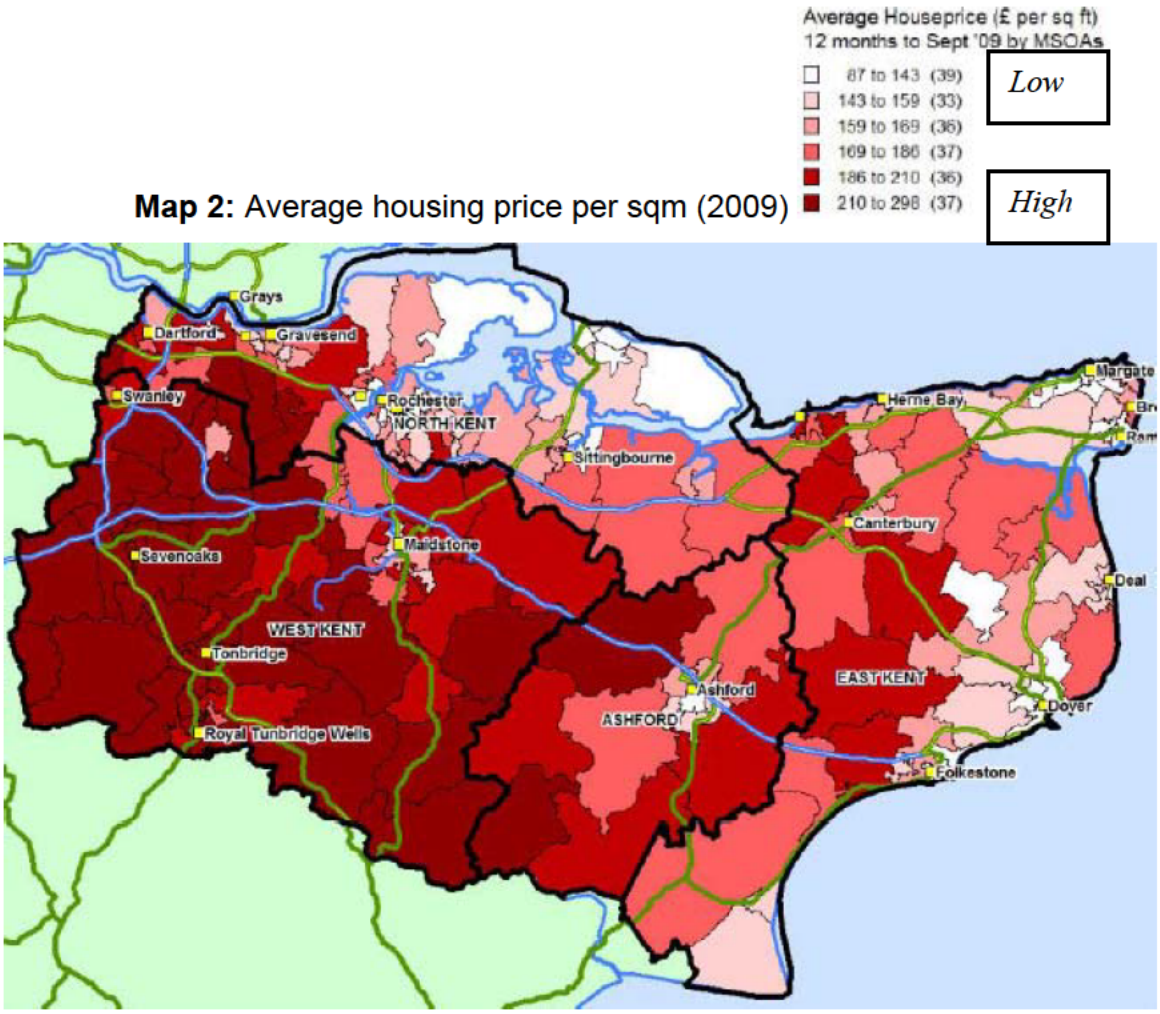
1.2.3 It is apparent from Map 1 that although the towns of Shepway (from the main coastal resorts through to Lydd) have reasonable access to housing and services, some areas are very isolated –shown in pink/red colours.

1.2.4 Related to the theme of housing deprivation, the Draft DTZ Assessment[8] highlights East Kent in the context of large-scale issues with homes in poor condition, which they attribute to problems with the private rented sector in coastal towns (such as Folkestone).

[8] DTZ (2010) Kent & Medway Strategic Housing Market Assessment: Draft Executive Report.

1.2.5 SHMAs are also very concerned with the cost of local housing. The following Draft DTZ Assessment map illustrates the wide variations that occur even disregarding the impact of the size of properties, both across the county and within the district.

Map 2: Average housing price per sqm (2009)



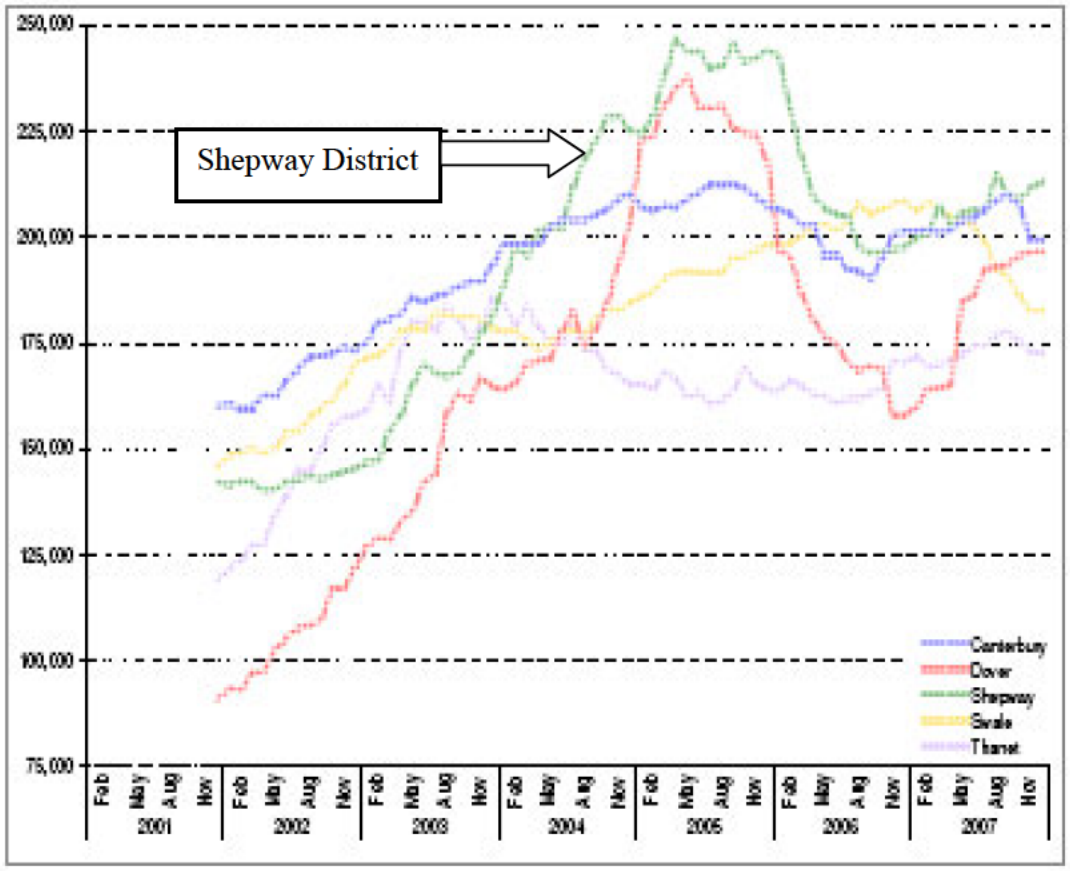
Source:

Kent & Medway Strategic Housing Market Assessment: Draft Executive Report. (Figure 11)

1.2.6 The Shepway SHMA[9] also provides additional housing market information of relevance to the SHLAA and housing delivery. For example Figure A shows cost in the context of only new-build properties.

[9] Ecotec (2009) Strategic Housing Market Assessment for the East Kent Sub-region, final Report.

Figure A: New build house prices in East Kent



Source:

Strategic Housing Market Assessment for the East Kent Sub-region, final Report (Fig. 8.4).

1.2.7 This reveals that new houses in Shepway generally cost the most (green line in Figure A) of any district in East Kent over the middle of the first decade of the century.

1.2.8 Continuing on the topic of the new-build housing market, the Draft DTZ Assessment[10] notes the tendency for recent completions to accentuate the existing "bias" in the size of properties. In this sub-region, it notes:

[10] DTZ (2010) Kent & Medway Strategic Housing Market Assessment: Draft Executive Report.

- *East Kent is characterised by a high relative proportion of small 1-2 bedroom stock, and this market area has also seen the largest proportion of small dwelling completions in 2007/8* (Paragraph 64).

This research also found that for the eastern part of the county, over three-quarters of 2007/8 completions were 1 or 2 bedroom houses.

1.2.9 Summing up, the final chapter of the SHMA[11] (first two paragraphs) highlights key geographic features shaping the local housing market:

- *Analysis in this [Shepway SHMA] report shows that parts of East Kent's housing markets are relatively self-contained, and function as separate entities within the South East. Other markets show much greater connectivity, and are more influenced by the pull of London, the Medway Towns, and Ashford to some extent.*
- *The rurality of much of East Kent is a significant factor that shapes housing markets. Rural areas tend to have higher values than more urban ones; this brings both benefits and disbenefits. While such areas can attract more affluent in-comers, needed to bolster the economy, consequent problems of affordability for existing local residents threaten the viability of smaller communities.*

The key conclusion of the SHMA is that for clear socioeconomic reasons there is major housing need in Shepway. The evidence is strong that planning strategies need to recognise the challenges of isolation and regeneration within specific parts of East Kent.

1.2.10 It can be concluded SHMA data on the district's housing stock suggests that the SHLAA results will need to be taken forward in the context of addressing issues in the quality, nature (size) and cost of market housing provision.

[11] Ecotec (2009) Strategic Housing Market Assessment for the East Kent Sub-region, final Report.

1.3 Executive summary of the Shepway SHLAA findings

1.3.1 The SHLAA seeks to identify **a pool of possible sites** sufficient to meet strategic housing requirements in the district.

1.3.2 SHLAA sources identified in **excess of 500 potential plots** of land for assessment, including planning applications plus approximately 200 specific submissions of land by landowners or agents.

1.3.3 Accounting for duplicated land, and discounting land that fails the essential qualifying criteria[12], **343 sites were assessed** for their suitability (and subsequently availability and achievability if suitable).

1.3.4 The SHLAA found **149 sites to be deliverable/developable** i.e. suitable and available and achievable. Further analysis shows the majority of these can be considered as already 'in the planning process'.

1.3.5 These deliverable/developable sites are calculated as holding the potential to **yield 10,533 dwellings in 2009/10 – 2025/26** (inclusive), without addressing the possibility of 'windfall' types of supply or sites producing under five dwellings (net).

1.3.6 This is well **in excess of the 5,800 minimum requirement** for Shepway set in the South East Plan (2009) covering the period 2006/7 – 2025/26 (this time period means the relatively high levels of delivery in the years since 2006/7 should also be recognised).

[12] Duplicated: both where desktop and submitted (call for sites) sources identify the same land, or where one site submitted is wholly within another submitted area. Qualifying criteria: being unable to produce a net gain of five dwellings or on areas strategically designated for their natural conservation value.

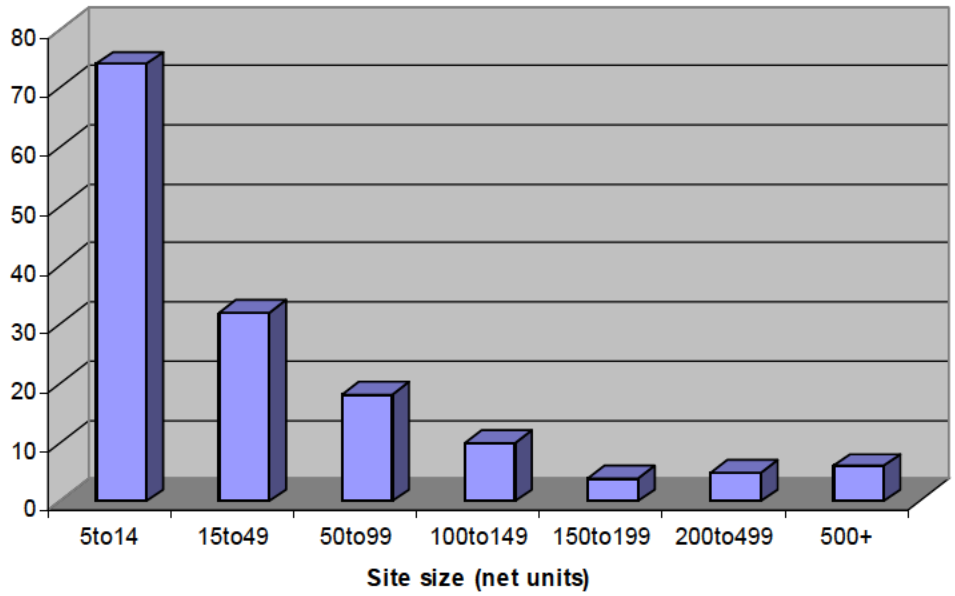
2. Deliverable and Developable Sites Evaluation

2.1 The objective of this chapter is to provide some context for the 149 'successful' sites as a whole in the SHLAA. This provides an overview of the scale, broad distribution, relative impact and (especially) feasibility of this crucial pool of sites from which Shepway's residential needs will be met in the future.

2.2 Analysis by location and scale

2.2.1 Looking at site capacity, most deliverable/developable sites are expected to be smaller in size, even though sites yielding less than five units are not included. Successful sites generally decrease in quantity as development size (net number of dwellings) increase as shown in figure B:

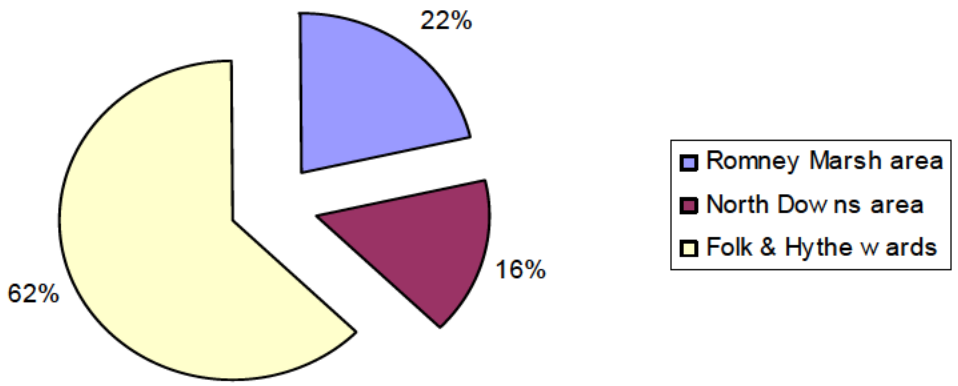
Figure B: Frequency of deliverable/developable sites by size



2.2.2 The mean average number of dwellings overall is 69 per successful site, and a median of 14 units. This highlights some very large scale sites, and also several significant medium/larger ones, with 50 sites estimated at between 15 and 99 dwellings.

2.2.3 The broad distribution of successful sites within Shepway is shown in the following chart (Figure C):

Figure C: Proportion of deliverable/developable sites by area



2.2.4 It is evident that although the majority of deliverable/developable ('successful') sites are urban, a significant proportion of sites are elsewhere. The North Downs and Romney Marsh areas[13] are broadly similar in the frequency of sites. North Downs area contributes more in terms of number of resulting units, as it includes some sites that are larger than found on Romney Marsh.

2.2.5 To give a more detailed idea of the prevalence of successful SHLAA sites within Shepway, a ward-based analysis can be used. The following table focuses

[13] These areas are mapped in Map 4, at the end of this section. They can be described as one 'urban area' and two 'rural areas', based on Shepway District Council wards (the rural boundaries equate to a County Council ward each). Folkestone & Hythe wards cover a strip along the coast from the district's eastern boundary outside Capel-le-Ferne (in Dover District) through to and including West Hythe. The North Downs area not only includes the AONB area but as far west as Sellindge and south as Lympne and Stanford (ward). Romney Marsh accounts for all of the south of Shepway, extending as far north to include the Royal Military Canal.

on the most significant wards to the SHLAA and also accounts for the varying size[14] of wards within the district:

Table 1: Number of deliverable/developable dwellings relative to land area in selected wards

Ward	*Number of D/D SHLAA sites*	*Number of D/D dwellings to 2026*	*D/D dwellings per hectare*	
Folk. Harvey Central	20	642	Shepway's highest	6.3
Folk. Harbour	5	759	2nd highest	4.1
Folk. Foord	7	214	3rd highest	4.0
Folk. Harvey West	6	399	4th highest	3.4
Folk. Cheriton	6	1044	5th highest	2.7
New Romney Town	12	514	6th highest	1.8
Hythe West	1	1050	7th highest	1.7
Folk. Park	9	348	8th highest	1.6
Hythe Central	12	209	9th highest	1.1
Folk. Sandgate	12	230	10th highest	1.1

D/D =Deliverable/developable site.

2.2.6 The 'top ten' wards are shown in (descending order) number of deliverable/ developable dwellings by ward area. This reveals that SHLAA findings are 'most relevant' to central Folkestone, in terms of number of dwellings (relative to land area). All the wards in Table 1 are urban, although New Romney Town sits in a rural area.

2.2.7 The more peripheral wards relative to Folkestone and Hythe town centres are relatively less prominent within Table 1, as is Hythe compared to Folkestone. For these town areas, Folkestone Cheriton and Hythe West (whose single site is Nickolls Quarry) are expected to be able to accommodate the highest aggregate number of additional dwellings. This is due to large sites e.g. military 'brownfield'

[14] This is the overall land mass sourced from the AMR 2008. Therefore it does not account for other factors, for example overall built-up area within wards, or available previously developed land.

land in Cheriton area. Folkestone Harvey Central has both the most sites and the most dwellings by area (top row of Table 1).

2.3 Feasibility by status evaluation

2.3.1 Although not forming part of the Assessment and not determining the a acceptability of sites, further analysis has been undertaken of the status of SHLAA sites in terms of their performance against current and emerging policy.

2.3.2 The SHLAA does not generally work by automatically 'rolling forward' existing local planning policy, as it uses independent criteria for key decisions (such as for land outside urban areas). This means analysing findings against current policy and planning decisions taken to date provides an interesting extra perspective.

2.3.3 Land is entered to SHLAAs from various origins (see Figure G in Section C), and can progress successfully through SHLAAs at differing stages of planning. It is common to illustrate this through reference to whether or not a site 'is within the planning process'. The national guidance for SHLAAs[15] defined this as:

- Existing housing allocations and site development briefs
- Permissions for housing (under implementation or outstanding)
- Land allocated (or with permission) for employment or other land uses which are no longer required for those uses.[16]

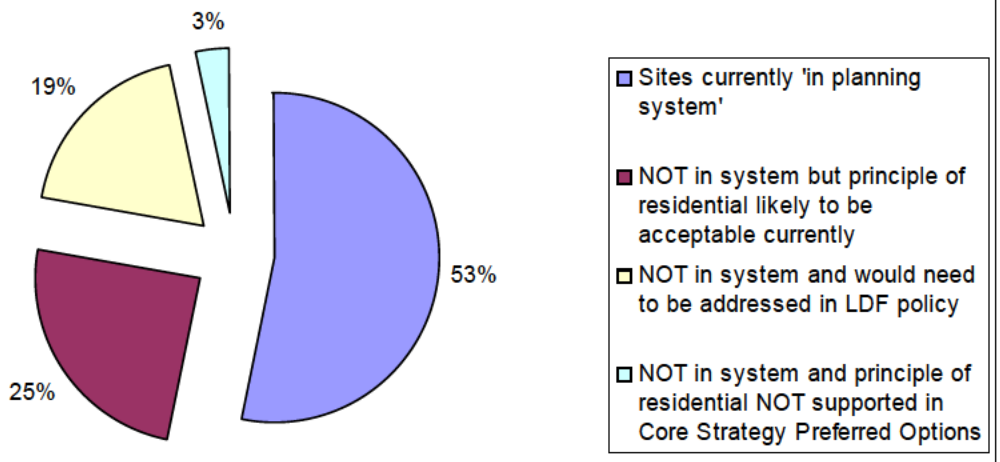
On this basis a majority (79) of the deliverable/developable sites, and over a third by number of resultant dwellings, were regarded as within the planning process/system (at the start of November 2009).

[15] DCLG (2007) Strategic Housing Land Availability Assessments Practice Guidance

[16] This is potentially very broad depending on the definition of "no longer required". A conservative interpretation of this has been adopted, and to clarify, only one site (35 dwellings at #195) has been included on this basis. This is because it was identified in the Employment Land Review as the main candidate for release to residential use.

2.3.4 As stated, there are 79 successful SHLAA sites already in the planning process/system. The remaining 70 deliverable/developable sites have been examined, firstly in terms of the likely acceptability in principle of residential development on site (given existing saved Shepway Local Plan Review (2006) policies). The results are shown below, in Figure D:

Figure D: Proportion of deliverable/developable sites by status



2.3.5 The diagram shows 37 (25% of the successful 149) sites can be considered – for illustrative purposes only – to be 'currently acceptable in principle'. Under a fifth (19%) of sites may be suitable to come forward (but would probably need adjustments to existing policy/designations through the LDF to win 'in principle' policy support).[17]

2.3.6 Figure D shows that over three-quarters of the potential sites identified from the SHLAA could realistically come about under current local policy (the two largest 'slices of the pie' illustrated). This is encouraging in terms of a positive

[17] The residual in Figure D highlights that Shepway LDF Core Strategy Preferred Options, summer 2009, specifically identified five (3% of) deliverable/developable sites as not preferred.

environment for bringing future housing supply forward in Shepway, as it is not dependent on a major change in policy happening i.e. is free from the element of risk with introducing a relevant new Development Plan Document.

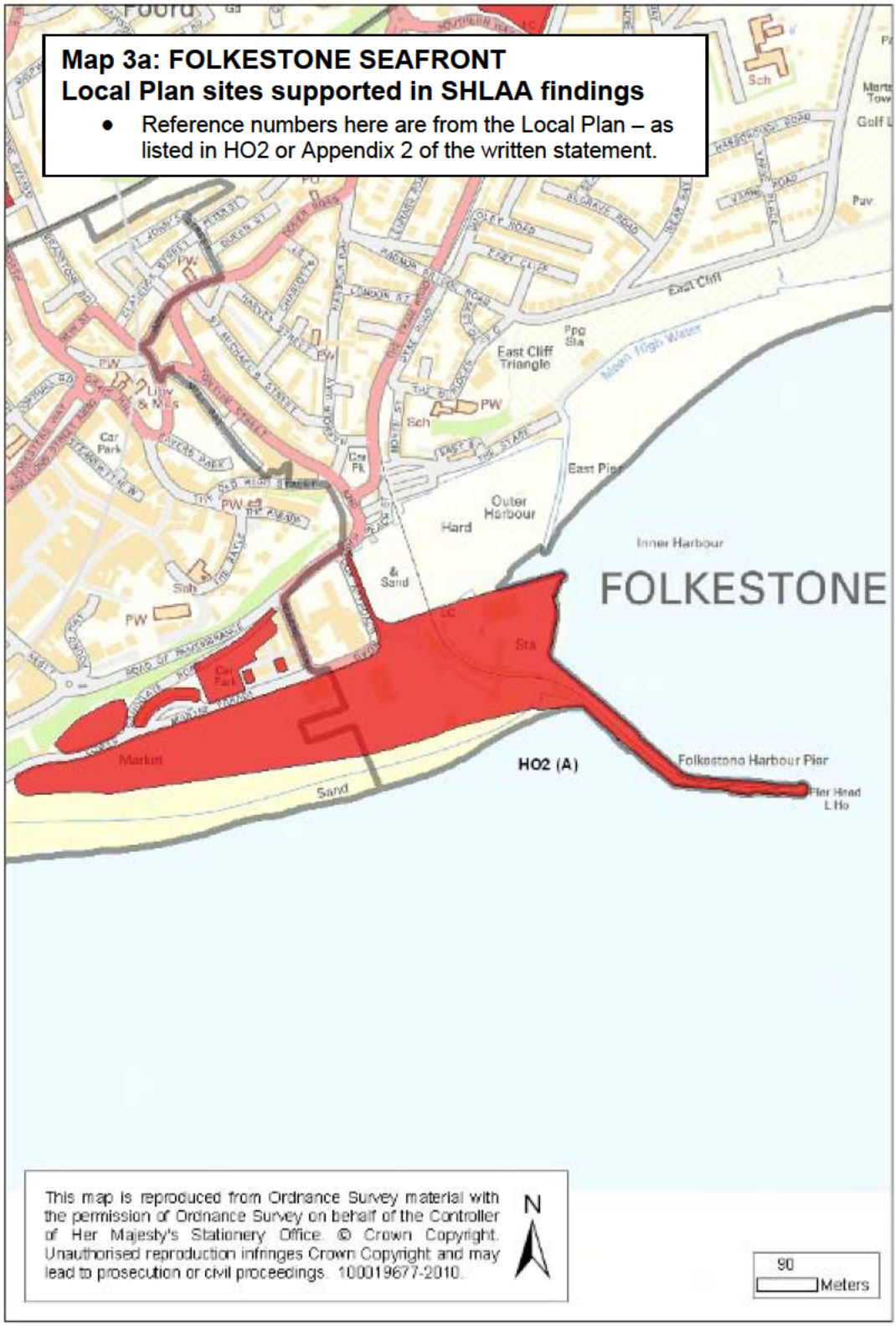
2.3.7 In conclusion, although the scope of the SHLAA is long-term, current information shows that as well as meeting deliverability criteria, much of the prospective supply is feasible in the shorter-term and under the current plan.

2.3.8 Nevertheless, the SHLAA has also produced several options for new sites of a strategic scale for later periods, as featured in LDF Core Strategy Preferred Options[18]. It is particularly important in this context to remember that further scrutiny of the sustainability and necessity of individual sites is necessary through the planning system, when applying SHLAA results.

2.3.9 As discussed above, some of the successful sites benefit from support in the current development plan (Shepway Local Plan[19] saved policies) and are still deliverable. The following indicative maps (3a-j) illustrate some of these key sites that are directly flagged up for development (allocated) in the Local Plan.

2.3.10 These 're-affirmed' sites are included along with other (non-Local Plan) successful sites in mapping later in this document. Note, the allocations in the Local Plan are not necessarily for all residential use, and the Proposals Map should be consulted for definitive boundaries (reference numbers on these maps are taken from Local Plan).

[18] SDC (2009) Shepway LDF Core Strategy Preferred Options.
[19] SDC (2006) Shepway District Local Plan Review, Adopted Plan.


Map 3a: FOLKESTONE SEAFRONT
Local Plan sites supported in SHLAA findings
Reference numbers here are from the Local Plan – as listed in HO2 or Appendix 2 of the written statement.
East Cliff
East Cliff Triangle
Mean High Water
Outer Harbour
Hard
Inner Harbour
FOLKESTONE
East Pier
Sand
Sta
HO2 (A)
Folkestone Harbour Pier
Pier Head
Market
Sand
Car Park
PW
Sch
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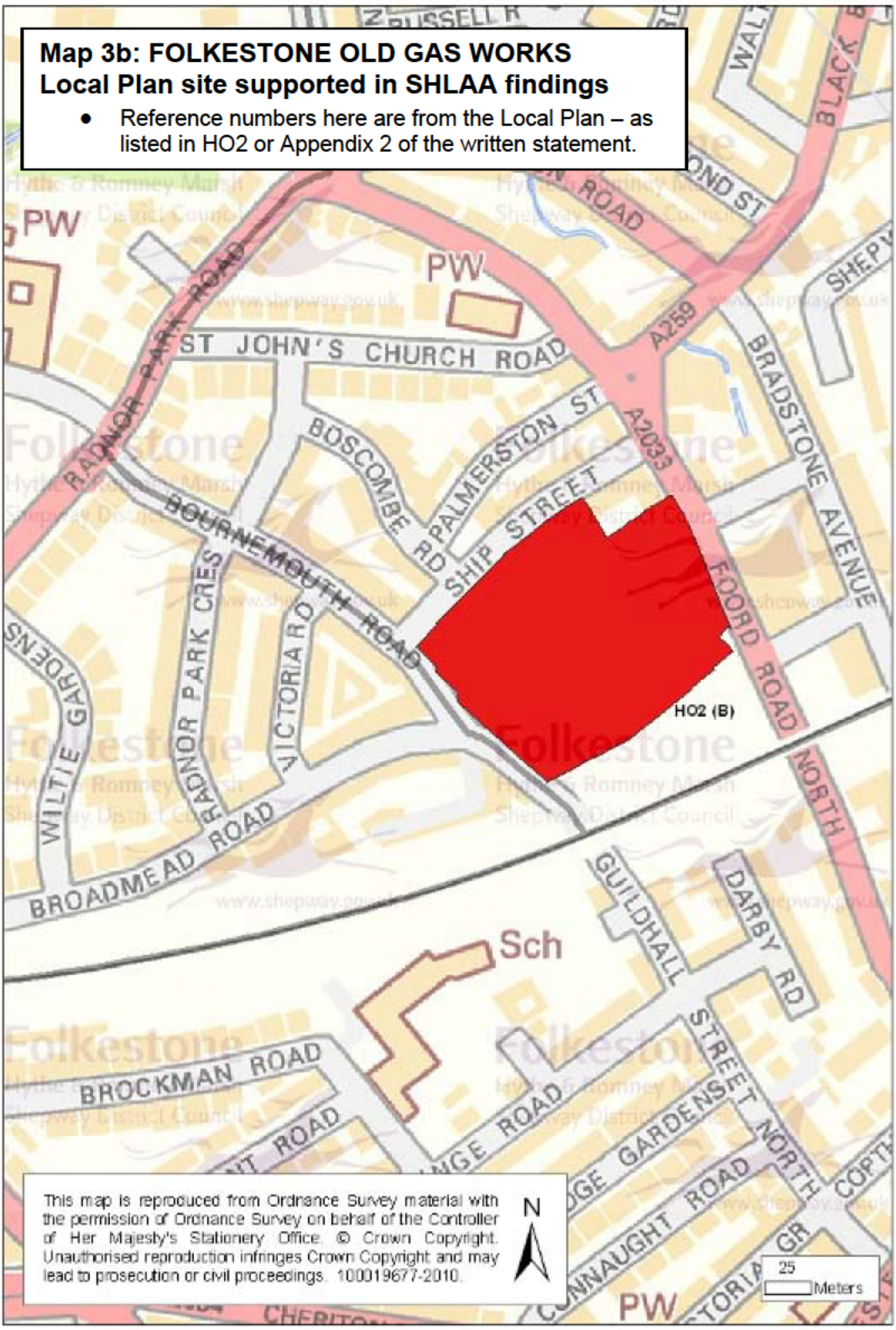
Map 3b: FOLKESTONE OLD GAS WORKS
Local Plan site supported in SHLAA findings
Reference numbers here are from the Local Plan – as listed in HO2 or Appendix 2 of the written statement.
ST JOHN'S CHURCH ROAD
RADNOR PARK ROAD
BOSCOMBE RD
PALMERSTON ST
SHIP STREET
BOURNEMOUTH ROAD
VICTORIA RD
RADNOR PARK CRES
WILTIE GAR
BROADMEAD ROAD
A259
A2033
FOORD ROAD
BRADSTONE AVENUE
HO2 (B)
NORTH
GUILDHALL
DARBY RD
Sch
BROCKMAN ROAD
STREET NORTH
CONNAUGHT ROAD
PW
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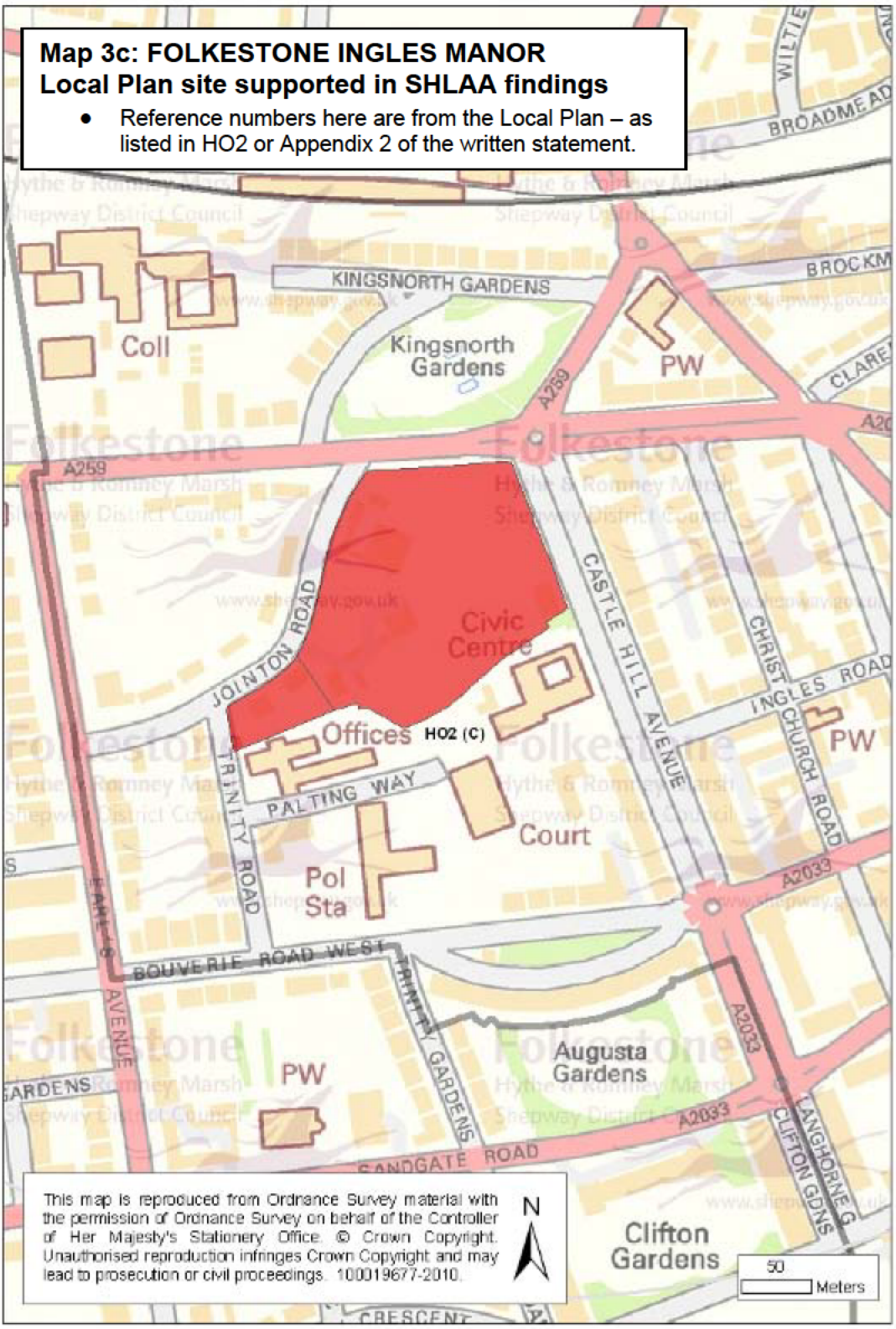
Map 3c: FOLKESTONE INGLES MANOR
Local Plan site supported in SHLAA findings
Reference numbers here are from the Local Plan – as listed in HO2 or Appendix 2 of the written statement.
KINGSNORTH GARDENS
Coll
Kingsnorth Gardens
PW
A259
JOINTON ROAD
Civic Centre
CASTLE HILL AVENUE
CHRIST CHURCH ROAD
INGLES ROAD
Offices
HO2 (C)
PALTING WAY
Court
TRINITY ROAD
Pol Sta
A2033
BOUVERIE ROAD WEST
EARLS AVENUE
TRINITY GARDENS
Augusta Gardens
SANDGATE ROAD
CLIFTON GDNS
Clifton Gardens
CRESCENT
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Map 3d: HAWKINGE
Local Plan sites supported in SHLAA findings
Reference numbers here are from the Local Plan – as listed in HO2 or Appendix 2 of the written statement.
Hawkinge
HO2 (E)
HO2 (D)
Airfield
School
Museum
Cemetery
Crem
Meml
Prospect Farm
Gibraltar Farm
Terlingham Manor Farm
PO
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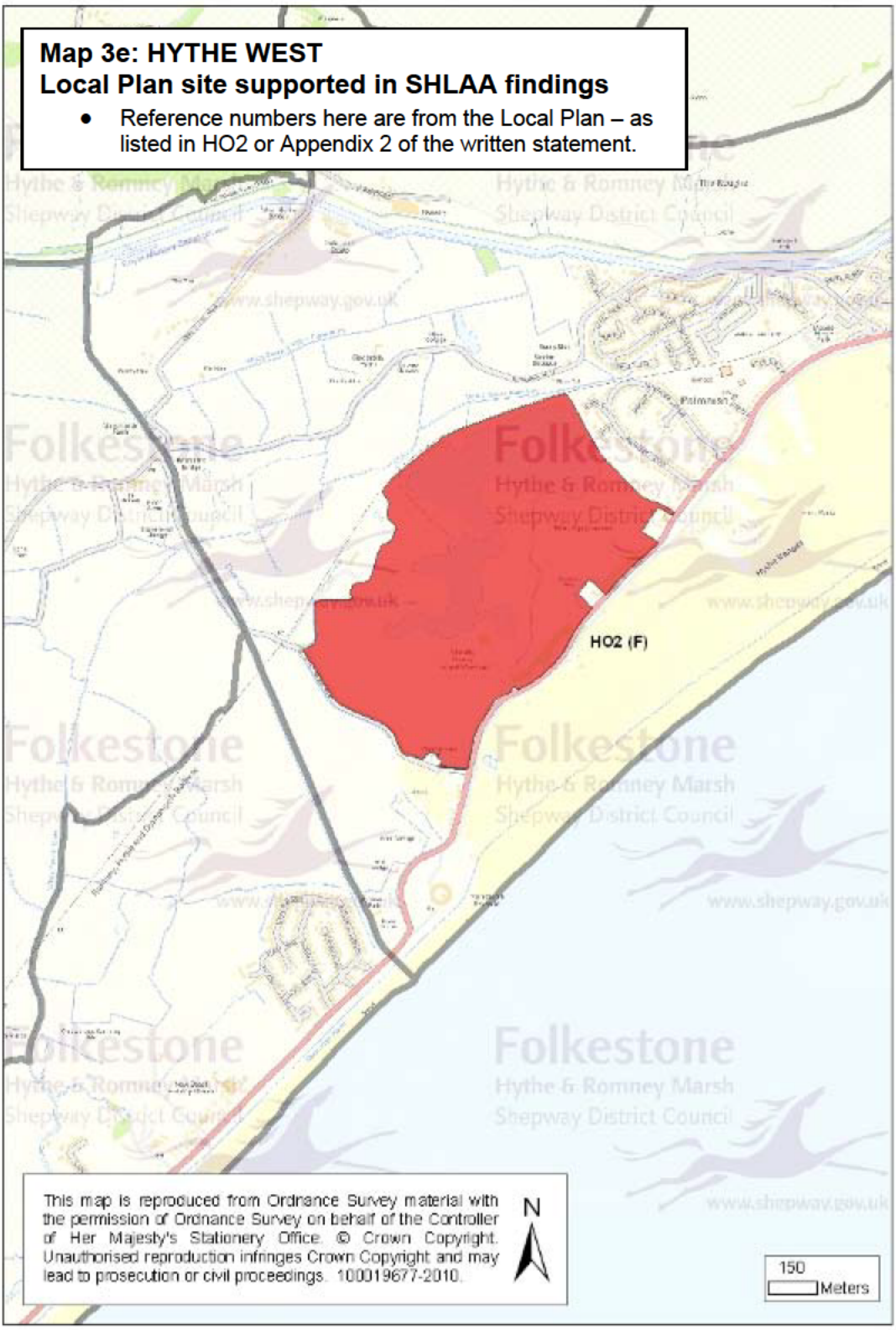
Map 3e: HYTHE WEST
Local Plan site supported in SHLAA findings

- Reference numbers here are from the Local Plan – as listed in HO2 or Appendix 2 of the written statement.




Map 3f: ST MARY'S BAY
Local Plan sites supported in SHLAA findings
• Reference numbers here are from the Local Plan – as listed in HO2 or Appendix 2 of the written statement.
31
32
St Mary's Bay
Sand
Caravan Park
Rugby Clubs Camp
Folkestone
Hythe & Romney Marsh
Shepway District Council
www.shepway.gov.uk
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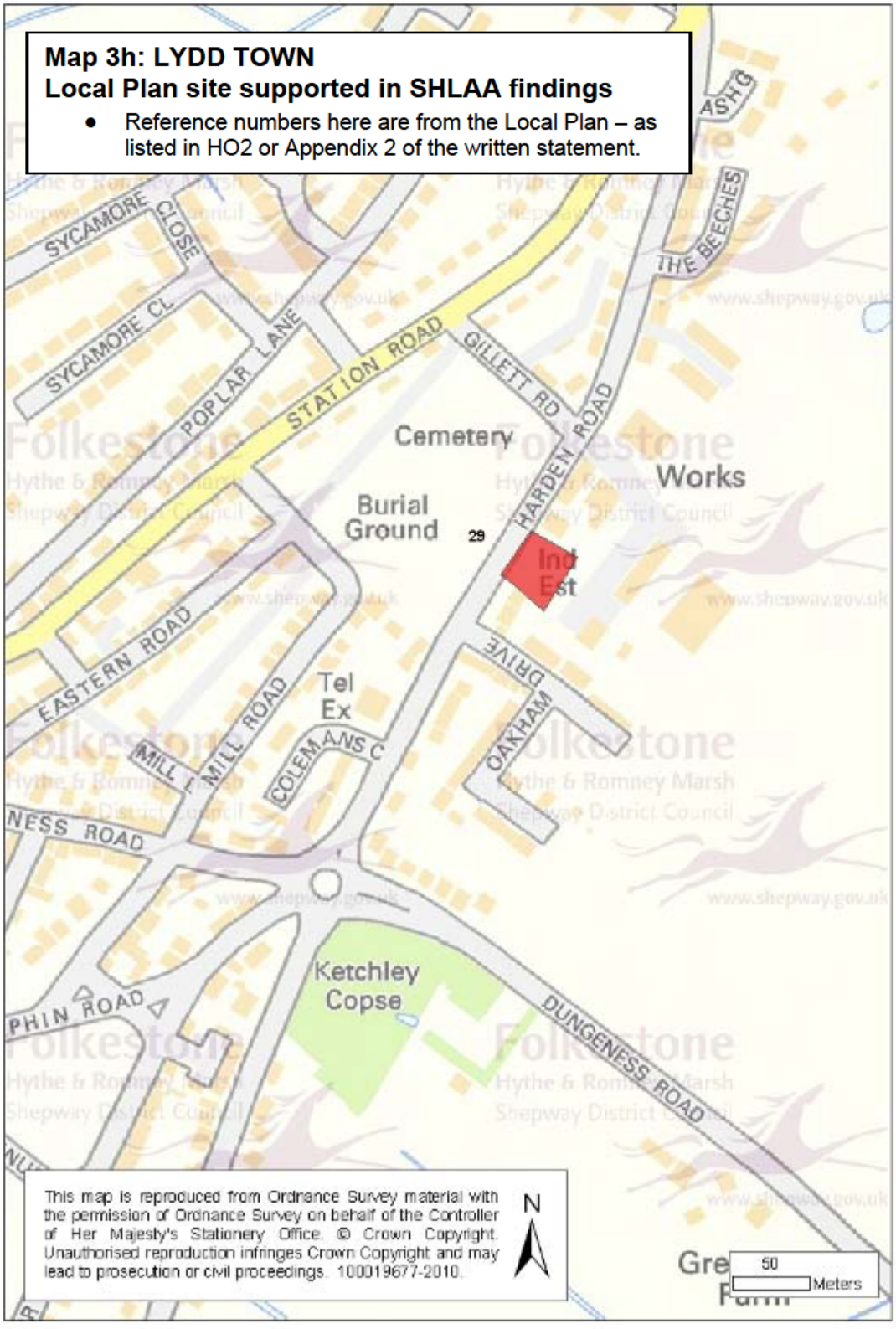
Map 3g: BRENZETT
Local Plan site supported in SHLAA findings

- Reference numbers here are from the Local Plan – as listed in HO2 or Appendix 2 of the written statement.


Map 3h: LYDD TOWN
Local Plan site supported in SHLAA findings
• Reference numbers here are from the Local Plan – as listed in HO2 or Appendix 2 of the written statement.
SYCAMORE CLOSE
SYCAMORE CL
POPLAR LANE
STATION ROAD
GILLETT RD
HARDEN ROAD
THE BEECHES
ASHG
Cemetery
Burial Ground
29
Ind Est
Works
EASTERN ROAD
MILL LANE
MILL ROAD
Tel Ex
COLEMANS C
DRIVE
OAKHAM
NESS ROAD
Ketchley Copse
PHIN ROAD
DUNGENESS ROAD
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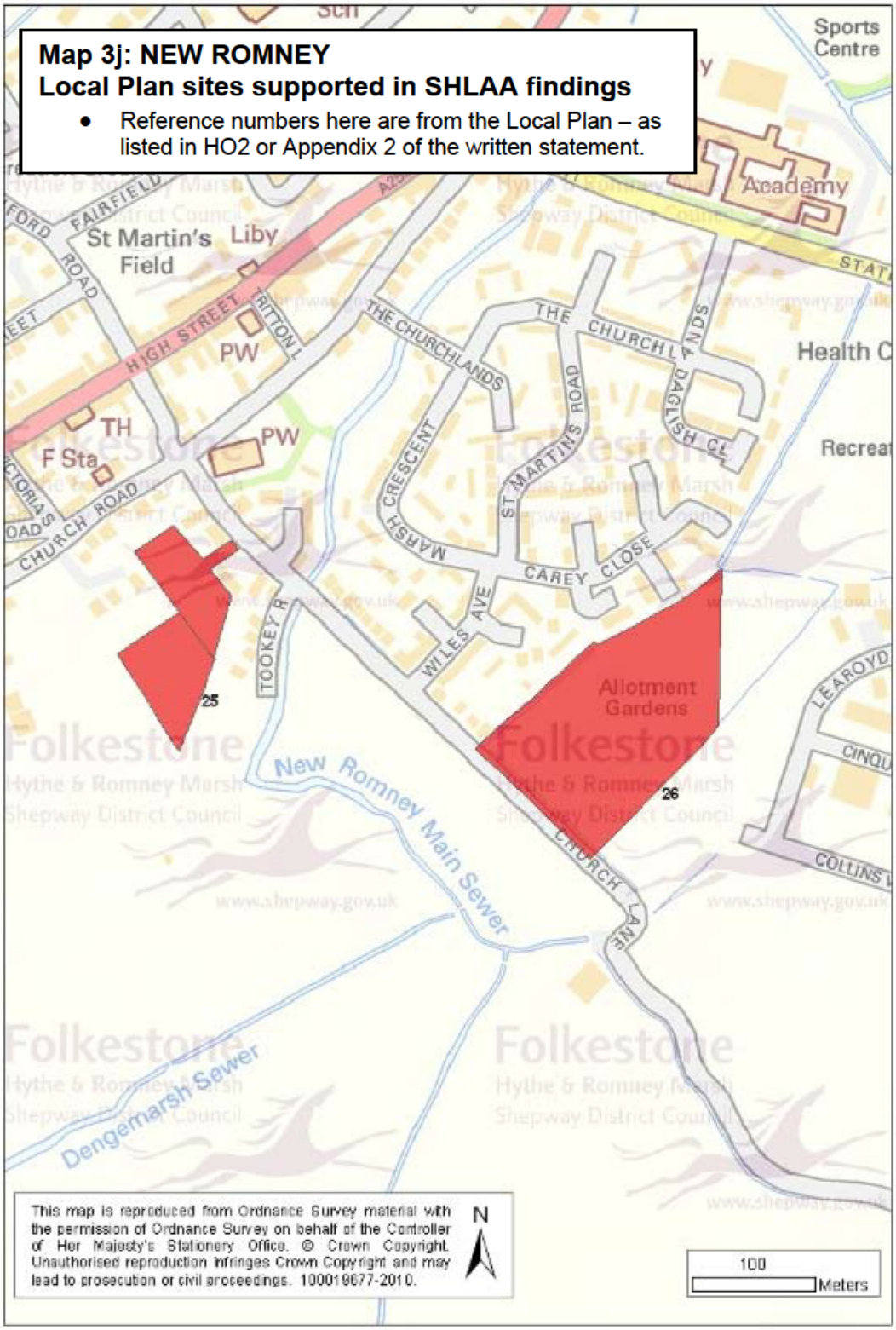
Map 3i: LITTLESTONE
Local Plan sites supported in SHLAA findings

- Reference numbers here are from the Local Plan – as listed in HO2 or Appendix 2 of the written statement.


Map 3j: NEW ROMNEY
Local Plan sites supported in SHLAA findings
• Reference numbers here are from the Local Plan – as listed in HO2 or Appendix 2 of the written statement.
Sports Centre
Academy
St Martin's Field
Liby
PW
TH
F Sta
HIGH STREET
CHURCH ROAD
FAIRFIELD ROAD
THE CHURCHLANDS
THE CHURCHLY
DAGLISH CL
ST MARTINS ROAD
MARSH CRESCENT
CAREY CLOSE
WILES AVE
TOOKEY R
Allotment Gardens
25
26
New Romney Main Sewer
Dengemarsh Sewer
CHURCH LANE
LEAROYD
COLLINS
Health C
Recreat
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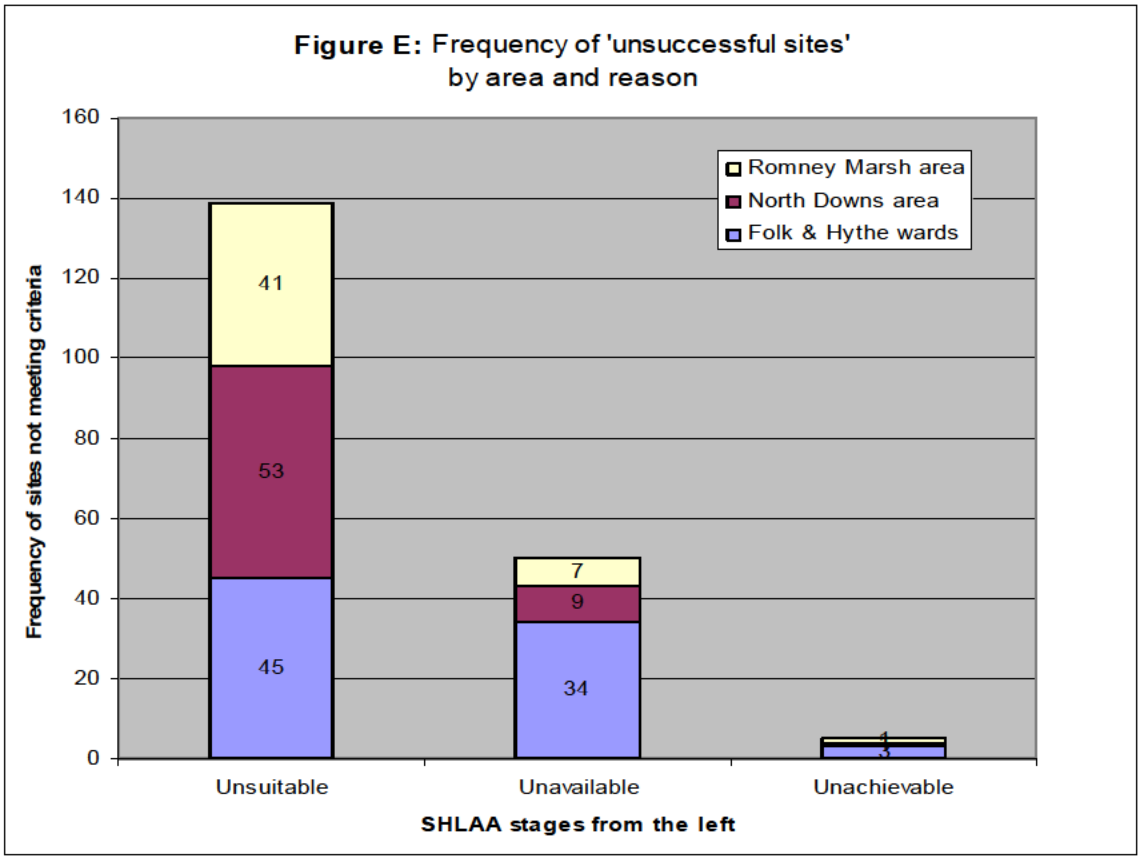
3. Unsuccessful Sites Evaluation

3.1 The SHLAA managed to identify a large number of sites for assessment. Due to this, it is not practical in this document to analyse in detail all of the suitability, availability or achievability issues encountered.[20] However it was clear that as many submitted sites were in relatively isolated locations (and as the assessment's key criteria includes tests of sustainability), that site suitability would require close consideration in many instances given Shepway's needs and characteristics.

3.2 The following chart summarises the broad reasons why 194 sites were not regarded as deliverable/developable, broken down by broad areas of the district (See Map 4 at the end of the section for areas):

[20] Specific information can be ascertained by studying the files for individual sites, which are all available for public viewing.



3.3 As expected with a step-by-step sieving process, the volume of sites falls in Figure E from left to right as the total number carried forward declines.

3.4 The vast majority of unsuccessful sites did not meet criteria at the suitability stage -particularly for sites in more rural parts of Shepway (outside of Folkestone and Hythe). This is believed to be attributable to their performance against (Kent Protocol) criteria on access to key services and public transport.

3.5 The next most significant determinants were availability factors, which were more commonly relevant to urban sites. It can be seen in Figure E (and Appendix IV) few sites were regarded as not successful purely on the basis of achievability considerations[21].

[21] Achievability factors were, nevertheless, important as information on this issue helped confirm, for a number of sites, that suitability of sites was unlikely to be sufficient (classified as Unsuitable).

SECTION A: SUMMARY

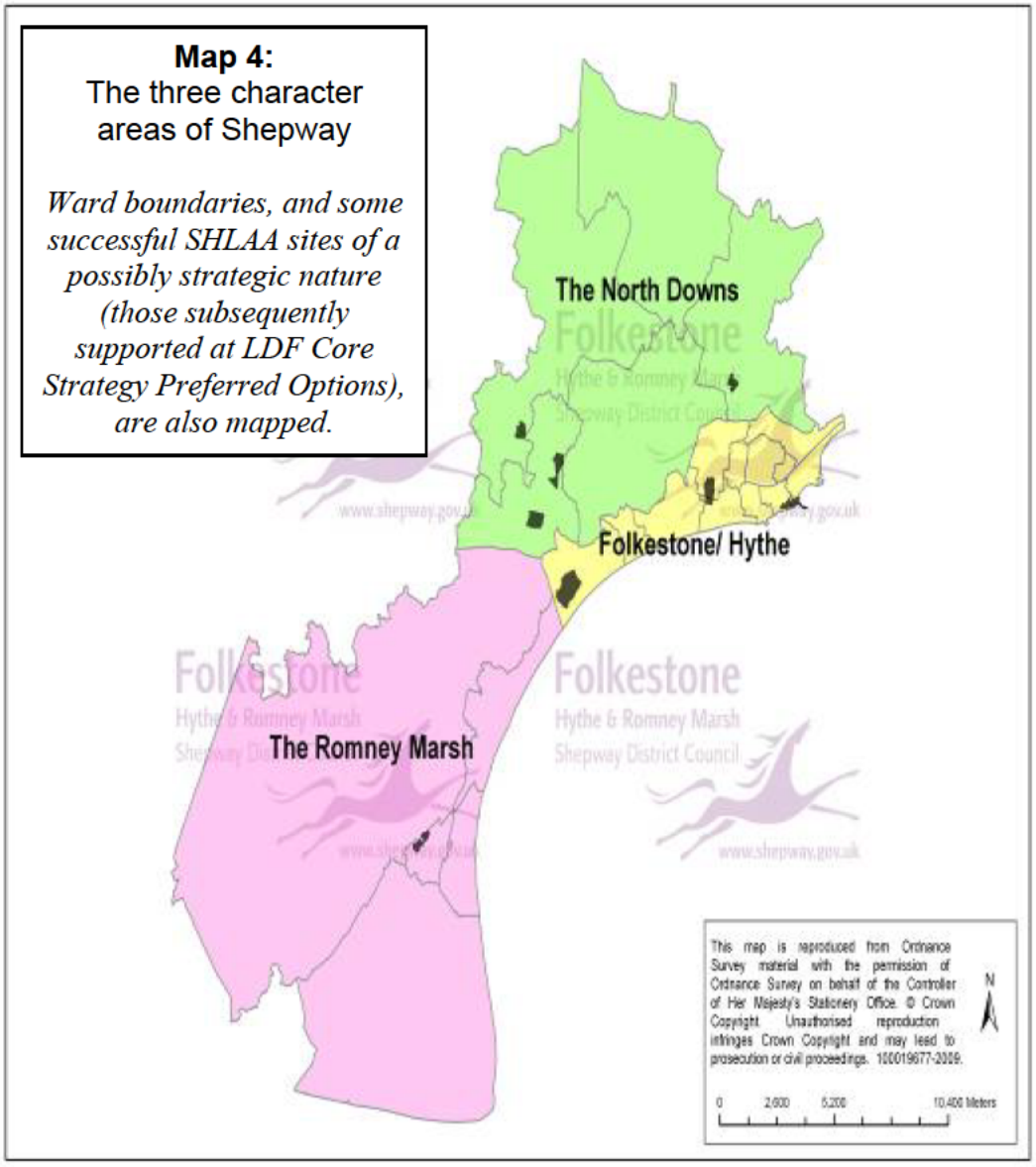
Complementary research such as SHMA data highlights the scale of quantitative and qualitative housing needs in the local market. Looking at how strategic development issues may be addressed in this district, analysis of SHLAA findings shows that there are around 150 identified sites in Shepway's pool of future land supply, which if all developed, are estimated to total over 10,000 dwellings. The majority of these deliverable/developable sites were in Folkestone and Hythe wards.

Relative to the geographic size of wards, the greatest number of deliverable/developable dwellings in the SHLAA were located in towns, especially the wards of central/inner Folkestone. The largest proportion of these successful sites in the SHLAA were smaller sites in terms of net additional dwellings. The median site capacity is 14 dwellings (net).

The primary reason, especially in rural areas, for sites not proceeding successfully through the SHLAA was suitability factors.

Map 4:
The three character areas of Shepway

Ward boundaries, and some successful SHLAA sites of a possibly strategic nature (those subsequently supported at LDF Core Strategy Preferred Options), are also mapped.



B. THE ASSESSMENT REPORT

SECTION B: INTRODUCTION

The section is the body of the SHLAA providing assessment results on specific sites. The first chapters (4 to 6) express the current and future setting for the findings, providing an overview of related documents, key principles and key local issues. Chapter 7 lists sites that are unsuitable, unavailable or unachievable. The final chapters (8-9) document and illustrate deliverable and developable sites, and comments on associated constraints and local infrastructure issues to overcome.

For supporting details in terms of the process and how these conclusions were reached, see the next section, including Figures G and H.

Apart from the maps, much of this information consists of notes published previously, which is shown in italics.

4. SHLAA Background

4.1 *This* section *summarises the findings of the first Strategic Housing Land Availability Assessment (SHLAA) for Shepway. The SHLAA will inform the Shepway Local Development Framework (LDF) evidence base, especially for the Core Strategy.*

4.2 ***The SHLAA identifies a pool of potential sites which may go forward for further consideration in the strategic planning of Shepway. However it does <u>not</u> make policy or assess the comparative sustainability or desirability of land.***

4.3 *This note is public and is published on Shepway's website* ***www.shepway.gov.uk/ldf****. Links to it were published and distributed in March 2009* in the form of Provisional Findings and published in June 2009 as finalised results. Findings were sent *to a number of parties, including:*

- *those who submitted sites,*
- *members of the East Kent Housing Market Partnership,*
- *others who responded to the Draft Shepway SHLAA Project Methodology,*
- *organisations who provided technical assistance on specific sites, and*
- *members of the Shepway LDF Core Strategy Advisory Panel.*

4.4 The following SHLAA illustrations later in this section are produced from *this note, in particular:*

- Table 3: *Unsuccessful sites table*
- Table 5: *Deliverable and developable sites table*
- Figure F*: Trajectory to 2026*

A Schedule of Amendments was also produced summarising the small minority of sites with changes following input from Provisional Findings (see Table 11).

4.5 *There are other important Shepway SHLAA documents directly relevant* to this report, *including:*

- *The Shepway SHLAA forms used to record the outcome of detailed site-by-site analysis* (templates form Appendix V, and completed forms for individual sites are held in site files, which are available for inspection).
- *The finalised Shepway SHLAA Project Methodology*[22] *arising from responses to the above consultation.*

These should be read alongside external publications such as national PPS3[23] *(Housing), government SHLAA guidance*[24]*, and - in particular - the finalised Kent*

[22] SDC (2009) Shepway LDF SHLAA Project Methodology.
[23] DCLG (2006) Planning Policy Statement 3: Housing.
[24] DCLG (2007) Strategic Housing Land Availability Assessment: Practice Guidance.

SHLAA Protocol, fully approved by county and regional stakeholders after its own consultation, forming Appendix I of this Consolidated Document.

4.6 Shepway District Council has finalised this Assessment through the preparation of a draft methodology and provisional results, to enable public comments to be received and taken on board. Provisional findings were produced in March 2009 to enable stakeholders (especially developers and East Kent Housing Market Partnership members) to input with knowledge of expected SHLAA outputs in Shepway.

5. SHLAA Outputs

5.1 In summary, the SHLAA has identified scores of sites as potentially deliverable/developable. Sites with this status inform LDF Core Strategy policy shaping in two ways:

- *Forming a picture of long-term housing land availability in Shepway, to inform Core Strategy options on the overall level of housing in the district 2006-2026 to be delivered by the LDF (in accordance with the emerging South East Plan).*
- *Selected significant sites feature directly in the Core Strategy as one of the limited number of strategic allocations to be proposed in the LDF.*

The status of sites is detailed on the Findings Tables accompanying this section *(Tables 3 and 5).*

5.2 The total of deliverable and developable dwellings (net) from April 2009 on sites of 5 dwellings or more up to 2026 is approximately ***10,533*** *dwellings.*

5.3 National policy *PPS3 states (para. 54 and 55) that deliverable and developable sites should be sufficient for at least 10 years. The South East Plan*

sets a requirement of 5,800 between 2006 and 2026 (290p.a.). Updating what has been delivered, the current residual is 4,698 dwellings (see paragraph 8.2.5).

5.4 SHLAA 'first trawl' findings thus indicate a sufficient potential supply of housing land in Shepway relative to the strategic (regional) requirement. The SHLAA can therefore be finalised and positively contribute to the preparation of Core Strategy options for further public participation.

5.5 The trajectory of delivery to 2026, taking into account completions to date since 2006, is shown in Figure F*. This is produced by averaging the total supply within the phases identified. The cumulative requirement (against the South East Plan) turns negative before 2020 and shows that a major 'over-supply' is anticipated by 2026. In summary:*

- *Average annual delivery since 2006/7 = 381.*
- *Average annual SHLAA projection up to 2015/16 = 376.*
- *Average annual SHLAA projection 2016/17 to 2020/21 = 642.*
- *Average annual SHLAA projection 2021/22 to 2025/26 = 938.*

It can be seen this increasingly exceeds the South East Plan annual requirement of 290 dwellings per annum. This potential excess results from large sites that meet basic suitability criteria in the SHLAA. Their full ***desirability and necessity should be tested through the LDF process*** *and Sustainability Appraisal.*

5.6 The total in the SHLAA is considered to be a somewhat moderate estimate of potential Shepway supply given urban density assumptions, and especially with the omission of sites under 5 units. No allowance for 'windfalls' has been made at all in the 10,533 deliverable/developable SHLAA sites.

5.7 It is acknowledged that windfalls have always formed a very significant proportion of Shepway's supply in the past, and that as a 5 dwelling threshold was necessary in the SHLAA, a small element of supply will come forward outside of SHLAA sites. Therefore Appendix VII *illustrates the implications of*

making an allowance of 80 dwellings per year for this, which is a conservative estimate given past 'windfall supply' and expected future policy (it would form only 11% of overall supply by 2026).

6. SHLAA Way Forward

6.1 Handling of subsequent information

6.1.1 As stated, the SHLAA will form part of the LDF evidence base, and does ***not*** *make policy, compare the relative merits of sites or make detailed conclusions about the exact development options for individual sites. No further sites or material adjustments may be made at present.*

6.12 Comments in relation to the judgements made on land against SHLAA criteria, or on sites submitted by other agents, should be made in the context of overall policy and be channelled through the public participation process on the LDF Core Strategy.

6.1.3 The SHLAA will be kept up-to-date through the LDF Annual Monitoring Report (AMR) process.[25] This will be a factual process on applicable sites (for example through new planning permissions), not a full review. It is expected that the SHLAA will inform a revision in the AMR of the 5-year supply of deliverable sites relevant for development control purposes (PPS3[26] para. 71).

6.1.4 Shepway District Council will use this SHLAA to finalise the LDF Core Strategy, but may elect to undertake a further SHLAA or review depending on progress in delivering the Core Strategy, or as other LDF Development Plan

[25]Although time has elapsed between the publication of SHLAA results and production of this Consolidated Document, this document does not adjust results and has not attempted to update sites e.g. planning permissions. Please refer to the appendix of the Annual Monitoring Report 2009 for further deliverable sites, and future AMRs.

[26] DCLG (2006) Planning Policy Statement 3: Housing.

Documents (for example a Sites Allocation DPD) require. On the latter point, the Shepway Local Development Scheme (LDF programme) should be consulted.

6.1.5 To promote sites not previously considered as part of the qualification for this Assessment through the LDF, SHLAA compliant land submission forms are available to record significant new expressions of interest not being progressed through a planning application.

6.1.6 It is expected this landowner/developer information will be published on-line. These sites are not part of this SHLAA, will not be individually subject to Assessment, and as not assessed, cannot be regarded as necessarily deliverable or developable.

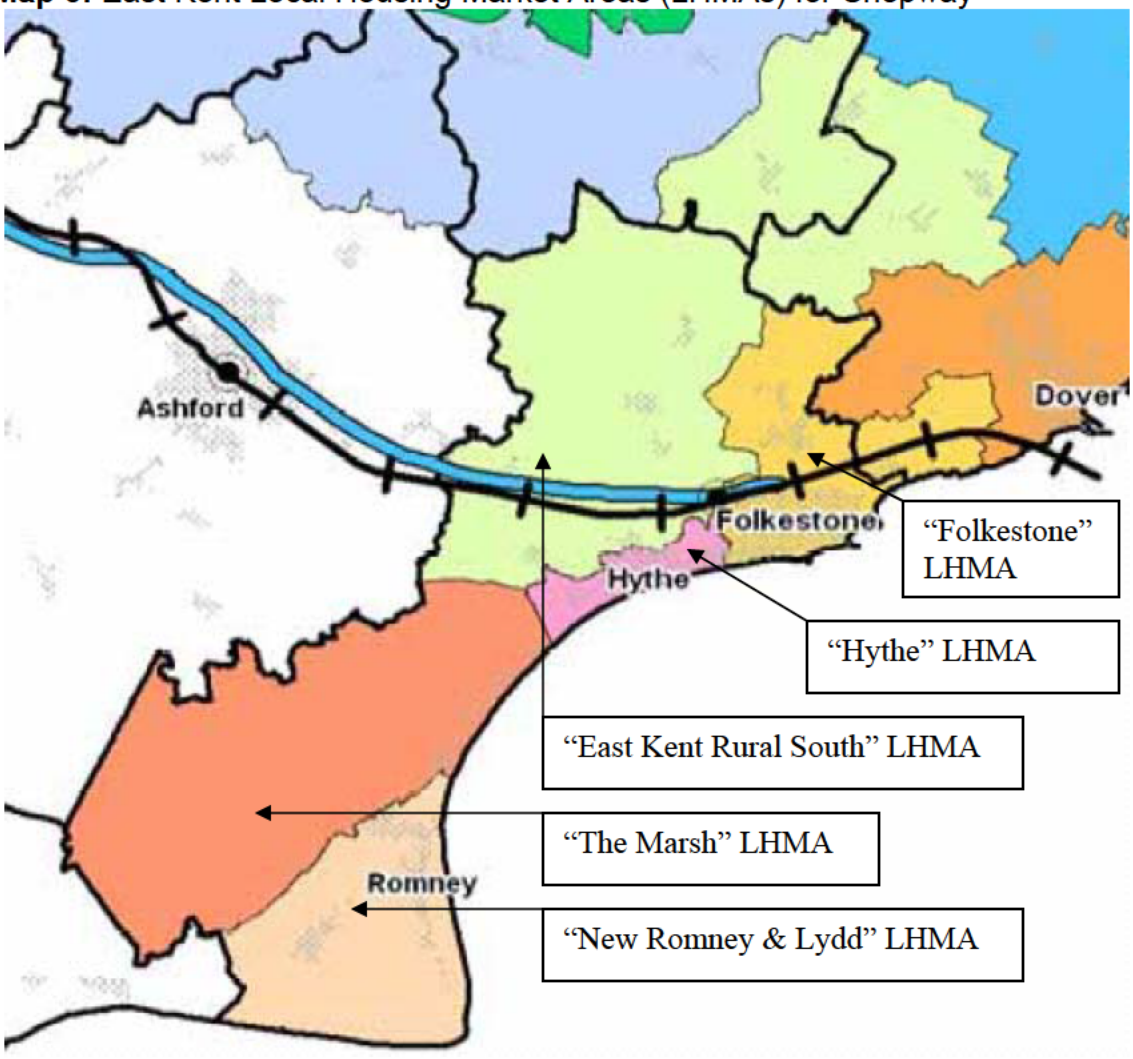
6.2 Applying results locally

6.2.1 SHLAA results will be utilised in accordance with national and regional policy. The other key housing evidence base expected by central government in PPS3 is the Strategic Housing Market Assessment[27] (SHMA) as explained in the first section of this document. As seen, the SHLAA results can be placed in context using information from this companion study. One of its useful elements is to demonstrate how constituent parts of the district (wards) relate to each other and adjoining parts of East Kent in housing and economic terms.

6.2.2 The SHMA defined five Local Housing Market Areas (LHMAs) within Shepway. This is based on a number of factors, but the map of LHMAs (Map 5 below) below expresses commonalities that geographically shape housing markets, for example travel to work patterns (which often reflect transport links).

[27] Ecotec (2009) Strategic Housing Market Assessment for the East Kent Sub-region, final Report.

Map 5: East Kent Local Housing Market Areas (LHMAs) for Shepway



Source:
Strategic Housing Market Assessment for the East Kent Sub-region, final Report (Fig. 9.1)

6.2.3 The defining characteristics of these LHMAs are explained in Appendix IX. Full details are available in the SHMA, such as the implications of rurality on housing need, but the following table outlines some key attributes relevant to the SHLAA:

Table 2: Local Housing Market Area information

Local Housing Market Area (LHMA)	*Total house-holds*	*Extends beyond Shepway District Council (SDC) boundaries?*	*Viewed as pre-dominantly rural?*	*House cost rank of Shepway LHMAs*	*Deliverable/ developable dwellings from SHLAA*
Folkestone	24062:	Yes, inc. non-SDC	No	5	5,278
E Kent Rural South	9292:	Yes, inc. non-SDC	Yes	1	1,886
Hythe	6751	No	No	2	1,604
New Romney & Lydd	5498	No	Yes	3	977
The Marsh	3832	No	Yes	4	788

Source: Extracted from this document and Strategic Housing Market Assessment for the East Kent Sub-region, final Report (Table 12.10a).

6.2.4 This table shows that, coincidentally, the strategic amount of additional housing possible in future is a similar proportion with the existing number of households in the LHMA (which in some instances is wider than just Shepway wards) in each part of the district. For further details see site-by-site information that follows in the rest of this section.

6.2.5 For the purposes of this Consolidated Document, SHLAA findings Tables (3 and 5) have been reformatted after June 2009 to present sites in relation to their LHMA, and within that, by ward. This is done alphabetically, and now excludes site cross-references.

6.2.6 The results i.e. whether deliverable/developable sites or not, are unchanged. **No** unique sites have been added or deleted, or capacity or phasing adjusted, since results were finalised in June 2009.

6.2.7 The only potentially material addition in this Consolidated Document is the insertion of cross-references to elsewhere in the document, in the strategic constraints column of Table 5 for some deliverable/developable sites.

7. The Unsuccessful Sites

7.1 Exclusionary criteria

7.1.1 The suitability, availability and achievability assessment is based on the Kent Protocol which forms Appendix I of this document*. For further information on local application, please see the finalised Shepway SHLAA Project Methodology and the Shepway SHLAA forms* (Appendix V).

7.1.2 The status of sites not deliverable/developable is classified as follows:

- *As identified at 1st SHLAA phase: Unsuitable*
- *As identified at 2nd SHLAA phase: Unavailable*
- *As identified at 3rd SHLAA phase: Unachievable*

Certain additional sites did not feature in the SHLAA, as they fail to meet the qualifying criteria set out in the Methodology Statements 1 and 2, termed: Non Qualifying. (These either were located in international or major national designated areas for protection, or failed to yield a net gain of five dwellings).

7.2. Unsuccessful sites schedule

Table 3i Non deliverable/developable sites (East Kent Rural South LHMA):

Site Details-			**Finding-**
ref.	**Address**	**Ward**	**Status**
6	*Adj. Kennel Cottages, Cullens Hill, Elham*	*Elham & Stelling Minnis*	*Unsuitable*
14	*Adj. Cemetery, Vicarage Lane, Elham*		*Unavailable*
362	*Orchard Nurseries, Stone St, Petham, Canterbury*		*Unsuitable*
396	*White Horse La, Wingmore, Canterbury*		*Unsuitable*
397	*Bunkers Hill, Elham*		*Unsuitable*
443	*Meadow Bank, Elham*		*Unsuitable*
198/199 /200/201	*Link Park Industrial Estate, Lympne*	*Lympne & Stanford*	*Unsuitable*
202	*NW of M20 J11*		*Unsuitable*
205	*M20 J11 South Side*		*Unavailable*
206	*Stanford North*		*Unsuitable*
208	*Remaining land at Link Park*		*Unavailable*
210	*Shepmead, Lympne*		*Unavailable*

211	*adj Nickolls Depot, Stone St, Lympne*		*Unsuitable*
212	*Land at Railway Cottage, Stone St, Stanford*		*Non-qualifying*
213	*Yew Tree Fm, Stanford*		*Unsuitable*
321	*W of Otterpool La, Lympne*		*Unsuitable*
323	*Cydonia, Ashford Rd, Newingreen*		*Unsuitable*
326	*Adj Elm Acres, Newingreen, Hythe*		*Unsuitable*
420/421	*W of Stone St, Stanford*		*Unsuitable*
434	*Opp Yew Tree Fm, Stanford*		*Unsuitable*
9	*9 Barrow Hill Rise, Sellindge,*	*North Downs West*	*Non-qualifying*
263	*Land at Main Rd, Sellindge*		*Unavailable*
268	*Springfield House, Sellindge*		*Unavailable*
274	*Jacksons, Lymbridge Green, Stowting Common, Ashford*		*Unsuitable*
320	*Land Adj Meadow Bank, Sellindge*		*Unsuitable*
363	*Stonegate Farmers, Stone Street, Canterbury*		*Unsuitable*
364a	*The Pines and Lodge, Lyminge*		*Unsuitable*
402	*Piggeries, Main Rd, Sellindge*		*Unsuitable*
428	*Somerfield Ct Fm N, Barrowhill, Sellindge*		*Unsuitable*
429	*Somerfield Ct Fm S, Barrowhill, Sellindge*		*Unsuitable*
439	*Otterpool Quarry, Ashford Rd, Sellindge*		*Unavailable*
456	*Elm Tree Fm W, Sellindge*		*Unavailable*
456a	*Elm Tree Fm E, Sellindge*		*Unavailable*
467	*Potten Fm, Sellindge*		*Unsuitable*
290	*Land S of Willetts, Sandling Rd, Saltwood, Hythe*	*Tolsford*	*Unavailable*
293	*Grange Rd, Saltwood, Hythe*		*Unsuitable*
301	*Beachborough Estate, Folkestone*		*Unsuitable*
325	*Peene House Cottages land, Newington Rd, Peene,*		*Unsuitable*
327	*Land on Teddars Leas Rd, Etchinghill*		*Unsuitable*
385	*Frogholt Manor Land, Frogholt,*		*Unsuitable*
417/418	*Etchinghill Nurseries, Etchinghill*		*Unsuitable*
419	*Etchinghill Golf land, Etchinghill*		*Unsuitable*
422	*Land at Newington Rd, Peene,*		*Unsuitable*
423	*Land N of former railway, off Teddars Leas Rd, Etchinghill*		*Unsuitable*
444	*Rectory La, Saltwood*		*Unsuitable*
445	*Trafalgar Field, Sandling Rd, Saltwood*		*Unsuitable*
446	*Land adj Hogs Green, Sandling Rd, Saltwood*		*Unsuitable*
447	*Land adj Sandling Station, Saltwood*		*Unsuitable*

Table 3ii Non deliverable/developable sites (Folkestone LHMA):

Site Details-			Finding-
ref.	**Address**	**Ward**	**Status**
16	*Ambulance Station, 121 Church Road, Folkestone*	*FOLKE-STONE Cheriton*	*Unsuitable*
17	*Bus Depot, Kent Road, Folkestone*		*Unsuitable*
18	*Land adjoining 71 Roman Way, Folkestone*		*Unsuitable*
365	*St Martin's Plain Camp land, Horn St, Shorncliffe Barracks, Folkestone*		*Unsuitable*
425a	*Upperworks, The Cherry Garden, Castle Hill, Folkestone*		*Unsuitable*
465	*Former Little Chef, Firs Lane, Cheriton, Folkestone*		*Unavailable*
343	*Land N of Churchill Avenue, Folkestone*	*FOLKE-STONE East*	*Unsuitable*
353	*Brabner Close land, Folkestone*		*Unsuitable*
454	*N of Montgomery Way, Folkestone*		*Unsuitable*
29	*Land adj Shepway Close, Folkestone*	*FOLKE-STONE Foord*	*Unavailable*
30	*Land adj 2 Bradstone Avenue, Folkestone*		*Unavailable*
359	*Viaduct, Foord North Rd, Folkestone*		*Unavailable*
360	*Folkestone Eastfields, Folkestone*		*Unsuitable*
448	*134-144 Canterbury Rd, Folkestone*		*Unsuitable*
472	*Builders Yard, Edward Rd, Folkestone*		*Unsuitable*
479	*45-47 Blackbull Rd, Folkestone*		*Unavailable*
34	*South Quay, Folkestone Harbour, Folkestone*	*FOLKE-STONE Harbour*	*Unavailable*
42	*1 London Street, Folkestone*		*Non-qualifying*
341	*Land off Wear Bay Rd, Folkestone*		*Unsuitable*
355	*Abbott Rd land, Folkestone*		*Unavailable*
37/372	*Highfield Industrial Estate, Warren Rd, Folkestone*		*Unsuitable*
450	*Southern Way, Folkestone*		*Unavailable*
54	*6-7 Kingsnorth Gardens, Folkestone*	*FOLKE-STONE Harvey Central*	*Unavailable*
57	*2 Ingles Road, Folkestone*		*Unavailable*
63/308/ 310	*Payers Park, Tontine Street, Folkestone*		*Unachievable*
309	*87-91 Sandgate Rd, Folkestone*		*Unavailable*
452	*Darby Rd, Folkestone*		*Unsuitable*
478	*27 Guildhall St, Folkestone*		*Unavailable*
69	*3 Clifton Road, Folkestone*	*FOLKE-STONE Harvey West*	*Unavailable*
70	*14 Plain Road, Folkestone*		*Unavailable*
71	*73 Shorncliffe Road, Folkestone*		*Unavailable*
73	*The Grand Land, Folkestone*		*Unavailable*
333	*Westbourne Gardens, Folkestone*		*Unsuitable*
471	*Builders/Office adj I Edward Terrace, Folkestone*		*Unsuitable*
81/82/83 /84/85	*Shearway NE Sites, Shearway Road, Folkestone*	*FOLKE-STONE Morehall*	*Unavailable*
87	*Land at Romney Avenue, Folkestone*		*Unsuitable*
88	*Concept Court, Shearway Road, Shearway Business*		*Unavailable*

	Park, Folkestone		
315	*Former Channel Sch & Park Farm Primary Sch, Folkestone*		*Unavailable*
356	*F'stone West Station - North Side, Folkestone*		*Unachievable*
425b	*Site B Shearway (N of Shearway Road), Folkestone*		*Unsuitable*
98	*7 Bournemouth Road, Folkestone*	*FOLKE-STONE Park*	*Unachievable*
100	*46 Broadmead Road, Folkestone*		*Non-qualifying*
104	*Linksway Site, Park Farm, Folkestone*		*Unavailable*
105	*Folkestone Golf Course/ Sports Centre, Radnor Park Avenue, Folkestone*		*Unavailable*
338	*Blackbull Allotments, Folkestone*		*Unsuitable*
361	*Broadmead land, Folkestone*		*Unsuitable*
87	*Romney Avenue Land, Folkestone*	*FOLKE-STONE Sand-gate*	*Unsuitable*
109	*Land opp 20-23 Encombe, Sandgate, Folkestone*		*Unsuitable*
111	*Lower Corniche, Hospital Hill, Sandgate, Folkestone*		*Unsuitable*
112	*15, Encombe, Sandgate, Folkestone*		*Non-qualifying*
114	*Former Tavr Centre, Sandgate, Folkestone*		*Non-qualifying*
116	*116 Sandgate Manor, Sandgate, Folkestone*		*Unavailable*
124	*Rathealy, Granville Road East, Sandgate, Folkestone*		*Unsuitable*
340	*Land at the Foreshore Riviera, Sandgate, Folkestone*		*Unsuitable*
368	*R/o Upper Corniche, Hospital Hill, Sandgate, Folkestone*		*Unsuitable*
369	*Risborough land, Folkestone*		*Unsuitable*
243	*R/o 75 The Street, Hawkinge,*	*North Downs East*	*Unsuitable*
245	*Hawkinge Employment allocation, Hawkinge*		*Unsuitable*
255	*Units 1&2 Gibraltar La, Hawkinge*		*Unsuitable*
261	*Limuru, Cowgate Lane, Hawkinge*		*Non-qualifying*
303/a	*Densole Farm etc, Canterbury Rd, Densole*		*Unsuitable*
311	*408 Canterbury Rd, Densole*		*Unsuitable*
331	*301-307 Canterbury Rd, Densole*		*Unsuitable*
332	*Pay Street, Densole*		*Unsuitable*
386	*Mill Lane land, Hawkinge*		*Unsuitable*
387	*Land E of Canterbury Rd, Hawkinge*		*Non-qualifying*
392	*Land at Paddlesworth La, Paddlesworth*		*Unsuitable*
393	*Dane Fm Land, Elvington La, Hawkinge,*		*Unsuitable*
394 inc. 395	*Land SW of Gibraltar La, Hawkinge*		*Unsuitable*
398	*Land at the Street adj 152 Canterbury Rd, Hawkinge*		*Unsuitable*
399	*Land NE of Canterbury Rd, Hawkinge*		*Unsuitable*
441	*289-301 Canterbury Rd, Densole*		*Unsuitable*
442	*304-318 Canterbury Rd, Densole*		*Unsuitable*
469	*Land adj The Paddocks, Densole*		*Unsuitable*

Table 3iii Non deliverable/developable sites (Hythe LHMA):

Site Details-			**Finding-**
ref.	***Address***	***Ward***	***Status***
127	*R/o Tanners House, Saltwood*	*HYTHE Central*	*Unsuitable*
128	*81 North Rd, Hythe*		*Unsuitable*
132	*Old Fire Station, Portland Rd, Hythe*		*Unavailable*
133	*36 Bartholomew St, Hythe*		*Unsuitable*
135	*1-3 Napier Gardens, Hythe*		*Unsuitable*
136	*Gopak, Range Road, Hythe*		*Unsuitable*
137	*Smiths Industries, Military Road, Hythe*		*Unavailable*
138	*Wood Acres, London Road, Hythe*		*Non-qualifying*
141	*Spanton Crescent Land, Hythe*		*Unsuitable*
148	*Stade Court & Land to North, Hythe*		*Unavailable*
485	*Land off Range Rd, Hythe*		*Unavailable*
149	*Eaton Lands, Hythe*	*HYTHE East*	*Unavailable*
150	*Paraker Way land, Hythe*		*Unavailable*
156	*Summerhayes, Cliff Road, Hythe*		*Non-qualifying*
158	*Vale Farm, Horn St, Hythe*		*Unsuitable*
159	*Gardens of 70-92 Seabrook Rd, Hythe*		*Unavailable*
160	*69A Seabrook Way, Hythe*		*Unavailable*
161	*69 Seabrook Way, Hythe*		*Unsuitable*
162	*26 Sene Park, Hythe*		*Unsuitable*
163	*40 Blackhouse Hill, Hythe*		*Unavailable*
165	*95 Seabrook Rd, Hythe*		*Unavailable*
166	*Garage block, Alexandra Corniche, Hythe*		*Unsuitable*
167	*Brambles, Cannongate Rd, Hythe*		*Unsuitable*
170	*Cliff Rd properties, Hythe*		*Unavailable*
371	*Hythe Town Reservoir, North Rd, Hythe*		*Non-qualifying*
412	*Land W of Horn St, Hythe*		*Unsuitable*
463	*Princes Parade Golf Course, Hythe*		*Unsuitable*
466	*Trout Fm, Horn St, Hythe*		*Unsuitable*
172	*Pennypot Ind Est, Hythe*	*HYTHE West*	*Unavailable*
174	*Willow Tree Fm Caravan Site, Hythe*		*Unavailable*
175	*Land SW of Nickolls Quarry, Willop Sewer, Dymchurch Rd, Hythe*		*Unsuitable*
179	*r/o Heronswood, 7 Woodlands Rise, West Hythe Rd, West Hythe*		*Unsuitable*
305	*Riverside Ind Est, West Hythe Rd, West Hythe*		*Unsuitable*
348	*Sunnyside Farm, Burmarsh Rd, Hythe*		*Unsuitable*
457	*Opp Rock Cottage, Botolphs Br Rd, Hythe*		*Unsuitable*

Table 3iv Non deliverable/developable sites (The Marsh LHMA):

Site Details-			**Finding-**
ref.	**Address**	**Ward**	**Status**
1	*The Levin Club, 33-35 Seaway Crescent, St Marys Bay*	*Dym-church & St Mary's Bay*	*Unsuitable*
2/384	*r/o 22 Marine Avenue/ 123 Hythe Rd, Dymchurch*		*Unsuitable*
3	*22 Seaway Gardens, St Marys Bay*		*Non-qualifying*
5	*TA Training Centre, Jefferstone Lane, St Marys Bay*		*Unsuitable*
347	*High Knocke (R/O), Dymchurch,*		*Unsuitable*
349	*Redoubt/Fleets land, Dymchurch*		*Unsuitable*
350a	*Pear Tree Lane (S) Dymchurch*		*Unachievable*
350b	*Pear Tree Lane (N) Dymchurch*		*Unsuitable*
351a	*Church & Smiths Land (S), Hythe Rd, Dymchurch*		*Unsuitable*
351b	*Church & Smiths Land (N), Hythe Rd, Dymchurch*		*Unsuitable*
352	*Jefferstone La land to N, St Mary's Bay*		*Unavailable*
380	*Jenners Way land, St Marys Bay*		*Unsuitable*
276	*Land at Ivychurch, Romney Marsh*	*Romney Marsh*	*Non-qualifying*
277/302	*Land adj Moore Close, Brenzett*		*Unsuitable*
278	*Land at Brenzett Green, Brenzett*		*Unsuitable*
287	*Land adj Framlea, Rye Road, Brookland*		*Non-qualifying*
288	*Martin's Farm, Wenhams Lane, Ivychurch*		*Unsuitable*
289/a	*R.M Potato Co.Cockreed Lane, New Romney*		*Unsuitable*
324/376	*Brenzett Nurseries, Brenzett*		*Unsuitable*
329	*Pepperland Nurseries, Straight Lane, Brookland*		*Unsuitable*
330	*Land at the Flots, S of Brookland*		*Unsuitable*
353	*Land W of Burmarsh*		*Unsuitable*
374	*Opp Hammonds Corner, A259 New Romney*		*Unsuitable*
375	*Land adj Appledore Rd, Brenzett*		*Unsuitable*
391	*The Old Rectory, Burmarsh*		*Unsuitable*
406	*W of Ashford Rd, Ivychurch*		*Unsuitable*
406a	*N of Ivychurch Rd, Ivychurch*		*Unsuitable*
406b	*Opp Marsh Fm, Ivychurch,*		*Unsuitable*
407	*S of Salters La, Brookland*		*Unsuitable*
410	*St. Mary's Rd (Land N) New Romney*		*Unsuitable*
411	*Land NE of Gloucester Mews N, New Romney*		*Unsuitable*
427	*adj Old Post Office, Newchurch*		*Unsuitable*
432	*Boarman's Lane, Brookland*		*Unsuitable*
433	*Mulberry House, Brookland*		*Non-qualifying*

Table 3v Non deliverable/developable sites (Lydd & New Romney LHMA):

Site Details-			**Finding-**
ref.	**Address**	**Ward**	**Status**
182	*Lydd Caravan Park, Lydd*	*Lydd*	*Unsuitable*
183	*Connector House, Servo&Electronic Sales Ltd, Lydd*		*Unsuitable*
184	*Romney Sands (S) The Parade, Greatstone*		*Unsuitable*
184a	*Romney Sands (N) The Parade, Greatstone*		*Unsuitable*
186	*Dengemarsh Ind Est, Lydd*		*Unavailable*
187	*Horses Bones Farm, Midley Wall, Lydd*		*Non-qualifying*
188	*Land adj Bridge Tavern, Lydd*		*Unavailable*
192	*R/O 62 High St, Lydd*		*Non-qualifying*
193	*Holcum Ho, New Lane, Lydd*		*Unavailable*
318	*Land off Kitewell Lane extension, Lydd*		*Non-qualifying*
319	*Land at Lade Fort, Lydd on Sea*		*Non-qualifying*
378	*Land at Mulberry Cottage, Lydd*		*Unsuitable*
381	*r/o Derville and Prior Rds, Greatstone*		*Non-qualifying*
390	*Peak Industrial, Lydd*		*Unsuitable*
400	*Land at Ballard Rd, Greatstone*		*Non-qualifying*
451	*Kitewell La (N), Lydd*		*Unsuitable*
180	*adj 84 The Parade, Greatstone*	*New Romney Coast*	*Unsuitable*
214	*103 Coast Drive Littlestone, New Romney*		*Unsuitable*
215	*31 Littlestone Rd, New Romney*		*Unavailable*
216	*Station Approach land, adj A Smith Motors, Littlestone, New Romney*		*Unsuitable*
221	*Adj 39 Meehan Rd, Greatstone,*		*Non-qualifying*
222	*Adj End House, Littlestone, New Romney*		*Unavailable*
224	*Chatsworth, Madeira Rd, Littlestone, New Romney*		*Unavailable*
437	*Land at Cherry Gardens, Littlestone, New Romney*		*Unsuitable*
462	*Adj Varne Boat Club, Greatstone*		*Unsuitable*
227	*Learoyd Rd, Mountfield Ind Est. New Romney*	*New Romney Town*	*Unsuitable*
231	*Running Waters, Lydd Rd, New Romney*		*Unsuitable*
234	*Golan House, Lydd Rd, New Romney*		*Non-qualifying*
235	*Warren Farm, Dymchurch Rd, New Romney*		*Non-qualifying*
307 inc. 468	*Herring Hang Field & adj Westview Cottages, New Romney*		*Unavailable*
438	*Church Farm Land (next to Church La), New Romney*		*Unachievable*

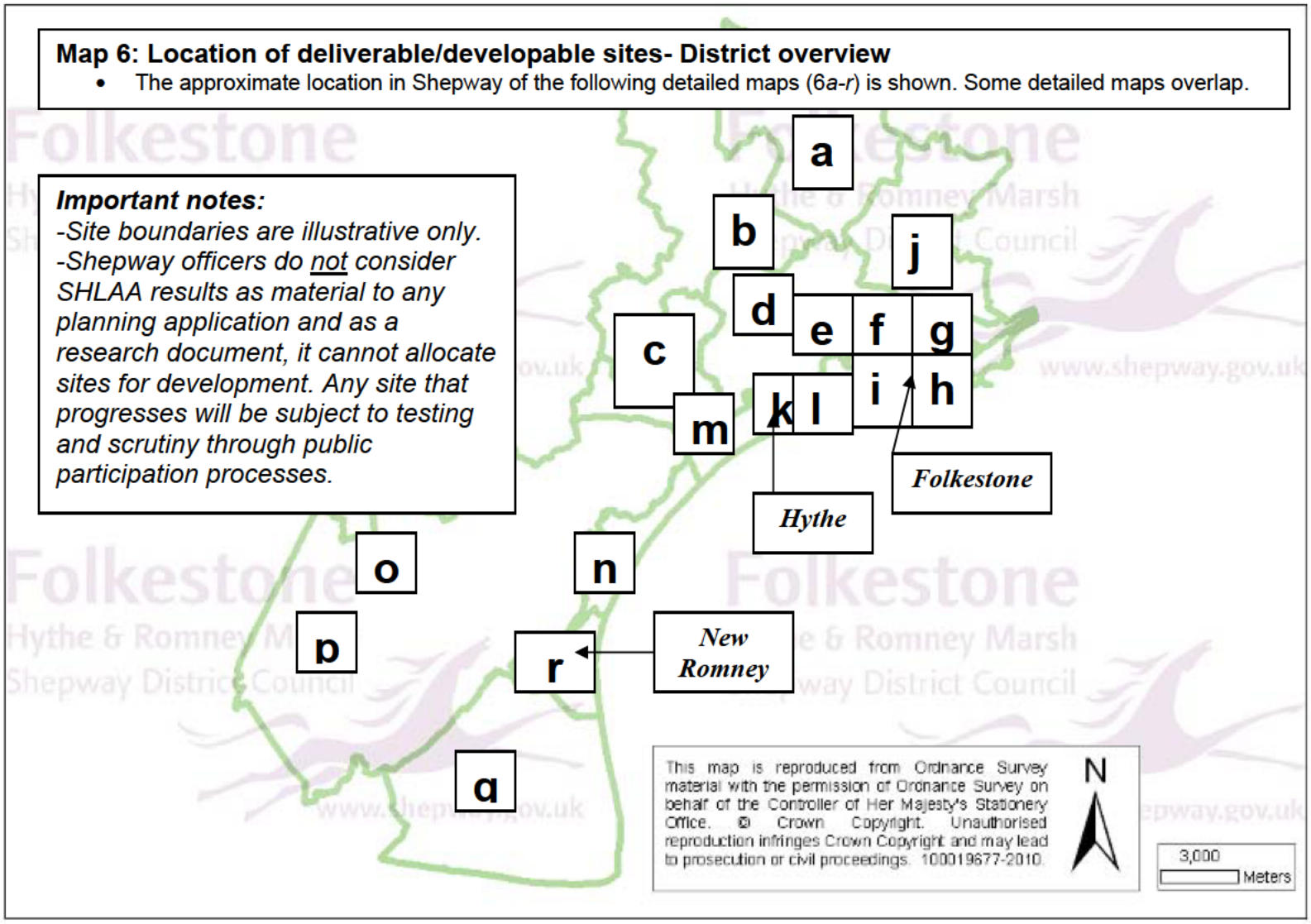
7.2.1 No polygons exist to electronically define most of these sites. Therefore it has not been possible to digitally map ‘unsuccessful’ sites. Hard copy based mapping is available on request for individual sites found to be not deliverable/developable.

7.2.2 Please note the following maps are of deliverable/developable sites, and show their SHLAA site reference number and ward boundaries. The intention is to show the location of the sites not their exact extent.

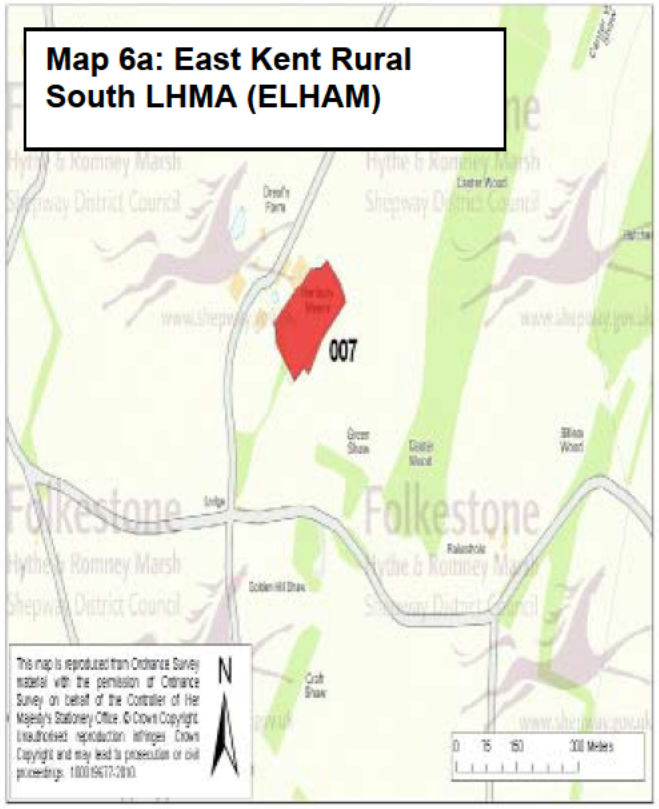
7.2.3 Whatever the SHLAA finding, if it is to be delivered **every site will be subject to testing and scrutiny** in the planning process (via the LDF or individual applications) if this had not already happened. This will include formal public consultation opportunities.

Map 6: Location of deliverable/developable sites- District overview

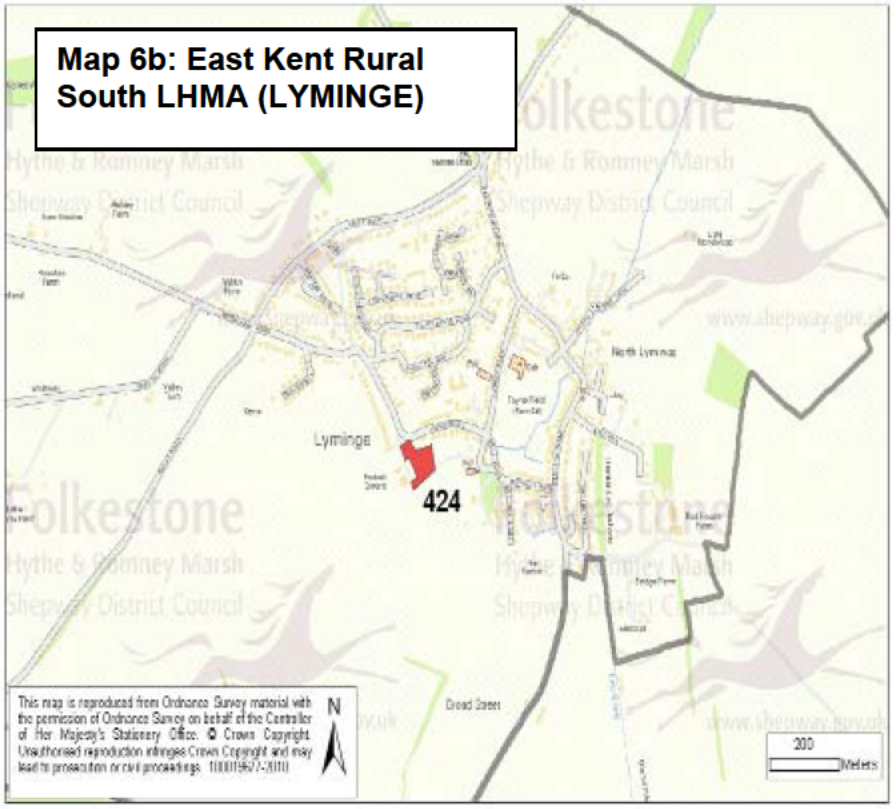
- The approximate location in Shepway of the following detailed maps (6*a-r*) is shown. Some detailed maps overlap.

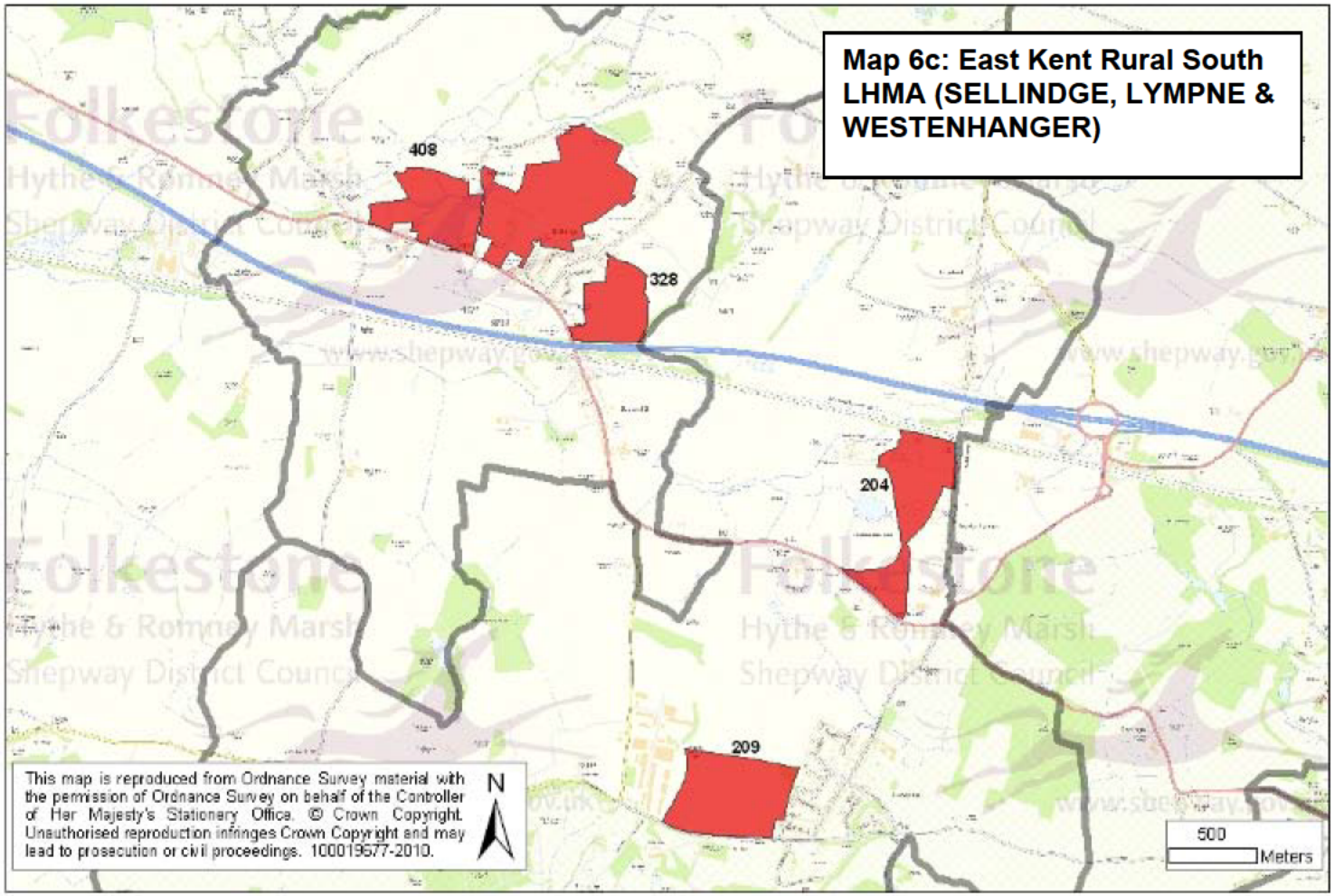


Map 6a: East Kent Rural South LHMA (ELHAM)



Map 6b: East Kent Rural South LHMA (LYMINGE)




Map 6c: East Kent Rural South LHMA (SELLINDGE, LYMPNE & WESTENHANGER)
408
328
204
209
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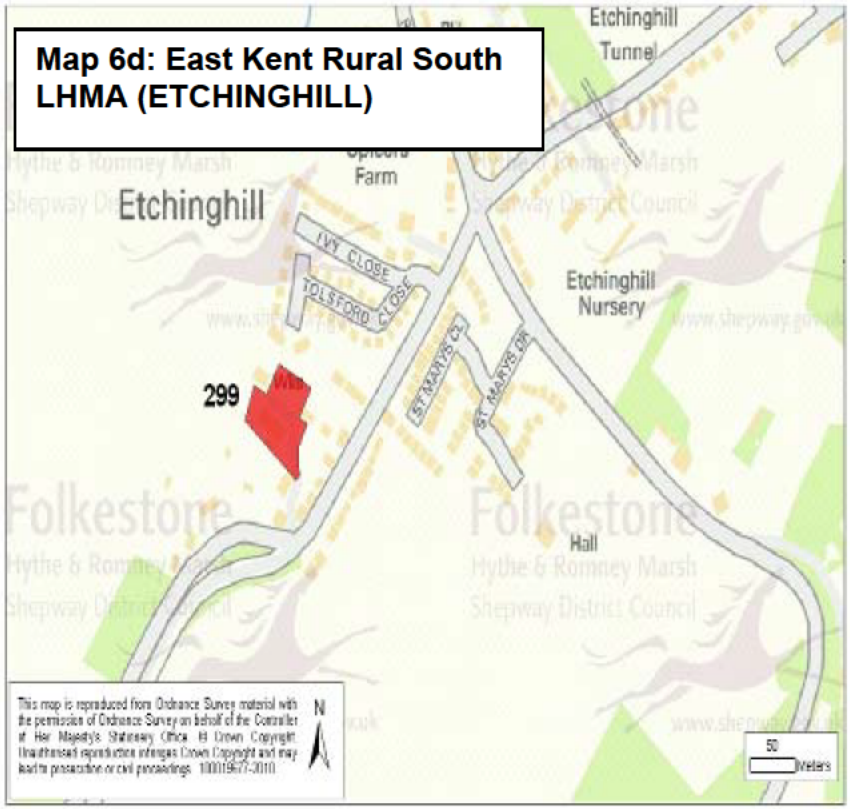
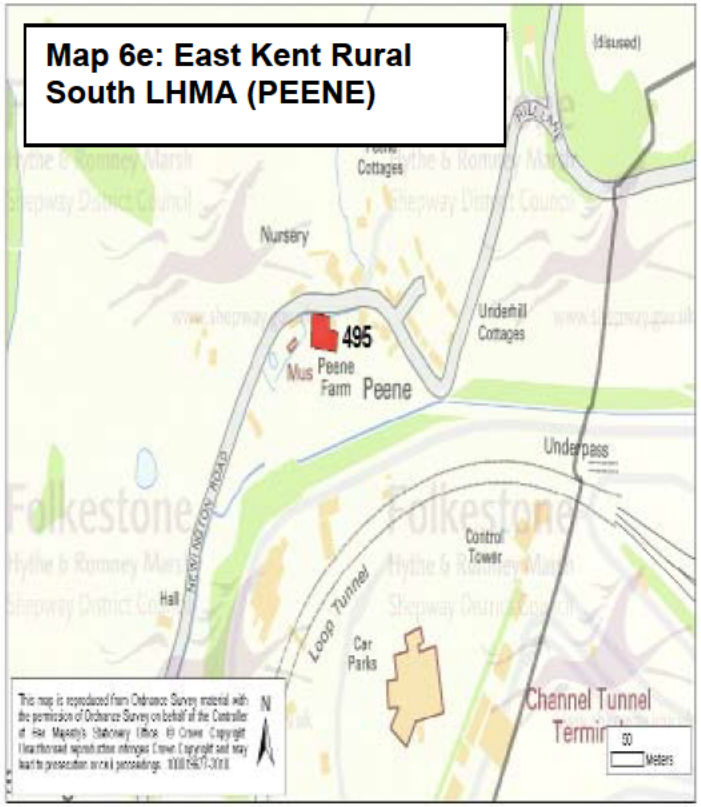
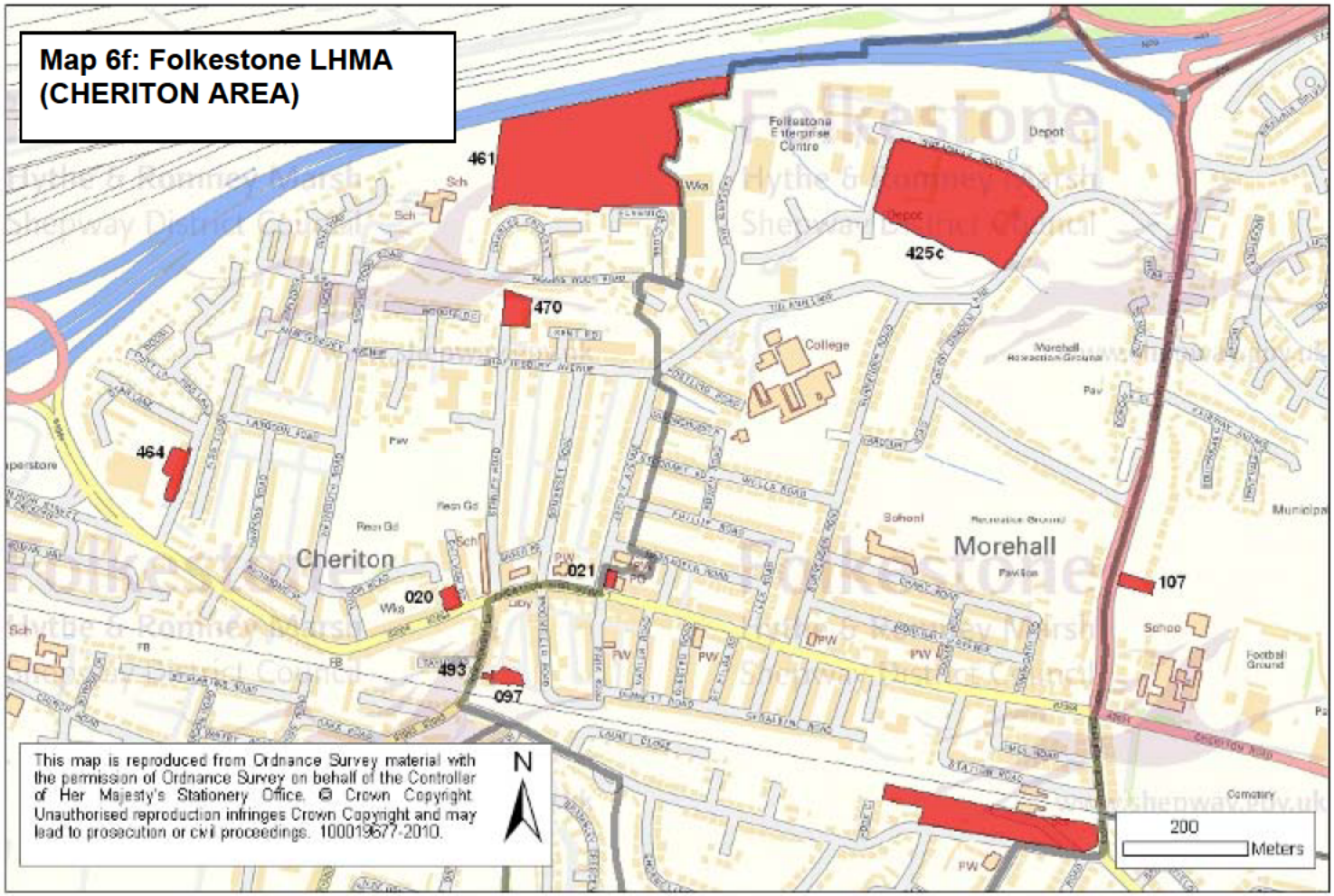
N
500
Meters


Map 6d: East Kent Rural South LHMA (ETCHINGHILL)
Etchinghill
Tunnel
Etchinghill
Farm
Etchinghill
IVY CLOSE
TOLSFORD CLOSE
ST MARYS CT
ST MARYS DR
Etchinghill
Nursery
299
Hall
Folkestone
Hythe & Romney Marsh
Shepway District Council
50
Meters
N


Map 6e: East Kent Rural South LHMA (PEENE)
(disused)
Cottages
Nursery
Underhill
Cottages
495
Mus
Peene
Farm
Peene
Underpass
Control
Tower
Hall
Loop Tunnel
Car
Parks
Channel Tunnel
Folkestone
Hythe & Romney Marsh
Shepway District Council
50
Meters
N


Map 6f: Folkestone LHMA
(CHERITON AREA)
461
425c
470
464
021
020
493
097
107
Cheriton
Morehall
College
Depot
Folkestone Enterprise Centre
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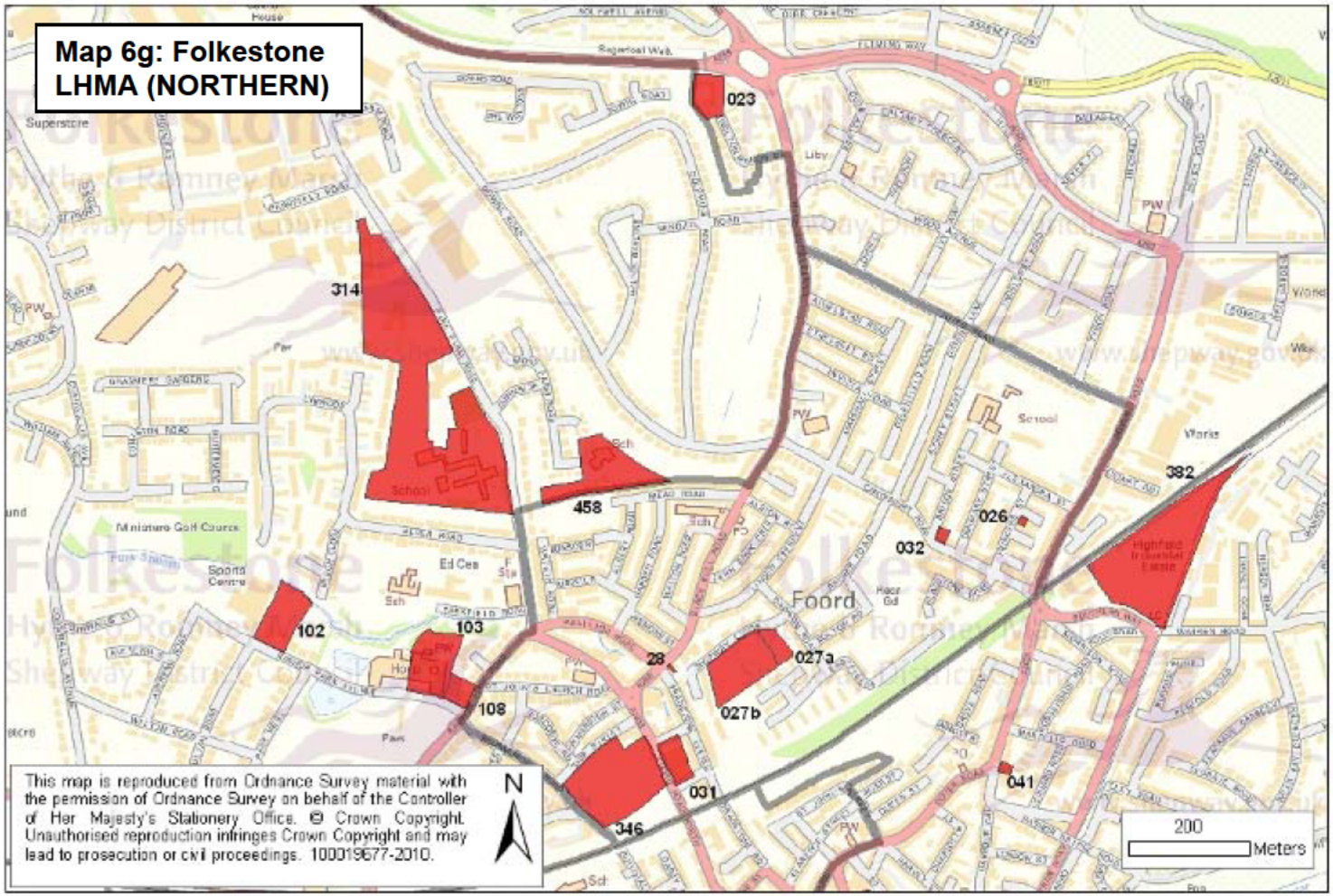
N
200
Meters


Map 6g: Folkestone
LHMA (NORTHERN)
023
314
458
382
026
032
102
103
108
28
027a
027b
031
346
041
Foord
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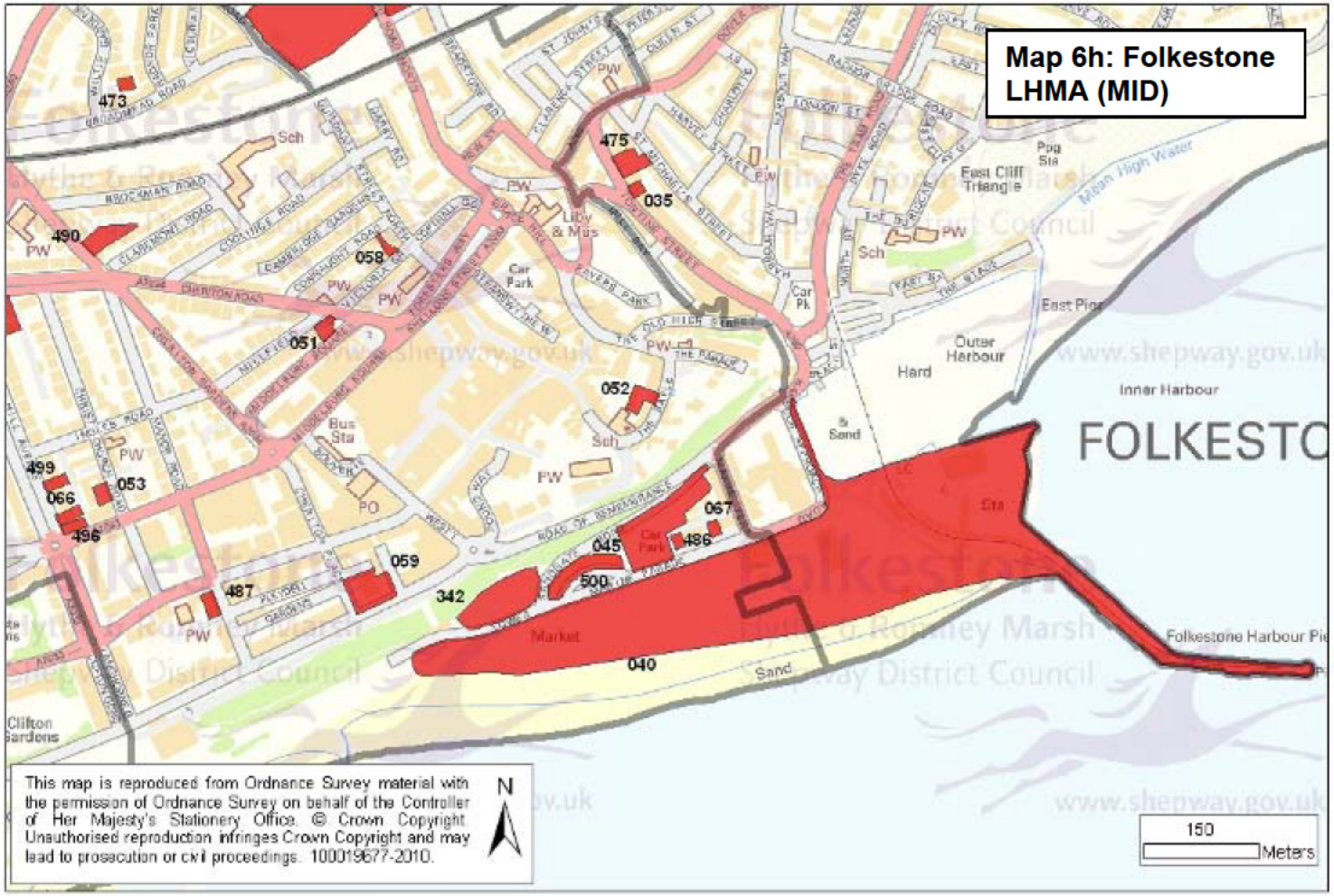
N
200
Meters


Map 6h: Folkestone LHMA (MID)
473
475
035
490
058
051
052
053
499
066
496
059
487
342
045
500
486
067
040
Sch
Car Park
Bus Sta
PO
Sub
Liby & Mus
East Cliff Triangle
Ppg Sta
Outer Harbour
Hard
Inner Harbour
Sand
Market
Clifton Gardens
Folkestone Harbour Pie
FOLKESTO
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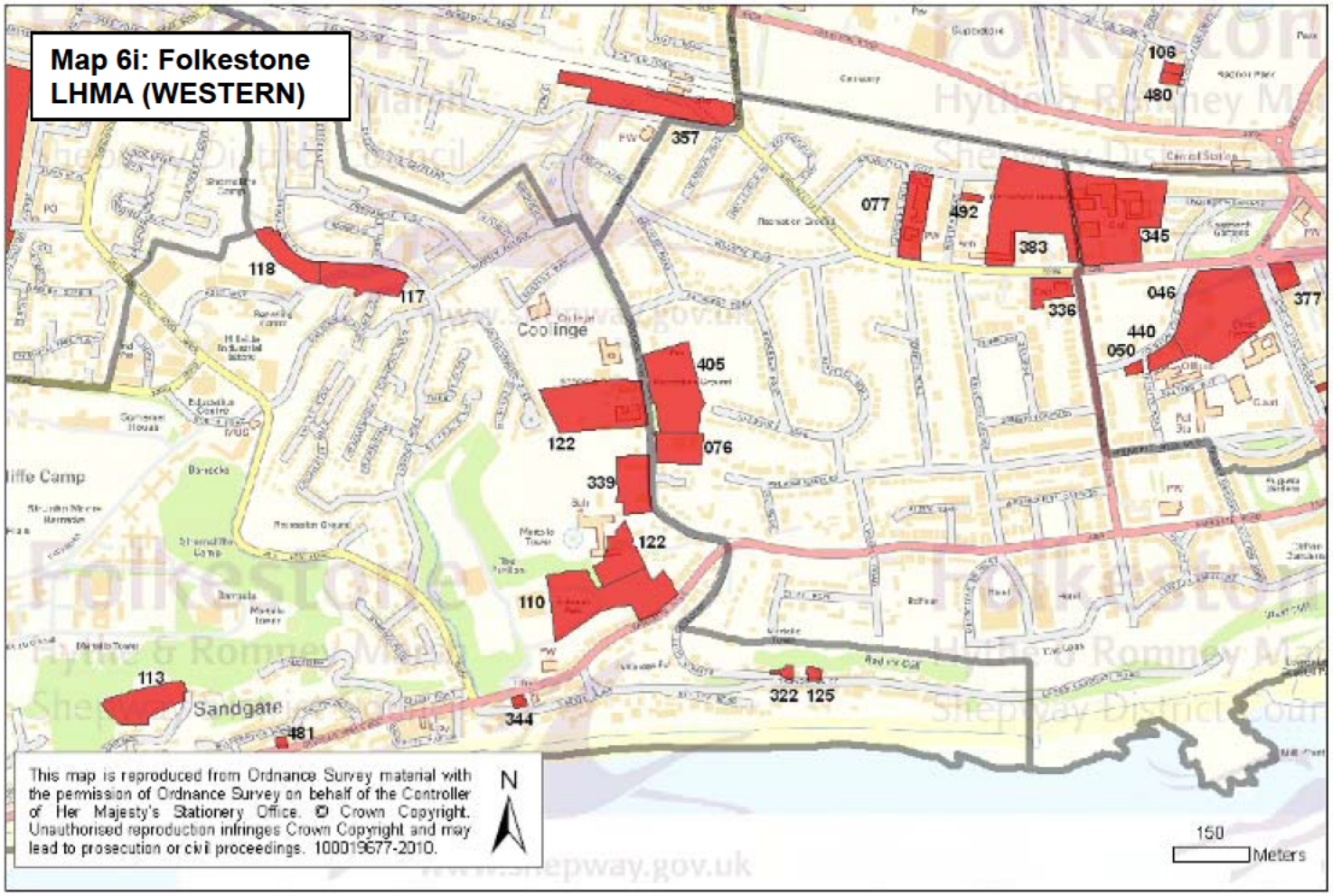
N
150
Meters


Map 6i: Folkestone
LHMA (WESTERN)
106
480
357
077
492
383
345
118
117
336
046
377
440
050
Cooplinge
405
122
076
339
122
110
113
Sandgate
481
344
322
125
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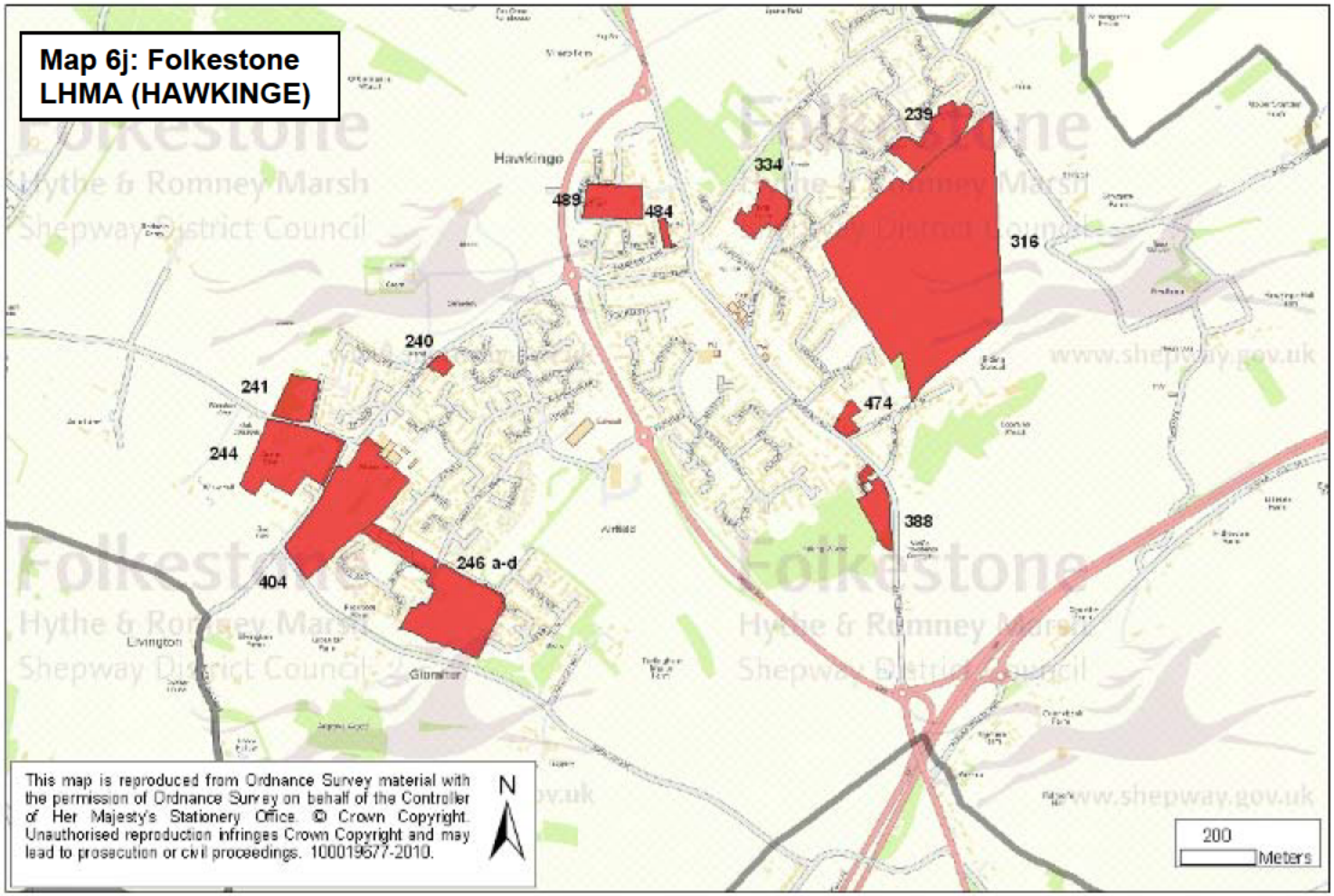
N
150
Meters


Map 6j: Folkestone LHMA (HAWKINGE)
Hawkinge
Livington
Gibraltar
239
334
489
484
316
240
241
244
474
388
246 a-d
404
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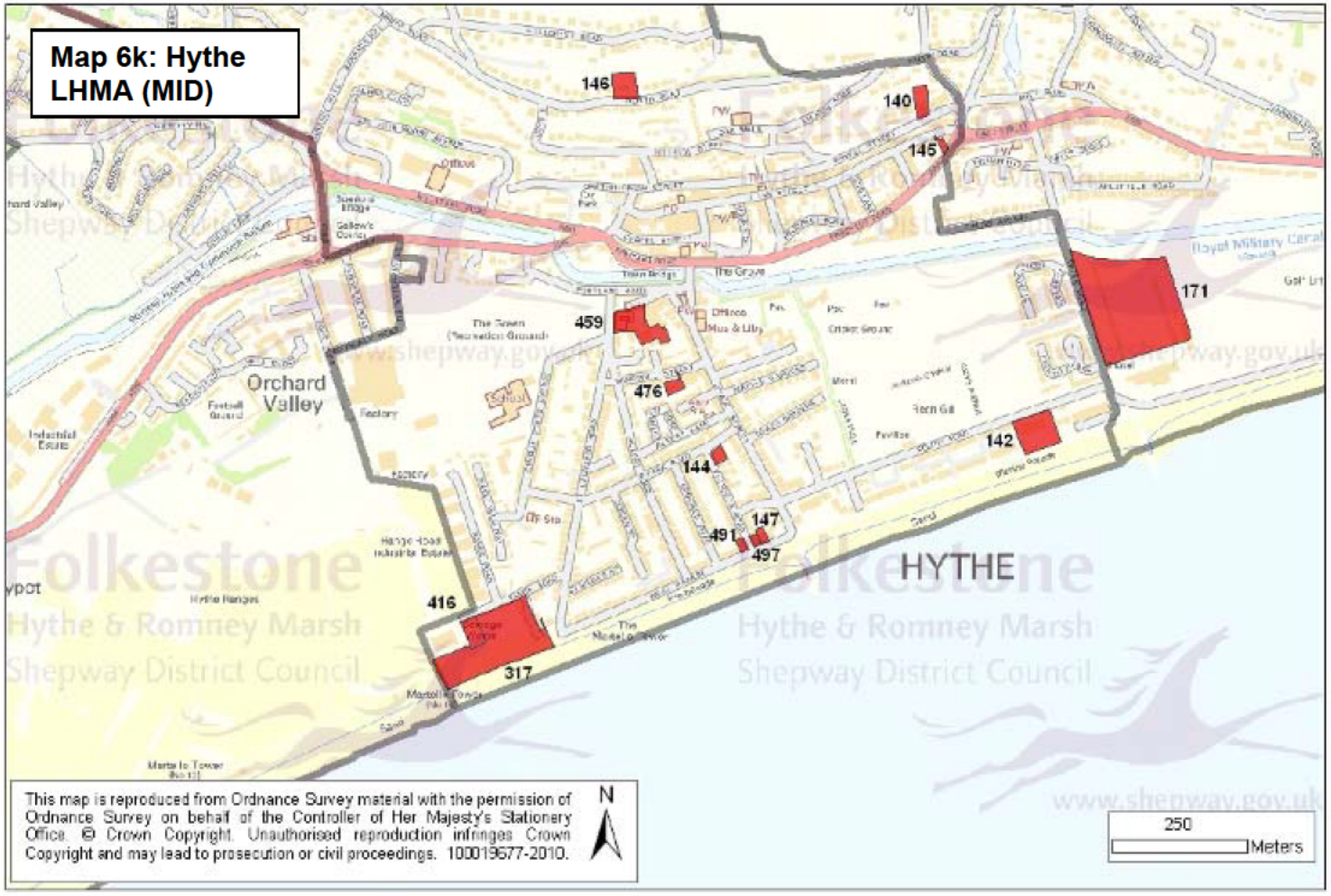
Map 6k: Hythe LHMA (MID)
146
140
145
171
459
476
142
144
147
491
497
416
317
Orchard Valley
HYTHE
Folkestone
Hythe & Romney Marsh
Shepway District Council
www.shepway.gov.uk
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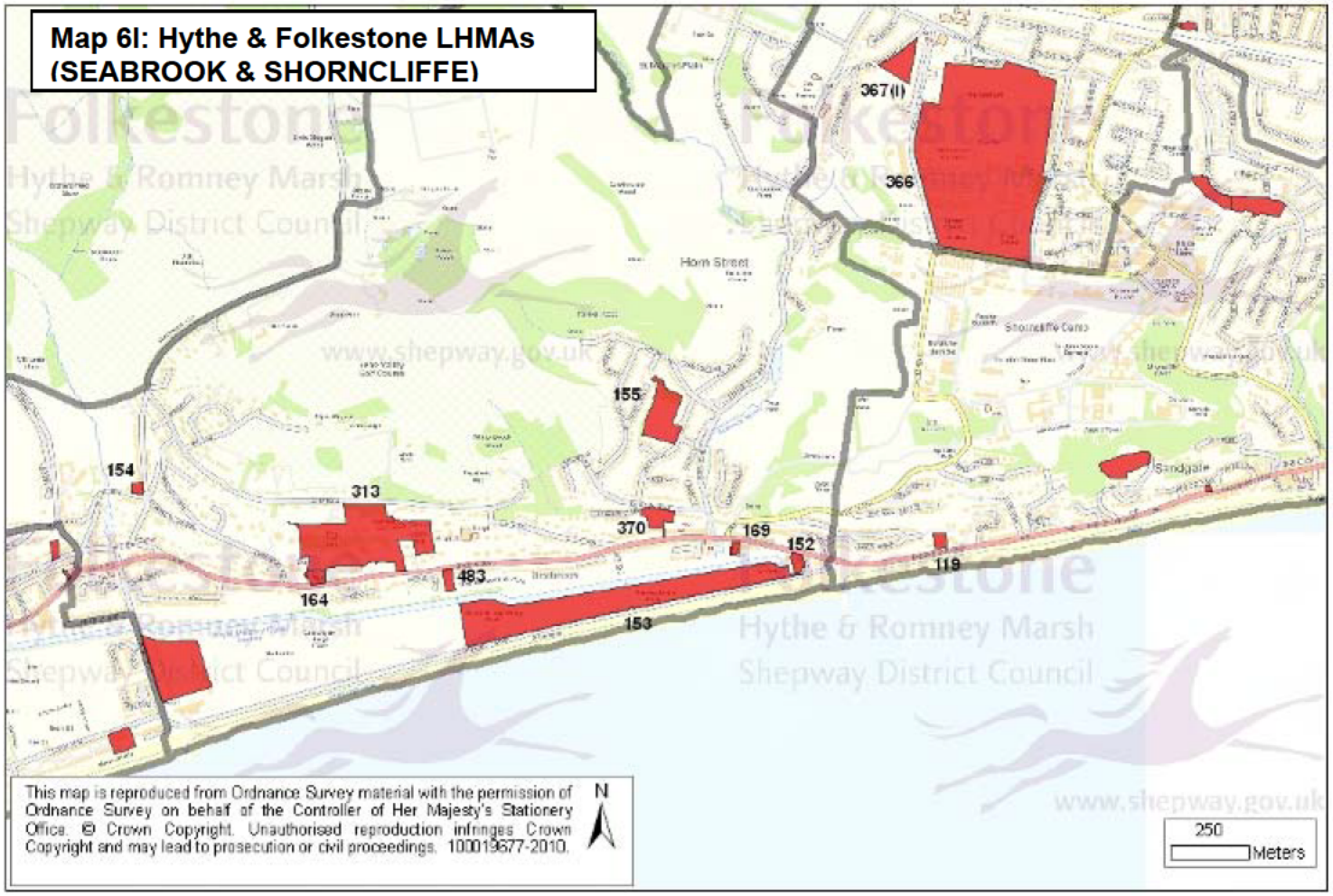
Meters


Map 6l: Hythe & Folkestone LHMAs
(SEABROOK & SHORNCLIFFE)
367(i)
366
Horn Street
155
154
313
370
169
152
119
483
164
153
Sandgate
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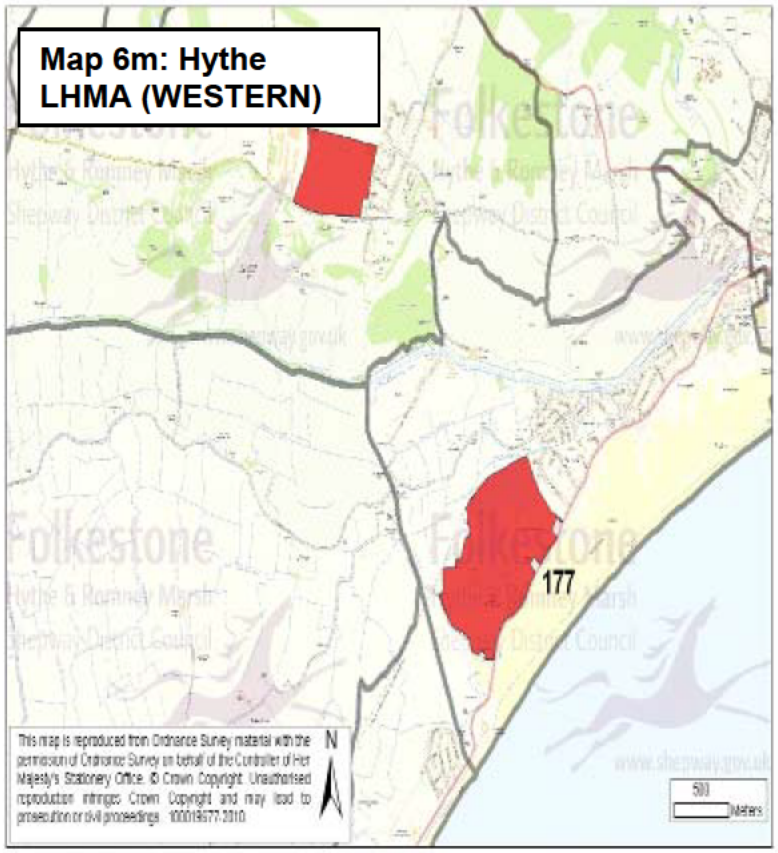
N
250
Meters


Map 6m: Hythe
LHMA (WESTERN)
177
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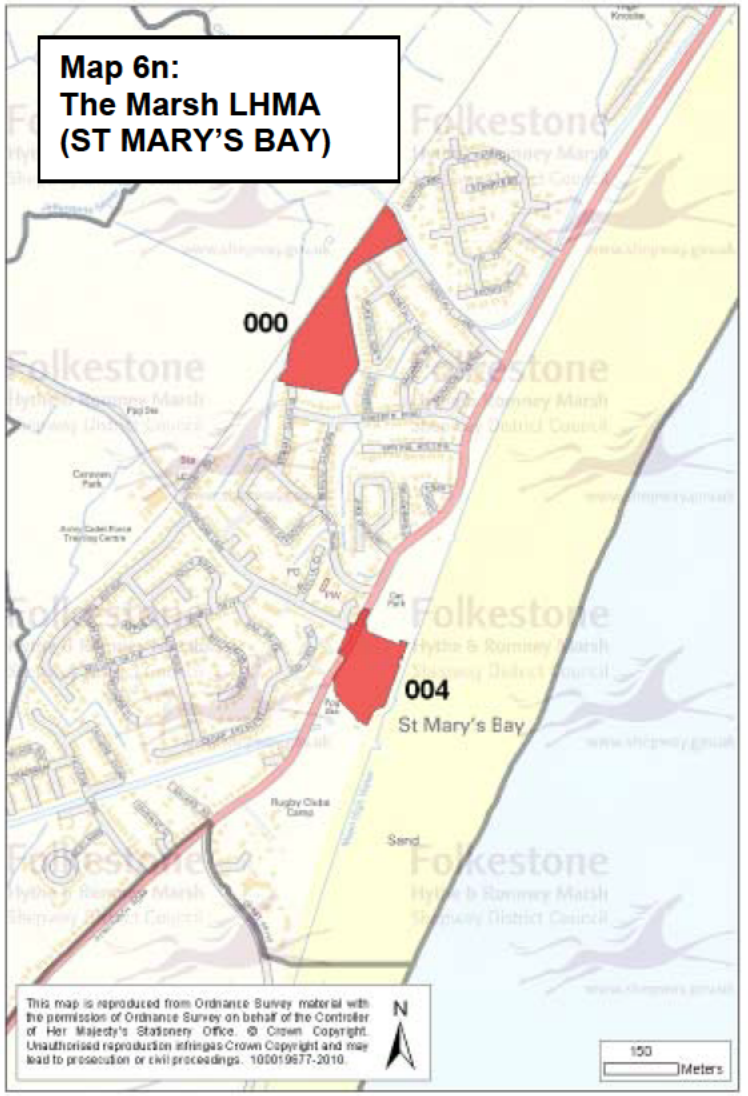
N
500
Meters


Map 6n:
The Marsh LHMA
(ST MARY'S BAY)
000
004
St Mary's Bay
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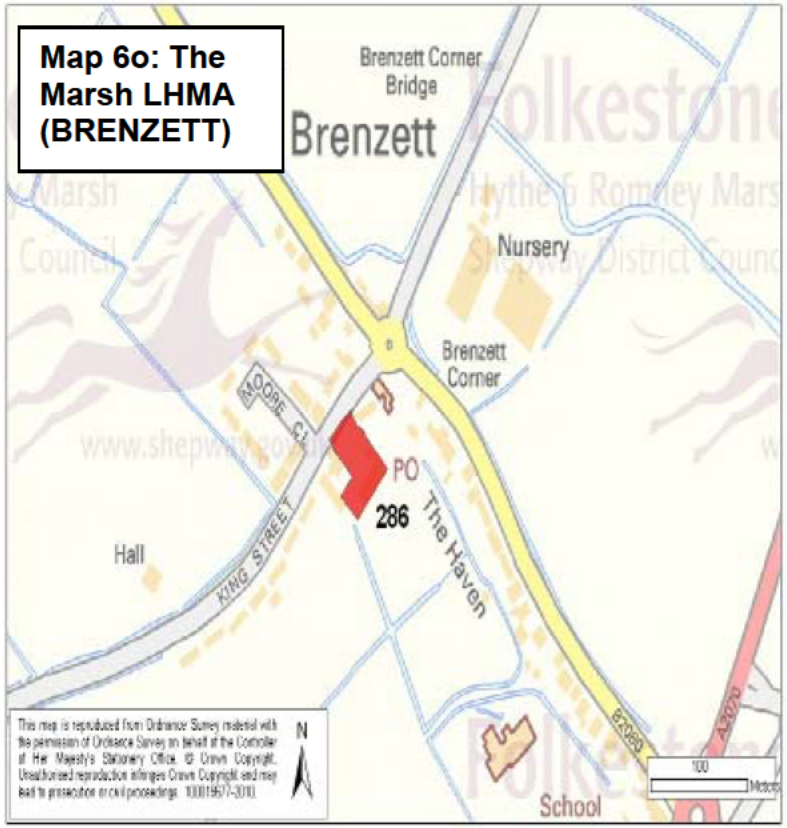
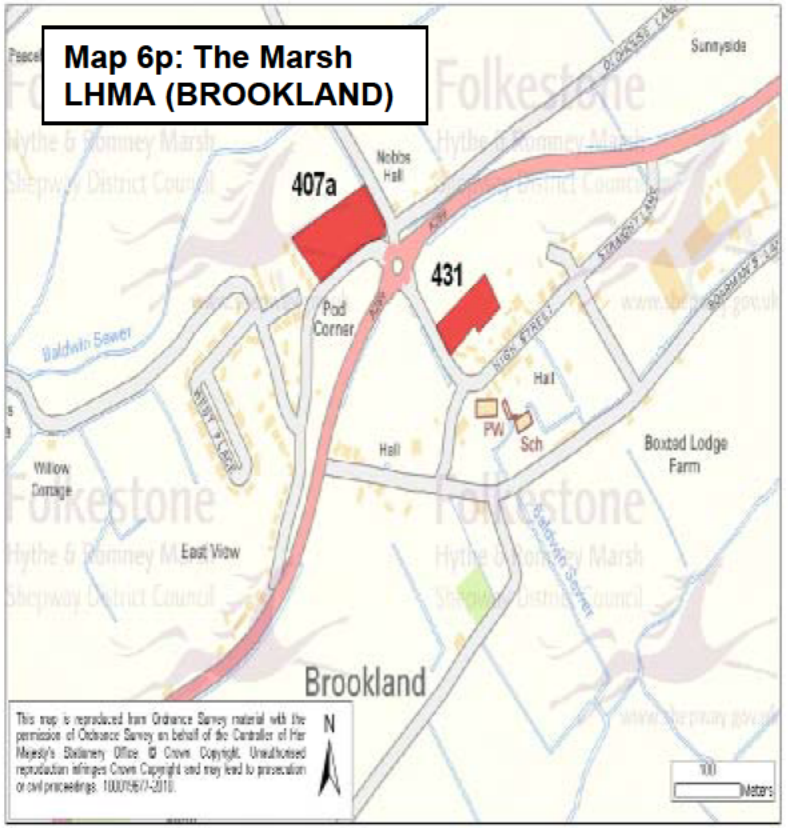
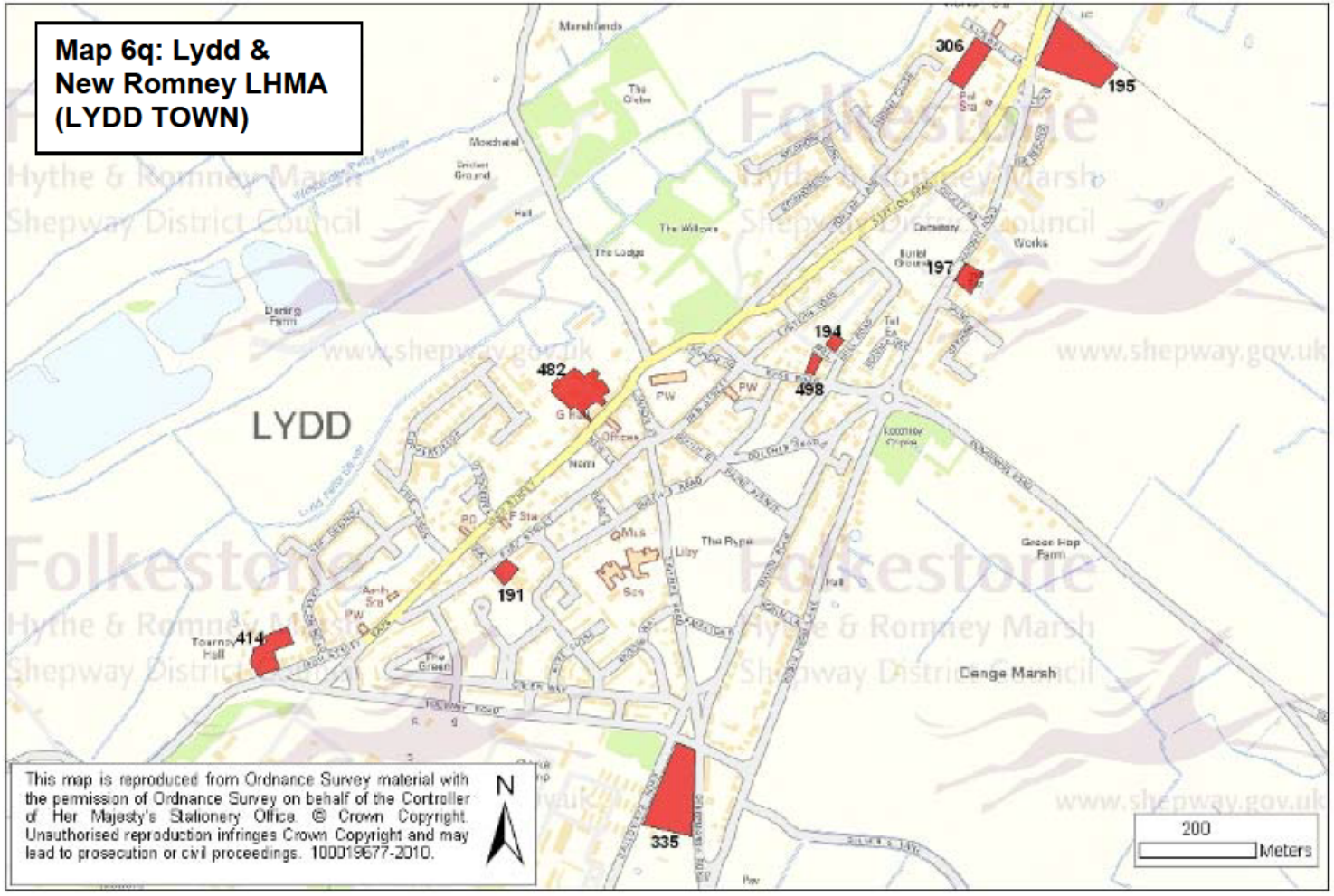
N
150
Meters

Map 6o: The Marsh LHMA (BRENZETT)



Map 6p: The Marsh LHMA (BROOKLAND)




Map 6q: Lydd &
New Romney LHMA
(LYDD TOWN)
LYDD
306
195
197
194
498
482
191
414
335
Denge Marsh
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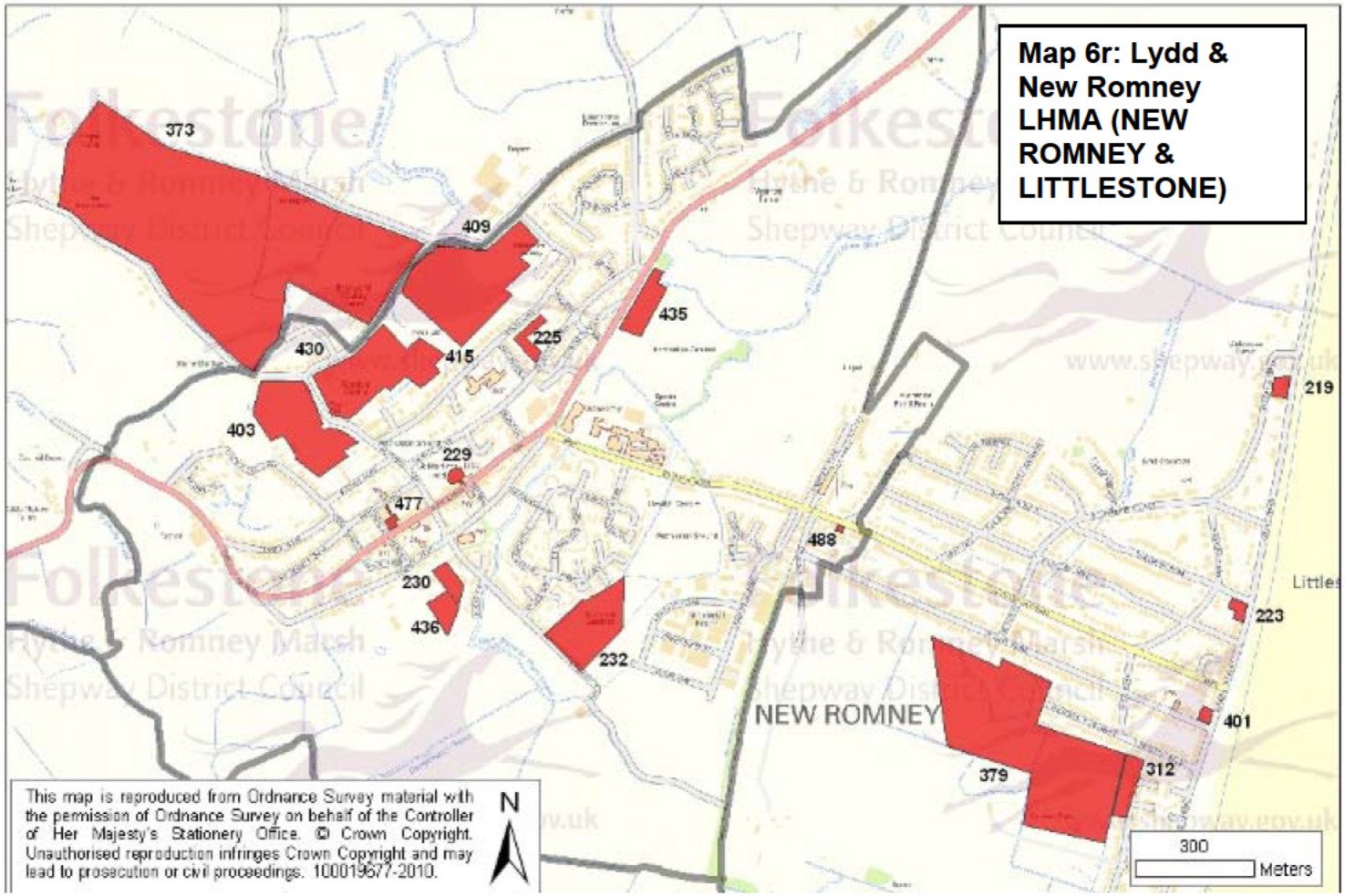
N
200
Meters


Map 6r: Lydd & New Romney LHMA (NEW ROMNEY & LITTLESTONE)
373
409
435
430
415
225
219
403
229
477
488
230
436
223
232
NEW ROMNEY
401
379
312
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N
300
Meters

8. The Deliverable and Developable Sites

8.1 Location of deliverable and developable sites

8.1.1 The deliverable/developable (successful) sites arising from the assessment are – along with ward boundaries - illustrated in Map 6 (a-r). Please note these maps are indicative only and could include other site references within.

8.1.2 The SHLAA has used the most recent information available, and generally focused on the 'parcelling' (dis-aggregation) of land as supplied through submissions, to define the extent of sites. Maps are not intended to provide a finalised boundary in terms of future change, as site extent may be refined as it progresses through the planning system. In particular, several landholdings are only acceptable in part for residential but the whole of the site may be shown.

8.1.3 Shepway District Council cannot guarantee that this list is exhaustive and all future sites (above 5 net dwellings) are featured. However it is expected that suitability, availability and achievability principles will be addressed in the LDF's consideration of all residential (Class C3) proposals.

8.2 Context for concluding a SHLAA ensuring sufficient sites

8.2.1 This chapter *details* individual *sites that have successfully proceeded through the SHLAA i.e. are Deliverable/Developable (see PPS3)* and notes some explanatory factors*.* As detailed in following parts of this document *the suitability, availability and achievability assessment is* primarily *based on the Kent Protocol criteria* (Appendix I).

8.2.2 *The* global *context for SHLAA findings is meeting strategic housing requirements. The Shepway LDF Core Strategy will be based both on the SHLAA and the South East (SE) Plan, which covers the period 2006-2026. The LDF Core Strategy is anticipated to cover the last 15 years of the period.*

8.2.3 *The Core Strategy will ensure the LDF manages a continuous supply of housing land in line with PPS3[28], providing sufficient housing to meet the remaining SE Plan housing requirement for Shepway. The scale of requirement for the SHLAA and Core Strategy Preferred Options is best assessed at present by looking at the residual for 2009/10 onwards:*

Table 4: SHLAA output requirements given delivery to date in SE Plan period

Year	Total	Note
2006/7	*146*	*Published delivery figure in AMRs each following December, after Kent County Council audit.*
2007/8	*394*	
2008/9	562	
All	**1102**	*Total supply in first three years of SE Plan period supplied to Government Office for the South East.*

8.2.4 *Above information is illustrated in* Figure F*. Working out the residual* as minimum target for the SHLAA*:*

- *SE Plan requirement for Shepway 5,800*
- *LESS Expected delivery Shepway* 1,102
- → *EQUALS Current SHLAA target* **4,698** (Total of columns left of the vertical red line in Figure F)*.*

[28] DCLG (2006) Planning Policy Statement 3: Housing.

This residual approach is understood to be considered suitable by central government in the context of providing the SE Plan requirement as a minimum over the plan period.

8.3. Successful sites schedule

8.3.1 Table 5 that follows outlines the conclusions from assessment of sites that were judged deliverable/developable. Important notes in relation to Table 5 are provided below:

- **Strategic Constraints-**

8.3.2. In line with PPS12 (Local Spatial Planning)[29]*, this factor* has been documented with *a strategic focus. This means it is not definitive, for example it must be interpreted alongside policy on developer contributions. Certain topics are not featured:* ***affordable housing*** *has not been highlighted although it is expected to be a key element of all applicable sites.*

8.3.3 It is recommended that to deliver sustainable developments, full discussion is undertaken with local authorities, service providers and utility companies from the start of the development process. Shepway District Council offers a free of charge pre-application advice service, and solutions to potential constraints can also be identified with reference to emerging LDF documents, and other local evidence such as Kent County Council's statements[30] on community infrastructure. In terms of information coverage in the SHLAA, local utilities connections are typically devised subsequent to the development control process, and therefore although key aspects have been examined on sites, constraints of this kind have generally not been detailed here. Moreover, wherever planning permission has been granted, conditions and planning obligations stand, and are not reproduced here.

[29] DCLG (2008) Planning Policy Statement 12: Local Spatial Planning.
[30] See http://www kent.gov.uk/community_and_living/regeneration_and_economy/development_contributions.aspx

8.3.4 *The comments below concentrate on findings from the SHLAA's evaluation of the various elements of suitability, in particular where community and local services are vital (alongside public transport access) to comply with SHLAA locational criteria. The notes outline, for strategic sites located outside existing settlement boundaries, the major requirements that are a prerequisite in the SHLAA's* terms for strategic development *to be acceptable in principle.*

8.3.5 *Flood risk was initially identified on the existing zones and comments below are generic only. Given the scale of potential flooding issues in Shepway the SHLAA has* ***not*** *been able to detail specific requirements for flood avoidance/mitigation on a case-by-case basis. Occasionally this may be substantial; it is premature to make assumptions within the SHLAA*. The next chapter provides vital guidance on this topic in the local context.

- **Phasing-**

8.3.6 In recognition of infrastructure issues, and *to produce the trajectories and inform the LDF, sites have been phased (illustrated in Figure* F*). This has been based on issues identified throughout SHLAA data collection and relates to strategic constraints. The general approach to development phasing has been conservative, which was regarded as most appropriate given global development uncertainty at the start of 2009 and LDF requirements. The three phases are:*

I. ***To 2016****. Predominantly 'deliverable' sites.* N.B. See the five year land supply details in AMRs for further details.
II. ***2016/7-2020/21****. 'Developable' sites.*
III. ***2021/22-2025/6****. 'Developable' sites.*

These years are based on PPS3[31] *in the context of applicable development plan dates.*

[31] DCLG (2006) Planning Policy Statement 3: Housing.

Table 5i Deliverable/developable sites (East Kent Rural South LHMA):

Ref	Name	Ward	Strategic constraints to overcome	Pha-sing	Cap-acity Est-imate
7	*Henbury Manor, Elham*	*Elham & Stelling Minnis*	*Refer to paragraphs 8.3.2- 8.3.5.*	*I*	*7*
204	*Folkestone Racecourse, Westenhanger*	*Lympne & Stanford*	*Strategic education/ health and community contribution. Provision towards strategic tourism and commercial uses. Access and highway infrastructure. Address flood risk/ sewage and open space/ landscaping as necessary*	*II*	*400*
209	*Former Ashford Airport, Lympne*		*Strategic health and community provision vital. Access and highway infrastructure. Contribution to public transport upgrades.Major landscaping and commercial land infrastructure.*	*III*	*450*
273/ 328	*Land fronting Main Rd, 'Sellindge East'*	*North Downs West*	*Open space/ landscaping/ biodiversity, and contributions to utility/ community uses.*	*II*	*300*
408	*Land at Moorstock La, Sellindge North*		*Major contributions to public transport, social/ community uses, utilities. Strategic landscaping/ open space/ biodiversity provision.*	*III*	*700*
424	*Land at Corner of Woodlands Rd, Lyminge*		*Landscaping and potentially water provision.*	*II*	*18*
299	*Bullimore Motor Repairs, Etchinghill*	*Tolsford*	*Refer to paragraphs 8.3.2- 8.3.5.*	*I*	*6*
495	*Peene Farm, Newington, Folkestone*		*Refer to paragraphs 8.3.2- 8.3.5.*	*I*	*5*
• *This large LHMA includes area beyond Shepway (see Table 2)*			**TOTAL** IN LHMA (Shepway element):		**1886**

Table 5ii Deliverable/developable sites (Folkestone LHMA):

Ref	Name	Ward	Strategic constraints to overcome	Pha-sing	Cap-acity Est-imate
20	*72 Cheriton High Street and land adjoining*	*FOLKE-STONE Cheriton*	*Refer to paragraphs 8.3.2- 8.3.5.*	*I*	*19*
354/ 366	*Risborough Barracks, Folkestone*		*Strategic sports/ open space, highways infrastructure. Potential public transport, health/ community and utilities contributions.*	*III*	*900*
367	*Backdoor Training land (part i) Cheriton Court Rd, Cheriton*		*Refer to paragraphs 8.3.2- 8.3.5.*	*II*	*30*
461	*Bigginswood land, Cheriton*		*Office/ industrial infrastructure and remediation.*	*II*	50
464	*The Firs Club, Firs Lane, Cheriton*		*Refer to paragraphs 8.3.2- 8.3.5.*	*I*	*25*
470	*Travis Perkins, 7-8 Salisbury Rd, Cheriton*		*Refer to paragraphs 8.3.2- 8.3.5.*	*I*	*11*
23	*New Lincoln House, Folkestone*	*FOLKE-STONE East*	*Refer to paragraphs 8.3.2- 8.3.5.*	*II*	*39*
26	*Land at junction of Princess St and Myrtle Rd*	*FOLKE-STONE Foord*	*Refer to paragraphs 8.3.2- 8.3.5.*	*I*	*8**
27a	*Former Youth Club, Shepway Close*		*Refer to paragraphs 8.3.2- 8.3.5.*	*I*	*12*
27b	*Shepway Close, Folkestone*		*Quality open space provision vital.*	*II*	*30*
28	*20 Blackbull Rd, Folkestone*		*Refer to paragraphs 8.3.2- 8.3.5.*	*I*	*5*
31	*Former Invicta Motors*		*Need to address flood risk*	*I*	*25*
32	*Two Bells Inn, 58 Canterbury Rd*		*Refer to paragraphs 8.3.2- 8.3.5.*	*I*	*8*
346	*Former Gas Works Site, Ship St*		*Land remediation and relevant issues in agreed development brief.*	*I*	*134*
35	*78 Tontine St, Folkestone*	*FOLKE-STONE Harbour*	*Refer to paragraphs 8.3.2- 8.3.5.*	*I*	*14*
38/ 382	*Southern Way Goods Yard, Folkestone*		*Office/ industrial infrastructure and remediation.*	*II*	20

40/ 43/ 47	*Port Area (Folkestone Seafront)*		*Transport and social infrastructure.*	*III*	*700*
41	*108 Dover Rd (Martello Hotel)*		*Refer to paragraphs 8.3.2- 8.3.5.*	*I*	*5*
475	*82-84 Tontine St, Folkestone*		*Refer to paragraphs 8.3.2- 8.3.5.*	*II*	*20*
45	*Land at Marine Parade Coach Park*	*FOLKE-STONE Harvey Central*	*Travel infrastructure.*	*I*	*64*
46/ 48/ 61/62	*Ingles Manor, Folkestone*		*Office/ industrial uses. Potentially landscaping, remediation and water.*	*I*	*100*
50	*21 Trinity Rd*		*Refer to paragraphs 8.3.2- 8.3.5.*	*I*	*12*
51	*33 Cheriton Rd and Land Adj.*		*Refer to paragraphs 8.3.2- 8.3.5.*	*I*	*13*
52	*19 The Bayle and R/O*		*Refer to paragraphs 8.3.2- 8.3.5.*	*I*	*10*
53	*Victoria Mews*		*Refer to paragraphs 8.3.2- 8.3.5.*	*I*	*14*
58	*Victoria Grove*		*Refer to paragraphs 8.3.2- 8.3.5.*	*I*	*9*
59/ 64	*The Leas Club, Folkestone*		*Access.*	*I*	*60*
66	*4 Castle Hill Avenue*		*Refer to paragraphs 8.3.2- 8.3.5.*	*I*	*9*
67	*8-9 Marine Parade*		*Refer to paragraphs 8.3.2- 8.3.5.*	*I*	*12*
345	*Land r/o South Kent College, Folkestone*		*Strategic education provision.*	*II*	*100*
377	*Frontier House, Shorncliffe Rd*		*Refer to paragraphs 8.3.2- 8.3.5.*	*I*	*50*
342	*Marine Car Park, Folkestone Seafront*		*Delivery may be closely linked to #40*	*II*	*100*
440	*1+3 Jointon Rd*		*Refer to paragraphs 8.3.2- 8.3.5.*	*II*	*8*
486	*14-15 Marine Parade, Folkestone*		*Refer to paragraphs 8.3.2- 8.3.5.*	*I*	*14*
487	*The Shakespeare Centre, Folkestone*		*Refer to paragraphs 8.3.2- 8.3.5.*	*I*	*12*
490	*38 Cheriton Rd*		*Refer to paragraphs 8.3.2- 8.3.5.*	*I*	*18*
496	*2 Castle Hill Ave +26 Bouverie Rd W*		*Refer to paragraphs 8.3.2- 8.3.5.*	*I*	*5*
499	*16-18 Castle Hill Ave*		*Refer to paragraphs 8.3.2- 8.3.5.*	*I*	*5*
500	*1-4 Marine Parade, Folkestone*		*Refer to paragraphs 8.3.2- 8.3.5.*	*I*	*27*
72/ 492	*20 Marten Rd, Folkestone*	*FOLKE-STONE Harvey West*	*Refer to paragraphs 8.3.2- 8.3.5.*	*I*	*6*
76	*Westbourne House, Coolinge La*		*Refer to paragraphs 8.3.2- 8.3.5.*	*I*	*13*
77	*St. Marys Westbrook Sch, Folkestone*		*Contribution to open space.*	*I*	*90*
336	*29 Shorncliffe Rd*		*Refer to paragraphs 8.3.2- 8.3.5.*	*I*	*15*

337/ 383	*Westbrook House and Adj, Shorncliffe Rd*		*Contribution to strategic sports/ open space provision.*	*II*	*150*
405/ 460/a	*Bathhurst Rd/Coolinge La, Folkestone*		*Strategic education provision, potentially utilities.*	*II*	*125*
21	*38 Cheriton High Street (land adjoining)*	*FOLKE-STONE Morehall*	*Refer to paragraphs 8.3.2- 8.3.5.*	*I*	*10*
97	*Land r/o 39 Risborough La, Cheriton*		*Refer to paragraphs 8.3.2- 8.3.5.*	*I*	*10*
357	*Former Goods Yard, Folkestone West Station*		*Refer to paragraphs 8.3.2- 8.3.5.*	*II*	*30*
425c	*Site C Shearway (South of Shearway Rd), Folkestone*		*Office/ industrial infrastructure and remediation, and potential open space, water and flooding.*	*II*	*70*
493	*39 Risborough La, Folkestone*		*Refer to paragraphs 8.3.2- 8.3.5.*	*I*	*5*
102	*18-20 Radnor Park Ave*	*FOLKE-STONE Park*	*Refer to paragraphs 8.3.2- 8.3.5.*	*II*	*60*
103	*R/O Royal Victoria Hospital, Folkestone*		*Refer to paragraphs 8.3.2- 8.3.5.*	*I*	*70*
106	*4 Radnor Park West*		*Refer to paragraphs 8.3.2- 8.3.5.*	*I*	*5*
107	*14 Cherry Garden Ave*		*Refer to paragraphs 8.3.2- 8.3.5.*	*I*	*7*
108	*1 Radnor Park Rd & 2-8 Radnor Park Ave*		*Refer to paragraphs 8.3.2- 8.3.5.*	*II*	*28*
314	*Former Channel Sch & Park Farm Primary Sch, Folkestone*		*Associated strategic improvements in education premises.*	*II*	*118*
458	*Highview School, Folkestone*		*Strategic education provision.*	*II*	*50*
473	*Builders Yard, r/o 52 Broadmead Rd*		*Refer to paragraphs 8.3.2- 8.3.5.*	*I*	*5*
480	*3 Radnor Park West*		*Refer to paragraphs 8.3.2- 8.3.5.*	*I*	*5*
110	*20/30 Sandgate Hill*	*FOLKE-STONE Sandgate*	*Refer to paragraphs 8.3.2- 8.3.5.*	*II*	*36*
113	*Former Encombe House, Sandgate*		*Land stability, landscaping*	*I*	*36*
117	*73-133 Enbrook Valley land opp.*		*Refer to paragraphs 8.3.2- 8.3.5.*	*I*	*15*
118	*57-73 Enbrook Valley land opp.*		*Refer to paragraphs 8.3.2- 8.3.5.*	*I*	*12*
119	*Lister House and Helena House, Sandgate*		*Refer to paragraphs 8.3.2- 8.3.5.*	*I*	*14*
122a	*Folkestone School for Girls land (S), Coolinge La, Folkestone*		*Strategic education provision.*	*II*	*25*
122b	*Folkestone School for Girls land (N),*		*Strategic education provision.*	*II*	*50*

	Coolinge La, Folkestone				
125	*25 Radnor Cliff, Sandgate*		*Refer to paragraphs 8.3.2- 8.3.5.*	*I*	*5*
322	*15 Radnor Cliff Crescent, Sandgate*		*Refer to paragraphs 8.3.2- 8.3.5.*	*II*	*7*
339	*Clewer House and White Lodge, Coolinge La*		*Refer to paragraphs 8.3.2- 8.3.5.*	*I*	*20*
344	*Royal Norfolk Hotel, Sandgate High St*		*Transport infrastructure and utilities.*	*I*	*5*
481	*124-132 Sandgate High St*		*Refer to paragraphs 8.3.2- 8.3.5.*	*I*	*5*
239	*14-24 Gray Close, Hawkinge*	*North Downs East*	*Refer to paragraphs 8.3.2- 8.3.5.*	*I*	*40*
240	*Spitfire Leisuredrome, Hawkinge*		*Community/ sports contribution.*	*II*	*13*
241	*Land Adj. Siskin Close, Hawkinge*		*Landscaping/ open space/ biodiversity.*	*II*	*35*
244	*Officers Mess, Hawkinge*		*Landscaping/ open space/ biodiversity, and community/ social provision.*	*II*	*150*
246a	*Terlingham Village Phase 3a, Hawkinge*		*Highways provision and social/ community infrastructure.*	*II*	*86*
246b	*Terlingham Village Phase 3b, Hawkinge*			*II*	*139*
246c	*Terlingham Village Phase 3c, Hawkinge*			*I*	*100*
246d	*Land North of Terlingham Village, Hawknge*			*I*	*9*
316	*Hope Farm, Hawkinge*		*Strategic landscaping/ open space/ biodiversity, contributions to community/social uses and public transport.*	*III*	*600*
334	*Land at Mill Lane, Hawkinge*		*Refer to paragraphs 8.3.2- 8.3.5.*	*II*	*25*
388	*Land SW of Canterbury Rd, Hawkinge*		*Strategic landscaping. Access and utility contributions.*	*II*	*15*
404	*Land adj Battle Of Britain Museum, former Elvington Airfield, Hawkinge*		*Open space/ biodiversity, and community/ social uses and tourism provision to contribute to site opportunities, local needs and strategic objectives.*	*III*	*200*
474	*32-34 Canterbury Rd, Hawkinge*		*Refer to paragraphs 8.3.2- 8.3.5.*	*I*	*7*
484	*Land adj. Telephone Exchange, Barnhurst La, Hawkinge*		*Refer to paragraphs 8.3.2- 8.3.5.*	*II*	*5*
489	*Barnhurst La land, Hawkinge*		*Refer to paragraphs 8.3.2- 8.3.5.*	*I*	*63*
• *This large LHMA includes area beyond Shepway (see table 2)*			**TOTAL** IN LHMA (Shepway element):		**5278**

*NOTE: This site (#26) was anticipated to be complete just in time for the 2008/9 element of supply – immediately before the formal date from which the SHLAA would be applicable. This was not ultimately the case and the capacity (8) was **excluded** in the SHLAA totals, however it had planning permission, forms a deliverable site and is expected to contribute to future supply.

Table 5iii Deliverable/developable sites (Hythe LHMA):

Ref	Name	Ward	Strategic constraints to overcome	Pha-sing	Cap-acity Est-imate
140	*Springfield, Dental St*	*HYTHE Central*	*Refer to paragraphs 8.3.2- 8.3.5.*	*I*	*10*
142	*Hythe Swimming Pool, South Rd*		*Need to address flood risk.*	*II*	*44*
144	*1 Park Rd, Hythe*		*Need to address flood risk.*	*II*	*6*
145	*R/O 162 High St, Hythe*		*Travel infrastructure.*	*I*	*5*
146	*102 North Rd, Hythe*		*Potential land and water issues*	*II*	*8*
147	*Seven Seas, West Parade*		*Refer to paragraphs 8.3.2- 8.3.5.*	*I*	*7*
317	*Fishermans Beach, Range Rd*		*Need to address flood risk and potential utilities issues.*	*I*	*70*
416	*Fishermans Beach (W), Range Rd*		*Need to address flood risk and potential utilities issues.*	*II*	*10*
459	*Former St Leonards Sch, Hythe*		*Need to address flood risk.*	*I*	*33*
476	*Builders Yard, Windmill St*		*Need to address flood risk.*	*I*	*5*
491	*The Haven, Victoria Rd, Hythe*		*Refer to paragraphs 8.3.2- 8.3.5.*	*I*	*6*
497	*4 Winds, Hythe*		*Refer to paragraphs 8.3.2- 8.3.5.*	*I*	*5*
152	*Seapoint Centre, Seabrook*	*HYTHE East*	*Need to address flood risk and strategic sports/community uses.*	*I*	*14*
153	*Land at Princes Parade*		*Need to address flood risk and strategic sports/community uses.*	*II*	*150*
154	*Briarwood, 1 Blackhouse Hill, Hythe*		*Need to address flood risk, remediation and potential utility and landscaping issues. Strategic*	*I*	*8*

			open space.		
155	*Eversley Rd Rec. Ground, Seabrook*		*Refer to paragraphs 8.3.2- 8.3.5.*	*II*	*5*
164	*Former St Augustines School, Hythe*		*Refer to paragraphs 8.3.2- 8.3.5.*	*I*	12*
169	*Seabrook Primary School*		*Refer to paragraphs 8.3.2- 8.3.5.*	*II*	*5*
171	*Hotel Imperial, Hythe*		*Refer to paragraphs 8.3.2- 8.3.5.*	*II*	*60*
313	*Foxwood Special School, Hythe*		*Need to address flood risk, strategic tourism, open space/ landscaping and potential utility/travel issues if applicable.*	*I*	*90*
370	*Seabrook Pumping Station*		*Transport infrastructure. Education provision.*	*I*	*5*
483	*102 & 104 Seabrook Rd, Hythe*		*Refer to paragraphs 8.3.2- 8.3.5.*	*I*	*8*
177	*Nickolls Quarry Site, 'Martello Lakes'*	*HYTHE West*	*Need to address flood risk. Strategic sports facility. Contribution to local school vital. Major landscaping and open/water space. Transport infrastructure. Land remediation. Commercial land infrastructure.*	*I&II*	*1050*
			TOTAL IN LHMA:		**1604**

*NOTE: This site (#164) was anticipated to be complete just in time for the 2008/9 element of supply – immediately before the formal date from which the SHLAA would be applicable. This was not ultimately the case and the capacity (12) was **excluded** in the SHLAA totals, however it had planning permission, forms a deliverable site and is expected to contribute to future supply.

Table 5iv Deliverable/developable sites (The Marsh LHMA):

Ref	*Name*	*Ward*	*Strategic constraints to overcome*	*Pha-sing*	*Cap-acity Est-imate*
0	*St Mary's Bay Holiday Centre*	*Dymchurch & St Mary's Bay*	*Need to address flood risk, drainage and access.*	*I*	*72*
4	*Former Sands Motel, St Mary's Bay*		NOTE E.A. COMMENTS (Appendix X). *Need to address flood risk, access and potentially water.*	*I*	*85*
286	*Former Coach Depot, King St, Brenzett*	*Romney Marsh*	*Refer to paragraphs 8.3.2- 8.3.5.*	*I*	*10*
373	*NW of New Romney site, Cockreed Lane*		*Need to address flood risk. Strategic landscaping, transport, utilities and potential community infrastructure.*	*III*	*600*
407a	*N of Pod Corner, Brookland*		*Need to address flood risk.*	*I*	*15*
431	*Old Slaughter House, Brookland*		*Need to address flood risk.*	*I*	*6*
			TOTAL IN LHMA:		**788**

Table 5v Deliverable/developable sites (Lydd & New Romney LHMA):

Ref	Name	Ward	Strategic constraints to overcome	Pha-sing	Cap-acity Est-imate
191	*Park St, Lydd*	*Lydd*	*Refer to paragraphs 8.3.2- 8.3.5.*	*II*	*12*
194	*DED Ltd, Mill Rd, Lydd*		*Refer to paragraphs 8.3.2- 8.3.5.*	*I*	*6*
195	*Station Yard, Lydd*		*Refer to paragraphs 8.3.2- 8.3.5.*	*II*	*35*
197	*Land adj. Millfield, Harden Rd, Lydd*		*Refer to paragraphs 8.3.2- 8.3.5.*	*II*	*6*
306	*Kitewell La (S), Lydd*		*Office/ industrial uses.*	*II*	*6*
335	*Fisher Field, Dengemarsh Rd (N), Lydd*		*Refer to paragraphs 8.3.2- 8.3.5.*	*II*	*12*
414	*Tourney Hall land, Lydd*		*Need to address flood risk, and potential access and water issues.*	*I*	*8*
482	*Land r/o 24 High St, Lydd*		*Need to address flood risk.*	*I*	*20*
498	*Mill Rd land, Lydd*		*Refer to paragraphs 8.3.2- 8.3.5.*	*I*	*6*
219	*Prospect, Coast Rd, Littlestone*	*New Romney Coast*	*Need to address flood risk.*	*II*	*5*
223	*Marine Parade corner with Blenheim Rd, Littlestone*		*Need to address flood risk and potentially sewage.*	*II*	*24*
312	*Meehan Rd (N) & Armada Close, Littlestone*		NOTE E.A. COMMENTS (Appendix X).	*I*	*8*
379	*Land W of Victoria Rd, Littlestone*		NOTE E.A. COMMENTS (Appendix X). *Strategic health, education and community provision vital. Highways and landscaping provision. Need to address flood risk, and potentially sewage.*	*III*	*300*
401/ 455	*Claverly House/adj 143 Queens Rd, Littlestone*		*Need to address flood risk.*	*II*	*15*
225	*Land Adj. Craythornes, New Romney*	*New Romney*	*Need to address flood risk.*	*I*	*8*
229	*Warehouse R/O 76 High St, New Romney*		*Refer to paragraphs 8.3.2- 8.3.5.*	*I*	*6*

230	*Land R/O Old School, New Romney*	*Town*	*Need to address flood risk. Access, highway and potentially sewage infrastructure.*	*I*	*14*
232	*Allotment Gardens, New Romney*		*Need to address flood risk.*	*I*	*30*
403	*Ashford Rd West land*		NOTE E.A. COMMENTS (Appendix X). *Need to address flood risk, landscaping, biodiversity, transport infrastructure.*	*III*	*100*
409	*Cockreed Lane land*		*Strategic landscaping, education, biodiversity, transport infrastructure.*	*II*	*150*
415	*Ashford Rd East land*		*Need to address flood risk, education, landscaping, biodiversity, and transport infrastructure.*	*III*	*140*
430	*Landscape Centre, Cockreed La, New Romney*		*Need to address flood risk, biodiversity, and transport infrastructure.*	*I*	*19*
435	*Dymchurch Rd land (Incl. Avonlea), New Romney*		*Need to address flood risk and potentially access and strategic landscaping.*	*I*	*20*
436	*Land adj. Cemetery, Church Rd, New Romney*		*Need to address flood risk and access.*	*I*	*10*
477	*Adj. 16 High St, New Romney*		*Refer to paragraphs 8.3.2- 8.3.5.*	*I*	*6*
488	*11 Littlestone Rd, New Romney*		*Refer to paragraphs 8.3.2- 8.3.5.*	*I*	*11*
			TOTAL IN LHMA:		**977**

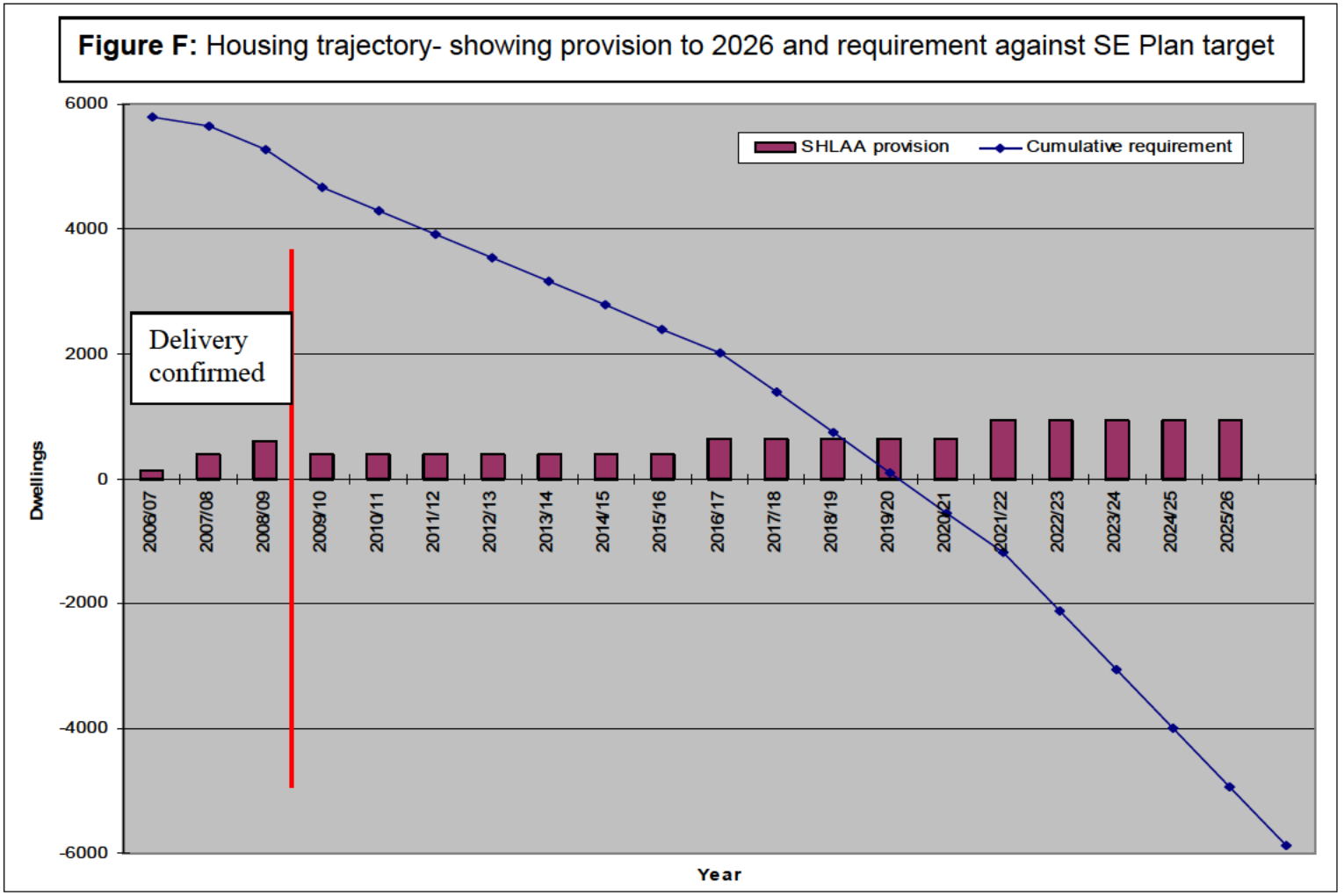
8.4 Resultant strategic housing trajectory

8.4.1 The SHLAA is the best guide to long-term housing potential in Shepway. A simple illustration of this, back dated with a few years recent supply, is show in Figure 5. This shows the 'trajectory' in terms of performance against the (minimum) requirement in the SE Plan.

8.4.2 The individual bars in the diagram show firstly actual completions from 2006 to date, and then applies SHLAA information. The trajectory line across the chart shows the consequent declining amount of housing needed to be delivered to meet the current strategic target (i.e. subtracts delivery figure the 5,800 SE Plan figure). The increasing rate of supply by the latter phase (III) is primarily resultant from certain large strategic sites -where there the need for the site's infrastructure provisions and overall desirability to be tested through the LDF and further public consultation is particularly substantial.

8.4.3 A comparable trajectory including a limited additional allowance is shown in Appendix VII for illustrative purposes.

Figure F: Housing trajectory- showing provision to 2026 and requirement against SE Plan target



9. Shepway Flooding and Viability Issues in the Assessment

9.1 This SHLAA has generally used site-specific specialist input, such as published work by Cluttons, or utility company comments. The assessment also benefited from other, brand new, key local evidence base studies on commercial uses/investment and flood risk (see next Section). These have been pivotal local topics in bringing development forward within some parts of Shepway.

9.2 Suitability, achievability and flood risk

9.2.1 *The Shepway Strategic Flood Risk Assessment[32] (SFRA) by Herrington Consulting has been taken into account but this must also be applied at later stages in the planning process.* ***Developers are strongly advised that inclusion in the SHLAA is no indication that flooding issues have been fully explored for sites.***

9.2.2 Shepway faces almost unique issues of tidal flood risk, and in this context the SHLAA has only excluded one site as "unsuitable" resulting from the SFRA (see Table 11*). This interpretation has been made in discussion with Herrington Consulting and to adhere to SFRA Policy Recommendations: "To ensure that new residential development does not take place in areas identified as 'extreme' flood hazard risk by the SFRA climate change hazard maps". Shepway's LDF will apply SHLAA findings by applying PPS25[33] (Development and Flood Risk) and in discussion with the Environment Agency.*

9.2.3 The Environment Agency commented on selected sites in Littlestone, St Mary's Bay and New Romney by way of a letter received in producing the SHLAA Consolidated Document: see Appendix X. This does not alter the findings given how this SHLAA has addressed flooding (and the necessary caveats noted above). However this information is highlighted in Tables 5Iv and 5V, and

[32] Herrington Consulting (2009) Shepway Strategic Flood Risk Assessment.
[33] DCLG (2006) Planning Policy Statement 25: Development and Flood Risk.

implications will be taken on board in further LDF work and guiding how this Assessment is implemented.

9.3 Achievability and economic confidence

9.3.1 *Regarding the SHLAA Achievability phase, the government states this factor is the capacity to deliver a completed development on site*[34]*. Local Planning Authorities have been advised that SHLAAs should adopt a long-term approach, and this is understood to also apply in relation to economic fluctuations. This has been the broad approach of the Shepway SHLAA, and further consideration of related issues has informed the constraints noted in the column above (Table* 5*). It is also anticipated that Shepway's LDF may also be informed by additional economic studies when conditions are more appropriate.*

[34] DCLG (2007) Strategic Housing Land Availability Assessment**:** Practice Guidance.

SECTION B: SUMMARY

The sources used in the Shepway SHLAA proved comprehensive, and allowed the assessment to close with a pool of potential sites well beyond the minimum needed. The concluding review thereby did not require the revisiting of assumptions, as a sufficient quantity of possible housing land was found.

If all the deliverable/developable sites are taken forward, then the trajectory would be healthy, and with delivery levels consistently above the South East Plan average minimum, Shepway would move towards an increasingly high level of housing delivery. However the sites will require further consideration in the planning process, notably LDF measures to confirm their sustainability and the acceptability of a major uplift in local housing supply.

SECTION C: STAKEHOLDER ENGAGEMENT & PROCESS

SECTION C: INTRODUCTION

The SHLAA is a major piece of research bringing together many sources of information to evaluate the residential potential of land against several factors. This section provides an overview of the steps undertaken and the nature of the partnership process that was fundamental in completing the SHLAA. The section firstly (Chapter 10) examines the process involved in Shepway's Assessment, with specific reference to national guidance (Table 6). It then (Chapter 11) depicts the opportunities for stakeholder input and feedback that have shaped this SHLAA.

Key phases prior to the production of this document are illustrated in the timeline in Figure I. For additional details of individual stages in the process please consult the *Project Methodology*[35] document or the appendices (especially Appendix V).

A small part of this has been previously published, shown in italics.

10. SHLAA Process

10.1 The overall SHLAA process in Shepway is shown in a chronological flow diagram (Figure G). This illustrates how desktop sources and external information and criteria are brought together, with opportunities for partner input, it ultimately feeding into (and being tested by) LDF development. To focus on the key assessment stages examining sites, see Figure H or Appendix IV.

10.2 An alternative explanation of the means of (1) involvement and (2) assessment is shown in Table 6. This utilises the national checklist points to summarise how Shepway's SHLAA approach complies with guidance.

[35] SDC (20009) Shepway LDF SHLAA Project Methodology.

Fig. G: Overview of Shepway SHLAA process- approximate chronological order

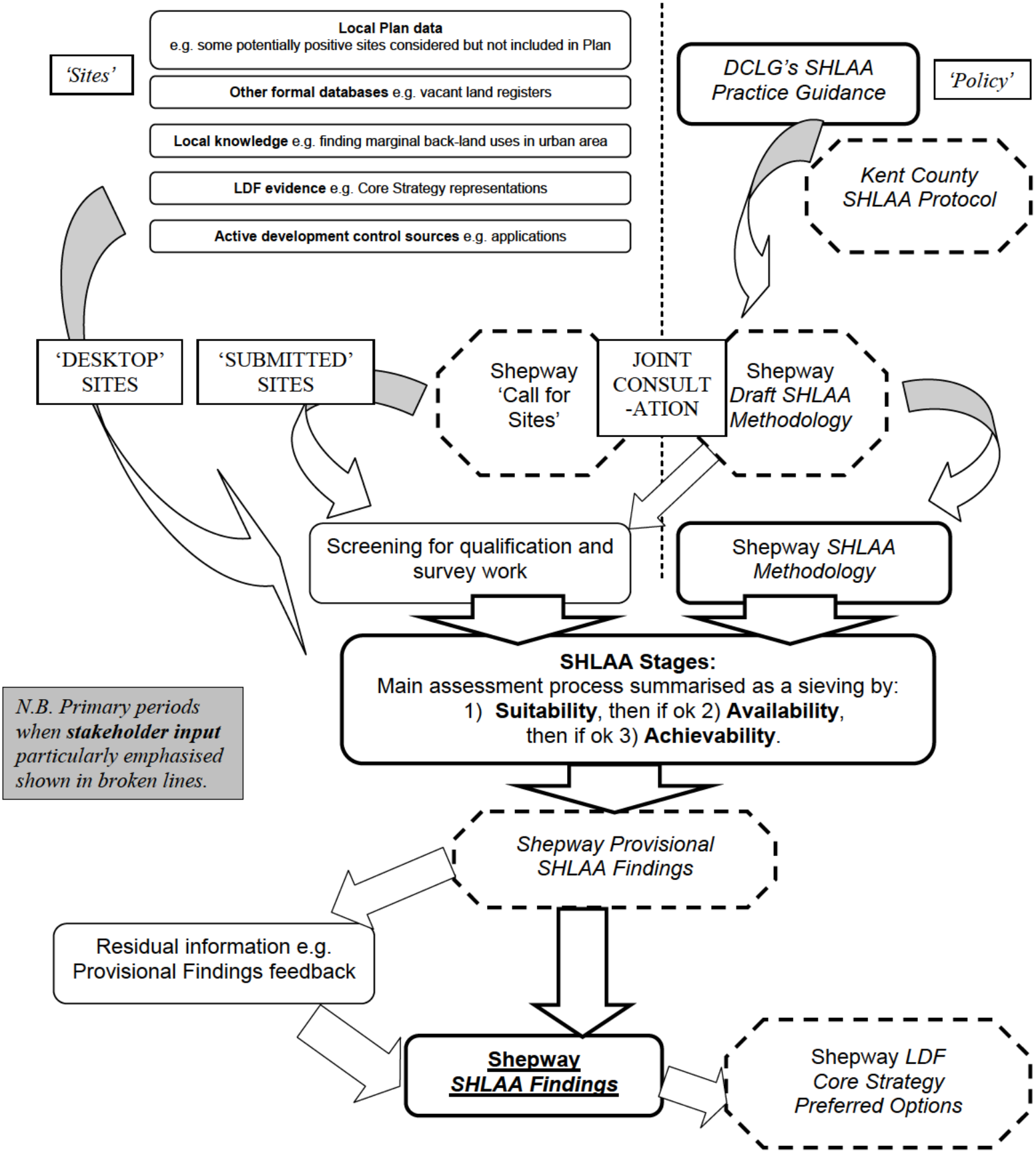


Table 6: Strategic Housing Land Availability Assessment process checklist

	DCLG point	*Shepway SHLAA note*	
1	The survey and Assessment should involve key stakeholders including house builders, social landlords, local property agents and local communities. Other relevant agencies may include the Housing Corporation and English Partnerships (a requirement in areas where they are particularly active)	✓ ✓ ?	1a. The survey process verified information supplied on behalf of house builders, social landlords, agents and the community. 1b. The same groups have been involved in the Assessment through shaping its methodology, by directly inputting market information at the outset, and by engaging in the validation and confirmation of Assessment results. 1c. The Housing Corporation formed part of the East Kent Strategic Housing Market Partnership which has been specifically included in SHLAA consultation and engagement, although it is not considered the Corporation (or English Partnerships) have been particularly active' in Shepway to date, or have their successor organisation, the Homes & Communities Agency.
2	The methods, assumptions, judgements and findings should be discussed and agreed upon throughout the process in an open and transparent way, and explained in the Assessment report. The report should include an explanation as to why particular sites or areas have been excluded from the Assessment	✓ ✓	2a. The methods and assumptions are based on the Kent Protocol, which has been through its own consultation process and is included in this document. Further details, specific to Shepway, were developed in discussion with stakeholders and through the consultation process outlined here. In particular, the (Draft) Methodology document allowed an up-front and transparent process of consultation and amendment, and forms a technical part of this SHLAA. (All the precise criteria are documented in the Assessment Forms appendices). The open Provisional Findings and Core Strategy Preferred Options stages, with responses provided, allowed discussion of the judgements and findings. 2b. The core basis on which sites specific are excluded has been stated from Provisional Findings onwards. Additional detailed information is publicly available.

Source:

Adapted from Strategic Housing Land Availability Assessment**:** Practice Guidance (Figure 2)

10.3 The assessment against criteria proceeded on a filtering out basis. This is illustrated - for a deliverable/developable site - in the following flow chart (Figure H). This chart is essentially a summary of the detailed flow charts in Appendix IV (where the step-by-step examination of Suitability, Availability and Achievability and number of unsuccessful sites are shown in turn).

10.4 National guidance[36] put forward some potential stages around which SHLAAs may be constructed. These have been addressed in the Project Methodology[37], but for information purposes these stages are referred to in the chart titles in Appendix IV. The charts in the Appendices also serve as a guide to the specific criteria (the assessment forms that follow).

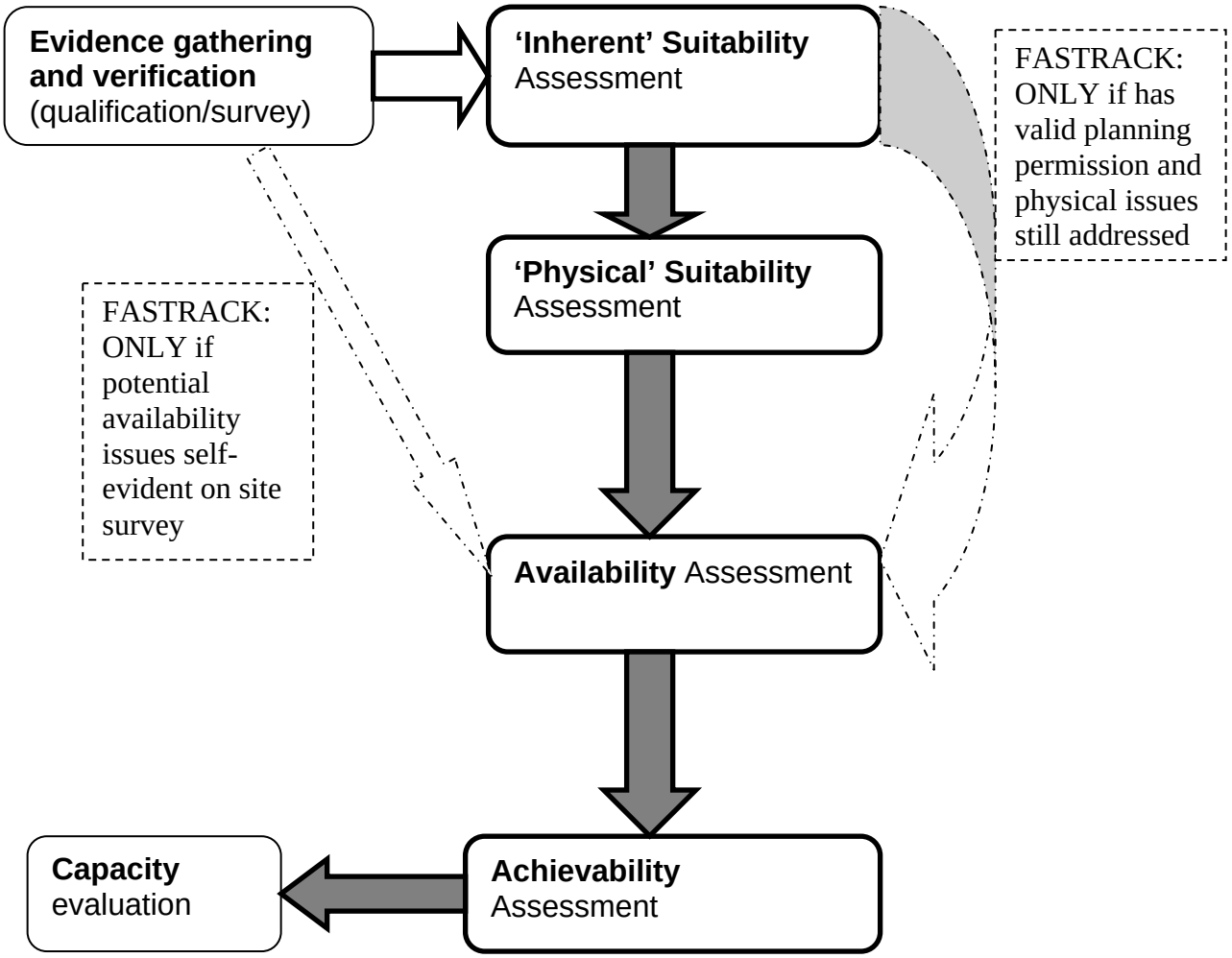
10.5 In terms of the detailed process, there was an emphasis on flexibility and not dismissing sites on the basis of issues that could reasonably subsequently be addressed or on minor/arbitrary factors. Care was taken for sites not to be rejected on the temporary absence of information, especially as other LDF evidence gathering was ongoing.

10.6 Assessment information is recorded on individual files for sites, which are available for public inspection. This data is primarily made up of developer submissions, survey forms and annotated forms. Forms put criteria in a usable structure to maximise objectivity and consistency. Template forms make up Appendix V, and at the beginning of them there is an important note in relation to understanding and completing forms.

10.7 The key filtering process is derived directly from the Kent Protocol. Figure H therefore provides an important summary of the central part of the Assessment. This diagram clearly shows the key stages in the Assessment process, and how the sites are strategically narrowed down to focus on deliverable/developable sites:

[36] DCLG (2007) Strategic Housing Land Availability Assessment**:** Practice Guidance.
[37] SDC (2009) Shepway LDF SHLAA Project Methodology.

Figure H: Diagrammatic representation of assessment filtering process



- *Please consult Appendix IV for full details*

10.8 Although considered potentially deliverable/developable, virtually all 149 successful sites require action before being taken forward in the planning process. Information on this has been gathered using all stages of the assessment; Table 5 outlines outcomes for phasing and infrastructure constraints of deliverable/developable sites.

11. Shepway SHLAA Stakeholders

11.1 The SHLAA has been produced in an open and evidence-based way, in consultation with stakeholders and using an agreed approach. This chapter sets out when this engagement has occurred, how it relates to public participation in the LDF overall, publicity initiatives, and who has been involved. Table 10 has not been published previously, addressing applicable LDF Core Strategy Preferred Options comments. Please consult the stakeholder summary timeline (Figure I) later in this section.

11.2 Engagement activities

11.2.1 Table 7 below establishes the chronology of stages and engagement throughout the SHLAA, and is the basis from which the timeline (Figure I) is derived. Key to this process has been the inclusion of a wide range of parties through direct communication and publicity efforts from the outset in 2008.

11.2.2 In addition to Shepway focused discussion, specific interactive exercises were also undertaken as part of the parallel Strategic Housing Market Assessment (SHMA) process for East Kent[38]. These workshops stimulated information from a range of stakeholders in East Kent and Shepway, across a comprehensive set out strategic housing issues (see Appendix VIII). Although starting from a generally 'SHMA-led perspective', there was considerable input from local private sector representatives focused on sites and specific land availability concerns and ideas.

[38] Ecotec (2009) Strategic Housing Market Assessment for the East Kent Sub-region, final Report.

Table 7: Stakeholder engagement chronology

• **2007**	
July	DCLG Practice Guidance published
October	Opening meeting of East Kent Housing Market Partnership, 23rd October, chaired by A. Hammond, Shepway Housing Strategy Manager.
• **2008**	
February	Some sites put forward in response to LDF Core Strategy Issues & Options consultation (published documents were not site specific), and recorded for SHLAA.
May	Stakeholder events on East Kent housing held under the auspices of the Partnership, contributing to the Strategic Housing Market Assessment later completed for the district. Site issues raised by development industry and SHLAAs highlighted as a 'next step' for districts.
June	Key stakeholder input to Kent Protocol.
August	Advance notification of intention to undertake SHLAA by email to stakeholders.
	Draft Methodology published on website.
	Letters and emails inviting comments on Draft Methodology (and invitation as 'call for sites') and forms sent out widely to all known agents, parishes and other key stakeholders.
September	Article publicising SHLAA and call for sites on page 15 Folkestone Herald, 11th September.
	Article publicising SHLAA and call for sites on page 28 of the Autumn Shepway Today magazine delivered across the district.
	SHLAA project presented and debated at Planning Local Users Group on 9th September (12 local representatives present). See Appendix III.
October	Culmination of response to Draft Methodology (and invitation as 'call for sites')
	SHLAA project discussed at Planning & BC Agents Group 13th October (10 private sector representatives present). See Appendix III.
December	Outline of SHLAA progress provided on page 3 of edition 3 of Local Development News, the LDF newsletter sent to all identified past and present interested parties.
• **2009**	
February	Key emerging site findings considered by Shepway Core Strategy Advisory Panel.
March	Provisional Findings published on website.
	Letters and emails publicising Provisional Findings etc sent out.

	Finalised Methodology published on website alongside schedule of amendments arising from consultation.
April	Culmination of responses to Provisional Findings.
June	Findings Reports and schedule of changes from Provisional Findings published on website.
	Letters, emails and events (and front page and feature in Summer Shepway Today) publicising launch of Core Strategy Preferred Options and supporting evidence base.
July	Extensive publicity of Core Strategy Preferred Options including Folkestone Herald articles, and several other local media features.
	Culmination of response to Core Strategy Preferred Options and supporting evidence base consultation.
November	Fully organised responses to Core Strategy Preferred Options and supporting evidence base available on website.
• **2010**	
February	SHLAA project discussed at Planning & BC Agents Group 1st February (11 private sector representatives present). See Appendix III.
	Draft Consolidated Document made public and key stakeholders informed.
April	Consolidated Document published

11.2.3 It can be seen the Consolidated Document comes after the SHLAA was completed, and feedback received. Nevertheless, a draft of this document was made public available prior to production, and comments invited from key stakeholders (primarily for presentational purposes). This resulted in some further agent contact and awareness, and Environment Agency comments (Appendix X).

11.2.4 The scale of engagement was 'front loaded' towards earlier stages to ensure all information and options were able to be incorporated. In terms of the volume of responses, the most significant was submissions by agents and landowners following the 'call for sites' in 2008.

11.3 Additional communication

11.3.1 As well as critical SHLAA stages, external parties were involved in ongoing and site-specific forms. Key contacts on this varied basis are outlined here.

- **Direct input from key stakeholders**

11.3.2 Table 8 shows some examples of how, through a partnership approach, the Assessment benefited from specialist input on local circumstances. For instances, every suitable site benefited from a site-specific perspective from Kent Highway Services.

Table 8: Examples of key stakeholder input

External specialist expertise on Suitability/ Achievability-	*Correspondence on draft Rural Services Study*[39]
Purpose: *technical comments on individual sites*	**Purpose:** *research informed detailed Suitability form design*
-Environment Agency	
-Kent Highway Services	
-Southern Water	-Brenzett Parish Council
-Nathaniel Lichfield & Partners: Employment Land Review[40]	-Newington Parish Council
-Herrington Consulting: Strategic Flood Risk Assessment[41]	-New Romney Town Council
-Cluttons (utilisation of Local Plan's Market Viability Assessment[42], where currently applicable).	-E Charlier & Sons (Better Places Ltd)

11.3.3 The left hand column identifies site-specific specialist input, and the right input to the draft Rural Services Study on which some detailed aspects of the application of Protocol suitability criteria were based.

- **Further contacts and discussions with developers/landowners**

11.3.4 The SHLAA concluded after an iterative process between parties, with communication being particularly important with respect to factors such as confirming availability.

[39] SDC (2008) Shepway Rural Services Study: Draft version.
[40] Nathaniel Lichfield and Partners (2009) Shepway Employment Land Review
[41] Herrington Consulting (2009) Shepway Strategic Flood Risk Assessment
[42] Cluttons (2002) Shepway Urban Housing Capacity Study, Market Viability Assessment.

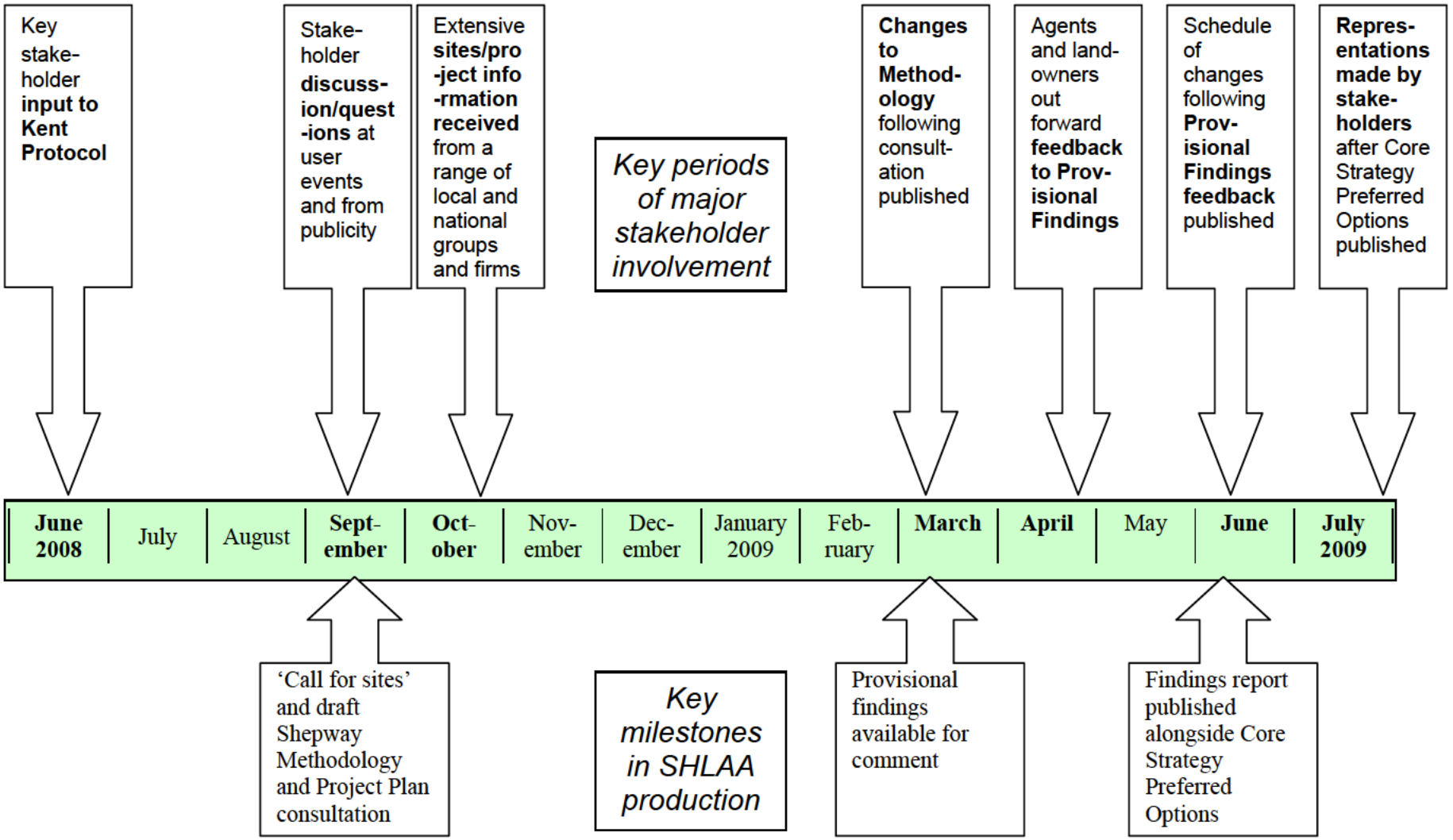
Table 9: Further contact on specific sites

Nature of contact-	*Example site references-*
Sites assessed regarding Availability/Achievability with the benefit of additional information from developer/ landowner:	• #104, 286, 335, 456, 475
Sites considered unavailable after Land Registry searches and unsuccessful attempts to contact landowner:	• #57, 215, 222, 307, 355, 359, 465
Sites with other correspondence, regarding suitability, findings etc:	• #2, 27A, 27B, 171, 302A, 303, 379, 380, 406, 406A, 406B, 407, 407A, 459

11.3.5 It is apparent that a large number of parties have inputted on specific sites or advised on key issues.

11.3.6 The succession of opportunities for external input to the evolution of Shepway's SHLAA is summarised in the following timeline.

Figure I: Stakeholder involvement summary timeline



11.4 Results of intensive engagement stages

11.4.1 The following tables (10 and 11) summarise key issues arising from information received at some of Shepway's specific consultation opportunities by key stakeholders.

Table 10: SHLAA site representations made at LDF Core Strategy Preferred Options

Site	*Represen -tation*	*Officer summary of comments in relation to SHLAA*	*Outcome*
#380 Land off Jenners' way, St Mary's.	On behalf of WS Fernival	Site forms appropriate "infilling and rounding off" of St Mary's Bay, and should form part of limited future development	• Noted. • Neither the Core Strategy nor the SHLAA are the appropriate places in LDF to conclude on whether small sites will form appropriate additional designations. • However the SHLAA does include provisions to be able to help inform this process in due course.
#379 Victoria Road West land, Littlestone-on-Sea.	On behalf of Furnival Farming Partnership	The site would meet needs identified in the SHLAA process. The phasing at 2021/22 – 2025/26 is appropriate, and given the possibility of improved flood defences, the land should be considered as the strategic site for the area.	• This site was directly addressed in Core Strategy Preferred Options, and therefore issues raised should be directly considered through the DPD examination process. • The file has been reviewed and the SHLAA regarded this as acceptable solely on a conditional basis, which in this case itself was a marginal decision based on two exceptions criteria. Further assessment on this basis revealed additional marginal considerations, for example the increasing severity of flood risk. Some of these concerns feature in the relatively lengthy site entry for the 'strategic constraints to overcome' column of the deliverable/developable table in the findings published June 2009.

			• Attention is drawn to the specific comments made by the Environment Agency about the site for this Consolidated Document (Appendix X) • It is also noted the agent supports timing of delivery in line with SHLAA phasing.
#437 Lawrence Field, off Cherry Gardens, Littlestone-on-Sea.	On behalf of Linkfield Ltd	Conclusions of SHLAA process need clarification, and it should be considered if file paperwork requires further completion i.e. whether landscape impact will be specifically analysed. The negative factor is distance from services, but this "is not considered to be significant in the context of the relationship between Littlestone on Sea and New Romney." Bus routes are only a short distance away, and topography suits cycling/walking. There are limitations to using a single set of criteria for across the district.	• The file has been reviewed. It remains the case that the criteria lead to a clear conclusion that the site is unsuitable (not deliverable/developable). For presentational purposes only the Suitability form on file has been represented for clarity. • The criteria in question are derived from the Kent Protocol, and their application is considered appropriate as forming a maximum reasonable walking distance. The Shepway SHLAA builds in reasonable flexibility, and objections to the inclusion of such criteria for the district or drawing from the Protocol could have been raised at the stage of consultation on the draft Shepway methodology but were not. • It is noted that there may be a need for further landscape consideration at a future junction as part of a separate LDF/planning process. • It is not possible for this SHLAA to undertake detailed examination of otherwise unsuitable sites. Neither the Core Strategy nor this SHLAA are the appropriate places in LDF to conclude on whether small sites will form appropriate additional designations.
#435 (Inc 449) Avonlea, Dymchurch	On behalf of A Webb	SHLAA identifies flood risk, access and landscaping as potential issues. These can be addressed, and "we do not consider the site to be a sensitive	• Noted • See also landscape comments on site 437.

Rd, New Romney.		location in terms of landscape".	
#427 Land adj the Old Post Office, Newchurch.	On behalf of H Langrish	Newchurch village has sufficient services to warrant inclusion within the Suitability SHLAA assessment.	• Objections to the focus on settlements highlighted in the Draft Rural Services Study could have been raised at the stage of consultation on the draft Shepway methodology but were not. • The general role of settlements is relevant to the Core Strategy therefore issues raised may be appropriate to the DPD examination process.
#433 Mulberry House land, High Street, Brookland.	On behalf of D Balcomb	The site should qualify and proceed successfully through the SHLAA because it is premature to exclude on the basis of yielding less than 5 units, and should therefore feature in the adjustment of village confines. It could be paired with 432.	• The files have been reviewed and it is considered the decisions on the sites are justified in the context of a strategic study. • Site 432 is regarded as Unsuitable as the potential development has not been shown to avoid having an unacceptable impact. • It is regarded as inappropriate for a positive conclusion to be drawn - under the parameters of this SHLAA – on site 433. It is non-qualifying as yielding under 5 on the basis of specific Design and Conservation Architect advice. Sufficient infilling cannot be assumed to be suitable. • The sites have been considered on the basis presented by the agent. If they were co-joined they would be larger than the 'minor' threshold permissible to be acceptable as an exception, as detailed on the Shepway SHLAA Suitability form, which is relevant given the identified sensitivity of the locality.
#432 Boarman's Lane, Brookland.		This site adjoins 433 and "we consider that this site should be considered an equally sustainable location". It is queried if conservation officer comments may suggest some development may be acceptable.	
#318 Land N of Megan Close, Lydd.	G Boot	How will sites of less than 5 units be addressed in LDF, and could they qualify as infill development?	• Neither the Core Strategy nor the SHLAA are the appropriate places in LDF to conclude on whether small sites will form appropriate additional designations. • A separate plan can pick up small sites in the LDF, guided by Core Strategy

			principles. This can help decide on whether proposed development would constitute acceptable infill.
#319 Land at Lade Fort, Lydd-on-Sea.		The majority of the site has been developed, and this is infill.	• Noted. • Land did not qualify for the SHLAA as is a Site of Special Scientific Interest.
#302 Land adj Moore Close, Brenzett.		It is frustrating it has not succeeded in the SHLAA and the site has a ready access left from recent development that has not yet been recognised through a settlement boundary adjustment. The doctor's access criterion is "somewhat spurious" and there is believed to have been historic encouragement for some growth of the village, which has been losing services although some remain.	• The GP criterion in question was derived from the Kent Protocol. (Moreover, there is no suggestion that the development would hold any ability to significantly alter healthcare access issues in the locality). • Objections to the inclusion of such criteria for the district or drawing from the Protocol could have been raised by the agent at the stage of consultation on the draft Shepway methodology but were not.

11.4.2 Please note due to the extensive nature of comments that Table 10 is not an exhaustive list of sites, and only aims to include comments by applicable landowners/agents raising SHLAA issues on their own sites. Original Preferred Options representations should be consulted, and please further note that the LDF Core Strategy process is still ongoing.

11.4.3 The following table confirms the results of consultation on provisional findings, all of which were included in the finalised results[43].

Table 11: Shepway SHLAA Provisional Findings: summary of actions arising

Site	Changed circumstances	Outcome
#1 The Levin Club, St Mary's Bay	*SFRA "Extreme" risk finding confirmed.*	*Suitability amended.*
#40 Folkestone Harbour	*Discussions highlight ambition for a greater proportion of houses, changing the yield.*	*Capacity estimate amended.*
#209 Former Ashford Airfield	*Further documentation produced supporting a 450 capacity.*	*Capacity estimate amended in line with documentation.*
#312 Meehan Rd (N), Littlestone	*Further to legal documentation received.*	*Availability amended.*
#314 Park Farm School, Folkestone	*Further documentation produced supporting a 118 capacity.*	*Capacity estimate amended in line with documentation.*
#317 Fisherman's Beach, Hythe	*Further documentation produced supporting an 80 capacity including site 416, capacity increased proportionate to area.*	*Capacity estimate amended in line with documentation.*
#335 Fisher Field, Lydd	*Submission received on suitable site after following up potential site availability.*	*Availability amended.*
#346 Old Gas Works,	*Documentation produced proposing a 200 capacity.*	*Capacity estimate amended.*

[43] Due to administrative error, unfortunately this was not fully translated across for sites #382 and #461. Therefore different figures were used in some previous publications, but the capacities in Table 5 of this document are correct and form the appropriate SHLAA result.

Folkestone		
#377 Frontier Ho, Folkestone	*Timing of site release confirmed, as 'deliverable'.*	*Phasing adjusted.*
#382 Southern Way Yard, Folkestone	*Employment Land Review confirmed possible ways forward.*	*Capacity estimate amended.*
#383 Westbrook Ho, Folkestone	*Further documentation produced supporting a 150 capacity.*	*Capacity estimate amended in line with documentation.*
#461 Bigginswood land, Cheriton	*Employment Land Review confirmed possible ways forward.*	*Capacity estimate amended.*

All other sites can be assumed to be substantively unchanged from provisional findings.

- *This table was published previously.*

11.4.4 The Kent Protocol (Appendix I) also benefited from stakeholder comments, and the example of the Home Builders Federation input is included at Appendix II.

11.4.5 To reiterate, some of the discussions of general SHLAA progress and issues with the local development community and neighbourhood representatives are documented in Appendix III.

SECTION C: SUMMARY

The SHLAA was completed using clear criteria, drawing from a range of desktop and submitted information. The key principles were derived from the agreed Kent Protocol, including the 'sieving out' assessment structure, a process that consistently examined factors in turn to ensure deliverable/developable sites are suitable, available and achievable. This approach was highlighted in advance in the separate Shepway Methodology document, which benefited from consultation.

The process undertaken was wide-ranging, and included several stages driven by input from varying stakeholders. Additional to general LDF Core Strategy public consultation, there were several specific SHLAA opportunities for the input of parties such as local agents, including a 'forewarning' mail out/ active publicity in advance of 'formal' contact on methodology/ call for sites. Private sector engagement and information was central to consideration of individual sites, with ongoing input supported by other LDF evidence base expertise. This was complemented by other specialist assessment of deliverability, for example Kent Highway Services scrutiny.

APPENDICES: Contents

[44] Ecotec (2009) Strategic Housing Market Assessment for the East Kent Sub-region, final Report.

APPENDIX I: KENT PROTOCOL DOCUMENT

Strategic Housing Land Availability Assessment Protocol for Kent and Medway – September 2008

Contents

Introduction.

1.01. As part of their evidence base for their local development frameworks, local planning authorities are required, by PPS3, to carry out a Strategic Housing Land Availability Assessment (SHLAA). It is also necessary to prepare a SHLAA as a condition for receiving the Housing and Planning Delivery Grant and as a tool for preparing housing trajectories required by N159.This assessment will help authorities to make provision for sufficient housing to come forward to meet future needs. In July, 2007, the Government produced a step by step good practice guide for local authorities on the preparation of SHLAAs.[45] This will be referred to as the "Practice Guidance" throughout this document.

1.02. In September 2007, the Kent Planning Policy Forum decided to prepare a protocol for undertaking SHLAAs in Kent to ensure consistency in the interpretation of the Practice Guidance and to help in the preparation of a sound evidence base for subsequent LDF documents. This protocol has taken into account both PPS3 and the Practice Guidance as well as advice provided by the Planning Advisory Service in its document, "Strategic Housing Land Availability Assessments and Development Plan Preparation". Advice has been taken from G.O.S.E. and regard has been had to other SHLAA methodologies prepared elsewhere in the country.

1.03. The protocol recognises the different circumstances that can prevail in different LPAs and is sufficiently flexible to allow for those differences. It is not intended to replace the Practice Guidance but to complement it and it should therefore be read in tandem with it. It is assumed that the Kent & Medway SHLAA Protocol provides an over-arching framework for SHLAA assessments in Kent & Medway, but that each LPA, in having regard to para 25 of the CLG guidance, will determine the detailed scope of their authority's assessment to meet their own area's characteristics and requirements.

Strategic Housing Land Availability Assessment Outputs.

2.01. The role of SHLAAs is to identify sufficient sites to meet the strategic housing requirements within LPA areas for at least 10 years and preferably 15 years. Those sites have to be available, suitable, and achievable. The SHLAA will be a technical document and judgements concerning the inclusion of sites in local development documents will be made separately through the statutory planning process. To remain useful, SHLAAs will need to be updated annually as part of the Annual Monitoring Report process.

[45] http://www.communities.gov.uk/publications/planningandbuilding/landavailabilityassessment

2.02. The Practice Guidance recognises that there are advantages in undertaking land availability assessments, particularly for housing, employment, retail and other uses in parallel, to ensure that due consideration is given to overall land use requirements in a comprehensive way. The decision whether to undertake such parallel studies will be a matter for each authority. The LPA will take into account the overall requirements for other land measured against current shortages or surpluses when making this decision.

2.03. Land use assessments may remain as separate exercises or combined into a single methodology. (Separate advice has been produced by the Government on the methodology for carrying out employment land availability assessments). As far as possible, where assessments are required for more than one use, they should be carried out in parallel rather than sequentially to avoid delay and uncertainty. Where the same site is identified as suitable for more than one use, it will be a matter for the LDF to consider which use is most suitable for the site. Sufficient additional housing sites may be identified to allow for the loss of any sites to other uses at this later stage (although a mixed use approach could be adopted in the assessment where appropriate).

2.04. The Practice Guidance sets out some minimum requirements for SHLAAs which should:

- Set out a list of sites, cross referenced to maps showing locations and boundaries (and showing broad locations where necessary)
- Assess the deliverability/developability of each site in terms of its suitability, availability and achievability, to determine when a site is realistically expected to be developed
- Identify the potential quantity of housing that could be delivered on each site or within each broad location (where necessary) or on windfall sites (where justified)
- Set out constraints on the delivery of sites
- Make recommendations on how these constraints could be overcome and when.

The Methodology.

3.01. The Government's Practice Guidance sets out eight stages for the preparation of an SHLAA, with two further stages that may be undertaken if it is not possible to identify an adequate supply of housing sites. This protocol follows the framework provided by each of those stages.

Stage 1: Planning the Assessment.

3.02. The study area may be a sub-regional housing market area or a local planning area. The stage at which each local authority has reached in its LDF preparation will be a principal consideration when determining whether a joint assessment is appropriate.

3.03. A Partnership should be established from the outset representing the relevant public bodies and private stakeholders. The Partnership will be responsible for the methodology adopted in each local authority area. It is proposed that local authority planning officers undertake the majority of the work although all members of the partnership will contribute towards the initial identification of sites and will provide advice on their availability and achievability (Stage 7).

3.04. The Practice Guidance expresses a preference for assessments to be carried out by housing market partnerships, which have been established for Housing Market Assessments. These should include key stakeholders, such as house builders, social landlords, local property agents, local communities and other agencies. Local authorities which have established SHLAA methodologies, have included bodies such as relevant Government Offices, the Home Builders Federation, Architects, Planning Consultants, the Environment Agency, Natural England, Community Bodies, Environmental Lobby Groups, the CPRE, Regional Development Agencies and Infrastructure Providers.

Stage 2: Determining which sources of sites will be included in the Assessment.

3.05. The Practice Guidance identifies the types of sites with potential for housing which should be covered by the assessment.

Sites in the Planning Process

- Land allocated or with planning permission for employment or other land uses which are no longer required for those uses
- Existing housing allocations and site development briefs
- Unimplemented/outstanding planning permissions for housing
- Planning permissions for housing that are under construction

Sites not currently in the planning process

- Vacant and derelict land and buildings
- Surplus public sector land

- Land in non-residential use which may be suitable for re-development for housing, such as commercial buildings or car parks, including as part of a mixed-use development
- Additional housing opportunities in established residential areas, such as under-used garage blocks
- Large-scale redevelopment and re-design of existing residential areas (residential intensification)
- Sites in rural settlements and rural exception sites
- Urban extensions (normally identified in RSS)
- New free standing settlements (normally identified in RSS).

3.06. The PAS Guidance explains that "there is no expectation that every possible greenfield site should be assessed within the SHLAA. Indeed, in many rural areas there will be large numbers of theoretically possible sites, many of which are patently unsuitable for housing because of their isolation from settlements or for other reasons. Rather, the assessment should concentrate on those sites with the best potential as possible housing sites."

3.07. GOSE has confirmed that the number of settlements, whether urban or rural, within which sites may be identified, can be limited in accordance with the criteria set out in paragraph 25 of the Guidance. Furthermore, it agrees that selected settlements should also be limited to those which meet sustainability criteria adopted by a partnership and/or are identified in DPDs as suitable for further development. Sites in such settlements would still need to meet deliverability/developability tests.

3.08. The criteria to be applied are set out in appendix 3B under "Suitability".

Exclusions.

3.09. The Guidance allows for particular types of land or sites to be excluded from the Assessment. The reasons for doing so will need to be justified and agreed by the members of the partnership. Although the Guidance gives a national designation, SSSIs, as an example, it will be a matter for each partnership to determine and justify which areas should be excluded. Methodologies elsewhere in the country demonstrate that a wide range of areas have been excluded, both of national and local importance.

3.10. Factors to be taken into account in deciding which areas are to be excluded will be the national importance of the area, the protection afforded to areas by policies in an adopted development plan, the role played by an area in the overall planning strategy, the overall housing

requirement and the availability of land unconstrained by policies to meet that requirement. Where protected areas need to be released to meet the requirement, it will be a matter for individual authorities to decide, based upon local circumstances.

Stage 3: Desktop Review of Existing Information.

3.11. A desktop review will be undertaken in order to identify sites with potential for housing. The Practice Guidance sets out some of the data sources that can be used to identify such sites. These are listed below:

Sites in the planning process

- Site allocations not yet the subject of planning permission.
- Planning permissions/sites under construction.
- Site -specific development briefs, which identify constraints.
- Planning application refusals where the principle of housing development is otherwise acceptable.
- Dwelling starts and completion records.

Other sources of information

- Urban Capacity Studies.
- LPA Empty Property Registers.
- English House Condition Survey.
- National Land Use Data Base.
- Register of Surplus Public Sector Land.
- Employment Land Reviews.
- Valuation Office database.
- LPA vacant commercial property registers.
- Commercial property data from estate agents and property agents.
- O.S. maps.
- Aerial photography.

3.12. In addition to these sources, lapsed planning permissions may be included and further information could be obtained from the Kent annual housing land supply studies, discussions with other council departments and pre-application discussions.

3.13. As part of this stage, stakeholders may be invited to submit proposals for the inclusion of their sites. This exercise may be based upon those stakeholders listed in the relevant SCI, supplemented by additional stakeholders who may have expressed an interest during consultation on emerging LDFs. Further information may be obtained in response to an advertisement in the local press.

3.14. The owners or agents of sites, which already have the benefit of an outstanding planning permission, may also be contacted to assess when or whether their site is likely to come forward for development. Site owner or developer details are available from the Kent annual housing land supply studies. A copy of the information to be included in a questionnaire to be sent to the stakeholders is shown in Appendix 1. Sites which fall below the relevant minimum site area threshold (See Stage 4), or fall within an excluded area, or fall at or in unsustainable settlements will not be included in the assessment.

Stage 4: Determining which sites and areas will be surveyed.

3.15. The Practice Guidance requires all sites identified in the desktop survey to be visited. The survey should also be used to identify further sites, which were not revealed by the desktop survey.

3.16. The survey does not necessarily have to be comprehensive and should be tailored to reflect the characteristics and needs of the area (para 25 of the Practice Guidance) as well as the resources available to undertake it. It is assumed that these decisions will be backed up by evidence so that the decisions underpinning the SHLAA are transparent. The geographical coverage of the survey and the minimum size of sites to be identified will depend on the nature of the area (e.g. an area dominated by rural settlements compared with a highly urbanised area.), and of the size of the majority of the sites likely to come forward. It also depends on the scale of the housing requirement (where housing targets are high, assessments may need to be more comprehensive and intensive, although Annual Monitoring Reports may reveal that even with a high requirement, the scale of existing commitments will reveal a need for only a limited number of additional sites.) The Practice Guidance identifies five geographical areas which could be covered by the survey:

- Development hotspots
- Town and district centres
- Principal public transport corridors
- Specific locations within settlements
- Specific locations outside settlements.

3.17. GOSE advises that if a first sweep doesn't find sufficient sites to address the housing challenge, a partnership will want to reconsider its assumptions and excluded sites (see Appendix 3), before looking at broad areas and windfalls.

3.18. In order to ascertain the number of potential sites required, it will be necessary to take into account all the sites in the planning process, where site capacities should already be known, together with sites outside the planning process, which were identified in the desktop study. In the latter case, an assessment of capacity will need to be made by applying the methodology in Stage 6, below.

3.19. The number of additional sites to be identified will then be determined by any remaining shortfall between the sites in the desktop study and the overall housing requirement. Some additional sites may be identified at this stage to offset sites which are found to be undevelopable when the full site assessments are carried out at stage 7. Alternatively, LPAs may prefer to wait until stage 7 has been completed before undertaking a re-examination of sites previous excluded, as a clearer picture will then have emerged of the number of additional sites required.

3.20. Generally, a site threshold of 0.15 hectares or 5 dwellings will apply as this coincides with that in the Kent Annual Housing Land Supply Studies. However, where an authority has a limited availability of large sites, no threshold need apply, thus enabling all potential sites to be included. Where a large number of sites are available, a higher threshold may be applied, enabling an authority to meet the housing requirement without identifying a substantial over-supply of sites.

Stage 5: Carrying out the survey.

3.21. Appendix 2 contains a site survey form, which sets out the characteristics to be recorded while on site. Although the Practice Guidance includes “site size” as an item to be checked on site, in reality this can only be checked as part of a desktop exercise.

Stage 6: Estimating the housing potential of each site.

3.22. The Practice Guidance advises that capacities may be established by the application of local site density policies. Where these are not available an Authority may wish to apply the densities in the Kent ad Medway Urban Capacity Protocol, namely 50 units per hectare within principal urban areas and 30 units per hectare elsewhere, if these standards have proved to be reliable. Alternatively, an authority may wish to establish its own standards by analysing the average densities achieved over, say, the last five years for town centres, suburban areas and rural areas. The use of average densities would need to be modified on a site, by site basis to

take into account individual site characteristics and availability of local services/facilities.

3.23. The Practice Guidance provides an alternative to the application of density criteria by the preparation of sketch schemes for each site. However, while these can provide a high degree of confidence in the results, this approach can be very resource intensive. A third approach may be to compare the site with a sample scheme, which represents the form of development considered desirable in a particular area. Put simply, this would be the application of similar densities to those in the surrounding area. As with the use of average densities, this would need to reflect local circumstances. The methodology or combination of methodologies used by an individual authority will depend on the resources and time available to it and the availability of existing information and is likely to be influenced by the size and number of sites identified. Authorities should make it clear in their documents, which methodology has been applied to each site.

Stage 7: Assessing when and whether sites are likely to be developed.

3.24. At this stage, a judgement has to be made on whether sites are i) **deliverable**, ie. available now, in a suitable location with a reasonable prospect of delivery within 5 years, and ii) **developable**, ie. in a suitable location with a reasonable prospect of development at a specific point in time, namely within 6 to 10 years, 11 to 15 years or after 15 years. Where it is unknown when a site could be developed, it should be regarded as not currently developable.

3.25. An assessment of suitability, availability and achievability will provide the information required to determine whether a site is deliverable and developable. The Practice Guidance sets out the factors to be considered under each of these categories, explaining each one in more detail[46]:

Suitability:

- Sustainability
- Policy restrictions
- Physical problems or limitations
- Potential impact on the environment
- Environmental conditions for prospective residents

[46] http://www.communities.gov.uk/publications/planningandbuilding/landavailabilityassessment, suitability paras 37 – 38, availability para 39 , achievability paras 40-41. Planning requirement cost may arise, for example, form the need for affordable housing, the requirements of the code for sustainable housing and other planning obligations. Development costs could also include the costs of site acquisition, relocation of existing uses or compensation.

Availability:

- Legal or ownership constraints

Achievability:

- Marketability
- Development costs
- Delivery rates

3.26. In relation to sustainability, access to public transport local services and district wide facilities are factors to be taken into account. There is no overall consensus on suitable walking distances, and these may vary according to the purpose of the trip. 1000m was raised as a potential threshold by the HBF in their consultation response and they highlighted that 2km in is included in paragraph 75 of PPG13. Both 400 and 800 metres have been used in other methodologies. Annex A of PPS 6 defines an easy walking distance to an edge of centre retail location as 300 m. from the primary shopping areas. For all other main town centre uses, this is likely to be 300 m. from the town centre boundary. For office development, locations outside the town centre but within 500 metres of a public transport interchange, including railway and bus stations within the urban area are considered as edge of centre locations. Paragraph 3:18 of "Encouraging Walking: Advice for Local Authorities, 2,000", states that the National Travel Survey showed that, when travelling by train, about 80% of travellers arrive at or leave the railway station on foot, walking an average of some 650 metres. In the light of this information, it is considered that 800 m, should be regarded as a maximum walking distance and therefore this is what has been included in Appendix 3.

3.27. In relation to achievability there are a number of residual valuation models available to help determine the economic viability of sites. Such a scientific approach may not necessarily be pursued and an "in-house" assessment undertaken instead. In either case, house builders, property agents and others in the partnership should be closely involved at Stage 7 in order to draw upon their expertise and ideally reach a consensus on each site, whilst recognising that this may not be achievable in all circumstances. Strategic housing market assessments may also provide useful information at this stage.

3.28. Where constraints have been identified, the assessment should consider what action would be needed to remove them.

3.29. Appendix 3 collates the information which has been gathered at each stage of the assessment process to enable a judgement to be made on each site. The aim of the protocol is to try and ensure that SHLAAs are undertaken to a consistent methodology to determine which sites fulfil the

suitability, availability and achievability tests. It is not intended to prescribe how the LPA determines which of these potentially suitable sites are taken through into the LDF e.g. whether the sites are scored and / or weighted as well as the other local policy factors that may need to be taken into account.

3.30. Peer reviews may be a beneficial mechanism for getting external views on an area's SHLAA and adding resources to the process. This is most likely to be of value if the staff undertaking the review have a good knowledge of the area that they are reviewing, such as an area within the same sub-regional housing market.

Stage 8: Review of the assessment.

3.31. An indicative housing trajectory should now be produced, based upon the site assessments carried out at stage 7. This will show how much housing can be provided for each five-year period. If insufficient sites have been identified to meet housing requirements for any of the periods, other sites may need to be found or capacity assumptions on specific sites may warrant reassessment.

3.32. At this stage, a re-examination of the excluded sites, referred to in paragraph 3.17, would be initiated. This may involve the reconsideration of the policy constraints applying to site selection (see paragraphs 3.09 to 3.10), particularly where planning policies allow for development subject to certain criteria in these designated areas. A reconsideration of site thresholds may also be appropriate at this stage.

3.33. Following this review of the assessment, if there are still insufficient sites, there are two options for meeting the shortfall: the identification of broad locations for future development and/or the use of a windfall allowance.

Stage 9: Identifying and assessing the housing potential of broad locations.

3.34. Only after a thorough review has been undertaken which results in the identification of insufficient sites, should authorities progress to stages 9 and 10. Broad locations should only be considered where necessary and may include areas within settlements and small extensions to settlements or locations outside settlements such as major urban extensions, growth areas, or new settlements where specific sites cannot yet be identified. The reasons why identification is not possible should be explained. An example might be where there is an area with a long history of sub-division of existing properties where evidence suggests that they will

continue to do so and policies are in place to allow them to do so. The need to explore broad locations outside settlements will usually be signalled by the Regional Spatial Strategy. In accordance with the PAS advice, the criteria to be applied to broad locations adjoining settlements will be the same as for specific sites, which is set out in Appendix 3, under "Suitability". Likewise, deliverability and developability would also be assessed in the same way.

3.35. The Practice Guidance advises that potential locations for broad areas within settlements would have been identified earlier, when determining where to survey for new sites, ie. development hotspots, town and district centres, and principal public transport corridors.

Stage 10: Determining the housing potential of windfalls.

3.36. PPS3 makes it clear that the supply of land for housing should be based upon specific sites and broad locations and a windfall allowance should only be used where there is robust evidence that it is genuinely not possible to identify specific sites. The PAS advice acknowledges that neither PPS3 nor the Practice Guidance give advice on what constitutes a special local circumstance and this is left up to the local authority to decide. However, it does indicate that before a windfall allowance can be considered, the process set out in the Practice Guidance to identify specific sites and, if necessary, broad areas should have been undertaken in a thorough manner. It includes the possibility of changes to Green Belt boundaries or other high level policy constraints if necessary in the process of identifying broad areas. (A further possibility is the removal of site thresholds in order to examine smaller sites which might otherwise have been excluded). A local authority will then need to provide evidence as to why sufficient sites could not be identified and to demonstrate that its site search has been comprehensive.

3.37. The fact that an Authority has relied on a high proportion of windfall sites in the past will not, on its own, be sufficient reason to include a windfall allowance in the assessment. The latest advice from SEERA[47] to its Regional Planning Committee is that it considers "there are no circumstances that would from the outset justify reliance on windfalls in housing supply trajectories" and therefore the special circumstances argument is not to be taken lightly.

3.38. Local Authorities in Kent are familiar with the use of windfall allowances and consequently, no further advice is included in this protocol. However, if a windfall allowance is used, care should be taken to avoid double counting of any capacity assessment of broad locations. Consideration will

[47] http://www.southeast-ra.gov.uk/documents/events/10/agenda_item_10-7_windfall_provison_update.pdf

also need to be given to whether the annual rate of windfalls is likely to increase or decrease, whether the pattern of redevelopment is likely to change and whether current market conditions are likely to change.

Reporting.

4.01. At the end of the detailed assessment, a report will be prepared and published, which will include an explanation of the methodology used, and will summarise the output information required by PPS3 and listed in paragraph 2.04 of this protocol. So long as these outputs are produced from the SHLAA, it is up to the LPA to determine how it is reported. It is suggested that this could in its simplest form consist of two tables, a set of site plans and a housing trajectory.

4.02. The first table will include all the sites/broad areas, which are deliverable and developable. It will consist of the site reference number and name, any constraints to delivery, how those constraints will be overcome, its capacity, and the time period when it can be delivered.

4.03. The second table will include all the sites which have been considered but then excluded from the assessment and the reasons for exclusion.

4.04. The housing trajectory will add together the total number of dwellings which will be developed in each time period and compare these with the housing requirement for each period. Defining a threshold will, for many Kent authorities, mean that small sites are not incorporated in the SHLAA. LPAs may therefore decide to produce additional trajectories where an allowance for small sites is incorporated but central government is likely to expect that this is in addition to meeting the area's requirement (subject to the above comments on windfalls and broad areas).

4.05. As the SHLAA is intended to be produced in partnership, it is assumed that the report will be considered and agreed by the partnership before it is finalised and published.

Annual Monitoring.

5.01. The final report will be updated annually as part of the Annual Monitoring Report. The review will record the following information:

- sites under construction which have now been completed

- sites with planning permission that are now under construction, and the stage reached
- planning applications that have been submitted or approved
- progress made in removing constraints and whether a site is now deliverable or developable and if so, when
- unforeseen events which now mean a site is no longer deliverable or developable and how these could be addressed
- where relevant, where a windfall allowance is included, whether it is coming forward as expected or whether it needs adjustment.

5.02. This information will be used to update the 5 year housing land supply and housing trajectory.

Timetable.

6.01. It is recommended that each authority prepare a project brief for undertaking the SHLAA which would be based on a summary of the Protocol and would include a timetable for its preparation.

Information Technology.

7.01. Given the varying stages of SHLAA preparation in each authority, it would be impractical to seek a uniform system of IT throughout the county. However, this something which may be worth exploring in the future.

Appendix 1 [to the Protocol]: Stakeholder Questionnaire.

YOUR DETAILS

Name
Company
Agent
Representing
Your Address
Telephone Number
E-mail

SITE DETAILS

Site Address
OS Grid Reference
Current Use
Your Estimate of Site Capacity

Please attach a map showing the boundary of the area to be developed. Without this map the site will not be included in the assessment.

OWNERSHIP

Are you the owner?
Are you part owner?

If you have not the sole owner, please list owner/owners with contact details if available.

POSSIBLE CONSTRAINTS

To the best of your knowledge are there any constraints which may affect the development of the site? Please specify.

Access
Infrastructure
Topography
Ground Conditions
Hazardous Risks
Contamination/pollution
Flood Risk
Legal Issues
Other

Do you think constraints on the site can be overcome? If so please explain how and when this might be achieved.

AVAILABILITY

Over what broad timeframe would you anticipate that the site could be developed? If this extends over more than one period please provde an estimate of the number of dwelling which would be completed in each period.

Within the next 5 years
Within the proceeding 6 to 10 years
Within the proceeding 11 to 15 years
After 15 years.

SITE SURVEY

It will be necessary for an officer of the Council to visit and carry out a site survey unaccompanied. If there are access difficulties, please provide contact details to enable a visit to be arranged.

PLANNING PERMISSION

Does the site have planning permission for housing or mixed use? If so, please state application reference.

RESPONSE

Please return this form and map to: before: .

Appendix 2 [to the Protocol]: Site Survey Form.

Date
Site Reference
Site Name
Boundary Check

Greenfield or Brownfield
Existing Use
Condition of Buildings/Ground
Description
Physical Constraints
Access availability

Adjoining Uses
Character of Surrounding Area

Construction Activity (e.g. Not started, Under construction, Completed and phasing if appropriate)

Initial Assessment of Suitability

Appendix 3 [to the Protocol]: Site Assessment Process.

SITE DETAILS

(Sources:

Site Reference Number
Site Name
Location/Address
Planning Status: Housing Allocation or Planning Permission?
Landowner/Owners and Contact Details
Agent Details

Description of Site
Site Area Indicative Capacity
Current Use
Surrounding Uses
Character of Surrounding Area
Greenfield/PDL/Mixed

POLICY CONSTRAINTS[48]

A - Is the site within any of the following Areas?

Category 1: National and Regional

SPA, Ramsar, SAC, SSSI, National Nature Reserve, AONB, Ancient Woodlands.

Category 2:

Green Belts

Category 3: Local

To be determined by each individual Authority in the light of local policies and local circumstances

B - Is the site currently in use or allocated for employment or other use and remains suitable and required for that use or is protected by a current development plan policy from development for other uses?

[48] (see paras 3.09 and 3.11 of this protocol which explains the flexibility that can be applied to policy constraints to take into account local circumstances and the local housing challenge)

C - Is the site neither in nor adjacent to a settlement?

D - Does the site fall within or adjacent to a settlement which has not been identified in a development plan document as a settlement/settlements suitable for future housing development with sufficient capacity to meet future housing requirements?

IF A SITE FALLS WITHIN ANY OF THESE CATEGORIES IT SHOULD BE EXCLUDED FROM THE ASSESSMENT AT THIS STAGE.

SUITABILITY.

A. Is the site allocated for housing in an existing development plan or does it have planning permission for housing?

If yes, the site will be suitable unless circumstances have changed to render it unsuitable. If no, the site should be assessed against the questions set out in B to E as follows.

B. Is the site in a suitable location when measured against the following criteria?

- Within 800m. walking distance of a bus stop or railway station providing two or more services per hour.
- Within 800 m. walking distance of a convenience store , a primary school and a GP surgery.
- Within 30 minutes public transport time of a hospital/health centre, secondary school, employment area, town or district centre.

IF A SITE FAILS TO MEET ANY OF THESE CRITERIA IT SHOULD BE EXCLUDED FROM THE ASSESSMENT AT THIS STAGE UNLESS THE SITE IS OF SUCH A SCALE THAT THESE CONSTRAINTS COULD BE OVERCOME AS A RESULT OF ITS DEVELOPMENT.

C. Does the site have any of the following physical or infrastructure constraints?[49]

- Access
- Highway capacity
- Infrastructure – Water Supply
  Sewerage/Drainage

[49] It is recognised that for some sites / constraints that additional site investigations may be required to fulfil this section)

Electricity supply
Gas Supply
Electricity Pylons

- Contamination/Pollution
- Adverse Ground Conditions
- Hazardous Risk
- Topography
- Flood Zone

If yes, how and when can the constraint be overcome?

IF THE NATURE AND SCALE OF THE CONSTRAINT IS SUCH THAT IT CANNOT BE REMOVED DUE TO COST OR TIMESCALE OR BOTH, IT SHOULD BE DELETED FROM THE ASSESSMENT AT THIS STAGE.

D. Would development have a detrimental impact on the following, either within or adjacent to the site or in its vicinity?

- Townscape
- Landscape
- Trees
- Conservation Areas
- Historic Parks and Gardens
- Listed Buildings
- Scheduled Ancient Monuments
- Sites of Nature Conservation Interest/Protected Species

If yes, could the impact be mitigated through the design process, the imposition of a condition or a legally binding agreement?

IF THE NATURE AND SCALE OF THE IMPACT IS SUCH THAT IT CANNOT BE MITIGATED, THE SITE SHOULD BE EXCLUDED FROM THE ASSESSMENT AT THIS STAGE.

E. Would the amenity of residents be adversely affected by any external, environmental factors?

If yes, could the impact be mitigated to such an extent that the residents' living conditions would be acceptable?

IF THE NATURE AND SCALE OF THE IMPACT ON AMENITY IS SUCH THAT IT CANNOT BE SATISFACTORILY MITIGATED, THE SITE SHOULD BE EXCLUDED FROM THE ASSESSMENT AT THIS STAGE.

AVAILABILITY.

Do any of the following legal or ownership factors apply to the site?

- Multiple ownership likely to result in protracted site assembly, part of the site being unavailable for development or a ransom strip situation.
- Existing tenancy or lease agreement, which could affect the timing of the release of the site for development.
- The willingness of an owner of owners to sell.
- The willingness of a developer with control of the site to develop.

If yes, how and when can the constraint be overcome?

IF THERE ARE ANY CONSTRAINTS TO THE DEVELOPMENT OF THE SITE WITHIN THE RELEVANT TIMESCALE WHICH CANNOT BE OVERCOME, (ie. IT IS NOT AVAILABLE), THE SITE WILL NOT SUBSEQUENTLY BE ASSESSED FOR ITS ACHIEVABILITY.

ACHIEVABILITY.

Can development of the site be achieved during the plan period having taken into account the following market, cost and delivery factors?

Market

- Compatibility of adjacent uses
- Land values compared with alternative uses
- Attractiveness of locality
- Market demand
- Projected rate of sales.

Cost

- Site preparation to overcome physical constraints
- On-site and off-site planning and infrastructure requirements
- Availability of funding

Delivery

- Developers' phasing
- Build-out rates
- Number of developers
- Size and capacity of developer.

If the site is deliverable and developable, in which of the following periods would development take place?

- During the next five years
- During years six to ten
- During years eleven to fifteen
- Beyond year fifteen and a) within the plan period or b) beyond the plan period, if known.

Information on the timing of overcoming physical, infrastructure, and legal constraints, identified under “Suitability” and “Availability”, will be taken into account, together with the “Achievability” criteria when determining the time of development.

APPENDIX II: EXAMPLE OF PROTOCOL CONSULTATION

Letter from Home Builders Federation on Kent Protocol

BY EMAIL ONLY

[redacted]
LDF Team
Medway Council
Gun Wharf
Dock Road
Chatham
Kent ME4 4TR

27th June 2008

Dear [redacted]

KENT & MEDWAY SHLAA PROTOCOL

Introduction

Thank you for allowing the Home Builders Federation (HBF) the opportunity of commenting formally on the draft protocol and apologies for the confusion which arose at the KPOG meeting regarding the pre-circulation of the text.

Overall HBF welcomes the thrust of the approach to carrying out SHLAAs set out in the protocol which, we are pleased to see, follows the general line set out in CLG's practice guidance. However, there are a couple of suggestions we would like to make for additional pieces of text and clarification of the advice already provided. These are set out below in the order in which they appear in the document.

Paragraph 2.03

While there is no problem with the different land use studies being carried out separately there is some sense in them being carried out at the same time (though to separate methodologies) if resources permit. The example referred to of sites being identified for more than one use highlights the potential problem of not doing these various studies together. While the final use will, as indicated, be a matter for the LDF, clearly if sites are

to be considered for a variety of uses then this will impact on the SHLAA in terms of the extent to which a site, say, already in an existing commercial use, should be considered deliverable, certainly in the short term. So identifying sites for a variety of uses can impact on the SHLAA and this impact should be recognised in the SHLAA rather than being solely left to the LDF.

Paragraph 3.11

What we are generally saying on SHLAA methodologies is that it makes sense for authorities to include in the SHLAA assessment all sites put forward by developers regardless of whether they would otherwise be excluded (for example under the criteria listed in paragraph 3.10). Clearly no respectable developer is going to be proposing a site for residential development in an SSSI ! However, some of the lower order constraints (car parks, allotments etc) should not be considered as absolute constraints in the same way as international designations. Certainly, if a developer is putting forward a site for inclusion in the SHLAA which falls foul of one of these lower order designations, then the fact it is being put forward suggests the developer considers it a prospect which they may pursue either through the LDF or via a planning application. On that basis, the evidence base would be more robust if all sites put forward by developers were assessed regardless of the level of constraint identified in this early part of the study. That is not to say any such site will not, later in the study, be found to be unsuitable. But it ensures that there is an audit trail in the decision making process which will make the SHLAA much more robust as an evidence base rather than ruling out sites at the start and not assessing them. We suggests there is provision made for this in the protocol.

We would also question the legitimacy of some of these category two examples in the context that the SHLAA should be seeking to identify as many reasonable sites as possible. It may not be reasonable to develop on a category-1 constrained site. But a car park or allotment should not be considered similarly constrained. We would therefore suggest that there is a caution against over-zealous exclusions included in the protocol.

Paragraph 3.12

Under the heading of “other sources of information” you could add local plan / LDF objection sites as well as lapsed planning permissions as other potential sources of sites.

Paragraph 3.15

If the above point under 3.11 is accepted then the words “except when suggested by developers / landowners” or words to that effect should be added to the last sentence of this paragraph.

Paragraph 3.18

3rd line should be “Practice” rather than “Practical” Guidance.

Paragraph 3.19

Again, following on from 3.11 above, we would consider that this adds weight to our suggestion as, if too many sites were excluded at the start, there will not be much left to revisit.

Paragraph 3.25

3rd line last word should be “and” rather than “ad”.

Paragraph 3.28

Under the heading of achievability it is vital that there is an assessment of the costs of meeting the council’s own planning requirements included. This would include the requirements to deliver affordable housing, deliver increasing levels of the Code for Sustainable Homes and paying any existing tariffs or other planning obligations.

On development costs, the costs associated with relocating existing uses or compensating existing owners for the loss of amenity (if residential infill) or moving house should also be factored in to the assessment. With the latter it is not just about assuming the market value of the house being lost but, on top of that, what an existing owner would wish to realise by way of value in order to make it worth his or her while moving house or selling part of a large garden which must be taken into account.

Paragraph 3.35

We would like to see a disclaimer included at the end of this section of the protocol explaining that these examples are for illustration only and that it should not automatically be assumed that the percentages, distances or general approaches applied in these case studies are replicable or directly relevant to the Kent situation. We have no problem including the information in the protocol by way of example. But we would be concerned if it was assumed that, just because 800m or 50% PDL is referred to in this protocol means it is in some way endorsed by KPOG or necessarily an appropriate way forward in a Kent SHLAA.

Stage 9

On the issue of broad locations I got the impression reading it that this section was a bit confused. I think there needs to be clarification that the concept of broad areas is not just any broad area that the council may wish to consider. Rather, it is clearly defined in the practice guidance as broad locations where housing is feasible and likely “but where specific sites cannot yet be identified” (para 46 of the practice guidance). So, on that basis

it would not be appropriate, for example, for a council to identify a whole settlement or part of a settlement as a broad location as it would be possible to identify sites in a complete settlement.
There has to be a reason why it is not possible to identify sites in any given part of a settlement before a broad location would be acceptable.

The sort of example I generally think of is student areas where there is a long history of sub-division of existing properties to flats and bedsits where it would not be possible to identify which property would be converted next but evidence suggests such conversions have consistently come forward in the past and will continue to happen in the future. So an area could be identified where this sort of development would be encouraged by policy and an allowance made accordingly. It is little more than a locationally and/or reason specific windfall allowance. The key to it, though, is that there has to be a robust explanation of why it is not possible to identify sites. The same applies to broad locations on the edge of settlements. If it is possible to identify specific sites put forward by developers then they should be assessed. Broad locations should only be used to indicate a general direction of expansion outwards of a settlement if that is a policy preference but no specific individual sites have yet been put forward or identified.

This section needs to be clarified by explaining the above.

Paragraph 3.44

On to the traditionally thorny issue of windfalls HBF is concerned that the protocol is a bit misleading in this respect. It is not the issue of whether there are particular local circumstances that justify the inclusion of a windfall allowance. Rather, paragraph 59 of PPS3 makes it absolutely clear that there is only one exceptional circumstance which could justify the inclusion of a windfall allowance; namely, that there is robust evidence that it is genuinely not possible to identify specific sites. If it is possible to identify sites then there is no justification for a windfall allowance.

In practical terms what this suggests really is that such an allowance is only really acceptable in those areas or for those categories of development below the threshold at which sites are identified and surveyed in the assessment; in other words, small sites. Larger sites could not be included in a windfall allowance as it is possible to identify them. Obviously there is a degree of overlap between a broad locations approach and a more general windfall allowance. The key is the explanation of why it is not possible to identify sites and the local circumstances, in that regard, must relate to the nature of development which tends to come forward in an area.

Paragraph 3.45

It is worth pointing out, however, that this is not an automatic justification for including a small site windfall allowance. The third bullet under paragraph 25 of the practice guidance makes it clear that authorities, in such cases, should still try to identify as many

sites as possible (and this may mean going down to a smaller site threshold for identifying sites than would otherwise be the case).
But, if it really is not and this can be proven via robust evidence, then a windfall allowance may be acceptable. That is the only circumstance. In that regard the reference to the SEERA windfalls report at paragraph 3.45 of the protocol is helpful.

Paragraph 3.46

Following on from that point, the sentence in paragraph 3.46 which begins "However, if a windfall allowance is used…." should be expanded to state that this should only be included as a last resort at the end of the SHLAA process rather than being automatically assumed right from the start.

Appendix 3

Finally, turning to Appendix 3 and the site assessment pro forma under Policy Constraints D, in order to reflect the comment made under paragraph 3.11 above, the heading should be expanded to say "Or has the site been put forward by a landowner / developer".

Under Suitability B we would question the justification for these walking distances. PPG13 on transport takes 2km as a reasonable walking distance (paragraph 75) so we would like further explanation of why only 800m has been chosen. Even if 2km is taken as a there-and-back trip it would suggest 1,000m would be more appropriate than 800m if not 2km in full. This requires further explanation otherwise the PPG13 figure should be used instead.

Turning finally to the Achievability section, this needs inclusion of a "Policy Factors" heading. While it would not be appropriate to assess the actual costs on a site visit, it would be helpful to record, for example, whether or not a site is likely to be liable to trigger an affordable housing contribution or any similar obligations.

I hope these comments are helpful and can be taken on board prior to the document being finalised.

Yours sincerely,

[redacted]

[redacted]

Home Builders Federation
Regional Policy Manager (South, East & London)

Kent Response to Home Builders Federation on Protocol

2.03 The HBF is concerned that if different land use studies are carried out separately, this could extend the period of uncertainty when more than one use is considered suitable, unless they take place at the same time. It is therefore considered that paragraph 2.03 should be amended to allow for such studies to be undertaken either separately or combined into a separate methodology and to point out the problems of delay and uncertainty if they are carried out sequentially.

3.11 The HBF proposal that all sites be assessed and only discarded later in the process, runs contrary to the Practice Guidance which allows for exclusions on designated areas early in the process at stage 2. The protocol allows for reconsideration of excluded sites at a later stage if necessary. The examples of lower order constraints in italics will not be included in the final document.

3.12 The HBF is seeking the inclusion of LDF objection sites and lapsed planning permissions as other sources of information. The former are already included in paragraph 3.14. It is agreed that the later should be included in paragraph 3.12.

3.15 The point under 3.11 is not accepted.

3.18 Typo correction agreed.

3.19 Sites excluded in stage two need not be permanently excluded and can be reconsidered if necessary. Therefore there could be a reasonable number of sites to revisit.

3.25 Typo correction agreed.

3.28 Appendix 3 includes the costs of on and off site planning requirements under “Achievability”. Paragraph 3:28 also states that the Practice Guidance explains each of the suitability, availability and achievability categories in more detail. However, a footnote could be included in the protocol to give some examples of planning requirements such as affordable housing, the requirements of the code for sustainable housing and other planning obligations. It could also include the costs of overcoming availability constraints such as site acquisition, relocation of existing uses or compensation.

3.35 A note on the contents page explains that the paragraphs in italics have been included as examples from elsewhere to help officers during the preparation of the protocol and they will be removed in the final document.

Stage 9 Paragraph 3.41 should be amended to explain that broad areas are areas where specific sites cannot yet be identified and the reasons why identification is not possible. It would also be helpful to include an example of a broad area within a settlement on the lines of that put forward by the HBF.

3.44 Paragraph 3.44 should be amended to include reference to the need for robust evidence that it is not genuinely possible to identify specific sites. The HBF asserts that a windfall allowance should only include small sites because large sites can be identified. However, even if a thorough assessment has been made of large sites, they will always emerge unexpectedly. Consequently, no restriction should be included in the protocol.

3.45 Paragraph 3.44 points out that there is no automatic justification for using a windfall allowance and paragraph 3.22 allows flexibility in applying a threshold.

3.46 Paragraph 3.44 already explains that before a windfall allowance can be considered, the process for identifying specific sites, including broad areas where necessary, should have been undertaken.

[Protocol Appendix 3] *Given that the amendment proposed by the HBF to 3.11 is not accepted, no change to Appendix 3, Constraints, D, is justified.*

There is no overall consensus on suitable walking distances and these may vary according to the purpose of the trip. Both 400 and 800 metres have been used in other methodologies. Annex A of PPS 6 defines an easy walking distance to an edge of centre retail location as 300 m. from the primary shopping areas. For all other main town centre uses, this is likely to be 300 m. from the town centre boundary. For office development, locations outside the town centre but within 500 metres of a public transport interchange, including railway and bus stations within the urban area are considered as edge of centre locations. Paragraph 3:18 of “Encouraging Walking: Advice for Local Authorities, 2,000”, states that the National Travel Survey showed that, when travelling by train, about 80% of travellers arrive at or leave the railway station on foot, walking an average of some 650 metres. In the light of this information, it is considered that 800 m. should be regarded as a maximum walking distance and no increase should be considered. An additional paragraph should be included in section 7, which reflects this response. NB. It would be useful to receive examples of walking distances included in any of the adopted plans throughout Kent.

Under “Achievability, policy factors are covered by “ on site and off site planning considerations” and an additional “Policy Factors” heading is therefore unnecessary.

APPENDIX III: EXCERPTS FROM PUBLIC MEETINGS

- **Planning User Group 9th September 2008 [Extract]**

Shepway District Councillors	Councillor Mrs J D Hollingsbee (in the Chair), Councillors H A Barker, Mrs J M Holben, D S Johnson, M J A Lyons, A North and D B Stephenson.
Town and Parish Council Representatives	R Belcourt – Hythe Town Council, Dr A Snoad – New Romney Town Council, A Davis and P Davis – Lydd Town Council, R Theobald – Folkestone Town Council, J Cockerill – Dymchurch Parish Council, D Suckling – Ivychurch Parish Council, W Hunter – Lympne Parish Council, L Page – Newington Parish Council, M Garrod – Sellindge Parish Council, D Stuart – Stelling Minnis Parish Council, C D Tearle – Swingfield Parish Council and L Oakes – Stowting Parish Council.
Officers Present:	C Lewis – Planning Services Manager, Miss L Patching – Development Control Manager, R Little, Development Control Team Leader M Aplin – Planning Policy Team Leader and S Lewis – Committee Administrator.
Apologies for Absence:	G Palmer - Elham Parish Council, D Callahan – Hawkinge Parish Council, K Baxter – Sellindge Parish Council

SHEPWAY LOCAL DEVELOPMENT FRAMEWORK (LDF) CORE STRATEGY

Mark Aplin, Planning Policy Team Leader presented members with an update on the Shepway Local Development Framework (LDF), informing them that the LDF's Core Strategy will replace local plans/structure plans.

Members were informed that the first stage of consultation earlier in the year received good responses and officers are now working towards public consultation early next year. A letter has been sent to all parishes requesting information on land that might be available for new housing. Particular attention is being paid to key services compared to population,

and a Rural Services Study has been produced in draft form for comment. The letter also mentioned that work is underway for an LDF study of Open Space provision.

The submissions of land must have a drawing/plan of the sites to be put forward. This is so it is clear how far the exact plot in question covers. This is not always easy to source other than via the internet, but members were informed that this information will be necessary, and officers will liaise with parishes to help provide the information.

It was also noted that it is very difficult to get ordnance survey grid reference numbers, members were informed that there is a lot of in-house work being done and again the officers will help parishes that request it.

Mr Aplin was asked if the LDF would interfere with the Area of Outstanding Natural Beauty (AONB). The AONB is not designated through the LDF, and members were also informed that SDC is focusing on Key areas and nothing is expected to come forward from open countryside in the AONB..

Mr Aplin was asked if parishes did not put areas forward would they be forced to. Members were informed it is optional and voluntary to provide an area to use. As the statutory development plan the LDF will need to consider all areas, and the in-house work on possible housing land could flag up land in villages that do not respond (it is looking at sources such as lists of previously developed land across the district).

Information is still held on the system of those areas that were put forward for the Shepway Local Plan but this will have to be updated.

[Minutes continue]

- **Planning and BC Agents Group 13th October 2008 [Extract]**

LOCATION: BOULOGNE ROOM, CIVIC CENTRE TIME: 6.00 PM

PRESENT: SDC - Chris Lewis (Chair); Lisette Patching; James Bailey; Nick Lewington; Valerie Knight; Cllr R Tillson, Cllr R Pascoe.
Charles Evans, Smith-Woolley & Perry**;** Richard Daniels, RDA Architects; Roger Joyce, Roger Joyce Associates; Peter Godden, Godden Allen Lawn; John Rapley, Charlier Construction; Tom Quaye; Charles Gasson, C K Gasson; Stuart Ingleston, S I Chartered Building Surveyors; Michael Barnes, Consultant; Eoin O'Connor, Hobbs Parker.

5. LOCAL DEVELOPMENT FRAMEWORK (LDF) UPDATE (CL)

CL advised that Cabinet approved the revised timetable for the Local Development Scheme in early October, particularly the production of the Core Strategy. The draft document will be produced for consultation between June and December 2009 then submitted to the Secretary of State before finally being adopted by March 2011.

SHLAA work is ongoing at present on the sites put forward for consideration with strategic development potential. Each proposed site has to be assessed against very strict criteria. This work will provide a core pool of preferred sites.

Charles Evans queried what denotes a site as strategic – the criteria is a site big enough for 5 or more dwellings. There was some discussion about the current vcant seafront site and CL confirmed that Folkestone Seafront would have to be assessed through the SHLAA process and the Core Strategy process. The fact that it was included in the Local Plan does not mean it would automatically go forward. Each site would have to be reassessed against the criteria.

Cllr Tillson raised the issue of flood risk and CL advised that other issues would also have to be considered as part of the process e.g. AONB, infrastructure, SSSI designations etc.

Modified housing figures in the SE Plan indicate a requirement for 5,800 houses in the district between 2006-2026 i.e. 290 per year - about the same requirement that was in the Structure Plan.

Economic development work on employment land has been outsourced to Lichfield.

Strategic Flood Risk Assessment (SFRA) work is being undertaken by consultants in Canterbury and feedback is expected within the next couple of months.

Tom Quaye asked about the Strategic Flood Risk Assessment and sequential tests. CL explained that the council would carry out the sequential tests and the SFRA would inform these tests.

5.6 CL requested that any further sites proposed are submitted as soon as possible as the timeframe is very tight. The information on the SFRA is due in December and for the SHLAA in January 2009. Work on both is ongoing and runs concurrently.

[Minutes continue]

- **Planning and BC Agents Group 1st February 2010 [Extract]**

LOCATION: BOULOGNE ROOM, CIVIC CENTRE TIME: 6.00 PM

PRESENT: SDC: Lisette Patching (LP), Development Control Manager; Roy Little (RL), Team Leader, Planning: Mark Aplin (MA), Team Leader, Planning Policy; Nick Lewington (NL), Principal Building Control Officer; Cllrs M Lyons; T McNeice.

Tom Quaye, Design & Building Services; John Rapley, Charlier Construction Ltd; Michael Barnes; Richard Daniels, RDA Architects; Charles Evans, Smith-Woolley & Perry; Eoin O'Connor, Hobbs Parker; Mike Simmonds, Kent Planning; Stuart Ingleston, S I Chartered Building Surveyors; Roger Joyce, Roger Joyce Associates; Peter Spiller, Spiller Associates; Peter Godden, Godden Allen & Lawn.

6. LOCAL DEVELOPMENT FRAMEWORK UPDATE

MA gave a brief update on the LDF which is a new series of plans for the district. He advised that an email had been sent to all agents in mid- January and hoped that all present at this meeting had received this.

News on the Core Strategy – programme discussions are continuing with partners and SDC Cabinet has agreed to a new interim programme. The next chance to comment will be towards the end of this year, 2010. The Cabinet report of 4 November 2009 gives details of key milestones.

The key points arising out of the feedback in response to the consultations held last year have been noted by Cabinet.
Work continues on the annual monitoring statement compiling information on performance of planning policies and housing supply.

TQ queried FO3 housing targets as 300-400 per year and whether it is deliberately wide or will be refined later. MA agreed that it would be refined and advised that SDC is aiming to go above the SE Plan target, and to explore providing evidence in support.

[Minutes continue]

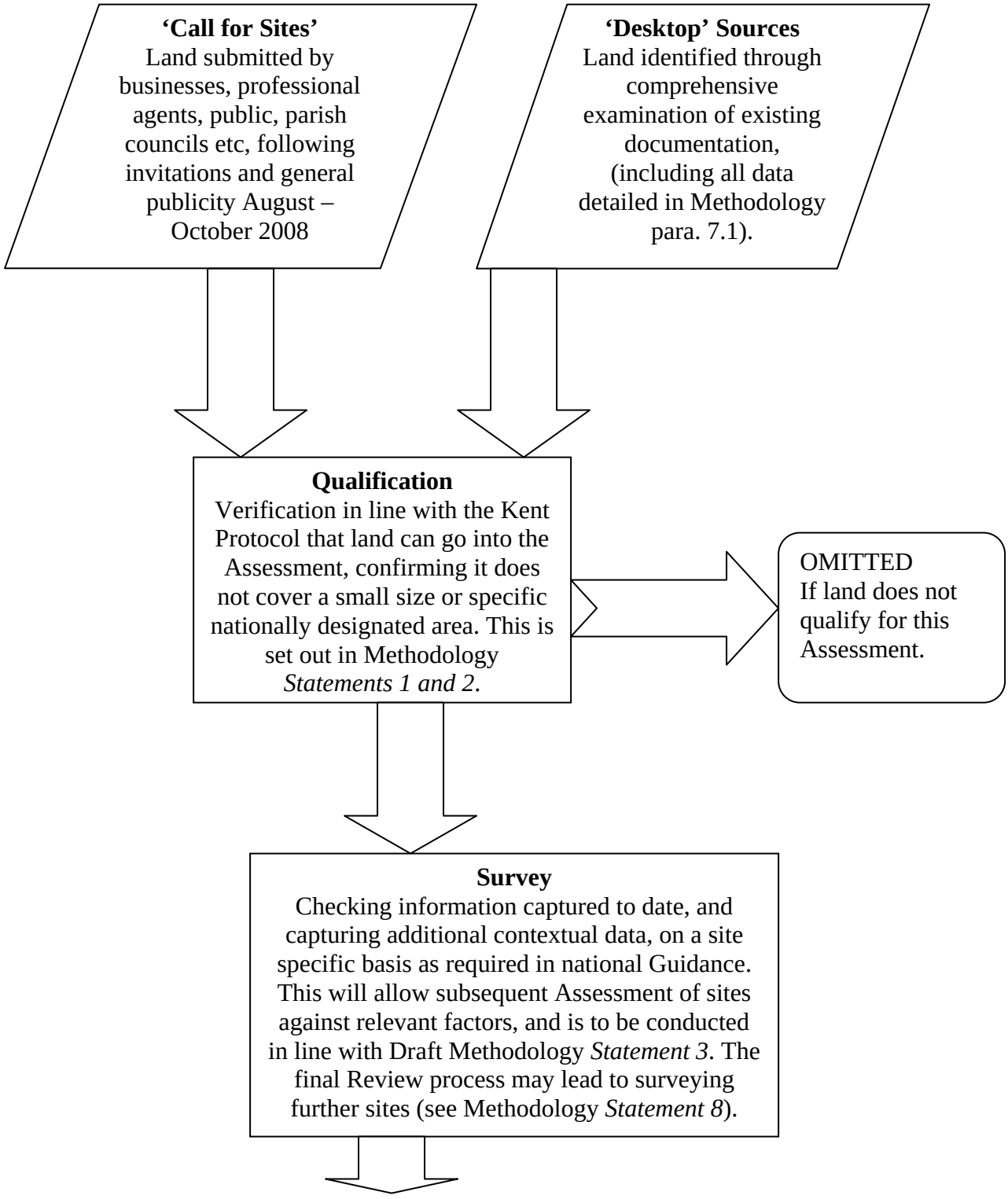
9. IMPLICATIONS OF SFRA ON DELIVERABILITY OF SHLAA SITES (TQ)

TQ asked about the number of housing sites selected on Romney Marsh that are in flood risk zones as he felt that there is conflict between the SHLAA and flood risk policy. He asked how this conflict is likely to be addressed. He felt that paragraph 3.52 is ambiguous in wording regarding mitigation measures. MA explained that the SHLAA is about identifying potential housing sites and does not address the issue of potential flood risks. The SFRA should be consulted in these cases.

[Minutes continue]

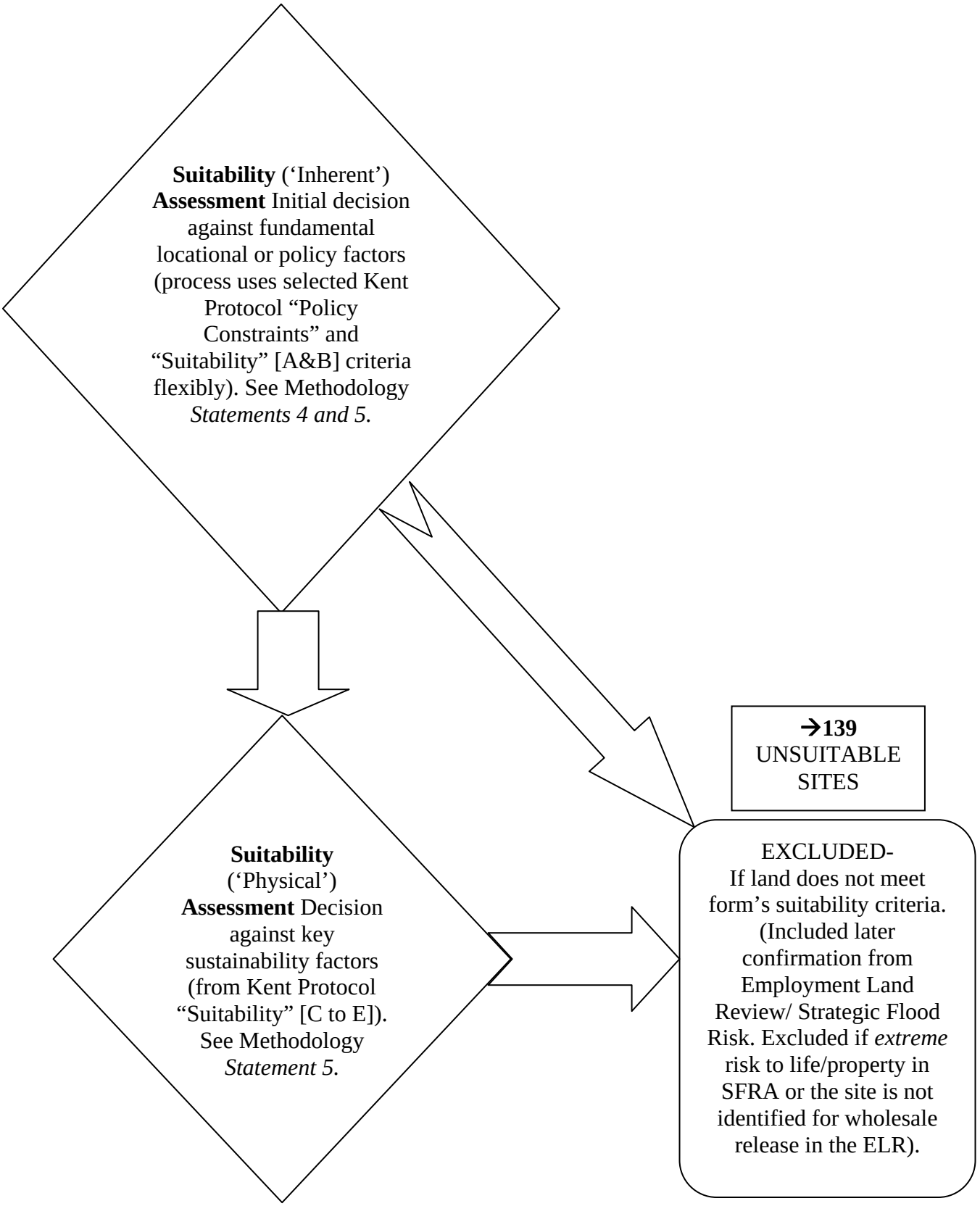
APPENDIX IV: FULL FLOW DIAGRAMS OF ASSESSMENT CRITERIA

DATA COLLECTION: *DCLG Practice Guidance*[50] *Stages 1-5.*



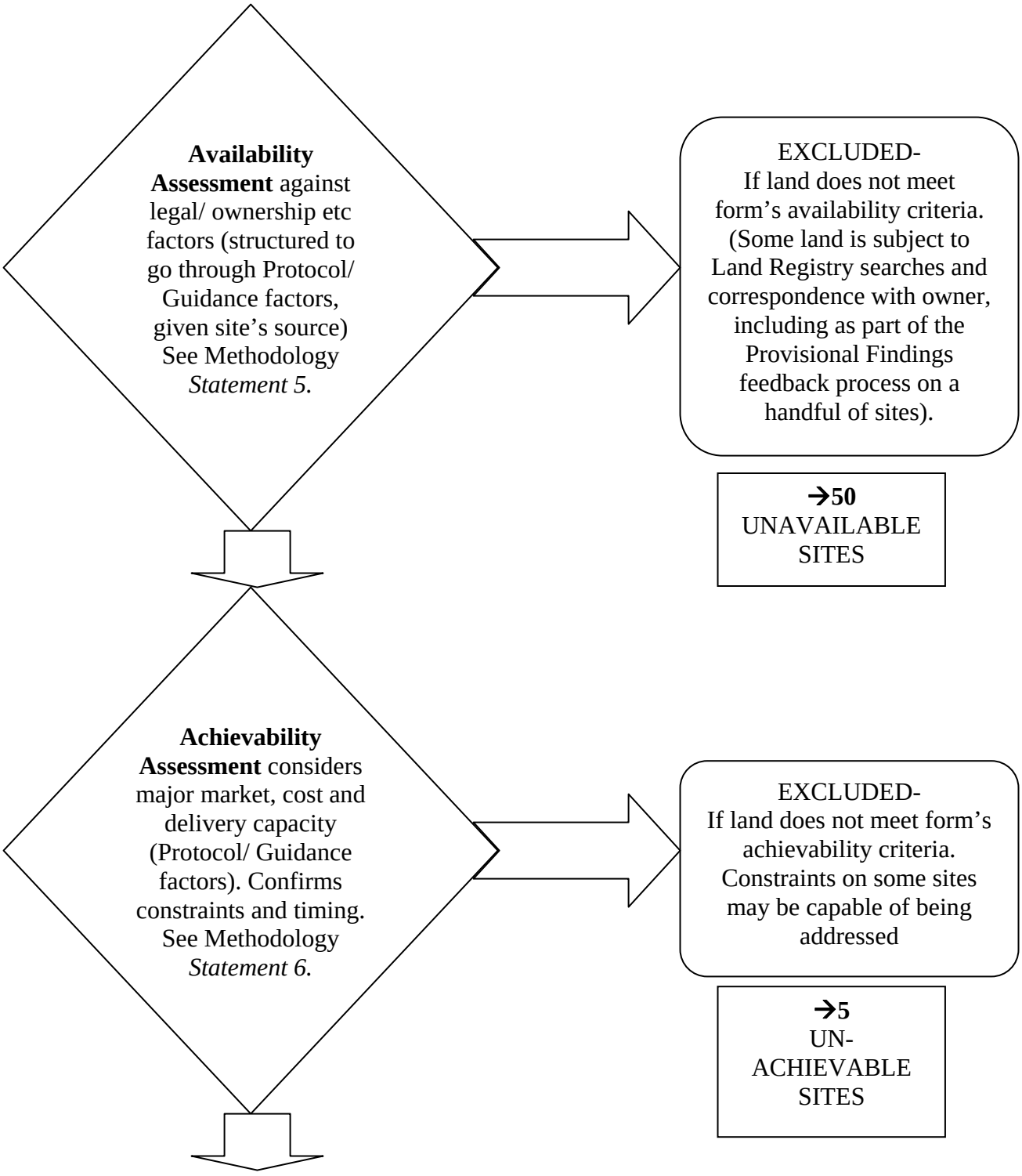
[50] DCLG (2007) Strategic Housing Land Availability Assessment**:** Practice Guidance.

SUITABILITY ASSESSMENT: *DCLG Practice Guidance Stage 7.*

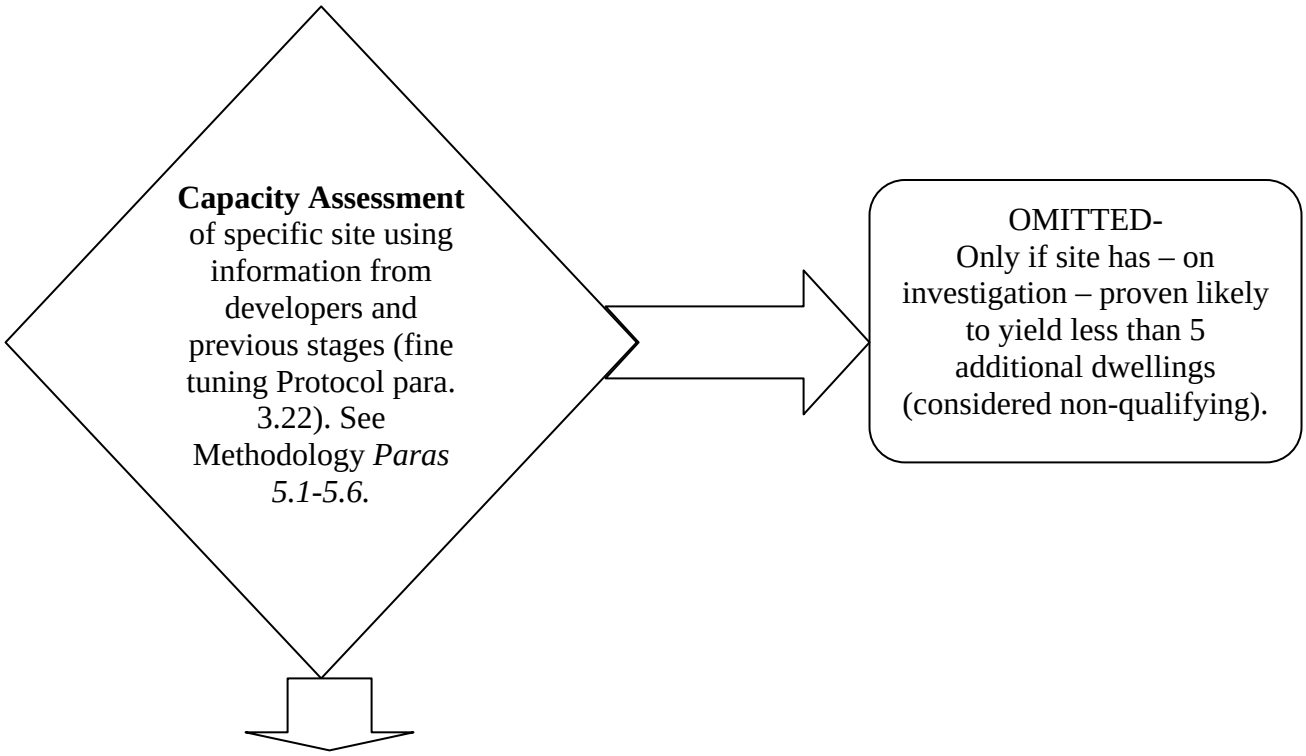


AVAILABILITY & ACHIEVABILITY ASSESSMENT:

DCLG Practice Guidance Stage 7 (cont).



POTENTIAL (CAPACITY) ASSESSMENT: *DCLG Practice Guidance*[51] *Stage 6.*



=149 DELIVERABLE/ DEVELOPABLE SITES

Informed DCLG Practice Guidance Stage 8 (Review: allowed conclusion of SHLAA)

Notes:

- The predominant process has been shown. It has been necessary to simplify the full approach for diagrammatic purposes.
- Only a small minority of sites are exceptional to the above approach. For example, where it is apparent from the survey that a site may have already been developed, the availability of such sites was 'fast-tracked'.

As detailed in the forms (that follow), in certain instances an efficient (less linear) approach was adopted of allowing sites to – temporarily - proceed as 'conditionally' acceptable, pending later confirmation of their suitability etc.

Please consult the important notes on the following page.

[51] The DCLG Practice Guidance shows stage 6 – estimating potential - does not necessarily have to be placed before stage 7.

Introductory note to APPENDIX V

Important points in relation to the completion of these forms (recorded in individual files on individual sites):

- The key factors and requirements are taken from the Kent Protocol. The forms below provide a structured approach to delivering a consistent and objective Assessment –to make the Protocol criteria usable and fair in their implementation.
- The specific layout of the forms has therefore been determined locally. They include guidance to weigh-up factors. They mostly take the form of prompts where an issue can be flagged up, the results of investigations summarised and outcomes recorded. However the crucial point is that the focus should be on the underlying picture on deliverability/ developability, and properly addressing Protocol criteria. Thus the suggested 'navigation' around the factors in the forms should ultimately be seen as guidelines. For instance, although the Availability form suggests 'advance to criterion X' (e.g. "→iii") in response to questions, this does not mean the intervening questions are necessarily irrelevant.
- As explained, the overriding structure to the process is sieving out. The notation used to record the conclusions of each sub-stage (for office purposes is) in generic terms:
    1. =Acceptable (proceed)
    2. =Conditional (provisionally proceed for now to gain further information but unlikely to be acceptable unless news to the contrary established)
    3. =Unacceptable (terminate)
- Nevertheless, despite this staged approach the information captured is applied throughout e.g. identification of constraints on varying aspects of suitability and availability is also considered at the later achievability stage (and vice versa in conditional cases). To aid this process the numeric codes are sometimes supported by an alpha-notation to record further information for general future planning policy purposes, for instance:
  A= Other inherent suitability issues
  B= Further physical suitability issues
  C= Availability factors issues
  D= Density and capacity issues
  E= Achievability and general commercial deliverability issues
  F= Strategic Flood Risk Assessment (suitability) input
  G= Employment Land Review (suitability) input.
  Please note, these are detailed notes secondary to the numerical code. They apply to both successful and unsuccessful sites and may not directly - when seen in isolation - relate to the final Assessment conclusion on a site.
- The structure and inter-relationship between stages is apparent on a full reading of the Assessment Forms. Shepway Planning Policy team is available to confirm the rationale behind decisions and background information, however please note recorded information cannot be simply changed (and moreover it is considered that possible appropriate minor amendments are unlikely to be material to the outcome of the final decision).

APPENDIX V- SHEPWAY ASSESSMENT FORMS

SHLAA SITES ASSESSMENT: EXAMINING INHERENT SUITABILITY
Form to apply Methodology & Protocol Appendices criteria

Summary of first sieve assessment

Site Name:		**Site Ref:**	
Locational finding *e.g.3*		**Policy finding** *e.g. 2D (or NA)*	
FINALISED CONCLUSION:	**SUITABLE (PROVISIONALLY) / INHERENTLY UNSUITABLE**		
Signed:		*Date:*	

All inherently unsuitables to be signed off by Team Leader.

To be inherently suitable must not be unacceptable ("3")
on Locational or major Policy grounds.

LOCATIONAL CONSIDERATIONS

Urban Area + Rural Services Study Primary & Secondary Clusters:

Within existing settlement boundary of:
- Folkestone/Hythe
- New Romney area (606613 124931)
- Lydd Town (604219 120499)
- Hawkinge (621548 139706)
- Densole[52]
- Lyminge (616139 141068)
- Elham (617663 143909)
- Sellindge (610336 138118)
- Dymchurch (610169 129316)
- St Mary's Bay[52]
- Brenzett[52]
- Brookland (598945 125807)
- Lympne (612093 135365)

(614506 146710) Stelling Minnis (no boundary for conservation reasons):
- Within central designated common area, or up to 200m from.

OR

[52] These villages do not qualify sites within 400m of their centre because they only feature here due to virtue of forming a joint cluster in the draft Rural Services Study, and it is their 'pair settlement' that contains the premier concentration of facilities.

Sustainable Location: Equals basic services nearby and major facilities accessible (public transport corridor).

- *Basic Services:* Likely site entrance is within 800m walking distance of a convenience store, a primary school and a GP surgery [Kent Protocol definition], or 400m from the above grid references. AND
- *Public Transport Corridor:* Within walking distance: 400m from bus stop/ 800m from railway station [Kent Protocol definition] with a 7 day a week service to accessible major facilities. It has been verified that in Shepway these corridors are half an hour's public transport time from Folkestone, Canterbury, Hythe and New Romney town centres or Ashford key services [The other Kent Protocol criterion stipulates this duration away from a centre with a hospital, secondary school, and designated retail function].

First sieve findings on locational considerations:

- **1. Acceptable** in terms of location (meets criteria above).

2. Conditionally acceptable.

- Potentially sustainable substantial[53] site(s). Needs to be:
  - on its own, or in combination with a single other adjoining site, the site is of a scale of at least 10ha or more. AND
  - In a *Public Transport Corridor,* OR
  - Within 800m walk from centre point of a Town Centre.[54]

→ Need improvements in basic services. Determine final suitability through scope for delivering necessary planning obligations given subsequent findings eg achievability. ACTION =2E.

- Sufficiently sustainable minor site. Needs to be:
  - A brownfield site of up to 5hectares OR adjoining a settlement listed overleaf and an 'infill' site/ not extending beyond the general built line, plus less than 1ha, AND have
  - *Basic Services,*

→ Capacity implications for achievability etc given PDL/scale, may require viability consideration. Lower capacity ACTION =2D.

- **3. Unacceptable** location (meets none of above criteria). TERMINATE.
  - **A**. Brownfield (sub-optimal location).
  - **A.** Possible small infill (sub-optimal location).

[53] Substantial site refers to the potential for development contributions significant enough to provide mix of uses, demand and sufficient developer contributions to overcome otherwise unsustainable location.
[54] In line with the draft Rural Services Study and external strategy, in practice this only applies from New Romney or Hythe (616192 134786) as all of this radius is within the Folkestone settlement boundary/sea.

POLICY CONSIDERATIONS

Is o Listed Building, o Scheduled Ancient Mon. o Conservation Area.	Action→Specialist officer view (attached) on principle of potential. Or note if in vicinity:
DISBARRING FACTORS	If all of the site falls within one (or more) of these categories then it will not be regarded as suitable unless: -the site survey suggests clear and practical scope to overcome harm -or if submitted land has a convincing strategy to ensure harm is overcome.
Historic Park/Garden?	
HSE Middle/Outer (Bowles Wells)	
Other national?	
LR9 (Open Space)?	
LR11 (Allotments)?	
BE14 (Folkestone W End Gardens)?	
E2 sites (A: Shearway)?	
E2 sites (B: Cheriton Parc)?	
E2 sites (C: Link Park/Lymne Ind Es[55])?	
Total number of disbarring points:	
REDEEMING FACTORS	If a site holds one (or more) of these redeeming factors from Community Plan aspirations then it may outweigh a disbarring factor above and be suitable.
Development is a relatively high crime area and would directly ensure a major improvement to the streetscene that would lead to a **significant sense of security.**	
Healthcare benefits in Romney Marsh.	
Substantial direct contribution to improved **provision of skills/training**.	
Part of a recognised package securing long-term retention of major local **employers**, or attracting investment improving the sectoral **mix of employers** in the district.	
Delivering several **LEQS points** on a significant scale.	
Total number of redeeming factors:	

[55] Policy E1 (land J).

First sieve finding on policy considerations:

- **1. Acceptable** in terms of local policy (not disbarred/conditional above).
    - **A.** Inactive HSE Zones (Gas Works & Harbour) → ACTION 1A: note for record.

2. Conditionally acceptable, future action required-

- Part of site disbarred.
- Community Plan support outnumbers disbarring.
- Is Listed Building/ Scheduled Ancient Mon./ Conservation Area. (follows ACTION OF Specialist officer **view** on suitability).
- Listed Building/Scheduled Ancient Monument/Historic Park or Garden in close proximity OR in BE12 (Special Character)

→ evaluating **Potential stage**. ACTION **2D.**

- E1/Other E2 designated employment site.

→ Await **ELR input** suitability. ACTION **2G.**

- **3. Unacceptable** in terms of local policy (majority of site disbarred above
    - **A**. Is Listed Building/ Scheduled Ancient Mon./ Conservation Area. (follows ACTION OF Specialist officer **view** on suitability).

[Form] Appendix: Dealing with conditional matters

-Policy Conditionally Acceptable:	Evaluation:
A. Listed Building/Scheduled Ancient Monument/ Conservation Area: Specialist officer evaluation –**would site be suitable for 5 or more (additional) dwellings, if not why not?** o Design & Con Architect → for LBs & SchAMs o Major Projs Officer → for CAs *Signed:* *Date:*	
B. ELR findings: Reference to report and summary of outcome. **Consider any mixed use possibility/ need – what scale feasible?** *Signed:* *Date:*	

ASSESSMENT OF SHLAA SITES: EXAMINING PHYSICAL (ETC.) SUITABILITY OF SITES
Form to apply Protocol Appendices criteria

Summary of first sieve assessment

Site Name:		**Site Ref:**	
Infrastructural/ physical finding *e.g.1*		**Local environmental finding *e.g. 1B***	
FINALISED CONCLUSION:	**SUITABLE / UNSUITABLE**		
Signed:		***Date:***	

All unsuitables to be signed off by Team Leader.

To be suitable at this stage must not be unacceptable ("3") on Infrastructural / physical or local impact.

Sites will proceed through each table (Set of constraints) unless it is clear a matter renders it unsuitable.

Infrastructural/physical constraints?

Matter	*Source*	*Potential issue? (tick=yes)*	*Summary of conclusions of specialist (if issue)*	*Note if Unsuitable (NATURE AND SCALE OF THE CONSTRAINT IS SUCH THAT IT CANNOT BE REMOVED DUE TO COST OR TIMESCALE OR BOTH?) or conditional on action (specify[56])*
Landform	-Internal maps/BE19 -OS Mapping	o Adverse Ground Conditions o Topography	*Building Control:*	
Pollution/ Hazards	-Internal potential contaminated land list -Survey of nearby uses -Historic maps	o Contaminated o Pollution o Unexploded Ordinance	*Environmental Health:*	
Infrastructure (utilities)	-FDWS -Internal e-maps/hotspots[57] -Urban area -CD rom	o Water Supply o Sewerage/ Drainage o Electricity supply[58] o Gas Supply	*FDWS concerns /* *S Water for selected sites:*	Individually these are unlikely to render sites unsuitable but may impact on Achievability? (ACTION 2E)

[56] If conditional, how and when can the constraint be overcome?

[57] The criterion of coverage on this map is augmented by factoring current capacity issues. Therefore a potential issue is a site **not covered** by this map OR in **Sellindge, Lympne, Folkestone Racecourse, Hawkinge, Dymchurch, Ivychurch (if more than 15 dwellings), or the rest of Romney Marsh (if more than 20 dwellings)**

Transport	-Kent Highways Officer's judgement -informed, by site specifics, size and location, background info.	o Access o Highway capacity[59]	*Kent Highways:*	
Flooding	-EA zones 2&3 [temporary only]	o Poss. serious flood risk general area (indicative)	**N/A** All sites reaching this stage will have specific assessment against SFRA. The left hand assessment is only to identify Zone 1, which (subject to final verification) may not be the only/ an issue.	

First sieve finding on physical/infrastructural considerations:

- **1. Acceptable** in terms of infrastructure/ physical suitability (no issues raised).
  - **B.** Following specialist investigation.
- **2 Conditionally acceptable**, to be decided later stage:
  - Subject to flood risk (ACTION 2F) -SFRA
  - Implications for capacity (ACTION 2D) –Note for design/layout consideration at later stage.
  - Implications for achievability (ACTION 2E) –Major requirement for significant mitigation.
- **3. Unacceptable** in terms of infrastructure/ physical suitability (disbarred above after special assessment).

[58] The presence of pylons and overhead wires are a separate issue. They are seen as generally a capacity constraint impacting on the Potential Assessment and possibly requiring re-evaluation of net developable site area/ site costs (note 2D).
[59] For strategic scale development.

Local Environmental Constraints?

ARISING FROM ON-SITE:

Matter	*Source*	*Potential issue – site is….? (tick/cross)*	*Summary of conclusions of specialist (if issue)*	*Note if Unsuitable (IF THE NATURE AND SCALE OF THE IMPACT IS SUCH THAT IT CANNOT BE MITIGATED, THE SITE SHOULD BE EXCLUDED FROM THE ASSESSMENT AT THIS STAGE.) or conditional on action (specify[60])*
Arbori-culture/ Bio-doversity	-Proposals Map -TPOs	o Ancient Woodland o Trees TPOs o Wildlife site (inc SNCI)		Individual TPOs unl kely to render sites unsuitable unless small and 5 dwellings not possible with screening but may impact on final potential (ACTION 2D).
Land-scape	-Proposals Map	o AONB o Current SLA o Current LLA	*Major Projects Officer (AONB outside settlement boundary):*	SLA and especially LLA is unlikely to render sites unsuitable unless small and 5 dwellings not poss ble with screening but may impact on final potential (ACTION 2D)

[60] If yes, could the impact be mitigated through the design process, the imposition of a condition or a legally binding agreement?

LOCAL IMPACT (Off site checks):

*Matter for land **in vicinity** of site*	*Source*	*Potential issue? (tick/cross)*	*Summary of conclusions of specialist (if issue)*	*Note if Unsuitable (IF THE NATURE AND SCALE OF THE IMPACT IS SUCH THAT IT CANNOT BE SATISFACTORILY MITIGATED, THE SITE SHOULD BE EXCLUDED FROM THE ASSESSMENT AT THIS STAGE.) or conditional on action (specify[61])*
Bio-diversity	-Scoping Report	o SPA/SAC/ Ramsar o (NNR/SSSI -note 'for record only')		
Townscape & Amenity	-Survey	o Existing adjoining uses (New residents amenity) o Likely to be high density/ impact relative to adjoining uses (If townscape not already considered).	*Major Projects Officer (small marginal sites):*	Townscape unlikely to directly render sites unsuitable but may impact on potential (ACTION 2D)

[61] If yes, could the impact be mitigated to such an extent that the residents' living conditions would be acceptable/ it could be dealt with through condition or legal agreement and considering the safeguards of the Habitats Regulations?

First sieve finding on local environmental considerations:

- **1. Acceptable** in terms of infrastructure/ physical suitability (no issues raised).
    - **B.** Following specialist investigation/note for record.
- **2 Conditionally acceptable**, to be decided later stage:
    - Implications for capacity (ACTION 2D) –Note for design/layout consideration at later stage.
- **3. Unacceptable** in terms of infrastructure/ physical suitability (disbarred above after special assessment).

SHLAA SITES ASSESSMENT: Availability
Form to apply Methodology & Protocol Appendices

Summary of first sieve assessment

Site Name:		**Site Ref:**	
		Finding e.g. 1C	
Finalised Conclusion:	**Availability (Provisionally) / Unavailable**		
Signed:		Date:	

All unavailables to be signed off by Team Leader:

i. Basic Possibility of Availability

Does the site currently appear available for development i.e in terms of appropriate condition or 'live' data source?

- Yes (Submission, RSPSL/ I&O/HIA/Gen. planning source OR vacant or underused land/premises within settlement boundary) → ii.
- No (None above e.g. development complete or fully occupied/active; and other source) → iii.

ii. Need for Ownership Information

Is ownership information required to be established?

- Yes (unknown from app. now uncertain, never established) → iv.
- No (None above e.g. Submission/ current applicant is owner) → vi.

iii. Recent Planning History

Has the site recent planning history relevant to additional housing?

- Yes (application, HIA/Gen. planning source from 07 or 08) → ii.
- No (None above e.g. old Local Plan) → vii.

iv. Restrictions on Availability

Does it appear that there are practical/legal restrictions on its availability?

- Yes (multiple ownership likely to be an issue[62] [1st Protocol Point], OR active operational/ legal requirements [eg 2nd Protocol Point], OR restrictive covenants identified) → vii.
- No (None above apparent) → v.

[62] Where it appears from documentation or pattern of land ownership and use that at least three parties control availability for acceptable development. On the largest 'strategic sites' consideration will be given to whether it is likely a larger number of owners could effectively work together.

v. Legal Documentation

Does Land Registry Documentation formally highlight or confirm any restriction issues covered above?

- Yes → vii.
- No → vi.

vi. Likely Intent

Check: Are the owners currently willing to see additional development?

- Yes. → viii.
- Unknown. Action**:** need to contact owner.
  3C: if a positive response, complete rest of form below**.**
- No. UNAVAILABLE (**3**)

vii. Addressing Constraints

Is there evidence that the limitation on availability may change?

- Yes. Constraint may be addressed within owner's power e.g. commitment in Submission or tenancy expires within period etc → viii.
- No. No likelihood that constraint can be sufficiently addressed within period e.g. no suggestion of additional development interest OR current uses needs to be relocated and no suitable location identified.
  → UNAVAILABLE (**3**)

viii. Major Availability Details

Have other availability/major timing issues been identified?

- Yes but probably available in due course. E.g. no relevant planning application OR owner needs to appoint/sell to develop [3rd Protocol Point] OR major actions required on large scale site OR other constraints incurring delay
  → AVAILABLE, probably later in period (**1C**).
- No → ix.

ix. Deliverability Circumstances

Is progress towards implementing a positive application being made i.e. recent follow-up actions, or construction underway?

- Yes → Possibly UNAVAILABLE 2011 (**2C**).
- No → AVAILABLE (**1**)

First sieve findings on availability considerations:

- **1. Acceptable** in terms of availability.
  - **1C.** Available later in period[63].
- **2C. Conditionally acceptable** -if permission not fully implemented 2011.
- **3. Unacceptable** in terms of availability. Unavailable within period and unreasonable to expect it to become available.
  - **3C**. Follows contacting land owner.

[63] In general terms this delivery later than anticipated or around or beyond 2016.

[Form] Appendix: Dealing with conditional matter of unaware owner on Achievable sites.

Action-	Date-
Need to contact established:	
Written contact sent:	

[POST SHLAA]:

Action-	Date-
Site investigation closed with availability confirmed? If Yes, detail below	*By April 2009*
Response received:	
Summary of situation:	*(&Signed):*

ASSESSMENT OF SHLAA SITES: EXAMINING ACHIEVABILITY
Form to apply Protocol Appendices criteria

Summary of first sieve assessment

Site Name:			**Site Ref:**		
***Market* Issues?**		***Cost* Issues?**		***Delivery* Issues?**	
FINALISED CONCLUSION:	**ACHIEVABLE / CONDITIONALLY ACHIEVABLE / UNACHIEVABLE ('Deliverable') ('Developable')**				
Signed:			***Date:***		

All unachievables to be signed off by Team Leader.

To be achievable must not be unacceptable on market <u>or</u> cost <u>or</u> delivery grounds, <u>or</u> on overall achievability.

Use following points as a <u>guide</u> to potential achievability and final deliverability issues.
Sites will generally proceed through each table, but note an overall assessment has to be made in addition to checking against the three achievability factors.

Long-term Market factors

Matter in Kent Protocol (tick= Likely issue)	*Information*	*Notes as applicable Inc. why an issue/ beyond 2016*
o **Compatibility** of adjacent uses	Survey and mapping	Adjacent use in question:
o Land values compared with **alternative** uses	Relative position of residential in typical land value ranking against existing/suitable alternatives	Applicable suitable alternative uses:
o Attractiveness of **locality**	Issue for most Folkestone East, Foord and Harbour wards[64] sites; and Cluttons UCS Market Viability Assessment (update)[66]	
o Market **demand**[65]	Cluttons UCS Market Viability Assessment (update) and Current/ recent marketing[66]	
o Projected rate of **sales** (on larger/phased sites)	General take-up levels in area/type of development[66]	

Sites will normally be unachievable if the majority (3+) of the matters form likely issues.

[64] These wards have been identified as both consistently below national house prices (2004-8) and significantly below average for key types of stock.
[65] This is a long-term study so this judgement is relative to nominal stable economic conditions.
[66] Where the source of the site in the SHLAA is a **Submission,** identification of issues will be primarily informed by Stakeholder information.

Long-term Cost Factors

Matter in Kent Protocol (tick= Likely issue)	*Information*	*Notes as applicable Inc. why an issue/ beyond 2016*
o **Site preparation** to overcome physical constraints	Via previous Assessment and Cluttons UCS Market Viability Assessment (update; recognising existing issues less likely for greenfield sites).	Conditional Suitability (2E)?
o Significant additional on-site and off-site planning and **infrastructure requirements** (interim view for broad location only, and including contribution towards potential strategic development of Greenfield areas)	Physical infrastructure- via previous Assessment, Social and Community- via Community Plan, Draft Rural Services Study, emerging SHMA and local information; all augmented by service providers.	Conditional Suitability (2E)/other site over 10ha?
o Availability of **funding** (on larger/regeneration sites)	General long-term private sector performance in delivery in locality/for type of development; and public sector initiatives[66]	

Sites will normally be unachievable if the majority (2+) of the matters form likely issues.

Long-term Delivery Factors

Matter in Kent Protocol (tick= Likely issue)	*Information*	*Notes as applicable Inc. why an issue/ beyond 2016*
o Developers' **phasing** (on larger sites)	Site history [66]	
o **Build-out** rates	Planning policy and history in locality/for type of development[66]	Availability (1C)?
o Number of **developers** (if multiple /or none expected)	Submissions	
o Size and **capacity** of developer.	Background research	Professionals involved:

Sites will normally be unachievable if the majority (3+) of the matters form likely issues.

Other final achievability factors (reiterating areas of potential uncertainty from previous stages)

- o Constraints/time delays (beyond 2016) recognised in Submissions (stakeholder information).
- o Acceptable development quantum lower than expected (2D Suitability).
- o Major physical/social infrastructure necessary for location to possibly be sustainable in principle (2E Suitability).
- o Delivery likely to be inter-related with another site(s) reference: [……]

Sites will normally be unachievable due to overall uncertainty if the majority (3+) of the matters form likely issues.

SHLAA FIRST SEIVE FINDINGS:

1. Acceptable achievability **(Deliverable** –PPS3 para. 54**)**

- *No significant deliverability constraints identified for site in SHLAA prior to 2016*

2. Conditionally achievable **(Developable** –PPS3 para. 56**)**

- *Expected to be (conditionally) suitable, available and achievable prior to 2026*
  (Including on a potential 'broad location' basis)

3. Unacceptable achievability issues (see evaluation above)

- *Long-term achievability restrictions to site coming forward*
  (Market/ Cost/ Delivery Factors above threatening feasibility OR other final achievability issues with overall uncertainty).
- *Other serious feasibility risks highlighted in SHLAA/Achievability considerations as a whole*
  *(CERTAIN CONDITIONAL SUITABILITY CASES: Where gross disparity between expected and acceptable (**2D)** quantum OR **2E** Scale of necessary actions/obligations very large relative to acceptable quantum of development)*

SHLAA SITES ASSESSMENT: Finalising a capacity estimate
Form to apply Methodology & Protocol Appendices

Summary of first sieve assessment

Site reference number:	
Final estimate (net gain):	
Initial estimate/ N.A. o Developer aspiration o Recent planning permission	
Summary of rationale behind any substantial discrepancy between final and initial estimates/ N.A.:	

Producing final estimate (if unable to use developer/ permission)

Site size:	(ha.)
Basic yield (at *30/ 50* dph?):	

Relevant factors to adjust basic yield (tick if applicable):

Lower	*Higher*
o 2D –capacity directly constrained as identified in SHLAA	o Central urban location (town centre facilities and setting)
o 2E/ other expectations for site to contribute land to provision of significant non-residential uses	o Walking distance from urban mainline railway station (max. 800m from Folkestone Central/ West)
o Other site specific contextual requirements – as identified on survey/conservation designations/ in SHLAA assessment.	

APPENDIX VI: Draft SHLAA Project Methodology –Consultation Responses

RESPONDENTS:

- E Charlier & Sons Ltd Agency (comments 8-9)
- Folkestone & Dover Water Services (comments 10-11)
- B Frith (comments 12-17)
- Highways Agency (comments 5-7)
- M Jarvis Homes Ltd (comment 4)
- SEEDA (comment 3)
- SEERA (comments 1-2)

The draft Methodology was updated to record the specific procedures adopted in the Assessment. All comments and main changes are highlighted below:

GENERAL COMMENTS

Respondent	***Comment***	***Response***	***Action taken***
1. S Janota, SEERA	SEERA can only offer generic comments on SHLAAs, but note "particular care should be taken in applying minimum site dwelling number thresholds or ruling out potential land sources - such as greenfield – if as a consequence you might need to resort to making a case for windfalls."	The Methodology and Draft adheres to national guidance in setting out a full and thorough process that will be undertaken before deliverable and developable site are considered against the housing requirement. It set out that at the review stage, criteria would be reconsidered before any alternative source of supply is identified. The Methodology also made it clear that all sites qualify including 'greenfield', the only exceptional circumstances being remote parts (open countryside) within the nationally designated Area of Outstanding Natural Beauty in the district and international habitat designations etc. A site size threshold is necessary given the vast extent of the district and also considered justified given Shepway's housing challenge. It has been based on the common Kent threshold set out in the Protocol for the county. Shepway's position on these issues has been to relax initial potential constraints as much as feasibly possible, in order that the maximum number of land options qualify for Assessment.	To clarify, an expanded para. 3.2 is featured.

Respondent	***Comment***	***Response***	***Action taken***
2. S Janota, SEERA	SEERA can only offer generic comments on SHLAAs, but note "If you find, or expect to find, yourself in a position where windfalls contribute more than a modest fraction of forecast supply we recommend early discussion with GOSE."	Noted. Section F of the Draft Methodology discussed windfalls and broad locations.	This part of Section F has not been changed, but the overall situation clarified in the first paragraph (14.1).
3. I Mawer, SEEDA	SEEDA "do not consider that our expertise can add value to the development of SHLAAs. Whilst we do not have any sites to put forward… we wish to emphasise the importance of allocated sufficient land to deliver the housing requirements of the emerging South East Plan".	The Draft Methodology made it clear the minimum requirement for the supply of deliverable and developable sites will be in excess of SE Plan requirements.	The scope of potential sources was further expanded to pick up on potential Local Plan Review data (para 3.2).
4. M Jarvis Homes Ltd (I Bull)	"Your proposals that the Shepway Assessment will be both comprehensive and intensive in its consideration of realistic possible sites is welcomed and will provide credibility to the emerging Local Development Framework."	Comment welcomed, and it should be noted that the Assessment opted to pick up additional information above and beyond Protocol etc requirements.	The methodology highlights various measures, and now includes actions to try and positively conform availability (para. 5.16), and be sensitive to achievability issues (Methodology Statement 6).
12. B Frith (A Coster)	Comments are in relation to Kent Protocol: "the Protocol provides only a framework and the draft methodology makes little reference to the preferred approach to be taken within	Kent Protocol was subject to its own consultation but we welcome implicit support for a district assessment well aligned with overall LDF work, and particularly for a	No change required.

Respondent	***Comment***	***Response***	***Action taken***
	Shepway… some Authorities may work together in the production of their SHLAAs… It is therefore preferable that Authorities conduct their own assessments in order to ensure that they are produced in accordance with their other documents within their LDF and to ensure timetables are adhered to."	methodology tailored to Shepway.	

COMMENTS ON DIRECTED AT SPECIFIC SECTIONS/PROJECT COMPONENTS

Respondent	**Comment**	**Response**	**Proposed action**
5. H Moore, Highways Agency	**B- Scope of Assessment**: The LDF will require an Evaluation of Transport Impacts.	Shepway have noted the Highways Agency advice on this topic and the need to consider when and how this can take place. Whilst the SHLAA will examine infrastructure in relation to deliverability and developability, it is accepted that it is likely a specific Evaluation will be required in the LDF, but this will be additional to the SHLAA.	No change required.

Respondent	Comment	Response	Proposed action
8. E Charlier (A Jarrett).	**B- Scope of Assessment:** "We very much support the Council's position as set out in **Statement 1**. Our particular interest is the opportunity it provides to balance the potential to improve the sustainability of existing settlements through development with the aim to protect the open countryside of the North Downs Area of Outstanding Natural Beauty."	Comment welcomed.	No change required, however a new para. (3.10) makes the scope to qualify as a sites explicitly clear.
10. Folkestone & Dover Water Services (A Jarrett).	**B- Scope of Assessment: [DITTO]**		
6. H Moore, Highways Agency	**D- Assessing Potential Sites & When They Can Be Developed**: "we request that the impacts of development on the SRN [Strategic Road Network] and its junctions in and around the District should be given detailed consideration throughout the SHLAA process." This should be recognised in 'Overcoming Constraints', along with infrastructure needs and costs which may act as constrains, including public transport links.	The SHLAA accommodates an independent assessment of site transport issues/constraints, through specialist input from KCC Highways. Comments inputted to the SHLAA cover a range of transport issues including access, capacity, foot and cycle links etc. The outcomes of this in terms of suitability and identification of constraints are noted in the Assessment and factored in to the overall classification of sites.	Clarification in new para. 5.14 as to the role of specialist input in the Assessment. The also highlights the utilisation of recent information from determining planning applications, to aid efficacious SHLAA production.
9. E Charlier (A Jarrett).	**D- Assessing Potential Sites & When They Can Be Developed:** "**Statement 3 and 5** both make references to the	The Assessment does allow for the potential for sites to deliver improvements and changing sustainability. This is	Clarification provided through new para.

Respondent	Comment	Response	Proposed action
	Shepway Rural Services Study as a means of assessing the appropriateness of rural settlements and their potential to meet sustainability aims and objectives. We welcome the Rural Services Study and believe it will be [sic] useful tool to help inform locational judgements. However it is important to recognise it is a snapshot of the present position of services in rural settlements, what it doesn't do is to assess the potential of new developments to improve the sustainability of existing settlements by providing new services. Our view is that this is an important factor that should be taken account of when comparing the benefits of competing site options and examining sustainability strategically."	focused on those sites in public transport corridors lacking basis services (using Kent Protocol definitions), and utilises a threshold approach to defining strategic sites where this will be relevant and more feasible. It is considered that this focus is justified given the Core Strategy focus of LDF activity.	5.12.
11. Folkestone & Dover Water Services (A Jarrett).	**D- Assessing Potential Sites & When They Can Be Developed:** "keen to ensure **Statement 4** enables the possibility for land presently allocated for employment uses to be developed for housing where it can be shown that this has a positive impact on employment."	It is considered sufficient flexibility was included in the Draft Methodology Statement 4, given this also refers to the potential relevance of Community Plan objectives.	Wording of Methodology Statement 4 slightly amended to clarify.
13. B Frith (A Coster)	**D- Assessing Potential Sites & When They Can Be Developed:** "Greater clarity is needed [than the **Kent Protocol]** as to how the housing capacity of particular site will be calculated… We proposed the Council set up a review panel"	Reasonable consistency and clarity was provided in the (Draft) Methodology, however some additional details have now been added A formal review panel is not considered appropriate given the pressure for efficient LDF progress, but a range of views are incorporated in the SHLAA process (Protocol,	Additional clarification in paras 5.4-5.6.

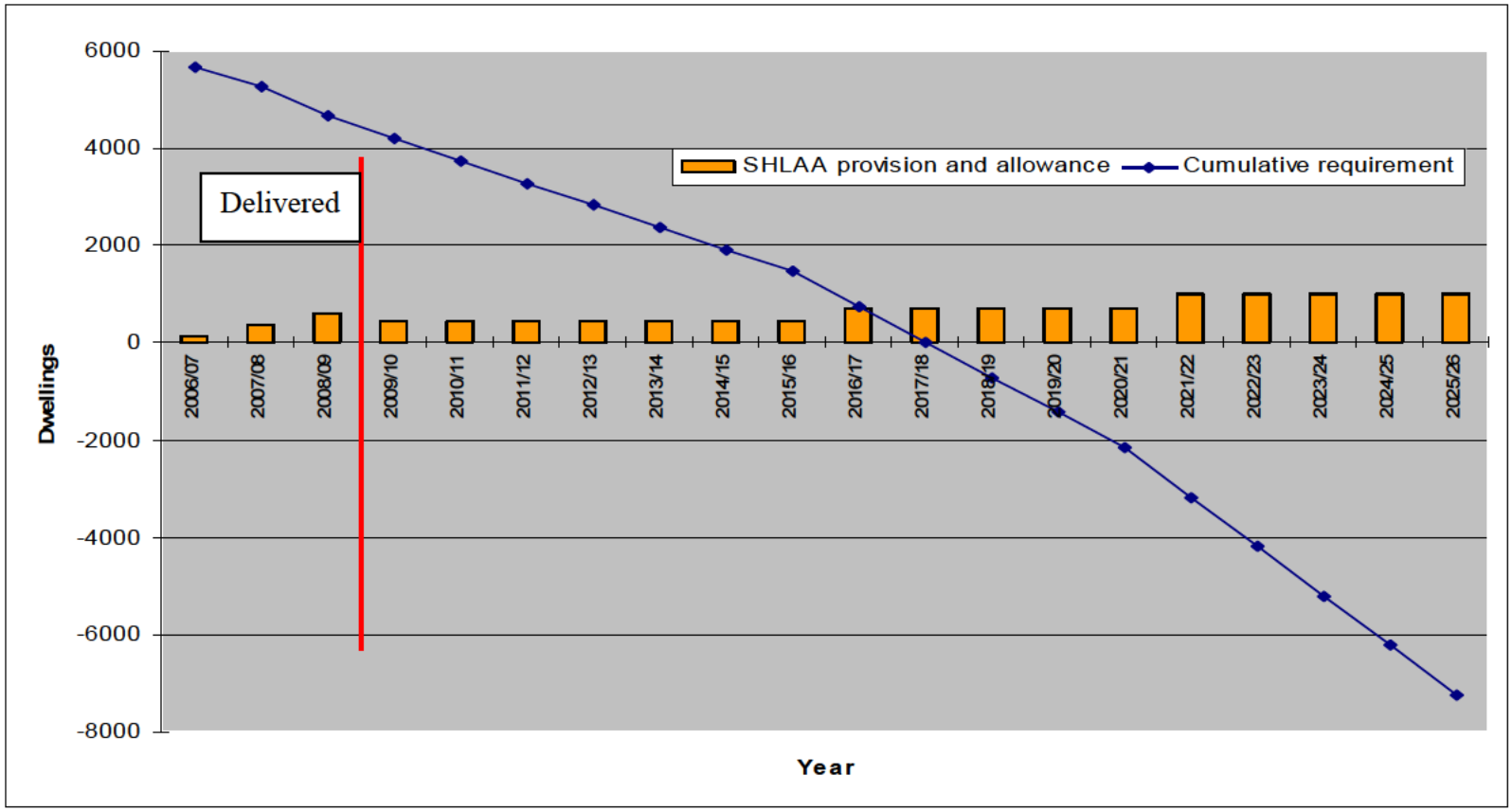
Respondent	Comment	Response	Proposed action
		Shepway methodology and final Assessment) Further private sector input is important but detailed discussion is most appropriate once principles are clear. There is a timely opportunity for this up to and including Preferred Options consultation following the SHLAA.	
7. H Moore, Highways Agency	**Stakeholder Questionnaire**: Disappointed that the standard form does not address off-site transport issues.	It is considered that there is additional scope in site surveying to capture off-site transport information.	Nearest bus stop section added to form.
14. B Frith (A Coster)	**Kent Protocol Para. 2.03:** SHLAAs need to identify a sufficient excess of sites to account for alternative uses for the land and mixed use projects.	See Response 3.	No change required.
15. B Frith (A Coster)	**Kent Protocol Para. 3.05**: SHLAAs should consider Greenfield sites as are good opportunity to deliver a suitable tenure and size mix as required in PPS3.	See Response 1.	No change required.
16. B Frith (A Coster)	**Kent Protocol Para. 3.18**: "Iceni identify that there is no further information regarding the processes to be used to ensure that assessment are reflective of the 'characteristics and needs of the area' and that they should therefore conduct a comprehensive survey of all sites".	The Shepway Draft SHLAA methodology document was produced to provide additional guidance. Shepway have visited all qualifying sites in line with government requirements.	No change required.
17. B Frith (A Coster)	**Kent Protocol Para. 6.01**: "The production of a project brief (As proposed in paragraph 6.01) offers an excellent opportunity to involve key stakeholders within the assessment process. However Shepway should provide regular updates to	The Shepway Draft SHLAA methodology document was produced to provide an opportunity for stakeholder involvement. Shepway officers have provided updates as requested, regularly amended website information and	To clarify, progress included in summary of overall approach in paras 2.6-2.8 and

Respondent	Comment	Response	Proposed action
	stakeholders regarding their position within the timetable and any slippages".	have produced an optional newsletter to update all stakeholders of major events and progress	outcomes in 6.2.

- *This appendix was published previously.*

APPENDIX VII: ALTERNATIVE HOUSING TRAJECTORY WITH ALLOWANCE

As noted in paragraphs 5.6-5.7, some small sources of additional housing land supply may be possible. To complement the trajectory in figure 5 the following chart applies the same principle but includes a small (80p.a. units) extra allowance, so with extra delivery the trajectory declines more quickly to negative need ('over-supply') territory.



- *This appendix was published previously.*

APPENDIX VIII: STRATEGIC HOUSING CONSULTATION IN EAST KENT

- **East Kent Housing Partnership SHLAA letter**

Forward Planning
White Cliffs Business Park
Dover
Kent CT16 3PJ

Telephone: [redacted]
Fax: [redacted]
DX: [redacted]
Website: ***www.dover.gov.uk***

Contact: [redacted]
E-mail: [redacted]
Our ref:
Your ref:
Date: *23 May 2008*

See list at foot of letter

Dear,

Strategic Housing Land Availability Assessments. East Kent Districts

I am writing to you as a member of the East Kent Housing Market Partnership, established to oversee the Strategic Housing Market Assessment (SHMA) currently in progress for East Kent.

You may be aware that in addition to the SHMA an equally important piece of baseline work the partner district planning authorities are required to undertake is a Strategic Housing Land Availability Assessment (SHLAA). Its primary purpose is to identify potential housing sites and assess their deliverability to inform our future planning strategies for providing a rolling supply of land to meet need and demand for new homes.

My purpose in writing to you is to let you know that the East Kent authorities wish to involve the existing East Kent Housing Market Partnership (being an established forum of key stakeholders) in undertaking SHLAAs. While the bulk of the work will be carried out by the district authorities or their appointed consultants, the involvement of the EKHMP would be invaluable in shaping and validating the SHLAA approach and methodology, and providing expertise helping to inform views on deliverability of potential housing sites.

Due to our respective work programmes we anticipate that our SHLAAs will be undertaken individually and at district level. Nonetheless, we are already

convening to optimise opportunities for shared working and practice including of course the essential involvement of stakeholders.

We would therefore like to request EKHMP members' involvement as partners in the SHLAA process. The EKHMA Stakeholder meeting on 4 June seems to provide a good opportunity to explore this. I would like to suggest that we discuss it immediately after the Stakeholder meeting has finished. I do not envisage that this would take too much time and hope that you are agreeable to the suggestion.

Perhaps you would let either me or [redacted] know if this is not convenient. I look forward to seeing you on 4 June.

Yours sincerely,

[redacted]

Forward Planning Manager

Letter to HMP members:

Mark Williams/Catherine Stubbings – SEERA
Ian Mawer - SEEDA
Anne Knight – SEEDA
Tim Warren – Town & Country Housing Group
Neill Tickle – AmicusHorizon
Dick Feasey, KCC (Planning)
Judith Ashton – Home Builders Federation
Heather Juman/Inez Hough - Housing Corporation
Susan Barnes/Hazel Long – GOSE

Local Authority partners:

Janet Walton, Dover DC (Housing) – Chair
Mike Ebbs, Dover DC (Planning)
Sarah Parker, Canterbury CC (Planning)
Gary Peskett, Canterbury CC (Housing)
Adrian Hammond, Shepway DC (Housing)
Mark Aplin, Shepway DC (Planning)
Amber Christou, Thanet DC (Housing)
Steve Moore, Thanet DC (Planning)
Alaine Bunce, Swale BC (Housing)
Alan Best, Swale BC (Planning)
Julie Davies Swale BC (Planning)

-

- **SHMA[67] Extract: Consultation Summary**

In May 2008 ECOTEC and the districts held two stakeholder events to collate views and gather local intelligence about key issues relating to the SHMA. Workshops were held covering a number of important issues relevant to the area.
3.1.1 The key points and findings from the workshops have been fed into the body of this [SHMA] report, particularly the sections regarding affordability, local housing market areas, economic factors and transport.
3.1.2 A full summary of the views collated appears as an annex to this report – here we list the subjects covered.

- *Transport*
- *Economic issues*
- *Demographics*
- *Planning, land availability and development*
- *Regeneration*
- *Rural communities*
- *Housing need and demand*
- *Housing Market areas*

3.1.3 The principle participants at the events came from a variety of backgrounds.
As well as local authority housing and planning staff, there was attendance by elected members of most authorities, housing associations, developers, estate agents, private renting agents, voluntary and community sector groups, as well as representatives from the South East England Regional Assembly, the South East England Development Agency, Government Office for the South East, and the Housing Corporation. A list of those attending appears in [SHMA] annex 12.

[67] Ecotec (2009) Strategic Housing Market Assessment for the East Kent Sub-region, final Report.

- **SHLAA Briefing for wider stakeholders at SHMA event**

Intro to SHLAA for EK Housing Market Partnership. 4/6/08

You should already/shortly receive a letter from the E K Councils about this.

Alongside the HMA an equally important piece of housing baseline work the partner district planning authorities are required to undertake is a Strategic Housing Land Availability Assessment (SHLAA).

The primary purpose of this is to

- Identify sites with potential for housing
- Assess their housing potential
- Assess when they are likely to be developed

Thus, while the HMA will inform us about future housing need and demand by size, tenure and affordability, the SHLAA will provide us with the information we require to decide which sites to allocate in our planning strategies ("Local Development Frameworks") to provide for a rolling supply of sites to deliver the new homes we will need.

The bulk of the SHLAA work will be carried out by the East Kent Councils or consultants appointed by them. However we wish to involve the EKHMP as a central element of the stakeholder partnership for this work (indeed Government advice advocates this). The key role of the SHLAA stakeholder partnership will be to:

a) Help shape the SHLAA methodology (we already have guidance from government and a Kent wide protocol is in preparation)

b) Provide expertise and knowledge to help take a view on deliverability and developability of sites. (We expect to include some additional partners for example local builders/ property agents with additional/detailed knowledge of the local market and site viability etc).

c) Update the SHLAA from time to time.

The EK district and borough Councils are at different stages in preparing their planning frameworks and on this basis we do not believe it will be practical to undertake the SHLAA as an EK wide exercise. Nonetheless we are already meeting to promote joint work and practice, and we will aim to involve the EKHMP and other stakeholders on a joint basis as far as possible,

We hope the EKHMP members will be agreeable to participate in the SHLAA work as part of the Stakeholder Partnership, hopefully by way of continuation of the liaison arrangements set up for the HMA.

Any comments? Will keep you posted.

In meantime distribute following hand out note explaining SHLAA's

STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENTS (SHLAA's)

The East Kent Councils are required to prepare Local Development Frameworks (LDF's), which will provide the future spatial planning strategies for the districts, and make provision for delivery of future new homes. These LDF's must be based on robust baseline information and evidence The Housing Market Assessment and SHLAA's are key components of this.

The SHLAA's will provide the baseline information to inform identification of suitable and deliverable sites to provide a rolling supply of land for new homes. They will

- Identify sites with potential for housing
- Assess their housing potential
- Assess when they are likely to be developed

Government has provided practice guidance on undertaking SHLAA's and this emphasises the importance of a partnership approach to harness the expertise and knowledge of key stakeholders (preferably involving Housing Market Partnerships).

Reflecting Government's practice guide, a Kent and Medway protocol for carrying out SHLAA's is currently in preparation and this will help guide a common approach

The key role of the SHLAA key stakeholder group will be to:

a) Help shape the SHLAA methodology

b) Provide expertise and knowledge to help inform assessments of sites' availability, developability and deliverability.

c) Update the SHLAA from time to time.

We anticipate that the key stakeholder group will need to include some additional representatives outside the East Kent Housing Market Partnership (for example local house builders and local property agents with a specific knowledge of issues and market conditions in our local areas.

The East Kent Councils wish to include the existing EK Strategic Housing Market partnership in progressing work on SHLAA's.

APPENDIX IX: LOCAL HOUSING MARKET AREAS

- **SHMA[68] Extract for LHMAs all or part in Shepway**

Folkestone LHMA (SHMA paragraphs 9.2.19-9.2.21)

- The Folkestone market encompasses the areas of Folkestone, the settlement of Hawkinge to the north and Capel-le-Ferne to the east (located in Dover District). Average house prices vary across the area, with the centre of Folkestone exhibiting relatively low (£130-160,000) house prices compared to Hawkinge and Capel-le-Ferne (£200,000+). The weighted average price at 2007 across the area was £184,000. However, travel to work patterns suggest that Folkestone acts as the economic centre for this area, with Hawkinge as a relatively new extension to the Folkestone urban area. Capel le-Ferne, though in a different authority area, has close travel to work links with Folkestone, with anecdotal evidence suggesting more alignment as such rather than with Dover.
- Together with Hythe, the CLG English Seaside Towns study classified Folkestone as being in the mid-range in terms of strength of local economy – neither particularly strong nor particularly weak. Although it has a substantial elderly population, this is less so proportionately than the other seaside towns in the sub-region. Perhaps more significantly, it is one of only two principal seaside towns (of 37 in the study) that has not seen an increase in employment levels, as part of the low key renaissance of these settlements nationally. The Medway and Kent Structure Plan also identified high levels of social exclusion and deprivation in the northern and central wards, including poor quality private rented stock. Within Shepway it is the area that both has the highest concentrations of need, and where the most brownfield development opportunities exist. In this context it is clear that East Folkestone in particular has major regeneration needs.
- In this context, we suggest an affordable housing contribution target of 30%. Although Folkestone has the highest gross level of need (728) of all the LHMAs, the rate of need is mid-range (12th of 21), and at the moment at least, in spite of having substantial regeneration ambitions, these do not appear to be concrete enough to suggest a higher rate of developer contribution. Although house prices are higher than Dover, with which Folkestone has similarities, in our view they are not strong enough to counterbalance these other factors. This target should be reviewed (with the aim of increasing it) if prices rise further and regeneration ambitions are rolled out.

[68] Ecotec (2009) Strategic Housing Market Assessment for the East Kent Sub-region, final Report.

Hythe LHMA (SHMA paragraphs 9.2.22-9.2.23)

- The Hythe market is characterised by a thin coastal strip of urban development to the west of Folkestone, displaying average house prices (£243,000 weighted average in 2007) that are higher than those for Folkestone in most areas. Localised migration patterns suggest Hythe to be a self-contained market area. Relatively, the area has a large elderly population, and there are limited opportunities for further housing development, though the Local Plan envisages further development in at Nickolls Quarry, and in some infill sites.
- Although there are limited development opportunities, in our view when they arise the authority should seek a 35% affordable housing contribution. This is primarily justified by the relatively high values (4th highest prices of all LHMAs), and the relatively high (8th) rate of need, as well as the development ambitions in place.

New Romney & Lydd LHMA (SHMA paragraphs 9.2.24-9.25)

- New Romney and Lydd is a sparsely populated area towards the south of Romney Marsh. Travel to work and migration patterns are locally constrained, suggesting that the housing market primarily services the area's main employment base. Average house prices in the area (£207,000 weighted average in 2007) are significantly lower than those to the north, probably linked both to transport difficulties and concentrations of bungalows (rather than larger detached houses). There are limited development opportunities, and development has been relatively slow, but the Local Plan considers that allocations for the area (and for The Marsh) are important, and should be retained. The Kent and Medway Structure Plan envisages New Romney as the key rural service centre for the Romney Marsh area, also suggesting further development at Lydd Airport. The area is predominantly rural, and is classified as such.
- Because of the relatively weak price profile (especially compared to the neighbouring The Marsh LHMA) the limited transport connectivity, we suggest a 30% affordable housing target. Additionally, New Romney has the fourth lowest numbers in need.

The Marsh LHMA (SHMA paragraphs 9.2.26-9.2.27)

- The Marsh forms the remainder of Romney Marsh. This area, in terms of housing market, is characterised by higher average house prices (£221,000 weighted average in 2007) than New Romney and Lydd; however it is also distinct from Hythe by the rural nature of the area and housing stock. The area also bounds the Ashford area of influence in travel to work patterns. The links with Ashford probably account for the relatively higher house prices, and the future development of Ashford as an economic centre is likely to impact further on affordability. Because of the risk of flooding, the Kent and Medway Structure Plan suggests avoiding further significant housing development. This in itself is likely to put upwards pressure on prices. A case study carried out in the area by

the Commission for Rural Communities as part of the Affordable Rural Housing Commission's Inquiry29 found that the housing market was highly competitive, characterised by a shortage of affordable housing, few affordable or long-term private rental options, and expensive private homes. We classify the area as rural for threshold purposes.

- The existing higher prices and the likely additional upward pressure on prices are indicators that a 35% target is appropriate for The Marsh. Given the limited number of development opportunities, and the links to Ashford (which may encourage further up-market development), we consider that ensuring a reasonably large proportion of affordable homes is important

East Kent Rural: North and South LHMA (SHMA paragraphs 9.2.53-9.262)

- Our [Ecotec's] commentaries on many of the other identified Local Housing Market Areas have noted features related to the degrees of rurality: economic and employment factors, transport connectivity, housing market effects, and relationship with associated urban areas. However, outside those areas already identified, there are additional swathes of countryside crossing all local authority boundaries that are largely rural in character, and that exhibit common features that give the characteristics of market areas, in spite of their broad geographic spread. The areas exhibit, in the main, relatively high average house prices (South - £259,000 and North - £260,000 weighted averages for 2007). Travel to work and migration patterns are low level, possibly as a result of a mixture of diverse populations such as retired people, higher management with the ability to travel to economic centres for work, those engaged in localised industries such as agriculture and long term residents.
- Some pockets of lower house prices are also evident, particularly around some ex-mining areas on the Canterbury/Dover border; however these are more likely sub-markets of a wider HMA in this context. Dover District Council aims to create a new market around the former mining community of Aylesham, through strategic village expansion of around 1000 homes.
- This collection of villages and rural localities covers a relatively large area of East Kent and has therefore been split into two markets: East Kent Rural North, surrounding Faversham to the west and bounding the Greater Canterbury and Sandwich markets to the east, and East Kent Rural South stretching from the southern part of Sandwich in the east to meet The Marsh in the west.
- These two markets cross district boundaries in a number of places, and indeed the East Kent Rural North market takes in the northern tip of Ashford Borough to the south west of Canterbury.
- Policy priority towards the rural areas tends towards reinforcing the existing housing market and broadening choice where possible. This broadening of housing choice – especially encouraging the development

of a supply of larger homes - is needed to improve market perception of parts of rural Kent.

- As with other areas of rural England, there are specific aspects that influence housing development options in these areas. Among other factors are a paucity of large sites, fragmented patterns of land ownership, high land costs and house values, environmental considerations (particularly the influence of the Kent Downs Area of Outstanding Natural Beauty), and planning policy constraints.
- Moreover, there is recognition that in these circumstances the provision of affordable housing can be particularly difficult to secure in rural areas, where densities are lower, and demand for second or holiday homes has led to escalation of local house prices. The absence of affordable housing can undermine the viability of local amenities such as shops, schools and transport networks as younger families in lower-paid occupations have to move elsewhere because they cannot afford to remain. This creates a spiral – as there is no school, the housing offer for younger people is reduced – and thus villages become the preserve of the retired and the wealthier.
- In these circumstances, policies that incentivise the creation of affordable homes in smaller villages to meet local housing needs are required. These include 'exception sites' policy for land that would not normally be used for housing purposes to accommodate small developments covenanted to remain affordable; use of a lower threshold for triggering on-site S106 affordable housing provision; and consideration of Community Land Trusts and similar vehicles to deliver affordable housing that remains a community asset in perpetuity.
- In terms of the lower threshold, the normal trigger for an affordable housing contribution is fifteen or more units, as set out in PPS 3. Given the features of rural areas we have noted above – smaller sites, fragmented ownership, higher land and house values – the likelihood of significant numbers of larger sites becoming available is remote. For the East Kent Rural North and South Local Housing Market Areas, and for other LHMAs that exhibit the main features of rurality in whole or in part, we recommend that when in future full economic viability studies of the sub-region's development potential are undertaken, these should examine whether reducing the threshold to lower numbers of units would be feasible. This is considered in more detail in [SHMA] section 12.
- For the present, we are recommending an affordable housing contribution of 35% on sites where fifteen or more units are to be built. This reflects the high land values (East Kent Rural North – highest property prices of all LHMAs, East Kent Rural South – 3rd highest) and the consequent pressure on affordability faced by local residents. While opportunities to implement this target may be sparse, they should be seized upon where achievable.

APPENDIX X: ENVIRONMENT AGENCY COMMENTS ON SELECTED SITES

- **The EA commented on SHLAA sites at Draft Consolidated Document stage, having not got directly involved previously[69].**

[redacted]
Shepway District Council
Civic Centre Castle Hill Avenue
Folkestone
Kent
CT20 2QY

Our ref: KT/2006/000338/BD-01/IC3-L01
Your ref:

Date: 19 March 2010

Dear [redacted]

[redacted] **Development Framework (LDF): Strategic Housing Land Availability Assessment (SHLAA) Evidence Base Document.**

Thank you for consulting us on the above document. We have the following comments to make.

We acknowledge that you intend to use your Strategic Flood Risk Assessment (SFRA) and its findings to assess all proposed sites against the Sequential Test, as described in Annex D of Planning Policy Statement 25: Development & Flood Risk (PPS25). We do however have serious concerns over the following sites in the SHLAA, which you should be aware of when considering your site allocations.

Site 379 and 312– Victoria Road West.

The following comments refer to sites identified within Table J.

These two sites are in Flood Zone 3 and are at risk from both tidal and surface water flooding. The Local Authority should also consider the previous uses of these sites as PPS25 suggests that in order to pass the Exception Test, sites

[69] Please note paragraphs 9.2.1- 9.2.2. These comments do not form part of SHLAA results but clearly can guide their future application. Shepway District Council also highlights the Agency's full role in the Shepway Strategic Flood Risk Assessment (Shepway SFRA) the results of which were directly applied in SHLAA final results e.g. extreme risk site regarded as not deliverable. The Agency have raised no objection to how the SFRA has been utilised in the SHLAA.

should normally be on previously developed land. Surface drainage of these sites relies on a pumped system. Failure of the pump would result in a high residual risk of flooding to any new development. We therefore consider these sites should not be considered favourably against the Sequential Test.

Site 403 at New Romney

We are aware that surface water flooding has occurred on a significant part of this site in recent years. Surface drainage improvements at a number of locations on third party land would be required to reduce flood risk on this site to an acceptable level and owing to existing development, these improvements may not be achievable. We therefore consider these sites should not be considered favourably against the Sequential Test.

Site 004 at St. Mary's Bay

This site occupies land immediately behind the tidal defences and remains at risk of flooding from overtopping. This site should not be considered for the *more vulnerable* types of uses, including residential, as described in Table D2 of PPS25.

Apart from the above we have no further comments to make on the SHLAA.

If you have any queries, please do not hesitate to contact me.

Yours sincerely

[redacted]
Planning Liaison Technical Specialist

Direct dial [redacted]
Direct fax [redacted]
Direct e-mail [redacted]