Matter 4 –
Other Strategic Allocations
(Core Strategy Policies SS6 and SS7)

Shepway District Council
Response

Reference is made to the document codes in the Programme Officer’s ‘Schedule of Documents’.
The following abbreviations are used throughout: CS (Core Strategy), SA (Sustainability Appraisal), SHLAA (Strategic Housing Land Availability Assessment), SHMA (Strategic Housing Market Assessment).
Matter 4 – Other Strategic Allocations
[Core Strategy policies SS7 and SS8]

Issue 4: Are the Core Strategy’s proposals for Shorncliffe Garrison and Folkestone Seafront realistic, deliverable, adequately justified and consistent with national and regional policies?

SUMMARY RESPONSE:
Major mixed-use proposals at Folkestone form strategic opportunities for highly sustainable developments in close accordance with national policy. Evidence demonstrates the deliverability and realism of these developments, and that they would form key elements of any Core Strategy from any reasonable perspective.

Key Evidence Documents
- [A12-A20] Transport Strategy
- [CR1] April 2011 Cabinet Report
- [A42-A50] Folkestone Seafront documents
- [A68-A114] Shorncliffe Garrison documents
- [A1] SHLAA Update July 2011
4.1 Shorncliffe Garrison:

a) Are the location, boundary and proposed mix of uses in this strategic allocation adequately justified? What alternatives were considered, and why were they discounted?

4.1.1 Folkestone is the largest and best served town in Shepway [A90; Strategic Distributions Report] and is the most sizeable coastal settlement from Thanet to the northeast through to Hastings in the west. The town has the critical mass of population, transport and other infrastructure and retail, cultural and public services to form an important economic centre for the sub region, as recognised in the South East Plan. Its growth is integral to the Core Strategy, as recognised in policies SS1, SS4, SS6, CSD6 and elsewhere, and accordingly growth of the town is necessary to meet local sustainable development objectives.

4.1.2 Successive local plan policies\(^1\) have identified the council’s long term support in principle for the redevelopment of military land in the west of Folkestone (Cheriton) in order to meet the changing needs of the MoD estate and as a suitable urban extension, subject to landscape, recreational, historical and architectural protection criteria.\(^2\)

4.1.3 Folkestone benefits from a high quality natural environment of coast to the south and east, and open countryside, incorporating AONB and SAC to the north. This is now reflected in the spatial strategy, and the proposal lies in the heart of the CS strategic corridor area.

4.1.4 Policy SS8 seeks an urban extension of the town on previously developed military land, facilitating the consolidation, upgrading and modernisation of the MoD’s facilities and ensuring the retention of military presence in Folkestone and the wider district [A68; Defence infrastructure Interim Land and Property Disposal Strategy 2011].

\(^1\) [S2] -Shepway District Local Plan to 2001, policy H02; [S3] Local Plan Review 2001 (deposit draft) policies H02(b) and H05,[G3] Shepway Local Plan Review 2006 policy HO3.

\(^2\) This is currently expressed in policy HO3 of the 2006 Local Plan Review, providing for land beyond 2011 by identifying a general zone for development in the area on the existing proposals map
4.1.5 Consultation [D1; Core Strategy Issues and Options] demonstrated majority support for a distribution of development in and around the largest towns [D2; Big decisions quantifiable summary]. Accordingly, the submission of several large land parcels adjacent to Folkestone in the SHLAA led to direct discussions with the MoD and the resultant Preferred Options [G5; Core Strategy to 2026. Preferred Options Consultation June-July 2009] proposal of a strategic site as set out in FH3. Other options considered were:

- To continue the current approach of policy HO3 (FH3a) or
- Have no policy for the site (FH3b).

Both these alternative options would be unlikely to deliver re-provisioning works and the long term retention of the military in Folkestone.

4.1.6 The boundaries and mix of uses have evolved following public engagement and evidence gathering to produce a deliverable and sustainable proposal. The MoD hosted local consultation in 2010 on the initial proposals for the redevelopment of the garrison [A79; Shorncliffe Rationalisation Project]. Feedback from this consultation and further examination of operational military requirements identified the land potential and overall requirement for a more extensive development capable of accommodating a consolidated MoD presence focussed in the north west (St. Martin’s Plain) and south east (Sir John Moore Barracks). The MoD’s reduced land requirement for military activity creates capacity within the central portion of Shorncliffe for up to 1200 dwellings [A71; Shorncliffe Garrison Masterplan].

4.1.7 The July 2011 CS stimulated further discussions between the MoD and community. This led to an alternative layout, shown in the masterplan [A77; Shorncliffe Alternative Option Plan] and revised diagram 4.8 [A118]3 with selected access revisions which the Council supports, demonstrating how objectives can be accommodated on site.

4.1.8 The allocation was examined alongside other locations in the detailed Shepway Strategic Sites Assessment process [A39-A40]. Following

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3 A118, change D17January 2012 Core Strategy Submission Document
Preferred Options and public consultation and analysis carried out by the MoD further analysis of Strategic sites was considered by the council, as set out in the April 2011 Cabinet Report [CR1]. Paragraph 5.6 of this report, together with Appendix 3 discusses the site selection process in detail, which then informed the Core Strategy submission document.

4.1.9 The site recommendations agreed by SDC Cabinet concluded that Shorncliffe was “Critical to the delivery of the spatial strategy;....completely consistent with national policy; ...[required to] deliver Shepway infrastructure; [and] strongly aligned to spatial objectives.

4.1.10 The redline strategic site boundary incorporates the military landholdings west of Folkestone, reflecting the importance of the whole proposals not just to strategic housing growth but also to the consolidation and reprovisioning of MoD facilities and Green Infrastructure and open space provision. The Seabrook Valley is to be retained as natural open space, meeting any recreational needs of the development not met through upgrades to current open space (and also providing wider green infrastructure benefits to the community).

4.1.11 As documented in Appendix 4.1, the proposal complements many other smaller housing sites [A1 –SHLAA] for Folkestone. This shows other sites within the wider Folkestone housing area are not comparable to the site with regards to efficient use of brownfield land in line with national policy, and overall scale and associated infrastructure delivery. Of course, this proposal is also unique in securing the reprovisioning and retention of the MoD presence in Shepway.

4.1.12 Policy SS8 would deliver a package of urban infrastructure for the town as set out in Appendix 2 of the CS. Notably, its scale and location means it may represents the best prospect of opportunity of securing an additional healthcare facility in Shepway; as well as a new urban primary school of identified need.

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* CS Map 6.2, Appendix 4
b) Has sufficient consideration been given to (1) the transport implications of this proposal and (2) the site’s historic significance?

Transport

4.1.13 The Shepway Transport Strategy\(^5\) (para 4.5.9) specifically evaluated Strategic Site proposals, stating that “The Risborough and Napier Barracks site also offers the potential for a relatively large development to come forward within the primary urban area of Folkestone. Therefore transport impact will be a key consideration although the benefits of the site’s location in relation to a range of local facilities should be borne in mind.”

4.1.14 The Transport Strategy recognises the very good overall sustainability of the site, with the location offering access to strategic transport services, including High Speed rail services at the nearby Folkestone West station. Moreover, the onsite provision of a primary school and healthcare facility and significant green infrastructure will minimise travel needs in the area. Further discussions with Kent Highways, the applicant and Stagecoach have been undertaken, identifying bus services that can be improved and extended in the area so as to link the site to key local services (supermarket, town centre, secondary schools and station) and employers (SAGA at Sandgate for example) whilst the allocation is also within walking distance to the identified retail area of Cheriton High Street. Shorncliffe is within the Urban Area and is surrounded by a series of potential Priority Centres of Activity\(^6\) with services and jobs (existing and allocations) in close proximity.

4.1.15 Relevant highway and junction capacities have been tested within the Shepway Transport Strategy and for the MoD within the Shorncliffe Transport Strategy \([A72-A76]\). This provides detailed analysis of the impact of the phased residential development upon existing highway and junction capacity, factoring in anticipated background growth in accordance with the Shepway Transport Strategy. At junctions where mitigation is required, the strategy sets out improvement measures required as well as details of phasing and

\(^5\) [A11-A22]  
\(^6\) Policy SS4 of the Core Strategy Submission Document
the likely cost of works. These are summarised [A73] and have been considered when determining the viability of the proposal.

4.1.16 CS Tables 6.1 and 6.2\(^7\) identify critical and necessary infrastructure for the area, including highway improvements and the upgrading of public transport facilities. These have been identified following evidence gathering and consultation for the strategic site. Notably A72 explores:

- Principles for a site wide travel plan.
- Pedestrian/cycle links, public transport upgrades and on site layout considerations.
- Highway Impact

4.1.14 Evidence produced by the MoD has evolved in response to the formation of development options and following public consultation and discussions with Kent Highway Services throughout. This includes further analysis [A76] on the potential pinch-point of the Horn Street railway bridge, identifying a viable, workable solution is possible on land within public ownership.

4.1.15 SDC consider the allocation fully complies with section 4 – promoting sustainable transport\(^8\) of the NPPF.

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\(^7\) Appendix 2, Core Strategy Submission Document

\(^8\) NPPF paragraphs 29 -41.
Heritage

4.1.16 The opening paragraphs of the Core Strategy allocation for Shorncliffe recognise the area’s military history. Within and adjoining the site itself are a number of heritage assets, both listed and unlisted that have been identified as of significance. These include the unlisted former Library, Officer’s Mess and Risborough Barracks gates. The Masterplan [A71] identifies Scheduled Ancient Monuments, Listed Buildings and a number of other Heritage Assets (see also S19). This has influenced the built form of development proposed, whilst the masterplan includes the conversion and reuse of identified heritage assets, ensuring their viable retention.

4.1.17 It is acknowledged within the submitted suggested changes to Core Strategy policy\(^9\) and Core Strategy Text\(^{10}\) that changes are proposed to policy SS7, so as to incorporate the following additional text to point (g).

“Townscape, heritage and archaeological analysis should be undertaken prior to the demolition of any buildings, informing the design of the redevelopment through retention of important features and references to former uses on the site.”

4.1.17 It is considered this clarification ensures that detailed masterplanning of the site meets with section 12 of the NPPF – “Conserving and enhancing the historic environment,” by embedding issues identified within the supporting text within the policy criteria in response to public consultations.

4.1.18 With regards to public representations on this issue it should be noted that these largely relate to one specific part of the site. This is the southern extreme of the site boundary, westward of the B2063 including the Redoubt land and land surrounding the Martello Tower (which is itself excluded from the site boundary). Document A79\(^{11}\) states that:

“Shorncliffe Redoubt is a British Napoleonic earthwork fort of historic importance, as it is the birthplace of modern infantry tactics. Its history can be traced back to 1794…”

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\(^9\) A117 Suggested changes to July 2011 Core Strategy Policy
\(^{10}\) A118 Suggested changes to July 2011 Core Strategy Text
\(^{11}\) A79 – Shorncliffe Garrison Rationalisation Project June 2010.
4.1.19 It is important to emphasise that there are no proposals within the Core Strategy to redevelop any of this land; which is labelled as ‘natural open space’ within CS figure 4.8 for housing or military purposes. This reflects the general position in relation to the full military land parcel in question (Backdoor Training Land/Seabrook Valley) which the MoD have been aiming to dispose of, however no heritage use has been ruled out for this specific area of historical importance. Policy SS7 identifies that the backdoor training land/Seabrook Valley will serve as strategic green infrastructure, and that uses should therefore be of an open character and complement the primary allocation functions.

4.1.20 Given the above, it is considered that policy SS8 is sound, and incorporating the changes set out in document A117 and A118 provides enhanced consideration of the site’s historic interest.
4.2 Folkestone Seafront:

a) Are the location, boundary and proposed mix of uses in this strategic allocation adequately justified? What alternatives were considered, and why were they discounted? Is the extension to this site boundary that is now being proposed by the Council necessary for soundness reasons?

Justification for the location

4.2.1 The rationale for delivering major development in Folkestone is clear (see inter alia paragraph 4.1.1 above). Moreover, the CS vision\textsuperscript{12} for Folkestone and the town centre area states that “Folkestone will be established at the heart of East Kent’s economic and cultural life, with a rejuvenated Seafront supporting a town centre vibrant with new offices and public open spaces…. Folkestone will be recognised and popular events town, with cultural and artistic festivals…."

4.2.2 This vision is central to the ambition for high quality coastal towns in Shepway. It seeks the culmination of the long term programme by the council and its partners to secure the comprehensive regeneration of central Folkestone, the development and implementation of this programme began in the mid 1990’s.\textsuperscript{13}

4.2.3 The comprehensive redevelopment of Folkestone Seafront represents a further, and arguably the most important in terms of scale and impact, piece in the ‘regeneration jigsaw’ for central Folkestone and, through providing such a diverse offer, will assist with enhancing the vitality of Folkestone Town Centre in accordance with national policy\textsuperscript{14}

\textsuperscript{12} (para 3.10 of CS)
\textsuperscript{13} Adjoining the site, Folkestone Coastal Park (phases opened 1996 and 2006) In the heart of the town centre, Bouverie Place shopping centre (opened 2008). At Folkestone Central, High Speed rail services to London (commenced in 2009). Adjoining the site and under the same ownership, The Creative Quarter – over £60 million investment in refurbishment and contemporary educational/ cultural

\textsuperscript{14} NPPF paragraph 23.
4.2.4 As well as the direction provisions of development through Policy SS6, the wider contribution in stimulating additional investment is also expressed in CSD6 Central Folkestone Strategy which states:

*The Seafront/Creative Quarter Regeneration Arc, provides major opportunities for development to contribute to the strategic needs and to upgrade the fabric of the town drawing from its past potential and sense of place.*

4.2.5 It is highly salient that immediately beyond this area remain some of the district’s most deprived communities, where spin-off physical rejuvenation would bring clear urban regeneration benefits.

4.2.5 The location of the Folkestone Seafront site is therefore justified in terms of the key role that its development will play in the continued delivery of a programme to secure the comprehensive delivery of the inner Folkestone area. The allocation was examined alongside other locations in the detailed Shepway Strategic Sites Assessment process [A39-A40]. Following Preferred Options and public consultation and analysis carried out by the landowner further analysis of Strategic sites was considered by the council, as set out in the April 2011 Cabinet Report [CR1]. Paragraph 5.6 of this report, together with Appendix 3 discusses the site selection process in detail, which then informed the Core Strategy submission document. The site recommendations/findings agreed by SDC Cabinet concluded that the seafront is:

- Completely critical to the delivery of the spatial strategy / probable that district vision not met if site not delivered.
- Completely consistent with national policy.
- Strong stakeholder buy-in / complete requirement for site in order to deliver Shepway infrastructure
- Strong alignment to Selective Approach spatial objectives.

**Justification for the boundary**
4.2.6 The boundary for the strategic allocation aims to ensure its deliverability. There have been many attempts over the years to secure the comprehensive redevelopment of Folkestone Seafront\textsuperscript{15}, including:

- 2006 – Fosters Masterplan commissioned by the Folkestone Harbour Company
- 2011 to date – Farrell’s masterplan commissioned by the Folkestone Harbour Company.

4.2.7 The Folkestone Seafront and Harbour site, as identified in Policy SS6, has been in single ownership since 2005. There is an identified commitment from the landowner to deliver a scheme based on comprehensive masterplan that has, to date, included two rounds of public/stakeholder consultation and recently culminated in the signing of a planning performance agreement (PPA) with the Local Planning Authority related to the submission of an outline application for planning permission in July 2012. In addition to the above there has been to date, the delivery of some elements of the masterplan including the Rocksalt and Smoke House restaurants and the harbour fountain.

4.2.8 The contribution of other sites to the regeneration of Folkestone Seafront, such as those to the north of Marine Parade, can be considered through the site allocations process (as set out in Shepway Local Development Scheme G14) within the framework set by Policy CSD6 or as individual planning applications consistent with that policy.

\textbf{Justification for the mix of uses}

4.2.9 As identified above the council is seeking to secure a range of appropriate and complimentary uses throughout Central Folkestone. It is considered that the uses identified in Policy SS6 are appropriate to a seafront location, for example the sea sports and the beach sports elements, and will achieve the objective of creating footfall between the upper and lower parts of the town.

\textsuperscript{15} Prior to this, 1989’s Sea containers proposal (for which the 1992 Act of Parliament was passed) and 1999’s SDC/ SEEDA funded Comprehensive Development Framework (used to inform the development of policies within the Shepway District Local Plan Review 2006) are notable.
The provision of up to 1000 residential units in this location is considered appropriate in terms of:-

- Meeting local housing need and demand (including for affordable housing). The mix of houses and flats, as set out in the supporting masterplan, focuses on deliverability as well as local character.

- The provision of new homes in close proximity to the town centre will have a positive effect in terms of enhancing vitality and viability, due to the increased population supporting local shops and other services.\textsuperscript{16}

- The approach to new residential development proposed by the landowner, based on a series of parameter plans and strict design codes, has the potential to deliver a number of different, yet complimentary architectural solutions that will create a unique sense of place within the Folkestone Seafront/Harbour area.

4.2.10 The strategic importance of the site can also be seen when set against other development options/locations, for example those set out in Appendix 4.1.

4.2.11 In order to provide further clarity to the mix of uses and to reflect the updated masterplan, produced following further public consultation in December 2011, the Council is proposing a more specific mix of uses, in addition to residential, be included within the policy, as set out in [A117] and [A118].

**Alternatives considered and why they were discounted.**

4.2.12 As set out above, a series of proposals have been considered over the past 20 years, none of which have resulted in the delivery of a comprehensive scheme for the regeneration of Folkestone Seafront. The CS Preferred Options document [G5] presented for public consultation alternatives to Policy FH2 (subsequently developed to SS6) these being:-

- Option FH2a – carry forward local plan policy
- Option FH2b – area to be used for low key recreation uses, such as an extension to current coastal park.

\textsuperscript{16} NPPF paragraph 23
4.2.13 The Preferred Option public consultation, and the masterplan consultation carried out in 2010, demonstrated a high level of support for the principle of FH2, as opposed to the other options. In addition the Preferred Options Sustainability Appraisal [A28]\(^\text{17}\) considered policy FH2 – very positive or significant positive in 11 of the 15 measures.

4.2.14 The Folkestone Harbour Company have assessed further options, including :-

- The Fosters Masterplan and its current deliverability or otherwise.
- Options analysis to develop the Folkestone Seafront Masterplan proposal following consultation responses to this Masterplan.
- Extensive consideration of the retention of ferry service verses alternative options.

**Is the extension to the site boundary that is now being proposed by the Council necessary for soundness reasons?**

4.2.15 The District Council does not consider the changes to the red line area are necessary for soundness reasons, instead relating to discussions with the landowner. Any further minor alterations to the site boundary will be clarified in a Statement of Common Ground and are likely to relate to the most appropriate location for sea sport facilities at the western edge of the site.

b) **Has sufficient consideration been given to the future role of the Folkestone Harbour itself and to existing and proposed linkages (notably the existing harbour rail link)?**

4.2.17 It is considered that the process of selecting an option for the future role of Folkestone Harbour should seek to ensure that such a future use is both deliverable and maximises the vitality of the area, for both local residents and visitors.

\(^\text{17}\) Appendix III
4.2.18 As noted, consideration was given in CS consultation to the way forward for this existing allocation in terms of options for the future role of Folkestone Harbour.

- [G5] Policy FH2 that sought to reinvigorate Folkestone as a major visitor centre, reconnecting the town to the sea through the provision of a high quality mixed use scheme that maximises the potential of the site, but did not require the potential for the continuation of a ferry service to be a requirement of any comprehensive redevelopment.
- [G5] Option FH2a that required the comprehensive redevelopment of Folkestone Seafront to maintain the potential for the continuation of passenger ferry services in the interests of tourism - effectively Shepway District Local Plan Policy FTC4.

4.2.20 Policy FH2 was chosen as the preferred option and this was subsequently developed into Policy SS6, informed by the submission from the Folkestone Harbour Company in October 2010, that was developed following widespread public consultation.

4.2.21 Policy SS6 seeks to promote the development of vibrant Folkestone Harbour through -

- Active uses within the vicinity of the harbour, on the Quayside and on the waterfront.
- A vibrant mix of uses to encourage an increase in visitors to the town and increased footfall within the town (including between the upper and lower parts), comprising small shops and retail services and other community and leisure use together with beach sports and sea sports facilities in close proximity.
- The retention of the current fishing fleet and provision for some pleasure craft.

4.2.22 The District Council chose to pursue the option for Folkestone Harbour set out in Policy SS6 for the following reasons :-
• Policy SS6 allows for a flexible mix of complementary uses to be provided that have the potential to increase the vitality of the town and increase visitor/tourist numbers.

• No clear evidence has been presented to the District Council, at either the consultation or public participation, stages that would justify limiting this potential mix of uses by requiring the provision or safeguarding of land for passenger ferry services to be a requirement of any comprehensive development of Folkestone Harbour.

• The landowner is, at present pursuing the comprehensive redevelopment of Folkestone Harbour and Seafront, through the development of an outline planning application that is scheduled to be submitted in July 2012. Were the retention of a passenger ferry service a specific requirement within Policy SS6 then, on the basis of the available evidence, the comprehensive redevelopment of the strategic site would not be progressed as the operation of a ferry service is not considered viable [A43] and the provision of such a service would seriously undermine the viability of the wider site as a whole.

4.2.23 To conclude the approach set out in Policy SS6 increases the potential options for the redevelopment Folkestone Harbour, through providing flexibility over the mix of uses that can be delivered.

4.2.24 Both Policy SS6 and CSD6 gives consideration to the improvement of existing and improved linkages following an assessment of such at both the local and strategic level [A13 and A44]. Policy SS6 ensures that sufficient contributions, highway improvements and parking arrangements are made to improve the connectivity of the Seafront to the town centre and central and eastern Folkestone, opening up new direct pedestrian, cycle and bus links in accordance with SS5, whilst policy CSD6 seeks to ensure better connectivity between Folkestone Central Station and the town centre and improved connectivity between the town centre and seafront.

4.2.25 Given that the Folkestone Harbour Branch line has not had a regular passenger service since 2001 (with freight services ceasing in 1968), that temporary line closure proceedings were instigated in 2009 (renewed in 2011)
and that no evidence had been presented to the District Council, through either the consultation or public participation process, setting out a viable proposal for bringing the line back into operational use, policy SS6 does not require the retention of the rail line. The District Council has however indicated, in the supporting text to Policy SS6 its support for a cycle/pedestrian link along the harbour rail line, as part of a package of measures to connect the harbour to the rest of the town and improve connectivity to and from East Folkestone. This could either be delivered as a partial scheme, within the boundary of the strategic site or along the full length of the line and would have the added benefit of providing an alternative, viable use for the swing bridge, recently grade II listed.
APPENDIX 4.1

ISSUE 4.1 / 4.2 (a) – HOUSING SITES OUTSIDE OF FOLKESTONE / HYTHE LHMA (See Appendix 5.1 for elsewhere)

SHEPWAY CORE STRATEGY– INSPECTOR’S MIQs: MATTER 4
FOLKESTONE & HYTHE LHMA (RESIDENTIAL) Sites

This consists of two tables to clarify whether the CS has dismissed ‘omission sites’ or whether a neutral or positive position has instead been adopted.

Applicable area: Shepway’s Folkestone & Hythe Local Housing Market Areas (CS figure 5.1) as defined in the East Kent SHMA i.e. Shepway ‘Folkestone….’ wards, North Downs East ward, and ‘Hythe….’ wards.

1. Sites ‘rejected’ through the Core Strategy process

The table below (4.1) lists relevant residential sites that were:

- Explicitly ‘rejected’ in Core Strategy consultation documents (Preferred Options [G5]) OR
- Found to be undeliverable/ undevelopable sites in the SHLAA [only those with a supporting 2011 Core Strategy landowner representation]

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<th>TABLE 4.1 – ‘REJECTED’</th>
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<tr>
<td><strong>SITE DETAILS</strong></td>
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<td>CS Representation number and landowner/ consultant name</td>
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<td>316 (no rep at publication stage)</td>
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<thead>
<tr>
<th>Site</th>
<th>Status</th>
<th>Implication (summary)</th>
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<tbody>
<tr>
<td>013 Maxine Waterson, Savills / Charles Evans [Viscount of Folkestone]</td>
<td>Marine Parade Car Park, Folkestone AND Ingles Manor, Folkestone</td>
<td>SS6/ CSD6</td>
</tr>
<tr>
<td>689 Charlotte Cordy-Redden, DE [Ministry of Defence]</td>
<td>Shorncliffe Strategic Site</td>
<td>Support CS</td>
</tr>
</tbody>
</table>
3. Summary

It can be seen that all large residential sites (>10ha) put forward are supported, apart from the two in Table 5.1. As explained the strategic option to continue the growth of Hawkinge out (east) further into the AONB has been rejected. There has been no feedback from the landowner in response to this. The other site is 12 hectares of land at the far southwestern extremity of Hythe/ the urban area. This is effectively the ‘next plot of land along’ from the Nickolls Quarry (planning permission) urban extension to Hythe; which may be inconsistent with SS1’s requirement to avoid “further co-joining of settlements” along the coast. This site was not considered a sustainable location in the SHLAA, not least due to its distance from town/local centre facilities etc; but if it had preceded further significant additional issues could be expected in relation to countryside protection and flood risk, for instance. It is Greenfield.

All other omission sites are minor and cannot be seen as reasonable alternatives to strategic allocations, albeit they are consistent with the CS’s expected housing supply (often previously developed land / within existing settlements). Table 5.2 shows allocations to determine/ review the use of small-medium sites should be made in the Allocations DPD guided by the CS.