Policies CSD6 – CSD9 set out positive settlement strategies for identified areas of strategic change. These delivery policies support the spatial strategy for delivering change in Folkestone, Hythe, New Romney and Sellindge.

In Folkestone, Hythe and New Romney there is a particular need to tailor regeneration and conservation objectives. In Sellindge the delivery policy must reflect neighbourhood and strategic aims.

In all cases sufficient guidance is necessary within the policy to give both meaningful indication to the community of the strategy and to give an appropriate level of clarity to developers.

The council also consider it important that the local plan co-ordinates sustainable development so as to be able to deliver infrastructure which individual smaller developments might not be able to do. This clarity and sense of combined purpose is particularly important where there is a multiplicity of potential land owners.

Government guidance in the form of the NPPF para 157 at bullet point 4 says that Local Plans should indicate broad locations for strategic developments on a key diagram.

However, there is no further specific guidance from the Government as to how broad locations should be covered in local plans. There is not a prescriptive approach that local planning authorities have to follow.

However it seems reasonable that a certain amount of detail is needed to support delivery and achievement of the aims of the plan, although that level of detail would clearly be less than that needed for a strategic allocation.

The council in preparing the plan felt that it had struck this balance correctly.

In the case of Folkestone, policy CSD6 identifies two spatial arcs which have different characteristics and therefore different opportunities and constraints. The policy provides guidance on the type of development that is likely to be acceptable in each arc without being specific about the proposed use of individual areas of land. The Council consider that this is a responsible approach for a plan of this nature to take. The policy is graphically illustrated at Figure 5.5

In the case of Hythe, policy CSD7 sets out the strategy for the town and the priorities for new development. The strategy is also graphically represented at Figure 5.6. No new broad locations for development are identified at Hythe as major large scale new development is already planned at Nicholl’s Quarry where outline planning permission has been granted. Future development at Hythe would be determined through a site allocations plan or a neighbourhood plan that met the provisions of policy CSD7.
In the case of the New Romney the plan identifies a broad area north of the town centre that is considered suitable for development of around 300 houses as informed by the evidence base. This broad location does not include a specific site boundary as in the case of the strategic allocations but its general extent is highlighted at Figure 5.7. The policy CSD8 as well as setting out a strategy for the whole town also identifies criteria that the development of the broad location would need to follow, although recognises that the objectives in the policy would need to be worked up in greater detail in a master plan before any planning application was submitted.

In the case of Sellindge, policy CSD9 has the primary purpose of bringing forward a limited residential led development that would deliver a range of infrastructure priorities identified by the local community. The plan identifies at Figure 5.8 a core development area and possible additional areas that when developed would not exceed approximately 250 dwellings. There are no specific site boundaries as in the case of the strategic allocations proposed elsewhere in the plan and the broad location is informed by the evidence base and in particular the work carried out with the community as part of the HCA’s Rural Master Planning Funding award. A more generalised broad location for development would run counter to the outputs of this work.

As can be seen from the above, the priorities for each of these four settlements are different and present unique challenges that when preparing policy have to be responded to in different ways.

However, the Council sense that the Inspector has some concerns about the approach that has been followed in the plan in connection with these delivery polices, especially policy CSD8 relating to New Romney.

Whilst the Council considered that the existing strategy was a reasonable approach to follow given the Government guidance available, it would also consider advice from the inspector as to how this issue could be dealt with in a manner that would ensure that its local plan can progress.

With this in mind the Council are prepared to discuss at the hearing possible amendments to policies CSD6 – CSD9 and to the diagrams that accompany these policies.

Finally in terms of relationship to future local plans, the Council would expect that policies CSD6-CSD9 will be delivered through future local plans.