

**Folkestone & Hythe District
Core Strategy Review Examination**

**Update from the Local Planning Authority regarding evidence in
relation to the SHLAA and the capacity of the existing built up
areas or smaller peripheral sites.**

1 Introduction

- 1.1 This purpose of this note is to set out the availability of evidence in relation to the potential housing sites and the capacity of the existing built up areas or smaller peripheral sites in the Folkestone & Hythe District.

2 Core Strategy Local Plan (2013)

- 2.1 Folkestone & Hythe District Council (formally Shepway until April 2018) carried out an initial SHLAA in 2009/2010 and updated this in 2011/2012.
- 2.2 The SHLAA 2009/10 Consolidated Document (EB 04.40) and the SHLAA 2011/12 Update Document (EB 04.50) formed part of the evidence base for the preparation of the Core Strategy (2013).
- 2.3 The SHLAA sought to identify residential sites to meet the Core Strategy (2013) housing target of 7,000 new homes. The SHLAA update found 138 sites to be deliverable/developable i.e. suitable and available and achievable from the start of the year 2011/2012. These deliverable/developable sites were calculated to have an estimated capacity of 8,543 dwellings in 2011/12 – 2030/31 (inclusive) - not including any 'windfall' supply or sites producing under five dwellings.
- 2.4 Table 8 of document (EB 04.50) sets out the deliverable and developable sites along with estimated site capacities.
- 2.5 National Policy and guidance from the Planning Inspectorate, at the time, set out clear criteria for the inclusion of strategic sites within Local Development Framework Core Strategy documents this is summarised in PPS12 paragraph 4.6 which stated:

'Core Strategies may allocate strategic sites for development. These should be those sites considered central to the achievement of the strategy. Progress on the core strategy should not be held up by inclusion of non-strategic sites'

2.6 Consequently, the SHLAA process culminated in the identification and inclusion of strategic sites for a variety of uses in the Core Strategy Proposed Submission document July 2011. These included:

- Folkestone Seafront
- Shorncliffe Garrison
- Folkestone Racecourse, Westenhanger.
- Nickolls Quarry (reference only – due to planning consent)

2.7 It also identified the presence of ‘broad locations’ at New Romney and Sellindge. These do not have specific boundaries, instead criteria in the policy guides the spatial outputs required for a proposal to meet Core Strategy needs in the locality. This is illustrated on the maps for New Romney and Sellindge, recognising the presence of SHLAA sites but without confirming any collective boundary.

2.8 Folkestone Racecourse, Westenhanger was deleted from the Core Strategy Local Plan during the Examination in Public for reasons set out in the Inspectors Report (EB 01.96), paragraphs 74 -84.

3 Places and Policies Local Plan

3.1 Following the adoption of the Core Strategy 2013, the Council subsequently undertook a new Strategic Housing Land Availability Assessment (SHLAA) to inform the preparation of its Places and Policies Local Plan in order to address the residual housing need not met by the Core Strategy with a focus on small to medium sized sites; however, there was no maximum threshold to the size of site that was considered.

3.2 An initial ‘call for sites’ was held between 9 December 2013 and 3 February 2014, whilst a further ‘call’ ran concurrently with the Issues and Options consultation between 29 January and 11 March 2015.

- 3.3 The assessment methodology and criteria used to assess these sites was updated in light of the publication of the National Planning Policy Framework and Planning Practice Guidance; as well as the adopted policies in the Shepway Core Strategy. The SHLAA 2015/16 Consolidated Document (EB 04.60) details the SHLAA site assessment methodology at paragraphs 4.1–4.7.
- 3.4 The SHLAA exercise identified and assessed 179 sites and found 120 to be suitable, available and achievable. Further analysis showed that the majority of those (38) could be considered as already in the planning process – leaving 82 deliverable/developable sites with an estimated capacity of 4,443 dwellings.
- 3.5 Table 1 of document (EB 04.60) sets out the number of deliverable and developable sites by ward area with cumulative capacity estimates.
- 3.6 Appendix 2 of Document (EB 04.60) summarises the performance of 141 individual SHLAA sites (excluding those already considered to be in the planning process); with those considered to be deliverable/developable scored either ‘green’ or ‘amber’. The individual site appraisal forms can be found in Appendix 3.
- 3.7 Appendix 1 of this document seeks to provide an update as to the status of each of the ‘successful’ SHLAA sites listed in EB 04.60 Appendix 2, and has been presented by settlement in line with the settlement hierarchy.
- 3.8 In total, 61 sites were assessed as ‘green’. Of these, eleven were not allocated – 3 sites were allocated in Preferred Options (405 and 656, 1020) but were withdrawn following representations at Regulation 18; 3 sites (689, (317 & 416), and 636) were pursued separately through planning applications; 4 sites (602, 158, 388 and 457) were not considered suitable due to impact on landscape and highways; and 1 site (457) was no longer available.
- 3.9 A total of 21 sites were assessed as ‘amber’. Of these, 13 were not allocated – 3 sites (303a, 615 and 617) encroached on the Kent Downs AONB, 3 sites (373, 640, and 1015) would have been detached from the settlement boundary (640 also impacted on a Local Landscape Area); 2 sites (329 and 335) were cited as

having flood risk issues; 3 sites (613, 620, 627 and 674) related to highway access and capacity; and 1 site (1014) had land ownership concerns.

3.10 For green and amber sites not allocated – estimated capacities have been provided.

3.11 A total of 58 sites were assessed as ‘red’. These were assessed as not being suitable due to significant policy constraint(s); the majority of these related to impacts and/or encroachment on the Kent Downs AONB, areas of extreme and significant flood risk according to the SFRA 2115 modelling or situated within an SSSI. Other reasons for excluding included impact on listed buildings, conservation areas, ancient woodlands, settings of scheduled ancient monuments; or failing to meet the minimum site thresholds. However, 9 sites (204A, 326, 428a, 428b, 606, 614, 632, 690; and 1006) now fall within the new garden settlement boundary covered by policies SS6-9; and a further site (609) was allocated as part of the PPLP. No estimated capacities have been set against these sites for the purpose of this note as they are deemed not suitable for development, other than through the comprehensive development of the new garden settlement proposed through Core Strategy Review Policies SS6-SS9.

3.12 The PPLP Sustainability Appraisal Report Regulation 18 (EB 02.97), Section 7, appraised all preferred allocations and reasonable alternatives for development in the PPLP (i.e. the sites scored green and amber). A policy-off approach to the appraisal was taken, i.e. the principle of housing development on each site was appraised without consideration of the measures that might be implemented at each site to mitigate adverse effects or enhance positive effects.

3.13 Further opportunities were available for ‘reasonable alternatives’ to be put forward as part of the plan making process during the Regulation 18 Preferred Options consultation, which ran between 7th October and 18th November 2016; and Regulation 19 consultation between 6th February and 19th March 2018 .

3.14 A total of 31 site submissions were received during the Regulation 18 consultation. A full list and the individual site appraisal forms can be found in the

SHLAA 2016/17 document (EB 04.70). In total, 15 of those sites were considered to be potentially deliverable/developable by officers.

3.15 Sites that were thought to be potential 'reasonable alternatives' to the suite of sites that made up the 'preferred development option' were considered as part of the PPLP Sustainability Appraisal Report Regulation 19 (EB 02.96), Section 7.

3.16 Subsequently, only 3 sites (PO18, PO19; and PO20) were allocated for housing as part of the Places and Policies Local Plan, and 2 sites (PO25 and PO28) were pursued separately through planning applications. The remaining sites were not taken forward to their perceived impact on landscape, protected habitats and flood risk; as well as deliverability issues such as achieving suitable access. It should also be noted that a further 2 sites (PO2 and PO6), which had not been considered as 'reasonable alternatives' as part of the preparation of the PPLP now fall within the new garden settlement boundary.

3.17 Appendix 2 of this document seeks to provide an update as to the status of each of the SHLAA sites listed in EB 04.70, and has been presented by settlement in line with the settlement hierarchy. Estimated site capacities have been included for those sites considered as potentially developable and deliverable.

3.18 The approach taken to the SHLAA and allocation of sites for the Places and Policies Local Plan was adjudged to have been sound by the planning inspector in 2019/20 and no omission site was added to the preferred development suite of sites.

4 Core Strategy Review

4.1 In response to the stepped increase to the minimum housing requirement, the Council commissioned a study to assess the capacity of the whole of the district for strategic growth, the High Level Options Report (AECOM, December 2016, Document EB 04.20), to inform the Core Strategy Review. This was supported by a comprehensive High Level Landscape Appraisal (AECOM, February 2016, Document EB 04.30).

- 4.2 The conclusion of the High Level Options Report was that the great majority of the district – the Folkestone and Hythe and surrounding areas, Kent Downs and Romney Marsh – was unsuitable for strategic-scale growth. It was found that Sellindge and surrounding area, may have opportunities to accommodate strategic growth and this area was therefore carried forward into the more detailed (Phase 2) analysis, which identified the specific boundaries of individual sites, including the proposed garden settlement.
- 4.3 The CSR has been subject to Sustainability Appraisal (SA), incorporating Strategic Environmental Assessment (SEA), throughout its preparation.
- 4.4 The Preferred Options Core Strategy Review SA (EB 02.70) Section 6, report on the appraisal of the High Level Growth Options and Section 7 on the spatial options at Otterpool and Sellindge.
- 4.5 A Sustainability was carried out specifically for the revised housing requirement, 'Sustainability Appraisal Addendum - Proposed Changes to the Proposed Submission Folkestone & Hythe Core Strategy Review' (EB 02.10).
- 4.6 Given the outcomes of the High Level Options work, the Council considers that there were no reasonable alternatives to the strategy put forward in the Core Strategy Review. Nevertheless, the Council run a further call for sites alongside the Regulation 18 consultation between the 29th March and 18th May 2018.
- 4.7 Overall, the further 'call' resulted in 5 new site submissions, 1 site (Land behind Rhodes House) was already be considered as already in the planning process with outline planning permission for 162 dwellings and fell within land identified for Phase 2 housing at Sellindge, leaving 4 sites for further assessment.
- 4.8 Whilst the 'call for sites' indicated that the Council was seeking land that could deliver housing at a strategic level and identified an indicative capacity of 250 dwellings – comparable with that identified at Sellindge (Phase 1), this did not preclude submission of sites of a smaller scale being submitted.

- 4.9 A full list and the individual site appraisal forms can be found in the SHLAA 2018 document (EB 04.80).
- 4.10 The Proposed Submission Core Strategy Review Sustainability Appraisal (EB 02.40) did not consider any of the additional SHLAA sites, as at the time of preparation, in the Council's view, it had sufficient land in its supply to meet the identified housing requirement; and none represented 'reasonable alternatives' to the preferred development option.
- 4.11 No further new sites were submitted to the planning making processes during the Regulation 19 Consultation.

5 Conclusion

- 5.1 In conclusion, the Council considers that it has demonstrated that it has kept an up-to-date review of potential SHLAA sites available in the Folkestone & Hythe District throughout the plan making process; and exhausted those that have been submitted and assessed as being suitable for development. The majority of those sites not allocated have constraints relating to impact on the Kent Downs AONB, internationally and nationally protected habitats; and flood risk, which is consistent with the highly constrained nature of the District. The Inspectors should therefore be confident that there is extremely little or no latent housing land capacity within existing built up areas or smaller peripheral sites and that the spatial strategy set out in the Core Strategy Review is the only deliverable option to meet the housing requirements for the District. Sites of nine dwellings or below are already accounted for in the Core Strategy Review trajectory through the windfall allowance, which has been based on evidence of past completions of small sites of this nature across the district.
- 5.2 The High Level Growth Options Study (EB 04.20) illustrates the constraints operating in the district. The sections below briefly summarise the main settlements of the character areas in turn.

Folkestone and Sandgate (see EB 04.20, Figure 8, page 3-55)

- 5.3 Looking at Folkestone and Hythe, to the immediate east of the built-up area, is the district boundary with Dover. The Folkestone and Dover Heritage Coast designation is to the east, with the Kent Downs Area of Outstanding Natural Beauty, Folkestone Warren Site of Special Scientific Interest and Local Nature Reserves to the immediate east.
- 5.4 To the immediate north-east of the built-up area the area is constrained by the Special Area of Conservation, Folkestone to Etchinghill Escarpment Site of Special Scientific Interest and Kent Downs Area of Outstanding Natural Beauty designations.
- 5.5 To the north of the built-up area is a large area of land in use for the Channel Tunnel terminal, immediately bordered by and in places overlapping with the Kent Downs Area of Outstanding Natural Beauty designation, Folkestone to Etchinghill Escarpment Site of Special Scientific Interest and Special Area of Conservation.
- 5.6 To the immediate west of Folkestone and Sandgate is an area of the Kent Downs Area of Outstanding Natural Beauty, Paraker Wood and Seabrook Stream Local Wildlife Site and Seabrook Stream Site of Special Scientific Interest. There is a small area of land adjoining, but not within the Kent Downs Area of Outstanding Natural Beauty that is in active use by the Ministry of Defence (Dibgate Camp).

Hythe (see EB 04.20, Figure 9, page 3-63).

- 5.7 To the south and west of Hythe is the Hythe Ranges Local Wildlife Site, in active use by the Ministry of Defence, and areas of high flood risk. The immediate north-west is the Kent Downs Area of Outstanding Natural Beauty. To the north-east are areas of high flood risk (Flood Zone 3) except for a former landfill site, allocated for development in the Places and Policies Local Plan. Within the built up area to the east is the Eaton Lands Meadow natural/semi-natural greenspace. There is a narrow area at risk of landslide, identified by the British Geological Survey, follow the steeper ground that crosses Folkestone, Standgate, Seabrook and West Hythe, and further across the district running east-west.

Romney Marsh Area (EB 04.20, Figure 12, page 3-90)

- 5.8 **Lydd** is an elongated settlement in the Romney Marsh character area. To the north and south of the settlement development is constrained by the Romney Marsh and Rye Bay Site of Special Scientific Interest. Close to the south and east of the settlement are overlapping designations of Ramsar, Special Protection Area, Special Conservation Area and Dungeness National Nature Reserve. Areas of high flood risk (Flood Zone 3) closely surround the settlement on all sides and in places overlap the built form.
- 5.9 **Dungeness** is a small dispersed settlement. It is entirely covered by the Dungeness National Nature Reserve, Special Area of Conservation and Dungeness, Romney Marsh and Rye Bay Site of Special Scientific Interest designations.
- 5.10 **Lydd-on-Sea** and **Greatstone-on-Sea** are small, linear, coastal settlements. The coastline is to the immediate east of these settlements, covered variously by overlapping designations of Special Area of Conservation, Ramsar, Dungeness, Romney Marsh and Rye Bay Site of Special Scientific Interest and Special Protection Area. Inland at Lydd-on-Sea the built-up area is immediately bordered by the Dungeness National Nature Reserve, Special Area of Conservation and Dungeness, Romney Marsh and Rye Bay Site of Special Scientific Interest designations. Inland at Greatstone, the area to the immediate west is bordered variously by the Site of Special Scientific Interest and areas of Flood Zones 2 and 3.
- 5.11 **New Romney** is a larger, linear coastal settlement. Areas of Flood Zone 3 abut the settlement to the north, east and, in part to the south. Areas to the immediate north are within the Dungeness, Romney Marsh and Rye Bay Site of Special Scientific Interest and Ramsar designations. There is an area of land between New Romney and Greatstone-on-Sea relatively free of constraints that was put forward for development during the Places and Policies Local Plan process, but this was withdrawn by the land-owners (1020).

5.12 **Brenzett, Brookland and Old Romney** are smaller settlements within the Romney Marsh Area (EB 04.20, Figure 11, page 3-81). These settlements are either entirely covered by or surrounded by areas of high Flood Risk (flood zone 3).

5.13 **St Mary's Bay and Dymchurch** are coastal settlements, either covered by or entirely surrounded by, areas of high flood risk (Flood Zone 3).

North Downs Area (EB 04.20, Figure 7, page 3-46)

5.14 The majority of the North Downs Area is largely covered by the Kent Downs Area of Outstanding Natural Beauty designation. There are a number of smaller sites within the larger North Downs settlements that were allocated in the Places and Policies Local Plan, having been judged not to have a significant impact on the AONB.

5.15 The area within the North Downs, outside the Kent Downs AONB is considered in the Core Strategy Review through the Phase Two Growth Options work (EB 04.21)

Appendix 1: SHLAA 2015/16

SHLAA Sites Scored 'Green'

Ward	SHLAA Ref	Address of site	Status	Est. Capacity
FOLKESTONE				
East Folkestone	27B	Shepway Close, Folkestone	PPLP allocation Policy UA6	
	346	Former Gas Works, Ship Street, Folkestone	PPLP allocation Policy UA7	
Folkestone Central	46	Ingles Manor, Castle Hill Avenue, Folkestone	PPLP allocation Policy UA5	
	625	3-5 Shorncliffe Road, Folkestone	PPLP allocation Policy UA4	
	689	Westbrook School playing field, Shorncliffe Road, Folkestone	Developed. Planning app ref: Y15/0550/SH	
Folkestone Cheriton	602	Land between Valebrook Close and Valestone Close, Folkestone	Site not allocated due to concerns of highway access and capacity on Horn Street; and potential for settlement coalescence.	45
	637	Brockman Family Centre	PPLP allocation Policy UA9	
	687	Cherry Pickers, Cheriton	PPLP allocation Policy UA10	
	425C	Affinity Water, Land at Cherry Garden Avenue, Folkestone	PPLP allocation Policy UA11	
Folkestone Harbour	45	Car and Coach Park, Marine Parade, Folkestone	PPLP allocation Policy UA2	
	342	Rotunda Car Park, Lower Sandgate Road, Folkestone	PPLP allocation Policy UA2	
	382	East Station Goods Yard, Southern Way, Folkestone	PPLP allocation Policy UA1	
Folkestone Park	458	Highview School, Moat Farm Road, Folkestone	PPLP allocation Policy UA6	
Broadmead	103	Royal Victoria Hospital, Radnor Park Avenue	PPLP allocation Policy UA3	
Sandgate & West Folkestone	113	Former Encombe House, Sandgate	PPLP allocation Policy UA12	
	636	Shepway Resource Centre. Sandgate	Developed. Planning app ref: Y16/0463/SH	
	405	Coolinge Lane Land, Sandgate	Site was allocated PPLP preferred options; withdrawn following	54

			objection from Sport England at Reg. 18	
HYTHE				
Hythe	317 & 416	Land off Range Road (Fishermans Beach), Hythe	Developed. Planning app ref: Y11/0284/SH	
	137	Smith's Medical, Boundary Road, Hythe	PPLP allocation Policy UA13	
	158	Vale Farm (The Piggeries) Horn Street, Folkestone	Site not allocated due to concerns of encroachment into countryside and impact on local landscape area, settlement coalescence; and contamination	26
	621	Land opposite 24 Station Road, Hythe	PPLP allocation Policy UA14	
	313	Foxwood School, Seabrook Road, Hythe	PPLP allocation Policy UA7	
	155	Rectory Field, Eversley Way, Seabrook, Hythe	Site is no longer available. It was submitted by KCC as part of plans for the relocation of Seabrook Primary School.	n/a
	153	Princes Parade, Hythe	PPLP allocation Policy UA18	
	1018	St Saviours Hospital	PPLP allocation Policy UA16	
	142	Hythe Swimming Pool	PPLP allocation Policy UA19	
Hythe Rural	457	Land opposite Rock Cottage, Botolphs Bridge Road, Hythe	Site not allocated as it is effectively an island within an SFRA Extreme Flood Risk	10
NEW ROMNEY (INC. LITTLESTONE)				
Romney Marsh	403	Land west of Ashford Road, New Romney	PPLP allocation Policy RM4	
	415/430	Land east of Ashford Road, New Romney	CSR allocation Policy CSD 8	
	409	Land at Cockreed Lane, New Romney	CSR allocation Policy CSD 8	
	638	Marsh Academy, Station Road, New Romney	PPLP allocation Policy RM5	
	639	St Nicholas Playing Field, Rolfe Lane, New Romney	CSR allocation Policy CSD 8	
	1020	New Romney Southern Extension	Site was allocated in PPLP Preferred Options; withdrawn following	400

			objections from site owner at Reg. 18	
	230	Land RO The Old School House, Church Lane, New Romney	PPLP allocation Policy RM3	
	289A	Romney Marsh Potato Company, New Romney	CSR allocation Policy CSD8	
	437	Cherry Gardens, New Romney	PPLP allocation Policy RM1	
HAWKINGE				
North Downs East	1002	Land at Spitfire Way, Hawkinge	Developed. Planning app ref: Y15/1035/SH	
	244	Former Officers Mess, Aerodrome Road, Hawkinge	PPLP allocation Policy ND1	
	344	Mill Lane r/o Mill Farm, Hawkinge	PPLP allocation Policy ND2	
	388	Land west of Canterbury Road, Hawkinge	Site not allocated due to concerns that development would encroach North Downs AONB scarp.	10
	404	Land adj Kent Battle of Britain Museum, Aerodrome Road, Hawkinge	PPLP allocation Policy ND3	
LYDD				
Walland & Dengemarsh	390	Peak Welders, Romney Marsh, Lydd	PPLP allocation Policy E1 (Employment)	
	195	Station Yard, Station Road, Lydd	PPLP allocation Policy RM8	
	306A	Land at Kitewell Lane, Lydd	PPLP allocation Policy RM6	
	306B	Land at Kitewell Lane, Lydd	PPLP allocation Policy RM7	
ELHAM				
North Downs East	656	Land at Duck Street, Elham	Site was allocated in PPLP preferred options; withdrawn following objections on highways, flooding and ecology at Reg. 18	5
LYMINGE				
North Downs West	605	Land South of Canterbury Road, Lyminge	PPLP allocation Policy ND4	

SELLINDGE				
North Downs West	623	South of Ashford Road, Taylor Wimpey lands, Sellindge	CSR allocation Policy CSD9 (Phase 1)	
	618	Land west of Jubilee Cottage, Swan Lane, Sellindge	PPLP allocation Policy ND5	
	402	The Piggery, Main Road, Sellindge	PPLP allocation Policy ND5	
	1005	Land at Barrow Hill, Sellindge	PPLP allocation Policy ND5	
	1007	Silver Spray, Sellindge	PPLP allocation Policy ND5	
ST MARYS BAY				
Romney Marsh	004	Former Sands Motel, St Mary's Bay	PPLP allocation Policy RM9	
GREATSTONE				
Romney Marsh	462	Land rear Varne Boat Club, Coast Drive, Greatstone	PPLP allocation Policy RM10	
	1013	Car Park, Coast Drive, Greatstone	PPLP allocation Policy RM11	
LYMPNE				
Hythe Rural	209	Former Lympne Airfield, Lympne	PPLP allocation Policy UA6	
BROOKLAND				
	431	The Old Slaughterhouse 'Rosemary Corner', Brookland	PPLP allocation Policy RM12	
DENSOLE, ETCHINGILL, STELLIN MINNIS and WESTENHANGER				
North Downs East	1003	Land adjoining 385 Canterbury Road, Densole	PPLP allocation Policy ND8	
	418	Etchingill Nursery, Etchingill	PPLP allocation Policy ND9	
	419	Land adjacent the Golf Course, Etchingill	PPLP allocation Policy ND10	
	635	Camping and Caravan Site, Minnis Lane	PPLP allocation Policy ND7	
North Downs Wes	204A	Folkestone Racecourse (parts), Westenhanger	CSR allocation Policy SS6-10 (Garden Settlement)	

SHLAA Sites Scored 'Amber'

Ward	SHLAA Ref	Address of site	Status	Est. Capacity
FOLKESTONE				
Broadmead Sandgate & West Folkestone	656	Silver Spring, Park Farm	PPLP allocation Policy RL11 (retail)	
	674	Digby Road, Folkestone	Site not allocated due to objection from Kent Highways concerning the potential loss of the car park.	10
HYTHE				
Hythe	615	Land north west of Blackhouse Hill, Hythe	Site not allocated due to prominent location in the North Downs AONB and would be a significant encroachment into the countryside; and other extensive natural constraints. Some potential in SW corner of the site?	5
	622	Saltwood Care Centre, Tanners Hill, Hythe	PPLP allocation Policy UA15	
	640	Adj 43 Horn Street, Folkestone	Site not allocated due to concerns of physical separation and encroachment into countryside, impact on a local landscape area, and distance from services.	8
NEW ROMNEY (INC. LITTLESTONE)				
New Romney	379	Land off Victoria Road West, Littlestone	PPLP allocation Policy RM3	
	436	Land at Church Road, New Romney	PPLP allocation Policy RM3	
Romney Marsh	373	Land North of Cockreed Lane, New Romney	Site was considered unsuitable for development given its separation from the main settlement. Whilst (CSD8) will bridge the gap over the course of the CS period, at this stage it would constitute	100

			encroachment into the countryside. Low SFRA 2115 hazard.	
	1014	Craythorne Farm	Site not allocated due to issues of dual site ownership issues.	3
	1015	Brickyard Poultry Farm, New Romney	Site was considered unsuitable for development given its separation from the main settlement. Whilst (CSD8) will bridge the gap over the course of the CS period, at this stage it would constitute encroachment into the countryside.	40
LYDD				
Waland & Dengemarsh	335	Fisher Field, Dungeness Road, Lydd	Site not allocated due to its situation in Flood Zone 3, with 'significant' SFRA hazard. In addition, it is a minerals safeguarding area.	10
	620	Land at Harden Road, Lydd	Site not allocated due to encroachment into the countryside; and not possible to create suitable access.	25
SELLINDGE				
North Downs West	328	Sellindge East, Sellindge	CSR allocation Policy CSD9 (Phase 2b)	
	610	Grove House land, Main Road, Sellindge	CSR allocation Policy CSD9 (Phase 2a)	
	627	Land rear of Brook Lane Cottages, Brook Lane, Sellindge	Site not allocated due to vehicular access not being able to be achieved.	10
BROOKLAND				
Romney Marsh	329	Pepperland Nurseries, Boarmans Lane, Brookland	Site not allocated due to flood risk, impacts on the Conservation Area; and remoteness from services.	10
	407A	Land N Pod Corner, Brookland	PPLP allocation Policy RM13	
BRENZETT				

Romney Marsh	612	Land adjacent Moore Close, Brenzett	PPLP allocation Policy RM14	
DENSOLE and STANFORD				
North Downs East	303A	Land south of Little Densole Farm, Densole	Site not allocated as considered that there were other sites in Densole that more contained, integrated and defendable, given the sites location in the Kent Downs AONB.	50 - 100
	617	Black Horse Caravan Site, 385 Canterbury Road, Densole	Site not allocation due to concerns regarding impact on AONB land immediately adjoining the settlement boundary.	5
North Downs West	613	Land rear Barnstormers, Stone Street, Stanford	Site was allocated PPLP preferred options; withdrawn due to concern regarding site access at Reg.18	5

Appendix 2: Further SHLAAs submitted during PPLP Regulation 18 Consultation

Ward	SHLAA Ref	Address of site	Status	Est. Capacity
FOLKESTONE				
Broadmead	PO16	Three Acres, Park Farm, Folkestone	Site not suitable as within an existing employment designation and would result in poor residential amenity.	
	PO17	Five Acres, Park Farm, Folkestone	Site not suitable as within an existing employment designation and would result in poor residential amenity.	
NEW ROMNEY				
New Romney	PO25	Land adjacent to Josephs Way, New Romney	Site had ransom strip at point of assessment. This was subsequently resolved and planning application ref: Y19/0553/FH is being determined.	25
	PO26	Cemex Station Approach, New Romney	Site not suitable due to concerns about flood risk zone 2&3; impact on townscape / urban form; and in close proximity to a recycling centre and sewage treatment works resulting in potentially poor residential amenity.	20
	PO20	Cherry Garden, Littlestone	Resubmission of SHLAA 437. PPLP allocation Policy RM1	
	PO28	Land at St Andrews Road, Littlestone	Planning App ref: Y19/0918/FH	
HAWKINGE				
North Downs East	PO3	Hawkinge East	Re-submission of SHLAA 316 (reduced in size). Concerns about expansion into Kent Downs AONB remain and sequentially would not be	50

			a preferred site while brownfield sites remain within the settlement boundary.	
LYDD				
Walland and Dengemarsh	PO23	Land at Harden Road, Lydd	Resubmission of SHLAA 620. Concerns about expansion into open countryside; and not possible to create suitable access.	20
	PO24	Land at Harden Road, Lydd (a larger area incorporating PO23)	Resubmission of SHLAA 620. Concerns about expansion into open countryside; and not possible to create suitable access.	30
ELHAM				
North Downs East	PO10	Cherry Gardens, Elham	Site not available; and is landlocked offering no available access to the public highway.	
	PO11	Cock Lane, Elham	Site not available; and access is considered to be unsuitable to accommodate additional traffic movements.	
	PO12	Cullens Hill, Elham	Site not available, impact on Kent Downs AONB, setting of a conservation area; and access is considered to be unsuitable to accommodate additional traffic movements.	
	PO13	Land at Canterbury Road, Elham	Site not available; and impact on Kent Downs AONB.	
	PO14	Land West of Canterbury Road, Elham	Site not available; and impact on Kent Downs AONB.	
	PO15	Land East of Canterbury Road, Elham	Site not available; and impact on Kent Downs AONB.	
LYMINGE				
North Downs East	PO4	Land West of Canterbury Road, Lyminge	Site not suitable due to concerns about	50

			expansion into Kent Downs AONB.	
	PO5	Red House Lane, Lyminge	Site not suitable due to concerns about expansion into the Kent Downs AONB.	10
SELLINDGE				
North Downs West	PO1a	Land at Sellindge West	Site not suitable due to concerns about expansion into open countryside and impact on the setting of the AONB.	10
	PO1b	Land at Sellindge West (Smaller parcel of PO1a)	Site not suitable due to concerns about expansion into open countryside and impact on the setting of the AONB.	
LYMPNE				
North Downs West	PO6	Port Lympne Zoo Park	CSR allocation Policy SS6-10 (Garden Settlement)	
	PO7	Land South of Aldington Road, Lympne	Site not suitable due to concerns about expansion into the Kent Downs AONB; impact on SSSI; and setting of a Listed Building	
DYMCHURCH				
Romney Marsh	PO21	Land behind Village Hall Car Park, Dymchurch	Extreme Flood Risk (SFRA 2115)	
	PO27	Recreational Ground, Dymchurch	Site not suitable due to designation as an open sports facility; proposed enabling development for new pavilion.	15
ST MARYS BAY				
Romney Marsh	PO31	Land off Jenner's Way	Resubmission of SHLAA 380. Concerns regarding Extreme Flood Risk (SFRA 2115); and encroachment into countryside, remain.	

BROOKLAND				
Romney Marsh	PO19	Land adjacent to Framlea, Brookland	PPLP allocation Policy RM15	
	PO22	Fairfield Court Farm, Brookland	Site not suitable due to concerns about expansion into open countryside and impact on local landscape.	
	PO30	Land off Boarmans Road, Brookland	Resubmission of SHLAA 1016. Concerns regarding flood zone 2 & 3; and coalescence of two distinct parts of the settlement remain.	
BRENZETT				
Romney Marsh	PO18	Land between Hillside and Brandet House, Brenzett	PPLP allocation Policy RM14	
ETCHINGHILL, STANFORD, PEENE and NEWINGTON				
North Downs East	PO29	Land off Teddars Leas Road, Etchinghill	Re submission of SHLAA 432a. Concern regarding impact on Kent Downs AONB remain.	
North Downs West	PO8	Land rear of Touchwood, Stanford	Unsustainable location (Stanford); and objections from KCC Highways regarding access.	5
North Downs East	PO9	Land opposite Underhill Cottages, Peene	Unsustainable location (Peene)	
North Downs West	PO2	Cydonia, Newingreen	CSR allocation Policy SS6-10 (Garden Settlement)	

Appendix 3: SHLAA 2018

Ward	SHLAA Ref	Address of site	Status	Est. Capacity
Broadmead	CSR2	Booker Wholesale, Park Farm Road, Folkestone	Site not suitable as within an existing employment designation and would result in poor residential amenity.	
North Downs West	CSR3	Land at Elm Tree Farm, Main Road, Sellindge	Site not allocated as it would extend development west as well as north towards the AONB. It is considered that there are more preferable areas for growth in Sellindge that would have a lesser impact on the setting of the AONB. Impact also on highways and setting of a listed building.	188
	CSR4	Land at the Piggery, Main Road, Sellindge	Site not allocated as it would extend development west as well as north towards the AONB. The Growth Options Report identified that strategic development in this area would have an unacceptable landscape impact.	
North Downs East	CSR1	Etchinghill Nursery, Canterbury Road, Etchinghill	Site does not qualify as a strategic site. It could be pursued as a planning application as part of an extension of the draft housing allocation in the PPLP (Policy ND10).	20