

PLANNING OBJECTION

Hythe Imperial Hotel and Golf Course

A shared drafting aid for individual objections to application 26/1290/FH

Site: Land east of Hythe Imperial Hotel, Princes Parade, Hythe

Proposal: Hotel/leisure and golf redevelopment, plus outline permission for up to 291 dwellings

Version: 23 August 2026

DRAFTING AID — DO NOT SUBMIT UNCHANGED. Delete this introductory page, add your own short personal paragraph, and retain only the grounds you genuinely support.

How to use this document

The objection begins on the next page. Use it as a drafting aid and submit your completed representation in your own name, with your address, through the Council's normal process.

- **Personalise it.** Add two to five sentences explaining your connection to the site and how the proposal would affect you.
- **Use your own words.** Keep only the arguments you understand and genuinely support; you do not need to include every section.
- **Before submitting.** Delete this page and check that the final objection says what you mean. The Evidence Note may be retained.

Authorship and checking: Prepared and circulated by Andrew Walters in a personal capacity, using the application documents and planning policies identified in the Evidence Note. Recipients should submit only points they understand and genuinely support.

Objection to planning application 26/1290/FH

I object to application 26/1290/FH. The application proposes the redevelopment of a 17.3-hectare site, including a 16-hectare golf course designated for the provision of open space under Policy C3 (Provision of Open Space) of the Folkestone & Hythe Places and Policies Local Plan (2020), together with outline permission for up to 291 dwellings. Most of the site is within Flood Zone 3. On the evidence presently submitted, the proposal has not demonstrated compliance with the adopted Folkestone & Hythe development plan - principally the Places and Policies Local Plan (2020) and Core Strategy Review (2022) - or the current National Planning Policy Framework (NPPF).

I ask the Council to refuse permission. If it is not presently prepared to refuse, it should defer determination until the applicant has supplied updated and independently tested evidence on open-space need, replacement provision, the flood sequential test, lifetime safety, landscape and visual harm, transport mitigation, healthcare capacity, the Royal Military Canal Scheduled Monument and the certainty and delivery of the claimed public benefits.

1. The application must be assessed against the current NPPF

The principal application assessments are dated 5 August 2026 and rely on the previous NPPF and its paragraph numbering. A new National Planning Policy Framework was published on 17 August 2026. Its policies are material considerations from the date of publication. The Council must therefore determine this application against the current National Planning Policy Framework (August 2026), including its Policies S4, HC7 and F4-F7, rather than simply accepting conclusions framed under the superseded version.

This is not a merely editorial point. The current framework expressly requires replacement open space to be equivalent or better in quantity and quality, with comparable or improved accessibility. It also sets out current requirements for the flood sequential test, exception test, lifetime safety, residual risk, safe access and escape, and an agreed emergency plan. The applicant should provide a comprehensive NPPF 2026 addendum. If that addendum materially changes the case or mitigation, the public and statutory consultees should be allowed to comment on it.

2. Loss of safeguarded open space - Policy C3 of the Places and Policies Local Plan (2020) and Policy HC7 of the National Planning Policy Framework (August 2026)

2.1 The policy starting point is protection

The site is designated for the provision of open space under Policy C3 (Provision of Open Space) of the Folkestone & Hythe Places and Policies Local Plan (2020). That Local Plan policy safeguards existing open spaces unless one of three tests is met: clear evidence that the space is surplus; equivalent or better replacement; or alternative sports and recreation provision whose need clearly outweighs the loss. Policy HC7 (Development affecting existing recreational land and facilities) of the National Planning Policy Framework (August 2026) applies materially the same protective approach. The burden is on the applicant to demonstrate one of those exceptions with clear, current evidence.

2.2 The claimed 'surplus' is not clearly demonstrated

The Open Space Assessment relies chiefly on the 2017 Shepway Open Space Assessment, which used data collected in 2015. The applicant acknowledges that this evidence is old and updates it only through a desk review. It does not provide a current district-wide needs assessment, a new community survey, robust participation trends, or an independent assessment of whether this particular designated site remains needed in 2026.

More fundamentally, the 2017 audit did not include golf courses, outdoor sports pitches or school playing fields in its quantified open-space baseline. It is circular to rely on a numerical surplus which did not count this golf course as proof that the golf course itself is surplus. The aggregate figure says nothing reliable about the need for this specific 16-hectare recreation site, its visual and landscape function, its potential future public use, or demand for outdoor sports land in Hythe.

The applicant's own figures show an active facility: 230 members and approximately 10,400 rounds in 2022. Elsewhere the same assessment says approximately 14,000 rounds in 2022. That unexplained difference is material because usage is central to the surplus test. It should be corrected and supported by source records, current membership and usage figures, waiting-list information, and direct consultation with users.

2.3 Nearby clubs are not proven to be an accessible substitute

The assessment treats clubs within a 30-minute off-peak drive as alternatives and infers spare capacity because they were accepting members. Accepting applications is not evidence of capacity to absorb the

displaced membership and visitor demand. No capacity figures, tee-time analysis, direct club confirmations, or assessment of the effect on existing members are provided.

The evidence also shows that Hythe Imperial is the least expensive 18-hole course in the catchment. A car-based test does not address residents who do not drive, the additional cost of travel and membership, or the accessibility needs of younger, older and disabled users. Policy HC7 of the National Planning Policy Framework (August 2026) specifically requires comparable or improved accessibility when replacement provision is relied upon. Those matters must be assessed, not assumed.

2.4 The replacement case is unquantified and insufficiently secured

The Open Space Assessment does not present a clear before-and-after schedule showing the hectares lost and the hectares, typologies, quality standards and access arrangements that would replace them. Its conclusion is expressly framed as better provision 'with regard to quality'; it does not demonstrate equivalent or better quantity and quality. The Planning Statement's broad assertion that approximately two-thirds of the site would remain green space is not a substitute for a policy-compliant comparison. Green infrastructure, drainage features, landscaping, roads crossing green areas, private or membership facilities, and land serving the needs of new residents cannot simply be treated as interchangeable.

Much of the residential element is in outline. The Green and Blue Infrastructure Parameter Plan shows only minimum or maximum extents, says roads may cross green infrastructure, and does not fix the detailed content, usability or quality of all replacement space. The Open Space Assessment itself refers to the development's 'potential' to provide benefits. The 9-hole academy course may be attractive to some users, but it is not an equivalent golfing experience to the existing 18-hole course and does not serve the same range of play.

The proposed pool and gym would be membership facilities rather than freely and generally accessible public open space. They should not therefore be treated as direct replacement for the designated open space being lost.

A separate requirement arises from the 291 new homes: Policy C3 (Provision of Open Space) of the Folkestone & Hythe Places and Policies Local Plan (2020) requires open-space provision to meet the needs of their future residents. The same provision should not be counted twice - first as the open space required for the new development and again as compensation for the loss of the existing designated site. Only provision demonstrably over and above the development's own requirement could contribute towards replacement provision. The applicant should provide a transparent, area-by-area calculation demonstrating whether any genuine additional surplus would be provided.

2.5 The ‘alternative recreation’ exception is not established

The applicant acknowledges that the proposal is not solely for alternative sport and recreation. A substantial part is an outline residential development of up to 291 dwellings, described as the funding mechanism for the wider scheme. The Council must assess the actual loss and the secured recreational benefits, rather than treating the mixed scheme as though it were simply a replacement recreation project. On the present evidence, the needs and benefits of the recreational elements have not been shown clearly to outweigh the permanent loss of the designated open space.

3. Flood risk — sequential test, exception test and lifetime safety

3.1 The site is mostly Flood Zone 3

The applicant’s Flood Risk Sequential Assessment and Planning Statement expressly confirm that most of the site lies in Flood Zone 3, with only small areas in Zones 1 and 2. The proposed dwellings are a more vulnerable use, so the sequential test, exception test and lifetime-safety requirements must be applied rigorously. The fact that the site benefits from existing defences does not remove the need to demonstrate that development is appropriately located, safe for its lifetime and will not increase flood risk elsewhere.

3.2 The scope of the sequential assessment may be unduly restrictive

The assessment treats the hotel, leisure, golf and housing elements as one indivisible scheme because housing is said to fund the wider masterplan. It then screens for alternatives able to accommodate at least 218 dwellings and at least 13 hectares—75 per cent of both the proposed housing and the entire application site. This approach risks building the applicant’s preferred business model into the test and excluding lower-risk options before they are properly assessed.

The hotel improvements are location-specific, but the outline housing is not operationally dependent on being in Flood Zone 3; it is the financing mechanism. The Council should require the applicant to test whether the more vulnerable residential component, or a materially reduced and differently configured scheme, could be located on lower-risk land. The assessment should explain why smaller sites, split provision or a reduced amount of housing are not appropriate alternatives under current national policy and guidance.

The evidence base is also questionable in date and completeness. The report relies on Strategic Housing Land Availability Assessment (SHLAA) material from 2015/16 to 2017/18, admits that actual market availability is unknown in several cases, and assumes permission would be granted in summer 2026 although the application was submitted in August 2026. The Council, as decision-maker, should verify

the current status and availability of lower-risk sites using up-to-date land-supply evidence and open-market information. An exception test cannot cure a failed sequential test.

3.3 Safe lifetime operation is not yet demonstrated

The scheme depends on substantial engineered mitigation: residential ground levels raised to 4.50 metres Above Ordnance Datum Newlyn (AODN), the national reference level used for heights; residential finished floors at 4.65 metres AODN; undercroft or ground-floor less-vulnerable uses; and a new tertiary defence along the southern boundary with a crest of 7.30 metres AODN. The Environmental Statement says the golf course and open areas may flood in the design event. National guidance treats avoidance as the most effective way to manage flood risk because defences, warnings and maintenance can fail or be exceeded over a development's lifetime.

The Planning Statement says a Flood Warning and Evacuation Plan ‘will be prepared’. That is not the same as demonstrating now that all occupants and visitors—including children, older people, disabled people and hotel guests unfamiliar with the area—will have safe access and escape during the relevant design events. Because the housing layout is in outline, the Council also needs firm evidence that the most vulnerable uses will be placed in the lowest-risk parts of the site and that safe routes will remain available under breach, overtopping, defence failure, surface-water and coincident-event scenarios.

Before determination, the Council should require a complete and agreed emergency plan, clear evacuation routes and destination, refuge strategy, warning and management responsibilities, and confirmation from emergency planning bodies. It should also require a legally enforceable, funded lifetime regime for ownership, inspection, repair and replacement of the new defence, existing boundary structures, pumping and drainage assets. The defence must be completed and independently certified before any vulnerable use is occupied, and the phasing must ensure the open-space and leisure benefits are delivered rather than left behind the housing.

4. Admitted harm to the Royal Military Canal Scheduled Monument

The applicant’s Non-Technical Summary identifies a Moderate Adverse (Significant) operational effect on the Twiss Road Bridge to Seabrook Lodge Bridge section of the Royal Military Canal Scheduled Monument. The detailed cultural-heritage chapter describes that significant effect from changes to setting as unavoidable, with a Moderate Adverse residual effect. This is a nationally important heritage asset immediately adjoining the site.

Substantial weight must be given to the conservation of the Scheduled Monument, and any harm to its significance is a matter of considerable importance and weight. A financial contribution or interpretation

measures do not erase harm to setting. If the open-space, flood-risk and recreational benefits are unproven, indicative or deferred, they cannot safely be relied upon to outweigh a permanent significant effect on the Scheduled Monument. The Council should obtain Historic England's formal view and explain transparently how the heritage balance has been undertaken.

5. Landscape, visual impact, scale and appearance

The existing golf course provides an extensive open break between the built-up area, Princes Parade and the Royal Military Canal. The applicant's own Non-Technical Summary identifies Major Adverse (Significant) operational visual effects for residents at the eastern edge of Imperial Green, reducing only to Major to Moderate Adverse (Significant) by year 15. It also identifies significant effects for residents at the western end of Cliff Road, residents at the southern end of Twiss Road and eastern end of South Road, and certain local people, interest groups and people engaged in active recreation.

These concerns do not depend on a private right to a view. The openness and landscape character of the site, views available from public routes and recreation areas, the townscape relationship between the coast and the canal, and the setting of the Scheduled Monument are material planning considerations. The applicant states that no additional mitigation or monitoring is proposed for the landscape and visual effects. Landscaping should not therefore be assumed to remove effects which the applicant itself says would remain significant after 15 years.

The residential part of the application is in outline, but the Council must assess the principle, maximum development parameters and design controls now. It should require a revised design and landscape response demonstrating how height, massing, density, building zones, lighting and vegetation would avoid or materially reduce the significant effects. If an acceptable scheme cannot be delivered within the maximum parameters, those parameters or the amount of development should be reduced before permission is considered, rather than leaving the fundamental harm to reserved matters.

6. Traffic, highway safety and healthcare capacity

6.1 Traffic and highway safety

The applicant predicts 1,547 additional two-way vehicle movements on Princes Parade on an average day - 774 arrivals and 773 departures - representing a 69 per cent increase in traffic. Its assessment records a lack of non-motorised crossing infrastructure, potentially high vehicle speeds on Princes Parade and parking on Twiss Road which can obscure sight lines. Before mitigation, it identifies

Moderate Adverse (Significant) effects on pedestrian delay and pedestrian amenity on Princes Parade, together with significant adverse effects relating to severance.

The applicant's conclusion that these effects can be addressed depends on a package of off-site walking and cycling improvements, crossings, traffic calming and highway works on Princes Parade and Twiss Road, changes at the A259 Seabrook Road/Twiss Road junction and restrictions on on-street parking. The Council should not assume that this package is deliverable merely because it is described in the Environmental Statement. Kent County Council as highway authority should verify the current and seasonal traffic baseline, trip distribution, junction capacity, pedestrian and cycle safety, construction traffic, cumulative effects and any displacement of parking. Every necessary off-site measure must be within the relevant parties' control, fully funded, legally secured and operational at the appropriate stage before occupation.

Policy TR6 (Assessing transport impacts) of the National Planning Policy Framework (August 2026) does not justify refusal simply because traffic would increase. The relevant questions are whether highway-safety effects would be unacceptable or whether the residual cumulative effects on the road network would be severe after reliable mitigation. Those conclusions require an up-to-date and independently checked evidence base.

6.2 Healthcare capacity

The applicant estimates that the development would accommodate 611 residents. Its assessment states that the two GP practices within 3 kilometres currently serve 17,536 patients with 5.9 full-time-equivalent GPs: approximately 2,974 patients per GP, compared with a national average of 1,690 and an Integrated Care Board average of 2,438. Under the applicant's worst-case scenario, the development would raise the local ratio to approximately 3,076 patients per GP.

The Environmental Statement assesses the resulting effect on healthcare provision as permanent, Moderate Adverse and Significant before mitigation. It relies on a contribution secured through a section 106 agreement (a legally binding planning obligation used to secure necessary mitigation, infrastructure and other commitments associated with a development) to reduce the claimed residual effect. A financial contribution will mitigate the harm only if it is based on current National Health Service (NHS) evidence and is tied to a deliverable capacity project at the time it is needed. Before determination, the Council should obtain a formal response from NHS Kent and Medway Integrated Care Board and identify the amount, recipient, purpose, delivery mechanism and payment and implementation triggers for any contribution.

7. Housing supply, planning balance and delivery of the claimed public benefits

7.1 Five-year housing land supply and current national policy

The Council's latest published Authority Monitoring Report records a 3.1-year housing land supply as at 1 April 2024, including the required 20 per cent buffer. The contribution of up to 291 dwellings, including any affordable housing which is properly secured, is therefore a material benefit. However, that published figure is now more than two years old. The Council should publish and apply its current housing-land-supply position at the date of its decision, with the calculation and assumptions made available for scrutiny.

The applicant's Planning Statement relies upon paragraph 11(d) and the 'tilted balance' in the previous National Planning Policy Framework. The National Planning Policy Framework published in August 2026 applies to decision-making from the day of publication. Because the applicant states that the site is within Hythe's settlement boundary, Policy S4 (Principle of development within settlements) of the August 2026 National Planning Policy Framework is the relevant national policy starting point.

The housing shortfall does not make permission automatic. Policy S4 of the National Planning Policy Framework (August 2026) requires the benefits to be assessed against the adverse effects. It expressly identifies substantial adverse impacts upon land safeguarded for particular uses in the development plan and the application of Policy HC7 to existing recreational land and facilities. Policies F5-F7 of the same Framework retain the sequential test, exception test and lifetime-safety requirements for flood risk. The applicant's own Flood Risk Sequential Assessment, paragraph 3.20, also acknowledges that the absence of a five-year housing land supply is not relevant to whether the sequential test is satisfied, although housing supply may carry weight in the overall planning balance.

7.2 Certainty and weight of the claimed public benefits

The proposal must be assessed through a fair planning balance, but the claimed benefits should not be assumed or given more weight than the submitted evidence supports. The applicant relies on up to 291 homes, including 25 per cent affordable housing, hotel and leisure investment, a 9-hole academy course, a swimming pool and gym, public-realm improvements, employment and local spending. The Environmental Statement nevertheless records that 291 homes represent approximately 2.2 per cent of the housing need identified in the Folkestone & Hythe Core Strategy Review (2022) and classifies the housing effect, operational employment and additional visitor expenditure as Negligible and Not Significant in Environmental Impact Assessment (EIA) terms. EIA significance is not the same as planning weight, but these findings do not support overstating the scale of the benefits.

Weight should be given only to benefits which are genuinely additional, sufficiently certain, accessible to the intended public and enforceable. Measures required to mitigate the development, open space needed for the 291 dwellings and other policy requirements should not be double counted as wider public benefits. Membership-based facilities should not be treated as freely accessible public provision without clear information about access, charges and long-term availability. The applicant's choice to use housing as a funding mechanism for its wider scheme is not, by itself, a public benefit.

Before relying on the benefits in the planning balance, the Council should require a delivery schedule identifying each benefit, its quantity and quality, who may use it and on what terms, when it will be completed, how long it will be maintained and the condition or legal obligation which will secure it. Phasing must prevent substantial occupation of the housing before the promised open-space, recreation, transport, flood-protection and healthcare measures are delivered. Indicative or deferred benefits should not outweigh permanent or significant harm.

7.3 Phasing and delivery of the leisure-led scheme

The applicant's Planning Statement, paragraph 6.4, states that the golf and leisure offerings will be delivered first, followed by the hotel extension, with the residential element forming the next phase. That proposed sequence is material to the applicant's claim that the scheme is leisure-led and that the housing facilitates the wider hotel, tourism and recreational benefits.

The sequence should not remain an unenforceable intention. Before determination, the applicant should submit a detailed phasing and delivery plan. If permission is granted, precise conditions and, where appropriate, a section 106 obligation should establish enforceable commencement and occupation triggers securing the timely completion and opening of the golf, leisure, hotel, public-realm and open-space components. Their long-term operation, management, affordability and public-access arrangements should also be secured. The Council should explain expressly how the applicant's proposed sequence will be enforced.

8. Decision requested

For the reasons above, I ask the Council to refuse application 26/1290/FH because the proposal has not demonstrated compliance with Policy C3 (Provision of Open Space) of the Folkestone & Hythe Places and Policies Local Plan (2020); Policies S4, HC7, F4-F7 and TR6 of the National Planning Policy Framework (August 2026); or the relevant heritage, design, landscape and transport policies in the adopted Folkestone & Hythe development plan. At minimum, the application should not be determined until the following have been supplied, independently checked and, where material, consulted upon:

1. A current, site-specific open-space and sports-needs assessment, including verified 2026 usage data and direct evidence of capacity, affordability and accessibility at any proposed alternatives.
2. A quantified open-space schedule separating: existing land lost; genuine replacement; provision required for the 291 dwellings; drainage or habitat land; and private or membership facilities.
3. Binding phasing, public-access, management and long-term funding arrangements for the replacement open space, golf, splash park and leisure facilities.
4. An enforceable phasing and delivery package securing the sequence described in paragraph 6.4 of the Planning Statement, with defined commencement and occupation triggers, long-term management arrangements and public-access requirements.
5. A revised flood sequential assessment under the August 2026 NPPF, using current land-availability evidence and testing the housing component, reduced scale and other appropriate configurations without assuming that the applicant's financing model defines the alternatives.
6. A completed exception-test and lifetime-safety case, including an agreed Flood Warning and Evacuation Plan, safe routes, residual-risk scenarios, and enforceable defence and drainage maintenance for the full lifetime of the development.
7. A revised design, landscape and visual-impact response which addresses the applicant's admitted significant effects and demonstrates that the maximum height, massing, density and development zones are acceptable.
8. An independently checked transport assessment and a complete, costed and deliverable highway-mitigation package, with the necessary land, funding, approvals, phasing and implementation triggers secured.
9. A current NHS assessment of primary-care capacity and a quantified section 106 healthcare contribution linked to an identified and deliverable capacity project.
10. A benefits and obligations schedule which distinguishes genuine public benefits from mitigation and policy requirements and secures public access, affordability, phasing, delivery and long-term management.
11. Up-to-date formal responses from the Environment Agency; Kent County Council as Lead Local Flood Authority and highway authority; emergency planning bodies; Sport England where applicable; Historic England; Affinity Water; NHS Kent and Medway Integrated Care Board; and the Council's appropriate ecological adviser.

The proposal may offer benefits, but those benefits do not remove the need to satisfy the safeguarding and flood-risk tests. On the present evidence, the necessary conclusions have not been demonstrated clearly enough to justify permission.

Evidence note

This note identifies the principal evidence supporting the model objection. Page references use the report page numbers printed within the application documents where available. Online policy links were checked on 23 August 2026.

Application documents

[A1] Application Form (revised), description of the hybrid proposal and site area.

[A2] Planning Statement (5 August 2026), para. 6.4 (proposed delivery sequence: golf and leisure first, followed by the hotel extension, with the residential element forming the next phase); paras. 8.28-8.33 (Flood Zone 3, mitigation, future evacuation plan and claimed indivisibility); paras. 8.81-8.83 and 11.6-11.7 (housing supply and reliance on the former paragraph 11(d) 'tilted balance'); paras. 8.105-8.115 (hybrid form, up to 291 dwellings and approximately two-thirds green space); schedule addressing Policy C3 of the Places and Policies Local Plan (2020) at pp. 83-84.

[A3] Open Space Assessment (5 August 2026), paras. 2.9–2.10 (230 members and 10,400 rounds); paras. 4.8–4.12 (2015/2017 evidence and desk update); paras. 4.34–4.44 (alternatives, affordability, 14,000-round figure and surplus conclusion); paras. 5.7–5.23 (golf courses excluded and quality-only replacement conclusion); paras. 6.2–6.14 and 7.9–7.14 (mixed scheme and claimed alternative recreation benefits).

[A4] Flood Risk Sequential Assessment (5 August 2026), para. 3.20 (five-year housing land supply and the sequential test); paras. 3.7-3.8 (site mostly Flood Zone 3); paras. 4.13-4.29 (218-dwelling/13-hectare thresholds, old SHLAA sources, market availability and summer 2026 assumption); site assessments and conclusions in sections 4-6.

[A5] Environmental Statement, Volume 1, Chapter D: Water Environment and Flood Risk, including the site levels, proposed 7.30m Above Ordnance Datum Newlyn (AODN) tertiary defence, Environment Agency advice, areas allowed to flood and construction phasing. See especially Chapter D pp. 9-18 and the mitigation schedule.

[A6] Environmental Statement, Volume 3, Non-Technical Summary, paras. 4.15-4.23 (Royal Military Canal Scheduled Monument and Moderate Adverse (Significant) effect), pp. 10-12; and paras. 4.30-4.36 (significant landscape and visual effects and no additional mitigation or monitoring), pp. 15-16.

[A7] Parameter Plans — Green and Blue Infrastructure Plan and Proposed Site Plan (approved/parameter drawings submitted with the application).

[A8] Environmental Statement, Volume 1, Chapters E-O, Chapter H: Traffic and Transport, paras. H5.36-H5.39 (additional movements, the 69 per cent increase on Princes Parade, pedestrian delay and amenity), H6.2-H6.5 and H8.2-H8.3 (the proposed off-site mitigation and residual conclusions).

[A9] Environmental Statement, Volume 1, Chapters E-O, Chapter M: Socio-Economics, paras. M5.42-M5.56 (housing contribution, local economic effects, education demand and GP capacity), M6.4 and M8.3 (the healthcare contribution and claimed residual effect).

Policy and guidance

[P1] Folkestone & Hythe Places and Policies Local Plan (2020), Policy C3 (Provision of Open Space). [Official link](#)

[P2] Folkestone & Hythe adopted development plan page: Core Strategy Review (2022) and Places and Policies Local Plan (2020). [Official link](#)

[P3] National Planning Policy Framework, published 17 August 2026: Policy S4 (Principle of development within settlements), Policy HC7 (Development affecting existing recreational land and facilities), Policies F4-F7 (flood risk), Policy TR6 (Assessing transport impacts), and Annex A (implementation). [Official link](#)

[P4] Planning Practice Guidance: Flood risk and coastal change, updated 17 September 2025. Relevant sections address the sequential test, reasonably available sites, the appropriate area of search, current availability and the exception test. [Official link](#)

[P5] Folkestone & Hythe District Council, Authority Monitoring Report 2024, paras. 3.25-3.29 and Table 5 (3.1-year housing land supply as at 1 April 2024). [Official link](#)