

1 INTRODUCTION

- 1.1 This statement amplifies the representations submitted on behalf of RAMAC Holdings Ltd on matters relating to the Core Strategy provisions for Sandwich, including:
- Nature of interest of RAMAC Holdings Ltd (Section 2);
 - Strategic context for Sandwich (RSS, Kent and Medway Structure Plan) (Section 3);
 - Summary of key principles for Sandwich set out in the Core Strategy (Section 4);
 - Summary of development opportunities of land in the ownership of RAMAC Holdings Ltd (Section 5);
 - Critique of analysis of constraints, and strategic proposals for Sandwich contained within the Core Strategy Submission Document (Section 6);
 - Consequent amendments sought by RAMAC Holdings Ltd to the Core Strategy Submission Document (Section 7);
 - Conclusions (Section 8).

2 NATURE OF INTEREST OF RAMAC HOLDINGS LTD

- 2.1 RAMAC Holdings Ltd are the owners of land at the Sandwich Industrial Estate, on the north side of the River Stour, at Sandwich (plan at Appendix 1); the plan denotes the general area of the Sandwich Industrial Estate, and immediately adjoining land, to which the amended Core Strategy proposals which are sought by these representations would be applicable.
- 2.2 In addition to the land at the Sandwich Industrial Estate, RAMAC Holdings Ltd are the owners of land to the north of the pharmaceutical complex, and east of the A256, running up to the boundary of the district with the Thanet District Council administrative area.
- 2.3 The Sandwich Industrial Estate is currently the subject of Policy AS15 (saved policy, Adopted Dover District Local Plan 2002); a copy of the policy text, and relevant extract from the Proposals Map are attached at Appendix 2.
- 2.4 In summary, the provisions of Policy AS15 allow for a mixed use development of land at the Sandwich Industrial Estate, for up to 300 dwellings, together with employment, and provision of a hotel.
- 2.5 Planning permission was granted in 2003 for residential development of part of the Sandwich Industrial Estate for 303 dwellings; within a flood protection bund, designed to give protection to potential risk of flooding from the sea. A further planning permission provides for development of vacant land within the AS15 area, in the ownership of RAMAC Holdings Ltd, to provide business/industrial floor space totalling 5,832m² (62,775 sq. ft.). A renewal of a planning permission

for this development was granted in 2008.

- 2.6 A further planning application proposing to increase the number of dwellings from 303 to 404 is currently pending determination, while additional information is provided in support of the application.
- 2.7 There remain areas of land to the north of the existing residential development which have potential for a mixed use redevelopment, comprising residential and business and tourism uses, as further set out in Section 5 of this statement. This land contains several buildings in active commercial vehicle use, but also underused or unused land, previously used for employment and open storage purposes, with scope for significant enhancement.
- 2.8 The land in the ownership of RAMAC Holdings Ltd to the north of the pharmaceutical complex presently in use in part for a major car repair and refinishing business; other areas of land are presently vacant, including an area previously used for open storage.

3 STRATEGIC CONTEXT

- 3.1 The Kent and Medway Structure Plan 2006 remains the strategic planning document for the Dover District Council area, until replaced during 2009 by the South East Plan. Strategic Policy DO1 notes that development in Dover should strengthen and diversify its economy and promote environmental enhancement, including support for pharmaceuticals research and development in the Sandwich corridor at Richborough. The economic prosperity of Sandwich will continue to be supported, as will its role as a service centre.
- 3.2 Policy HP1, setting out housing provision for Dover District, includes a minimum of 300 dwellings for the post 2006 period to be accommodated at a location, or locations, that can support, and offer good accessibility to, business growth to the north of Sandwich.
- 3.3 Policy HP2, Housing Provision – Phasing, Assessment and Sequential Approach to Location gives priority to the reuse of previously developed land and buildings, firstly within major/principal urban areas, followed by rural service centres, inter alia. A guideline of 70% of housing on previously developed land is set for the Dover District area, as an indicative guideline, for the period 2001 to 2016. Policy HP4 states that residential development should secure the efficient use of land, typically realising densities of between 30 and 50 dwellings per hectare.
- 3.4 The emerging South East Plan, in its originally published form, proposed housing provision of 6,100 dwellings for the Dover District Council area, over the period to 2006 to 2026; the report of the panel following the examination of the South East Plan in 2007 proposed that this should be increased to 8,100 dwellings for this period. The latest proposed modifications published by the Secretary of State propose a further increase, to 10,100 dwellings. The response of the Secretary of State to

consultation on the proposed modifications is expected in Spring 2009.

- 3.5 The proposed modifications to Policy EKA4 note (subsection iv) that further growth will be encouraged and supported at the large scale pharmaceutical manufacturing and research plant at Sandwich. The proposed modifications to Policy EKA6 give broader support to high quality proposals for intensifying or expanding the technology, knowledge and science sectors, at locations including the pharmaceuticals base at Sandwich and nearby Richborough.
- 3.6 The Core Strategy submission document reflects the provisions of the RSS; with regard to housing provision, a larger allocation (14,000 dwellings) is made, with a strategic objective of obtaining a minimum of 10,100 dwellings (in accordance with the Secretary of State's proposed modification) by 2026.

4 CORE STRATEGY SUBMISISON DOCUMENT – PRINCIPLES RELATING TO SANDWICH

- 4.1 The Core Strategy Submission Document (CSSD) draws out a number of key principles with regard to Sandwich, with particular regard to:
- RSS (South East Plan) provisions for employment at Sandwich/pharmaceutical industries
 - Nationally important medieval historic town centre
 - International and national significance of golf (3 golf courses in the vicinity of Sandwich)
 - Significance of Sandwich as a local service centre.
- 4.2 Other factors are denoted in the Core Strategy Submission Document, but are not highlighted to the same degree; the following factors are considered to be significant, with regard to the overall strategy to be adopted for Sandwich:
- High level of inward commuting, over the northern district boundary, with Thanet District Council administrative area (1,400 out, 4,200 in) (source: paragraph 2.2, CSSD)
 - Sandwich is identified as a distinct housing market area in the Strategic Housing Market Analysis (document in draft form at this point, referred to at 2.36, CSSD)
 - Sandwich is an area of high demand for housing (2.63, CSSD)
 - Sandwich has the highest level of unmet need for affordable housing (as yet untested conclusion of emerging SHMA, see 2.37, CSSD)
- 4.3 In its analysis of the constraints at Sandwich, the Core Strategy gives prominence to the issue of flood risk (see paragraph 3.22, CSSD; and paragraph 2.63); infrastructure proposals at Table 3.2, CSSD, indicate proposals for enhancement of flood defences between Sandwich and Pegwell Bay, for the period 2011 to 2016.
- 4.4 The profile of Sandwich also refers to the capability of the road network to accommodate additional

development (noting that the road network is not capable of accommodating a great deal of additional development); reference is also made to the predominantly flat landscape within which Sandwich is set, the CSSD stating that new development can easily have a harmful impact (paragraph 2.63, CSSD).

4.5 We comment on these assertions in Section 6 of this statement below.

5 OPPORTUNITY FOR MIXED USE REDEVELOPMENT, LAND NORTH OF RIVER STOUR, SANDWICH

5.1 The Core Strategy Submission Document is not the LDF stage at which detailed site considerations will be relevant; however, to support the proposed changes to the CSSD put forward in Section 7 below, it is necessary to briefly outline the scope for mixed re-use redevelopment of land to the north of the River Stour.

5.2 Land to the north of the River Stour is already subject to planning permission for 303 dwellings; this planning permission has been commenced, and 55 dwellings are currently complete, with a further 45 commenced to ground floor slab level.

5.3 This residential development is protected by an existing flood protection bund, built under the provisions of the planning permission granted in 2003; a current planning application seeks to increase the number of dwellings to 404, as noted in Section 2 above. There is a further opportunity to extend the flood protection bund to include additional land north of the present residential development, but south of the industrial estate access road, with an approximate area of 2.2 hectares (potential capacity: 110 dwellings).

5.4 To the north of the industrial estate access road lies an area including existing offices; a café; a vacant fire damaged (formerly listed) building known as Stonar House, which has in the past previously had planning permission for conversion and extension to provide offices; and areas of underused or vacant land and buildings, forming part of the original Sandwich Industrial Estate. This area extends to the southern perimeter of Stonar Lake, to the north.

5.5 The parts of Sandwich Industrial Estate outside the residential development area are in poor condition and detract both from the visual amenity of the area, and represent an underused opportunity for employment growth, in accordance with the current provisions of the Kent and Medway Structure Plan 2006, and the emerging provisions of the RSS, and CSSD. Regeneration comprising a mixed use development of area outside the current residential development area would contribute to the housing requirement for Sandwich; enhance the environment of the area north of the River Stour; and increase the provision of employment floor space in accordance with the strategic objectives for employment outlined above.

6 CRITIQUE OF ANALYSIS OF CSSD ANALYSIS OF CONSTRAINTS, AND RESULTING PROPOSALS FOR SANDWICH

- 6.1 It is considered that the Core Strategy proposals, in their current form, fail the relevant tests of soundness, our detailed commentary on the tests of soundness, with regard to specific sections of the CSSD is set out in Section 7 below.
- 6.2 The first general area to address is the analysis of constraints on brownfield development at the urban area of Sandwich. It is correct that the major part of the existing urban area of Sandwich lies within an area shown as Flood Risk 3a, an area at high risk of tidal flooding. However, the area of the Sandwich Industrial Estate to the north, subject to the existing residential planning permission, which has been commenced, provides appropriate protection against flood risk; there is scope for the existing flood defences to be extended, to include additional land to the north of the existing residential development, but south of the industrial estate access road.
- 6.3 There may be other areas, within the urban area of Sandwich, which are also capable of being defended against flood risk in an acceptable manner. It is noted that the Strategic Housing Land Availability Assessment (SHLAA) does not exclude land in Flood Risk Zone 3a from further consideration; and that land at risk of flooding, within this zone, is specifically allocated for development within the urban area of Dover.
- 6.4 This approach is considered to be consistent with the guidance in Annex D to PPS25, Development and Flood Risk; paragraph 14 noting the guidance in PPS3 Housing setting out the Government's objectives for a flexible, responsive supply of land for housing which gives priority to the use of previously developed land for development. The guidance further notes:
"However, flood risk should be taken into account in determining the suitability of the land for development."
- 6.5 The suitability of land for development at the Sandwich Industrial Estate has been already demonstrated, by virtue of the earlier planning permission, with appropriate levels of flood protection.
- 6.6 It is also noted that the wider provisions of the Core Strategy (section on infrastructure – table following 3.87) indicate that additional flood protection is to be provided for the area between Sandwich and Pegwell Bay (to the north), between 2011 and 2016.
- 6.7 It is of course agreed that the detail of proposals for protection against potential flood risk, and their acceptability, is a matter for detailed consideration, through the Site Allocations DPD, and the submission of detailed application proposals. However, at this stage, it is considered that there is sufficient evidence that the location of land at the urban area of Sandwich within Zone 3a for flood

risk, does not, in itself, constitute an overriding constraint, that should prevent such land being given consideration for further development, within the context of the guidance in PPS3 and PPS25.

- 6.8 The second constraint noted (paragraph 2.63, CSSD) is the assertion that the road network is not capable of accommodating a great deal of additional development. While it is correct that the historic core of Sandwich has a network of relatively narrow roads, unsuitable for significant increases in traffic, the area on the north side of the River Stour can be differentiated from the adjoining town centre, in terms of ease of vehicular access.
- 6.9 The construction in recent years of the new road link from Ramsgate Road, adjoining the northern part of the Sandwich Industrial Estate, to the A256, via the pharmaceutical complex, provides a high standard of vehicular access to the principal road network, and towns to the north, south and west.
- 6.10 The Sandwich Industrial Estate itself is within short walking or cycling distance of the town centre facilities of Sandwich, and employment opportunities at the pharmaceutical complex, and other employment uses to the north and east, together with those in the town centre of Sandwich, and at other local employers, including both primary and secondary schools.
- 6.11 Accordingly, it is not appropriate to refer in broad terms to the road network not being capable of accommodating a great deal of additional development; rather, for each development opportunity considered, it is important that its transport impact should be considered, looking beyond the question of vehicular traffic alone.
- 6.12 The third constraint concerns the predominantly flat landscape referred to at paragraph 2.63. It is agreed that, in some locations, either extensive views, or sensitive views, could be affected by new development. However, the significance of impact on the landscape will depend on whether proposals are for redevelopment of brownfield sites, with existing buildings, or development on Greenfield sites; and the site specific considerations applicable in each individual instance. Accordingly, a more appropriate response to this issue is to refer to the issue of landscape impact in general terms, with the significance of this issue to be assessed in individual instances.
- 6.13 It should be noted that this approach is consistent with that set out in PPS7, which favours criteria based policies in Local Development Documents, utilising tools such as landscape character assessment (paragraphs 24 and 25, PPS7). It is acknowledged that these paragraphs refer principally to the wider concept of the undesirability of local landscape designations, but it is considered that there is a parallel in this instance, with a broad sweeping statement seeking to impose a constraint on development at Sandwich.

7 CONSEQUENT AMENDMENTS SOUGHT BY RAMAC HOLDINGS LTD TO THE CORE STRATEGY SUBMISSION DOCUMENT

7.1 This section sets out the detailed representations made on behalf of RAMAC Holdings Ltd, to the Core Strategy Submission Document, setting out the reasons why particular sections/references are considered to be unsound, and the consequent amendments sought.

(a) Vision for Sandwich

7.2 The vision for Sandwich set out in the section on aims and objectives fails to reflect the important role of the town as a strategic employment location; historic town of national significance; its international and national role as a centre for golf; and as a local service centre. All these factors are referred to elsewhere in the Core Strategy (see, inter alia, 2.76; 3.69; 2.62; 3.68 – 3.73 respectively).

7.3 The Core Strategy also refers elsewhere to opportunities for both development and redevelopment; the need to support and strengthen the service centre role; the opportunity to strengthen the significance of golf to the town; and strategic infrastructure proposals to improve flood protection (see 3.73, 3.70, 3.70 and Table 3.2 respectively). The strategic vision for Sandwich should more accurately reflect both the important role of the town, and opportunities at the town; the reference to “responding to local needs” (paragraph 4, under heading Commentary), and “address more localised needs for employment, housing and community facilities at Sandwich....” (District Objective 4) fail to reflect the important role of Sandwich, and the significant opportunities to be realised. The issue of flood risk affects the majority of the built area of Sandwich, including the historic core; this is of great significance as an issue for the town as a whole, not merely to be considered as a constraint on new development.

7.4 For this reason, this part of the DPD is considered to be unsound, as it is not justified by the evidence base on which the Core Strategy has been based.

7.5 The following wording is suggested to enable the Core Strategy to meet the test of being justified by the available evidence base:

Amend paragraph 4 under heading Commentary to read:

“At Sandwich the strategy will reflect its important role as a strategic employment location, historic town of national significance, international and national focus for golf, and important local service centre.”

(Other text concerning Deal and rural areas unaltered).

District Objective 4 should be amended to read:

“At Sandwich, secure strategic employment growth in accordance with RSS; encourage tourism and leisure associated with the national historic significance, and international and national golf facilities; meet localised needs for housing, utilising brownfield land in preference to Greenfield land; provide

protection against risk of flooding; and strengthen the role of the town as a local service centre.”

7.6 Our representations with regard to the analysis of Sandwich, at paragraphs 2.62 and 2.63, and at Sections 3.1 and 3.2, identify a lack of strategic vision for Sandwich. The text at paragraph 2.71 underplays both the significance of Sandwich to the district, and the issues to be considered in formulating the Core Strategy proposals for Sandwich.

7.7 With regard to paragraph 2.71, we would suggest the following wording would more appropriately reflect the role of Sandwich, and issues facing the town:

“Given the national significance of Sandwich as a historic town, and international and national significance of its golf courses, the strategy for Sandwich should seek to maintain and develop these roles. The district wide importance of the pharmaceutical industry area, and other areas of employment development, should be maintained and enhanced, and there is scope for regeneration opportunities on land to the north of the River Stour to contribute to the housing, employment and tourism needs of the town.”

(b) Scope for brownfield sites to contribute to housing provision at Sandwich

7.8 Paragraph 3.71 refers to the Strategic Housing Land Availability Assessment; it is noted firstly that this assessment is presently in draft form. This paragraph goes onto suggest that the potential for urban brownfield development in Sandwich is limited, and that the combination of constraining factors greatly restricts it further. We disagree with this assertion; a significant area of brownfield land, within the urban area boundary, is available for mixed use redevelopment. A significant area to the north of the River Stour already has planning permission for 303 dwellings, and is subject to a current proposal to increase capacity to 404 dwellings; further land to the north of the existing residential development area also has potential for residential development. It is acknowledged that this area is subject to flood risk; however, this constraint has been overcome with regard to the land with planning permission for residential development, and it is considered that further residential development in this location, as part of a mixed use regeneration of the area north of the River Stour, can contribute to meeting the housing needs of Sandwich.

7.9 The provision of new housing in this location would also contribute to reducing the significant in commuting movements from the adjoining Thanet District Council area, which are principally related to the substantial employment at the pharmaceutical complex to the north. New housing in this location would also strengthen support for local facilities, in accordance with the objectives of the CSSD.

7.10 Paragraph 3.71 refers to an opportunity for Greenfield urban expansion, to the south west of the town, noting that the strategy promotes this area in order to help provide sufficient housing to improve choice and meet local needs. We consider that the development of Greenfield land should

only take place if it has been demonstrated that no suitable brownfield land is available; and propose rewording of the text of paragraph 3.71 accordingly.

7.11 It is also considered that the overall delivery of housing for the district is heavily reliant on the Whitfield expansion area, and the Dover area in general; this is considered to be a high risk strategy. The CSSD seeks to deliver a substantial increase in housing provision for the district, compared to historic rates; in this situation, it is considered that there are significant benefits in providing new housing in a variety of locations within the district, providing both choice, and flexibility of delivery. Sandwich is considered to be a suitable location for new housing development, in the light of the high demand for housing; and the significance of the town as an employment location. The CSSD already makes provision for an increase in the number of dwellings over the notional allocation of 500.

7.12 The existing text of the CSSD is considered to be unsound, as it does not take account of evidence available (of the availability of brownfield land); we also consider that the current text does not provide sufficient flexibility, and would have an adverse effect on deliverability, for housing, therefore failing the soundness test of effectiveness. By failing to give priority to development on brownfield land over Greenfield land, the current wording also fails the test of consistency with national policy in PPS3 Housing.

7.13 Paragraph 3.71 should be reworded as follows:

“With regard to housing, brownfield land has been identified in the Strategic Housing Land Availability Assessment, which is subject to a flood risk constraint. This land adjoins land on the north side of the River Stour, with the benefit of planning permission for residential development, and for which an appropriate flood risk mitigation strategy has been approved. Subject to satisfactory resolution of the matter of flood risk, development of this brownfield area for housing would contribute to local housing needs, and the general housing requirements for the district. If this brownfield area cannot be brought forward for development, or if it is considered, in the context of the Site Allocations DPD, that a greater amount of land for new housing should be identified, then an area of land to the south west of the town represents a potential opportunity for urban expansion. The capacity of this land is, however, limited by a combination of access and landscape impact issues.”

7.14 It would also be appropriate, in the light of these representations, to amend the text of paragraph 3.73, which refers to the business area to the north of the town; the following wording is suggested:

“The business area to the north of the town has considerable potential for further jobs growth through a mixed use redevelopment of disused or underused sites, including residential development, provided flood risk and wildlife constraints can be managed.....”

7.15 The bar chart at Figure 3.2 appears to underestimate the availability of both brownfield and

Greenfield land at Sandwich, given the housing requirement of a minimum of 500 dwellings. With regard to brownfield land, land at the Sandwich Industrial Estate has planning permission for 303 dwellings, of which 55 have so far been completed; a current planning application proposes to increase the total number of dwellings at this site to 404. In addition, land to north of the existing residential development has potential to contribute to increased housing numbers; the figure should be revised to reflect this position. It appears that the Greenfield site allocation may also need to be amended.

- 7.16 Amend bar chart at Figure 3.2 to show the existing brownfield site availability for housing at Sandwich, together with potential for additional contribution as part of mixed use regeneration of land north of the River Stour.

(c) Recognition of potential for mixed use regeneration

- 7.17 Our representations with regard to Sections 3.1 and 3.2, and 3.71 and 3.73 of the CSSD seek recognition of the potential for mixed use regeneration (including residential, business and hotel uses) of land to the north of the existing residential redevelopment at the Sandwich Industrial Estate.

- 7.18 It is considered that this change is necessary, to meet the tests of the DPD being justified on the evidence available; effective in bringing forward development proposals to meet the overall housing growth strategy, and to achieve consistency with national policy guidance in PPS3, and PPS25.

- 7.19 To secure consistency with the proposal for a mixed use redevelopment of the Sandwich Industrial Estate, Figure 3.5 Sandwich Spatial Issues, should be amended as follows:

- Notation applicable to Sandwich Industrial Estate – amend to read:
“Industrial Estate – redevelopment to residential started; opportunity for further mixed use (residential/business/hotel regeneration).”
- Replace reference to *“broad location for urban extension”* with wording:
“Potential location for urban extension”
(Replace text for notation on plan, and key to plan)

- 7.20 To achieve consistency with the proposed mixed use regeneration proposals for the Sandwich Industrial Estate, the key diagram at Figure 3.6 should be amended as follows:

- Add new point 3 to Sandwich text as follows:
“3. Mixed use (residential/business/hotel) regeneration of Sandwich Industrial Estate.”
- Replace existing point 3 for Sandwich with following text:
“4. Potential new housing south-west of the town”
- Renumber point 4 to become point 5.

(d) Amendments to commentary on constraints to development at Sandwich

7.21 Paragraph 2.63 refers to constraints on development at Sandwich. We consider that this paragraph overstates the nature of the constraints, our detailed response on these is set out in Section 6 of the attached report, dealing with the wider representations with regard to the amendments necessary to the Core Strategy to provide a framework for consideration of the detail of the mixed use allocation proposals for land at the Sandwich Industrial Estate in the succeeding Site Allocations DPD.

7.22 We consider that the text at paragraph 2.63 fails the test of soundness, on the basis that it is not justified by the evidence base. By virtue of this failing, the text is not effective, in that it is not flexible, nor does it contribute to deliverability.

7.23 Amend sentences 2, 3 and 4 of paragraph 2.63 to read:

“The town is, however, subject to a number of constraints. The nature of the existing road network, with particular reference to the road network south of the River Stour, must be taken into account in determining the amount and location of new development which can be accommodated. It is set in a predominantly flat landscape, where careful account must be taken of the scale and location of new development, to avoid any harmful impact. Much of the town is at risk of flooding, especially from the sea, and account must be taken of this constraint in determining the location and amount of new development, including consideration of appropriate mitigation measures.”

7.24 In the light of our representations on paragraph 2.63, with regard to constraints to development at Sandwich, we consider that amendment is required to the district portrait at Figure 2.11.

7.25 Section 4, under the heading Sandwich, on Figure 2.11 District Portrait should be amended by the deletion of the word “major”, with the resulting text stating:

“4. Flood risk, wildlife habitat and access pose constraints upon the town.”

7.26 Please note also that paragraph 2.66 refers in error to Figure 2.12; this should read Figure 2.11

(e) Contribution of golf to the local economy

7.27 Paragraph 2.62 refers to an international golf course to the immediate east of the town, which it notes is an important contributor to the local economy and profile of the area; a further golf course lies to the north east of the town, and is directly related to the town of Sandwich, and makes a similar contribution. Reference is made elsewhere in the CSSD to three golf courses in the local area (Sandwich/Deal, the third golf course lying immediately to the north of Deal); we consider that the present text in paragraph 2.62 underplays the significance of golf to Sandwich, and to the local economy, and consider that the text should be amended, as shown at 7.19 below. For this reason, this text fails the soundness test of being justified.

7.28 Amend final sentence of paragraph 2.62 to read:
“An international golf course lies to the immediate east of the town, and a second golf course of national importance lies to the north east of the town, both of which are important contributors to the local economy and profile of the area.”
(Similar amendment required to paragraph 3.70).

(f) Tourism and hotel provision

7.29 Paragraph 3.21 refers to demand for a mid range hotel at Deal allied to the potential to develop the golfing offer of the three courses that lie between Deal and Sandwich.

7.30 The Adopted District Local Plan Policy AS15 includes an allocation for a proposed hotel at the Sandwich Industrial Estate; our wider representations seek changes to the Core Strategy to provide a framework for consideration of detailed proposals for a mixed use allocation of land at the Sandwich Industrial Estate, north of the River Stour, including provision of a hotel, in accordance with the provisions of the Adopted Local Plan.

7.31 We consider that the town of Sandwich retains potential for such development, both to serve the interests of the golfing sector, and in connection with the major employment area, including the pharmaceutical industry and other industries, to the north of Sandwich. Accordingly, amended wording is sought to paragraph 3.21 to reflect this. The current wording fails the test of soundness relating to proposals being justified.

7.32 Insert additional sentence after second sentence of paragraph 3.21, as follows:
“The urban area of Sandwich also offers potential for hotel development associated with the golfing offer, and the major employment area, including the pharmaceutical and other industries, to the north of the town.”

7.33 Paragraphs 3.22 and 3.23, and the box text below 3.23, discuss potential for tourism in the Dover District administrative area. We consider that the omission of reference to Sandwich in this section should be rectified. The significance of Sandwich, as an historic town, of national significance, and in relation to the golf offer (see our representations with regard to paragraph 2.62, concerning golf courses, and paragraph 3.21 concerning hotel provision), these both offer significant potential for enhancement of the role of tourism in the district as a whole, with consequent employment benefits. The present wording fails the test of soundness, on the basis that the omission of reference to Sandwich, in the context of the existing wording of the CSSD, would render the approach taken unjustified, in the light of the evidence available.

7.34 Add new paragraph after paragraph 3.23:

“The nationally important historic core of Sandwich, and its international and national golf offer, also offer scope for enhancement, to increase their economic contribution to the district.”

(g) Factual correction required concerning household

7.35 The first sentence of paragraph 3.39 refers to *“growth in couples with no children and single person households and a decline in couples with no children.”* It is assumed from the remaining text that the final part of this sentence should read *“a decline in couple with children.”*

7.36 Make appropriate factual correction to text in 3.39.

8 CONCLUSIONS

8.1 We conclude that the CSSD is unsound, as detailed in the earlier sections of this statement, and appropriate amendments are sought to the wording of both the policies, and their justification, as appropriate, to ensure that the Core Strategy Submission Document is sound, and in particular that it retains sufficient flexibility to respond to the detailed consideration of proposals at the succeeding Site Allocations DPD stage.