1. Introduction

1.1 On 10\textsuperscript{th} April 2013, the Secretaries Of State for Communities & Local Government and for Transport issued decisions concerning development at London Ashford Airport, Lydd. This results from a Public Inquiry held in 2011, after resolutions by Shepway District Council to support the planning applications (submitted 2006).

1.2 The Shepway Core Strategy Local Plan was submitted on 31\textsuperscript{st} January 2011 to allow examination of its soundness. The 2012 National Planning Policy Framework (NPPF) sets out the tests of soundness are that the plan is: positively prepared, justified, effective, and consistent with national policy.

1.3 Flowing from the Lydd Airport decisions in April 2013, the Core Strategy Inspector has set a deadline of 20\textsuperscript{th} May 2013 to receive any representations on the implications of the Lydd Airport decisions insofar as they are relevant to the Core Strategy Examination. This document is the representation of Shepway District Council officers.

1.4 The document is structured as follows. It firstly (part 2) reviews the Core Strategy’s approach to Lydd Airport, and then (part 3) outlines findings from the Public Inquiry considering the Airport proposals. Part 4 of this note then concludes in relation to the relevance of any implications of the Airport decisions on Core Strategy soundness.

2. The Core Strategy’s approach to Lydd Airport

2.1 The Core Strategy does not contain proposals or a policy in relation to Lydd Airport. As the strategic part of the development plan, it sets objectives, district wide policy and selected strategic allocations and broad locations.

2.2 Strategic needs for sustainable development are set out in Core Strategy section 2. These inform local plan aims, and incorporate:

“The challenge to improve employment, educational attainment and economic performance in Shepway: Strategic Need A. This includes tackling the limited range of jobs and skills, the suitability of the workforce to future business needs, resident wage and unemployment levels, and comparatively slow economic growth.”

The expansion of Lydd Airport is wholly consistent with this objective.
2.3 Overarching strategic policy for Shepway is included within Core Strategy Policy SS1: District Spatial Strategy. This is one of the two policies in the plan that apply ‘district character’ areas to articulate the local policy context; stating:

“The future spatial priority for new development in the Romney Marsh area is on accommodating new development at the towns of New Romney and Lydd, and at sustainable villages; improving communications....”

Many rural parts of Shepway, including the Romney Marsh area, are isolated in the context of South East England, and Lydd is the least well connected town in Shepway.

2.4 The Core Strategy’s approach to Lydd Airport and the section focusing on Romney Marsh is contained in Core Strategy section 5. Paragraphs 5.105- 5.118 form the description and cross referencing of the approach to the district character area, including key issues and the development situation with respect to Dungeness Nuclear Power stations, Lydd Airport and Lydd town. The following plan content on the Romney Marsh Area focuses on policy proposals (CSD8) for New Romney.

2.5 Paragraphs 5.115 – 5.116 form the plan’s content specifically regarding Lydd Airport. Paragraph 5.115 highlights that the Airport has been regarded by Shepway as an important development opportunity for Romney Marsh due to anticipated connectivity and economic improvements. It reports the 2010 council decision to support the planning applications in line with regulations and Shepway District Local Plan Review (2006) saved policy TR15. In paragraph 5.116, the Public Inquiry process is noted (including the need for consistency between its outcome and the Core Strategy) and it is considered that in any event the identified regeneration needs would remain relevant.

2.6 Appendix 5 (Paragraph 6.31) of the Core Strategy confirms that Shepway District Local Plan Review (2006) saved policy TR15 would remain on adoption of the Core Strategy. The main potential infrastructure implication associated with development at Lydd Airport is also recognised in the Core Strategy (Appendix 2, Table 6.2) namely the Hammonds Corner junction upgrade.

2.7 In summary, the Core Strategy did not focus on Lydd Airport and was written without pre-empting the findings of the Public Inquiry. This was possible as it considered plan needs and provisions would remain pertinent to Romney Marsh both with Lydd Airport in its current form, or with extended Airport operations (given that proposals form part of a comprehensive economic strategy for the area that also includes

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1 Proposed Modifications 2012.
development of employment land, broadband improvements, and support for ‘green’ tourism and start-up businesses).

3. Relevant findings in the Lydd Airport decisions

3.1 The final decisions on Lydd Airport reflect the Inspector’s Report and draws from full Public Inquiry consideration of planning policy and economic, environmental and social factors.

3.2 The ‘overall conclusions’ includes the following summary by the Government:
“The Secretaries of the State have found that there is development plan support for the proposals from LP policy TR15 and that, in an area where the prospects of significant regeneration remain precarious, the proposals would have a positive effect. In line with NPPF paragraph 19, they attach significant weight to the need to support economic growth through the planning system.” DCLG & DoT (2013) Paragraph 42.

3.3 The Inspector places the nature of economic benefits from Lydd Airport development in context (Paragraph 14.8.5 of his report):
“Although the proposals might not fundamentally alter the district's economic direction or generate significant demands for employment land, the Airport would change the perception of the area being 'out on a limb' and is supported by East Sussex County Council and Rother District for the benefits it would bring to their area.”

3.4 The findings suggest implications of development at Lydd Airport should be set against the scale of overall sustainable development needs in Shepway. Therefore, the decisions are not considered to result in a necessity for new or modified Core Strategy policy, either in respect of binding commitment to reviewing the plan or its policy content on adoption. Any altered content would only be non-material, an updated statement of fact.

3.5 The Inspector and the Government accepted saved policy TR15 and have essentially found the adopted development plan fit for purpose i.e. determination of proposals at Lydd Airport. The emerging Core Strategy was considered by the Inspector but was not seen to be of significant relevance or weight in this respect. No inconsistency of any kind has been identified.
4. Conclusions

4.1 The Core Strategy does not set out specific policy for Lydd Airport, but the decisions allowing expansion of the Airport are consistent with the plan and reflect its aims and overall spatial strategy.

4.2 The need for regeneration at Romney Marsh, as addressed in the Core Strategy and elsewhere, has been confirmed in the decisions and highlighted as appropriate in the context of national policy.

4.3 Implications in relation to the examination of the Core Strategy can be considered against the tests of soundness:
   - The Core Strategy is clearly positively prepared. The council’s strategic planning approach is positive and enshrined in the plan; moreover the development at Lydd Airport would meet additional development and infrastructure requirements.
   - The Core Strategy is further justified. Findings from the Public Inquiry in relation to the needs of Romney Marsh confirm the appropriateness of the council’s general strategy in the area.
   - The Core Strategy is effective and deliverable (now even more so). The achievement of objectives is enhanced through the Lydd Airport decisions.
   - The Core Strategy is consistent with national policy. Development at Lydd Airport has been confirmed as in line with national policy and it would be consistent with the Core Strategy.

4.4 There is no need for any main modification to be made to the Core Strategy in order to ensure soundness or legal compliance. This would entail extra delay in the plan-making process, which is regarded to be unwarranted and detrimental to the achievement of national sustainable development objectives throughout the district.

4.5 It is considered this evaluation has shown the implications of the Lydd Airport decisions insofar as they are relevant to the Core Strategy Examination to be very limited or negligible.