Email

To: The Programme Officer (alexandra.sansom@shepway.gov.uk)

From: Karen Banks (karen.banks@lee-evans.co.uk)

Date: 27th April 2012

Our Ref: P3205

Dear Ms Sansom

NPPF SUBMISSIONS – EXAMINATION IN PUBLIC – SHEPWAY’S CORE STRATEGY RESPONDENT 013, COMMENT ID’S 527, 531 AND 535

Further to the representations made on behalf of the Trustees of the Viscount Folkestone (1963) Settlement, the following comments are submitted in relation to matters arising as a result of the publication of the NPPF.

Comment ID 527
Policy CSD2

Paragraph 50 of the NPPF, (bullet point 1) is relevant to the submissions made under this comment ID:

“(Local Planning Authorities should)... plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community…”

In recognising that Policy CSD2 seeks to do this, it remains overly prescriptive for this strategic document and does not allow for flexibility later in the plan period which may be affected by demographic change and updates to the Strategic Market Housing Assessment. In this regard, paragraph 158 of the NPPF advises:

- “Each Local Planning Authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local Planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals.”
Comment ID 531  
Policy CSD6 (in part)

The Trustees support the proposed re-phrasing of the policy as suggested by the Council (Editing for Core Strategy Submission Document). In this regard, it is submitted that the policy meets the provisions of the NPPF’s Core Planning Policies concerned with the objective identification and positive response to wider opportunities for growth.

Comment ID 535  
Paragraph 5.91

In supporting the specific representation, it is submitted that the focus of development, as part of the Central Folkestone Strategy, is consistent with:

- NPPF, paragraph 17 (Core Planning Principles) bullet point 11:
  “[Planning should] … actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable…”

- NPPF, paragraph 23, bullet point 1:
  “[Local Planning Authorities should] … recognise town centres as the heart of their communities and pursue policies to support their viability and vitality.”

- NPPF, paragraph 23, bullet point 9:
  “[Local Planning Authorities should] … recognise that residential development can play an important role in ensuring the vitality of centres and set out policies to encourage residential development on appropriate sites.”

- NPPF, Section 4, and the relevant provisions encouraging sustainably located development sites which provide for the reduction in greenhouse gas emissions and reduce congestion, and support the use of sustainable modes of transport.

- NPPF, paragraph 70, bullet point 4:
  “[Policies should] … ensure an integrated approach to considering the location of housing, economic and community facilities and services.”

Lee Evans Planning, on behalf of the Trustees of Viscount Folkestone (1963) Settlement.