Statement in relation to the National Planning Policy Framework

THE TRUSTEES OF VISCOUNT FOLKESTONE (1963) SETTLEMENT
(Respondent 013)

CONSULTATION POINT: POLICY SS6; SPATIAL STRATEGY FOR FOLKESTONE SEAFRONT

Lee Evans Planning Ref: P3205
April 2012
Further Representation on behalf of
The Trustees of Viscount Folkestone (1963) Settlement

(Changes to)
The National Planning Policy Framework

CONSULTATION POINT: POLICY SS6; SPATIAL STRATEGY FOR
FOLKESTONE SEAFRONT

<table>
<thead>
<tr>
<th>Client</th>
<th>The Trustees of Viscount Folkestone (1963) Settlement</th>
</tr>
</thead>
<tbody>
<tr>
<td>Determining Authority</td>
<td>Shepway District Council</td>
</tr>
<tr>
<td>Prepared by</td>
<td>Lee Evans Planning</td>
</tr>
<tr>
<td>Author</td>
<td>Karen Banks</td>
</tr>
<tr>
<td>Date</td>
<td>April 2012</td>
</tr>
<tr>
<td>Status</td>
<td>Submission</td>
</tr>
</tbody>
</table>
1. Introduction

1.1 This additional representation is submitted to the Examination in Public addressing the relevant policy provisions of the National Planning Policy Framework (NPPF). The following statement relates to the submitted representation of November 2011 (Comment ID 613), on behalf of the Trustees of the Viscount Folkestone (1963) Settlement (hereinafter referred to as ‘The Trustees’) and as submitted by Savills.

1.2 For clarification, following the merger of The London Planning Practice with Savills (representing the Folkestone Harbour Company), Lee Evans Planning shall be representing The Trustees at the Examination.

2. Appropriate Policy Revisions to the Written Representation (30th September 2011)

2.1 Having regard to the principle of Policy SS6, and the Trustees’ recognition that the ability of the seafront development to successfully reconnect with the town centre is central to the success of the project, the original representation made reference to the Draft NPPF (Paragraph 116). In this regard, the draft policy wording remains consistent with the published version of the NPPF and advice provided at Paragraph 58.

3. Relevance of other relevant NPPF Policy Provisions

3.1 The Trustees continue to assert that Policy SS6 should be made more robust in securing the appropriate delivery of connectivity infrastructure between the site and the town centre. Relevant policies of the NPPF support this view:

"[Planning should] ... be genuinely plan-led, empowering local people to shape their surroundings with succinct local ... plans setting out a positive vision for the future of the area. Plans should be kept up-to-date, and be based on joint working and cooperation to address larger than local issues. They should provide a practical framework within which decisions on planning applications can be made with the high degree of predictability and efficiency."

(Paragraph 17, NPPF - our emphasis)

3.2 Core Planning Principle ‘No. 11’ further supports The Trustees’ assertion that connectivity between the site and town centre can be improved upon that which exists and that which is shown in the proposed indicative concept plan:
“[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 …”

(Paragraph 17, NPPF - our emphasis)

**Ensuring the Vitality of Town Centres**

3.3 In accordance with the submitted representation, The Trustees continue to support the planned regeneration of Folkestone Seafront which, if appropriately reconnected with the town centre, will meet the relevant provisions of the NPPF in seeking to retain and enhance the vitality and viability of town centres. In this regard, appropriate revisions to Policy SS6, in ensuring appropriate connectivity, will meet national planning advice provided at Paragraph 23:

“In drawing up Local Plans, Local Planning Authorities should … recognise town centres as the heart of their community and pursue policies to support their viability and vitality.”

3.4 With the proposed mixed use strategic allocation providing significant residential development, in addition to community, cultural, sporting and employment uses, the seafront site provides an excellent ‘edge-of-centre site’, meeting a number of key aims as provided by Paragraphs 23 and 24 of the NPPF. Significant emphasis is, however, placed (Paragraph 24) on the ability of sites/proposals to be “well connected to the town centre”.

**Promoting Sustainable Transport**

3.5 It is clear that the relevant provisions of the NPPF support The Trustees’ representation in seeking to ensure appropriate and improved links between the proposed strategic site and the town centre. In summary:

“In preparing Local Plans, Local Planning Authorities should … support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport.”

(Paragraph 30, NPPF)
“All developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment. Plans... should take account of whether:

- the opportunities for sustainable transport modes have been taken up, depending upon the nature and location of the site, to reduce the need for major transport infrastructure;

- safe and suitable access to the site can be achieved for all people.”

(Paragraph 32, NPPF)

“Plans ... should ensure developments that generate significant movements are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised.”

(Paragraph 34, NPPF)

“Plans should protect and exploit opportunities for the use of sustainable transport modes for movement of goods or people. Therefore, developments should be located and designed where practical to, inter alia:

- give priority to pedestrian and cycle movements and have access to high quality public transport facilities;

- create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians …;

- consider the needs of people with disabilities by all modes of transport.”

(Paragraph 35, NPPF)

3.6 Paragraph 41 of the NPPF is wholly relevant in supporting The Trustees views with regard to connectivity:

“Local Planning Authorities should identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice.”

(Paragraph 41, NPPF)
3.7 The Trustees’ assertions that there is need to ensure a more robust approach to connectivity (as part of the wording of Policy SS6) is supported by the NPPF in its policy provisions relating to the delivery of high quality homes. Paragraph 61, in recognising that visual appearance and design of buildings and spaces are important, emphasises that high quality and inclusive design ‘goes beyond aesthetic considerations’:

“Therefore, planning policies … should address the connections between people and places and the integration of new development into the natural, built and historic environment.”

Promoting Healthy Communities

3.8 The provision of appropriate pedestrian, cycle and disabled persons connections, between the proposed strategic site and the town centre, would meet a number of policy aims as provided by Section 8 of the NPPF, in seeking to facilitate social interaction and creating healthy, inclusive communities. A more robust policy wording would also meet these aims, potentially through the protection and enhancement of public accesses (Paragraph 75, NPPF).

3.9 In summary, the requested revisions to the wording of Policy SS6 will meet the plethora of national planning policy provisions, as identified, and certainly assist in achieving each of the economic, social and environmental dimensions of sustainable development. In recognising that the NPPF (Paragraph 157) requires Local Plans to indicate broad locations for strategic development on key diagrams, the Trustees believe that an appropriate addition/re-wording of the policy can ensure that appropriate connectivity not only complements this exciting, and unique, opportunity to regenerate Folkestone Seafront but meet a number of other strategic aims relating to the regeneration of Folkestone.