The National Planning Policy Framework (NPPF) was published after the submission of the Shepway Core Strategy for Examination, but prior to the commencement of Examination hearings. Accordingly, the Inspector has asked for comments and this is the response of Shepway District Council.

Executive Summary

The publication of the National Planning Policy Framework (NPPF) on 27th March 2012 introduced significant changes to the scope and nature of national planning policy and followed on from the draft NPPF that was published in July 2011.

The Council, throughout the process of developing the Shepway LDF Core Strategy, has been mindful of the importance of ensuring that the policies contained within the document are consistent with current national planning policy given that this represents one of the key tests of soundness.

This paper therefore demonstrates how the Council has progressed the development of the Core Strategy, against the backdrop of changing national planning policy; and it sets out, in terms of the Plan-making aspects of the NPPF and on a policy by policy basis, evidence to support the Council’s view that the Core Strategy is consistent with the adopted NPPF. This arguably applies both to its overall emphasis and individual national policies.

1. Introduction

1.1 This statement identifies the conformity that exists between the Shepway Core Strategy, which is under public examination, and the new national planning policy document. This alignment is not surprising for, as shown in section 2 below, plan finalisation has evolved in parallel with national policy, and the spirit and specific provisions of the NPPF have been paid close attention.
1.2 Section 3 of this statement focuses on the formative period in winter 2011/12 when the issue of producing a final NPPF and submission Shepway Core Strategy was under consideration.

1.3 This is followed by Section 4, which demonstrates the way in which the 2012 NPPF and Core Strategy mutually inter-relate. This is supported by a specific justification of individual policies provided as an Appendix.

2. Chronology of the Core Strategy and NPPF

2.1 The new government formed in May 2010 has been, from the outset, committed to major reform to the planning system. This intention was well publicised and the potential for national changes to policy was acknowledged within the Core Strategy report [document CR5] to Cabinet on 28 July 2010.

2.2. It became readily apparent that one preferred means by which the new government would slim down central policy was to form a unified national planning policy. In time, the probable overall disposition of its content became apparent, and the prospect emerged that a draft would be released in 2011.

2.3 Locally, the Shepway Proposed Submission Core Strategy document was reported [document CR2], considered by, and approved by, the council’s Cabinet on 13 July 2011. This allowed the publication Core Strategy to be subject to representations on its soundness between 29 July and 23 September 2011. The July 2011 Core Strategy included references to national policy then in existence i.e. PPGs and PPSs.

2.4 The Cabinet Report CR2 stated in paragraph 2.4:

As part of the preparation of the Proposed Submission Document a cross checking to ensure compliance with national policy, contained with a series of planning policy statements and planning policy guidance document, has been undertaken. (It is the intention of the coalition government to introduce a national planning framework, to replace current national guidance, at some point in the near future. It may be necessary, dependent upon whether any new national requirements are set out and also the timing, for the Council to consider the implications of this prior to the submission of the Core Strategy to the Planning Inspectorate).

2.5 The Draft NPPF was published 25 July 2011.

2.6 Representations on the publication Core Strategy, changes to the national planning system and next steps for the Core Strategy were reported to Shepway’s Cabinet on 21 December 2011 [document CR4]. Cabinet formally approved recommendations to:

“agree to the Shepway LDF Core Strategy plan and associated documents being submitted to the Secretary of State for Examination” [and] “note the process of assessment of compliance with draft National Planning Policy Framework and the revised test of soundness.”
2.7 These recommendations reflected analysis of direction national policy was moving in, and identification of areas of expected continuity.

2.8 In line with report CR4, the Core Strategy was submitted for Examination on 31 January 2012. Supporting documents included a soundness assessment [A110] and potential editing to the July 2011 Core Strategy [Change P1 and others in document A118] that addressed the changing national context.

2.9 In conclusion, it can be seen that close regard has been had to national policy throughout the process of preparing the submission Core Strategy, including ensuring that national modifications do not conflict with its policy provisions.

3. The publication Core Strategy and the draft NPPF

3.1 Although the draft NPPF was released prior to the commencement of representations on the Core Strategy, this was too late for it to be directly reflected in the document. The chronology means that representations were able to be made on Core Strategy using the draft NPPF, when there had been no opportunity to fully assess the proposed national changes against the Core Strategy.

3.2 Nevertheless, the thrust of draft NPPF had arguably been successfully addressed by and large in the Core Strategy’s own approach. The December 2011 Cabinet Report [CR4] states (paragraphs 4.4 and 4.5):

> Many aspects of it [draft NPPF] had been anticipated as the NPPF reflects a composite of pre-existing principles (applied and referenced throughout the Shepway Core Strategy) and refinements to streamline the system reflecting the well-publicised priorities of the coalition government.

> The government has indicated that some amendments to the draft NPPF will be considered in light of concerted concerns raised over the impact of parts of the proposals. It is expected that the proposed deadline for issuing the final NPPF (April 2011) will be later than the date for submitting the Shepway Core Strategy.

3.3 Draft NPPF emphasised the need for suitably up-to-date plans to be in place, and in the context of pressing local needs it was consequently considered inappropriate to postpone the Core Strategy on the basis of a proposed central government target for completing the NPPF. Instead more detailed analysis was completed, including with evaluation of public consultation responses on the draft NPPF, and also applying representations on the Core Strategy.

3.4 In late 2011, close consideration was given to assessing the compatibility of the draft NPPF against the publication Core Strategy. This was undertaken both by Shepway officers and through an independent review process.
3.5 An Appendix to report CR4 focused on the main policy changes introduced by the draft NPPF. This interim evaluation identified only a limited need for Core Strategy refinements.

3.6 As a result, the Cabinet report CR4 stated (paragraph 4.7):

*Consideration of emerging national policy, plus the nature of expected changes to the NPPF suggest a broad conformity between the Shepway Core Strategy and new national policy, and that no critical issues of soundness are raised.*

3.7 To ensure effective verification, officers suggested the Core Strategy be probed against draft NPPF by external experts appointed by the Planning Advisory Service. This report (which is available to the Inspector) and overall assessment as described here, led to the submission of the Core Strategy on 31 January 2012.

4.0 NPPF full assessment

4.1 The final NPPF was published on 27 March 2012.

4.2 On the key issue of the ‘presumption in favour of sustainable development’ it is currently being proposed nationally that plans which are at a highly advanced stages, such as the Shepway Core Strategy, may deal with this issue through a ‘model policy’ drawing on the NPPF.

4.3 The contents of this model policy may best accord with policy CSD10 on implementation, but the significance of this issue may warrant moving forward the revised implementation policy as well as expanding it in line with the model wording.

4.4 A national policy for Travellers sites was published 23 March 2012. Shepway District Council responded to this in a separate note [Z56] in April 2012.

4.5 For brevity and focus, this assessment reviews the Core Strategy against the section devoted in the NPPF to development plans, i.e. the “Local Plans” provisions.

4.6 Consideration of the Core Strategy is presented against a reference to NPPF paragraphs below (Table 1). On the important summary paragraph 157 (Crucially Local Plans should....) the full NPPF text and SDC comment is given point by point.

<table>
<thead>
<tr>
<th>NPPF para. on 'Local Plans'</th>
<th>SDC summary comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>150-153</td>
<td>The council’s consistent focus of strategic planning on finalising the Core Strategy</td>
</tr>
</tbody>
</table>
demonstrates the commitment to delivering plan-led sustainable development in line with national policy. The approach to producing development plans for Shepway minimises reliance on unnecessary plans or supplementary policy, whilst ensuring a strategic approach.

154 The Shepway Core Strategy takes a clearly spatial approach to considering economic, social and environmental implications on places and the sustainable development of the district as a whole. Positive opportunities for change are set out, and Core Strategy policies focus on the delivery of these opportunities and providing clear indications to decision makers.

155 As documented in supporting reports, meaningful local engagement has taken place to guide the plan’s direction; with several examples of in-depth community engagement. A wide degree of agreement is evident on the vision and strategic future set out; although there is sometimes less consensus on the means of delivery.

156 Priorities are clearly set out in the Core Strategy. The Strategic Needs are addressed through provisions, including (in terms of spatial strategy policies SS1-SS4):

- SS2, SS4 on homes and jobs (including retail/leisure/tourism)
- SS5 & associated Appendix 2 on infrastructure/delivery
- SS1, SS3 on climate change mitigation/adaptation and conservation and enhancement of environments

4.7 The essential elements of ‘local plans’ are covered in the Core Strategy, as shown below for NPPF paragraph 157:

- *plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework;*

  ➔ Positive planning for development has very much has been a key local priority from the outset. Core Strategy policies SS2 and SS5 in particular set out a positive approach to development and infrastructure.

- *be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date;*

  ➔ The Core Strategy is of a suitably long-term timescale for a strategic plan, with the maximum period extending to slightly over 15 years from anticipated adoption to maximise consistency. Section 5.3 sets out provisions for Implementation including annual review and periodic plan milestone details.

- *be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations;*

  ➔ The plan has been produced in an open spirit of co-operation with regular communication and examples of joint working, as documented in the Record of Co-operation [DOC].
• indicate broad locations for strategic development on a key diagram and land-use
designations on a proposals map;

→ The Core Strategy has identified two broad locations as the most feasible
means of delivering sustainable development in the localities in line with
national policy, and aimed to actively plan for their delivery.

• allocate sites to promote development and flexible use of land, bringing forward new
land where necessary, and provide detail on form, scale, access and quantum of
development where appropriate;

→ The Core Strategy has allocated three strategic sites to promote
development with appropriate detail on the quantum of development, its form
and strategic infrastructure.

• identify areas where it may be necessary to limit freedom to change the uses of
buildings, and support such restrictions with a clear explanation;

→ Areas - such as town centres - where it is critical to limit (changes of) use to
meet strategic objectives have been identified. This includes SS4 and a number
of Core Strategy Delivery policies.

• identify land where development would be inappropriate, for instance because of its
environmental or historic significance;

→ Land that is generally inappropriate for development has been set out; most
notably open countryside and coast through policies SS1, SS3 and CSD3-
CSD5.

• contain a clear strategy for enhancing the natural, built and historic environment, and
supporting Nature Improvement Areas where they have been identified.

→ A strategy for enhancement of the environment is set out for the district in
SS1, SS3 and Core Strategy Delivery policies (particularly with the positive
green infrastructure approach of CSD4).

4.7 The next NPPF sub-section focuses on Evidence, Planning strategically, and
Examining Local Plans / Neighbourhood Plans. This are included in Table 2.
### Table 2: NPPF paragraphs 158-185 assessment

<table>
<thead>
<tr>
<th>NPPF para. on 'Local Plans'</th>
<th>SDC summary comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Evidence</td>
<td></td>
</tr>
<tr>
<td>158-159 The Strategic Housing Market Assessment [A6] is produced on a joint cross-boundary basis, detailing the range of Shepway’s residential accommodation requirements. The Strategic Housing Land Availability Assessment [A1] examines the suitability and availability/achievability of housing sites; with further testing of viability provided in the Economic Viability Assessment [A5].</td>
<td></td>
</tr>
<tr>
<td>160-161 The Employment Land Review [A8] is produced in parallel with the Strategic Housing Land Availability Assessment and considers other studies of business needs in neighbouring authorities. It re-eppraised employment land allocations; and it also benefited from business community involvement. Together with the Retail Needs Assessment Update [A9] the market needs for town centre uses are evaluated.</td>
<td></td>
</tr>
<tr>
<td>162 The Core Strategy is based on information from working with other organisations about the range of infrastructure requirements. This the range of social, physical and communications infrastructure with detailed studies including the Shepway Transport Strategy [A11] and the Shepway Water Cycle report [A31].</td>
<td></td>
</tr>
<tr>
<td>163-177 The Core Strategy reflects close working with partners on issues such as defence, minerals, water quality, coastal management, the historic environment, health and safety. The overall economic context in producing the plan means that throughout these issues and others, viability and deliverability have been central considerations as to how objectives can be realised.</td>
<td></td>
</tr>
<tr>
<td>• Planning strategically across local boundaries</td>
<td></td>
</tr>
<tr>
<td>178-181 Shepway has worked closely with public agencies and other councils. As documented in the Record of Co-operation [G16] topics that feature national strategic priorities (NPPF paragraph 156) have been a focus of collective planning as shown in Table 1: Housing, Employment, Retail and Tourism, Table 2: Social and demographic issues, Table 3: Transport and minerals/waste, Table 4: Environment and Green Infrastructure and Table 5: Water/Coastal Environment. Core Strategy policies have been examined by other local councils and no soundness concerns are apply; this in part at least could reflect the shared evidence base on key topics.</td>
<td></td>
</tr>
<tr>
<td>• Examining Local Plans / Neighbourhood Plans</td>
<td></td>
</tr>
<tr>
<td>182-185 The Core Strategy is ideally placed to foster the production of Neighbourhood Plans in Shepway. It sets a suitable local framework, and as a strategic plan there is scope for local communities to explore the best means for their own neighbourhood to meet objectives. Villages in the district have expressed an interest in bringing forward neighbourhood plans, and the district council has benefited in experiencing the formulation of locally-led proposals through the Sellindge Future rural masterplan process [A84].</td>
<td></td>
</tr>
</tbody>
</table>

Neighbourhood plans offer significant opportunities to shape places in Shepway in accordance with the Core Strategy’s approach and aims.

4.8 The soundness of plans remains a critical issue, as documented in NPPF paragraph 182.

4.9 It is evident from NPPF paragraph 182 that the Shepway Core Strategy accords with these tests, and the introduction of an emphasis on positive production is closely aligned with the Shepway Core Strategy’s overall approach. This is shown in the following

4.10 NPPF 2012 tests of soundness:
• **Positively prepared** – *the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;*

  ➔ The Core Strategy is clearly positive in seeking to maximise opportunities to meet the objectively assessed development requirements, in accordance with the sustainable development of Shepway and neighbouring areas.

• **Justified** – *the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;*

  ➔ The Core Strategy is the most appropriate strategy given evidence and reasonable alternatives.

• **Effective** – *the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and*

  ➔ The Core Strategy is deliverable over its plan period and effective in addressing priorities and strategic issues for Shepway and the wider area.

• **Consistent with national policy**

  ➔ As set out here.

4.11 The Core Strategy is sound against the NPPF, and moreover there is extensive support in the NPPF for all its individual policies, as documented in the following appendix.
APPENDIX:

Individual Core Strategy policy vs. National Planning Policy Framework paragraphs

- All Core Strategy policies are listed below in association with relevant parts of the NPPF.

SS1: District Spatial Strategy

Para 17 “take account of the different roles and character of different areas” [5th bullet]

“contribute to conserving and enhancing the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in this Framework” [7th bullet]

“encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value” [8th bullet]

“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” [11th bullet]

Para 110 “… Plans should allocate land with the least environmental or amenity value, where consistent with other policies in this Framework”

Para 111 “Planning policies and decisions should encourage effective use of land by re-using land that has been previously developed”

SS2: Housing and the Economy Growth Strategy

Para 14 “…local planning authorities should positively seek opportunities to meet the development needs of their area”

Para 17 “…proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs” [3rd bullet]

Para 47 “To boost significantly the supply of housing”

Para 47 ”use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area”. [1st bullet]

Para 154 “Local Plans should be aspirational but realistic”

Para 159 “Local planning authorities should have a clear understanding of housing needs in their area. They should:

- prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries. The Strategic Housing Market Assessment should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which:

  o meets household and population projections, taking account of migration and demographic change;

  o addresses the need for all types of housing, including affordable housing and the needs of different groups in the community (such as, but not limited to,
families with children, older people, people with disabilities, service families and people wishing to build their own homes); and
  o caters for housing demand and the scale of housing supply necessary to meet this demand;

- prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period.”

Para 161…“the needs for land or floorspace for economic development, including both the quantitative and qualitative needs for all foreseeable types of economic activity over the plan period, including for retail and leisure development;” [1st bullet]

Para 161… “the existing and future supply of land available for economic development and its sufficiency and suitability to meet the identified needs. Reviews of land available for economic development should be undertaken at the same time as, or combined with, Strategic Housing Land Availability Assessments and should include a reappraisal of the suitability of previously allocated land;” [2nd bullet]

**SS3: Place Shaping and Sustainable Settlements Strategy**

Para 9 “replacing poor design with better design” [3rd bullet]

Para 17 “always seek to ensure high quality design” [4th bullet]

Para 35 “Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods and people

Para 94 “Local planning authorities should adopt proactive strategies to mitigate and adapt to climate change, taking full account of flood risk”

Para 100 “Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere”

Para 58 “Local and neighbourhood plans should develop robust and comprehensive policies that set out the quality of development that will be expected for the area. Such policies should be based on stated objectives for the future of the area and an understanding and evaluation of its defining characteristics. Planning policies and decisions should aim to ensure that developments:

- will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;

- establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;

- optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses (including incorporation of green and other public space as part of developments) and support local facilities and transport networks;

- respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation;

- create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and

- are visually attractive as a result of good architecture and appropriate landscaping.”
Para 101 “The aim of the Sequential Test is to steer new development to areas with the lowest probability of flooding. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding. The Strategic Flood Risk Assessment will provide the basis for applying this test. A sequential approach should be used in areas known to be at risk from any form of flooding.”

Para 102 “If, following application of the Sequential Test, it is not possible, consistent with wider sustainability objectives, for the development to be located in zones with a lower probability of flooding, the Exception Test can be applied if appropriate. For the Exception Test to be passed:

- it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, informed by a Strategic Flood Risk Assessment where one has been prepared; and
- a site-specific flood risk assessment must demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

Both elements of the test will have to be passed for development to be allocated or permitted.”

SS4: Priority Centres of Activity

Para 23 “recognise town centres as the heart of their communities and pursue policies to support their viability and vitality” [1st bullet]
“define a network and hierarchy of centres that is resilient to anticipated future economic changes” [2nd bullet]

Para 69 “opportunities for meetings between members of the community who might not otherwise come into contact with each other, including through mixed-use development, strong neighbourhood centres and active street frontages which bring together those who work, live and play in the vicinity” [1st bullet]

Para 161 “the existing and future supply of land available for economic development and its sufficiency and suitability to meet the identified needs. Reviews of land available for economic development should be undertaken at the same time as, or combined with, Strategic Housing Land Availability Assessments and should include a reappraisal of the suitability of previously allocated land” [2nd bullet]

“the role and function of town centres and the relationship between them, including any trends in the performance of centres” [3rd bullet]

SS5: District Infrastructure Planning

Para 7 “…and by identifying and coordinating development requirements, including the provision of infrastructure” [1st bullet]

Para 17 “proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure” [3rd bullet]

Para 21 “identify priority areas for economic regeneration, infrastructure provision” [5th bullet]

Para 162 “Local planning authorities should work with other authorities and providers to:

- assess the quality and capacity of infrastructure for transport, water supply, wastewater and its treatment, energy (including heat), telecommunications, utilities, waste, health, social care, education, flood risk and coastal change management, and its ability to meet forecast demands; and
- take account of the need for strategic infrastructure including nationally significant infrastructure within their areas.”
SS6 (Folkestone Seafront), SS7 (Shornecliffe Garrison), SS8 (Folkestone Racecourse)

Para 7 “…ensuring that sufficient land of the right type is available in the right places and at the right time”

Para 14 “…Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change” [1st bullet]

Para 47 “…identifying key sites which are critical to the delivery of the housing strategy over the plan period” [1st bullet, also see comment under SS2 relating to para. 47]

Para 28 “support sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors…” [3rd bullet, Racecourse Specific]

Para 38 “Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties.”

Para 110 “…Plans should allocate land with the least environmental or amenity value, where consistent with other policies in this Framework”

CSD1: Balanced neighbourhoods for Shepway, CSD2: District Residential Needs

Para 173 “…the costs of any requirement likely to be applied to development… should, when taking into account of the normal cost of development and mitigation, provide competitive returns to a willing land owner”

Para 174 “Local planning authorities set out their policy on local standards in the Local Plan, including requirements for affordable housing”

Para 50 “To deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, 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 (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes);

• identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand; and

• where they have identified that affordable housing is needed, set policies for meeting this need on site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified (for example to improve or make more effective use of the existing housing stock) and the agreed approach contributes to the objective of creating mixed and balanced communities. Such policies should be sufficiently flexible to take account of changing market conditions over time.”

CSD3: Rural and tourism development of Shepway

Para 28 “Planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development” “…support sustainable rural tourism and leisure developments that benefit businesses in rural areas…” [3rd bullet]
CSD4: Green infrastructure of natural networks, open spaces and recreation

Para 114 “Local planning authorities should: set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure;” [1st bullet]

Para 115 “Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty”

Para 117 “To minimise impacts on biodiversity and geodiversity, planning policies should:

- plan for biodiversity at a landscape-scale across local authority boundaries;
- identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation;
- promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan;
- aim to prevent harm to geological conservation interests; and where Nature Improvement Areas are identified in Local Plans, consider specifying the types of development that may be appropriate in these Areas.

Para 74 “Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements;
- or the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.”

Para 109 “The planning system should contribute to and enhance the natural and local environment by:

- protecting and enhancing valued landscapes, geological conservation interests and soils;
- recognising the wider benefits of ecosystem services;
- minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government’s commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
- preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability; and
• remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate."

Para 113 “Local planning authorities should set criteria based policies against which proposals for any development on or affecting protected wildlife or geodiversity sites or landscape areas will be judged. Distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks.”

CSD5: Water and coastal environmental management in Shepway

Para 94 “Local planning authorities should adopt proactive strategies to mitigate and adapt to climate change, taking full account of flood risk, coastal change and water supply and demand considerations”

Para 99 “Local Plans should take account of climate change over the longer term, including factors such as… water supply’

Para 156 “the provision of infrastructure for... water supply, waste water” [3rd bullet]

CSD6: Central Folkestone Strategy and CSD7: Hythe Strategy

Para 21 “identify priority areas for economic regeneration, infrastructure provision and environmental enhancement” [5th bullet]

Para 69 “The planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Local planning authorities should create a shared vision with communities of the residential environment and facilities they wish to see. To support this, local planning authorities should aim to involve all sections of the community in the development of Local Plans and in planning decisions, and should facilitate neighbourhood planning. Planning policies and decisions, in turn, should aim to achieve places which promote:

• opportunities for meetings between members of the community who might not otherwise come into contact with each other, including through mixed-use developments, strong neighbourhood centres and active street frontages which bring together those who work, live and play in the vicinity;

• safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and

• safe and accessible developments, containing clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas.”

CSD8: New Romney Strategy and CSD9: Sellindge Strategy

Para 17 “be genuinely plan-led, empowering local people to shape their surroundings [1st bullet]

Para 150 “Local Plans are key to delivering sustainable development that reflects the vision and aspirations of local communities”

Para 154 “... Local Plans should set out the opportunities for development and clear policies on what will or will not be permitted and where”

Para 155 “... A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities”
Para 157 “… Local Plans should: indicate broad locations for strategic development on a key diagram and land-use designations on a proposals map” [4th bullet]

Para 70 “To deliver the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:

- plan positively for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;

- guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community’s ability to meet its day-to-day needs;

- ensure that established shops, facilities and services are able to develop and modernise in a way that is sustainable, and retained for the benefit of the community; and

- ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.

CSD10: Implementation Strategy

Para 181 Duty to Cooperate and “Cooperation should be a continuous process of engagement from initial thinking through to implementation, resulting in a final position where plans are in place to provide the land and infrastructure necessary to support current and projected levels of development”