Opening Statement – Core Strategy EIP Session 1

The Process of Preparing the Core Strategy.

The Core Strategy, as submitted, is a culmination of several years work dating back to 2007.

The Core Strategy reflects consideration of the diversity of Shepway – the wide range of places and sustainable development needs found within this large district.

The spatial strategy and individual policies are justified by an extensive and detailed evidence base that covers a wide and comprehensive range of topics. It has been an evidence led process.

The strategy has evolved in line with changes in national planning system.

The Core Strategy has been the subject of considerable community involvement and public consultation/participation at every stage of its development – from Issues and Options, through Preferred Options and then at Publication Stage in 2011.

In addition masterplan proposals for the potential strategic site allocations and broad locations for development were subject to individual consultations in 2010. These proposals along with the results of the consultation processes were submitted to the Council for close consideration.

The Core Strategy has been responsive to local input. Although it is the Proposed Submission Document, dated July 2011, that is the subject of the examination, the Council have sought to resolve outstanding points arising in representations received in the summer of 2011, by incorporating these in the January 2012 document.

We see this as a shadow document that sets out a series of minor policy refinements and textural amendments that enhance the readability and clarity of the document and address a number of concerns raised by representatives. Schedules of these changes - both policy and textural - have been provided to the Inspector.

Further evidence of this on-going dialogue is set out in a number of statements of common ground that have been prepared in advance of this Examination in Public.

Whilst these modifications are considered by the Council to be minor in nature they do reflect the Council’s commitment to producing a CS that is of the highest quality achievable.

The council remains of the view that the July 2011 Core Strategy is sound.

Draft National Planning Policy Framework

It is recognised that the introduction by the Coalition Government of both the draft NPPF in July 2011 and the final NPPF in March 2102, represented a major change to the national planning policy environment within which the plan was being
prepared. This is particularly relevant given that one of the key tests of soundness, against which the strategy will assessed, is compliance with national policy.

The draft NPPF stressed the need for suitably up to date plans to be in place.

Shepway has a pressing need for a Core Strategy, in order the future needs of the District can be confirmed and the appropriate development delivered to meet those needs, and did not consider that there were any compelling reasons for the Council to postpone work on the document.

Following a series of review exercises, the content of the Core Strategy was considered to be consistent with the general thrust of the draft NPPF and there appeared to be no significant inconsistencies between the two documents.

The NPPF

The Council recognise that the final NPPF was issued by the Government on March 27th after submission of the Core Strategy.

A detailed document has been submitted to the Inspector that analyses, paragraph by paragraph, the content of the plan making section of the NPPF with the content of the CS. A policy by policy analysis has also been undertaken and is included within the document.

The Council are satisfied that this analysis throws up no anomalies but it recognises that, to ensure complete conformity with the NPPF, the Core Strategy may need to include an additional ‘model policy’ as proposed by central Government.

The model policy would confirm that that the policies of the CS would work alongside the NPPF’s commitment to the presumption in favour of sustainable development.

I can confirm that the Council are willing to discuss the form of this model policy, where it should sit in the CS document and what process would be needed to ensure its inclusion.

Sustainable Development

There are 3 dimensions to sustainable development - economic, social and environmental.

The corner stone of both the CS and the NPPF is to achieve sustainable development and the economic, social and environmental roles referred to in the NPPF are reflected very clearly in the strategic needs (A, B and C) of the CS.

It is the Council’s view that the plan’s policies, and in particular the proposed level of housing growth, have been designed to achieve the right balance between these needs.

It would result in the vision for places, as set out in the Core Strategy.
Therefore the strategy is about stimulating economic growth in our district, whilst recognising the need to protect and enhance our rich environmental assets (such as the North Downs AONB and international habitats) and also recognising the need for promoting vibrant and healthy communities, (for example, by ensuring there is an appropriate mix of housing and the necessary education provision).

The Core Strategy and the Core Principles of the NPPF

The NPPF contains 12 core planning principles.

I would like to demonstrate briefly how the plan reflects each of these.

1. The CS is a positive, up to date plan, that has been prepared and discussed with a wide range of stakeholders co-operating together.

It is the first and most important step in replacing an aged local plan prepared under a previous and now non-existent planning structure. A discussion relating to how the District Council has worked with stakeholder to producer the strategy, as part of its duty to co-operate, is scheduled for day 5 of the Examination in Public.

2. The plan is “creative” and seeks to enhance people’s lives by ensuring that quality and sustainable new development is built in the right places and is supported by the right infrastructure.

It aims to ‘create’ more vibrant and distinctive places.

3. The plan does proactively drive and support economic development. It recognises that going forward there needs to be a population demographic that has a sufficient working age population and labour supply that will support existing local businesses and that will, alongside improvements to key transport infrastructure, encourage new business to locate and expand in Shepway.

Every effort has been made to meet the districts housing and business needs by identifying a suitable quantum of housing and employment land and by allocating strategic sites and identifying broad locations for development that are of sufficient size and in the appropriate locations to provide and deliver sustainable development.

4. The plan commits to a high quality of design and a good standard of amenity such as by encouraging sustainable construction, planning for densities that make good use of developable land, without being excessive, and by ensuring through policy SS3 part A that the scale and impact of development is proportionate and consistent with a settlement’s status and identified role within the district.

These commitments will be carried forward in more detail in a Development Management DPD and reflected in future land allocations.

5. The NPPF requires account to be taken of the different roles and character of different areas. The plan is built on the recognition that the district has 3 distinct character areas - namely the Urban Area of Folkestone and Hythe, the North Downs Area and the Romney Marsh Area.
The district spatial strategy at policy SS1 sets out clearly the different planning priority for each of these areas. Elsewhere in the CS, significant further detail is provided for individual places.

6. The plan recognises the importance of climate change:
- by proposing a choice and mix of transport and encouraging sustainable transport,
- by directing most development to the strategic corridor where such sustainable transport options can be provided.
- by including detailed policies relating to flood risk, and
- by including policies that promote water conservation, sustainable construction and a proportion of energy from renewable/ low carbon sources on new development.

7. In terms of conserving and enhancing the natural environment policy CSD4 as proposed to be modified in the January 2012 document comprehensively sets how the plan will conserve and enhance the natural environment by providing a proportionate level of protection to green infrastructure assets and by tackling qualitative deficiencies in GI where they exist.

A statement of common ground has been prepared by the Council and Natural England setting out an agreed approach as to how this core principle can be delivered.

8. The plan envisages that over 65% of new development land will be on brownfield sites and the 3 strategic allocations are on land that is either previously developed or, in the case of the racecourse, partly previously developed.

The plan contains the provisions needed to ensure that smaller sites allocated through a sites allocation DPD or through neighbourhood plans identify sites for development that are of lesser environmental value.

The council’s SHLAA identifies a sufficient quantum of available sites to meet the growth target set out in policy SS2 without the need to build on areas that are inherently unsuitable for development.

The strategy represents a move away from development within the AONB, as was shown in Structure & Local Plans for expanding Hawkinge.

The council are not relying on sites in the open countryside to deliver its housing growth target.

9. The plan does promote mixed use development and this is true of all 3 strategic allocations, as well as the proposed broad locations.

10. The policies of the plan such as policy SS3 are consistent with the NPPF’s aim of conserving heritage assets and policies will be developed further in a Development Management policy document.

The proposals for all 3 strategic sites recognise the heritage assets that must be safeguarded and where appropriate enhanced.
11. NPPF's makes reference to managing patterns of growth and making the fullest use sustainable transport.

The central premise of the plan is that the majority of new development during the plan period will be located in the strategic corridor where all the major transport infrastructure connections and transport modes are accessible.

Proposals are put forward in the infrastructure plan to address those deficiencies in transport infrastructure that have been identified, such as upgrading certain key road junctions.

A statement of common ground has been prepared by the Council and the Highways Agency that addresses any outstanding issues and confirms the view of the HA that the document is sound. Kent Highway Services also support the Strategy and have been actively involved in its preparation.

These matters are dealt with comprehensively in the transport strategy and reflected in the provisions of policy SS3 and in policy SS5.

12. The final NPPF Core Principle is for planning to take account of and support local strategies to improve health, social and cultural well-being for all and to deliver sufficient community and cultural facilities to meet local needs.

These issues are dealt with in policy SS3 and will be developed further in Development Management policies.

It is therefore SDC’s contention that there is a clear consistency between the 12 core planning principles of the NPPF and the policies of the CS.

Conclusions

The plan is a positively planned document that seeks to address the core needs of the district—whether economic, social or environmental.

It addresses the issues raised by strong pressures for demographic change, notably a decreasing working age population.

The district has urban regeneration needs as well as pockets of deprivation that have to be tackled and there are opportunities to take advantage of the recent major transport upgrades.

The Core Strategy seeks to rectify this situation by proposing a long term and sustainable level of housing growth that allows the local economy to prosper and allows the social needs of the local population to be met with the right mix of housing, while balancing that against the need to protect and enhance the natural environment.

The plan is justified by a comprehensive evidence base.
The evidence base has been developed at a local level in order to identify the
economic, social and environmental needs of the District that need to be addressed
with the Core Strategy.

Various strategies were tested at the preferred options stage, including differing
growth levels, and that process led to some changes to the plan by submission
stage.

The plan is effective in addressing the priority needs of the district and has a clearly
thought through implementation strategy at policy CSD10 that is supported by a
detailed infrastructure schedule at appendix 2.

Finally the plan is consistent with national policy by meeting all the core principles of
the NPPF and will result in the delivery of sustainable development.