Statements for Matter 1

The Strategic Corridor – agenda item 3 (question 1.1)

The strategic corridor is the product of existing communications infrastructure and is constrained in its extent by the AONB and the Flood Risk areas to north and south.

It is a factual recognition of the key elements defining the district’s infrastructure and environment and is a reflection of where most existing activity occurs.

The boundaries of the SC are well defined by existing features and represents a concentration of settlements in a central band.

It does not include isolated rural communities.

The identification of a strategic corridor for long term purposes based on the primary east - west transport channel is strongly endorsed by KCC.

KCC also recognise that this area offers the greatest potential for sustainable development in the district through the maximisation of existing- and particularly rail based - transport infrastructure.

Policy SS1 gives priority to previously developed land and allocates strategic sites that are within the corridor but outside the AONB.

The Core Strategy confirms that the main area for change is likely to be within the corridor including the urban area but outside the AONB.

The Strategic Corridor provides opportunities for new housing development and economic growth on land that is mostly, but not exclusively, previously developed.

However, it is not a “broad location” policy for development. Amendment Y15 of the January 2012 document makes this clear and says that it “represents the concentrated distribution of wells served towns, villages etc”.

Countryside protection provisions are included in policy SS1, and planning applications in the strategic corridor are not exempt from countryside and landscape protection.

The Strategic corridor will not therefore be shown on the Proposals Map.

It also provides a focus for enhanced green infrastructure where there are the greatest opportunities.

Alternative distribution of development options were tested at Issues & options stage and were not found to be appropriate. As recognised in statutory Sustainability Appraisal, the Strategic Corridor is a clear overlay of the two most popular distributions consulted on at this stage.

The Strategic Corridor area has been identified previously and subject to consultation.
Concentrating new development in the Strategic Corridor will also help to ensure that there is not a sporadic spread of unsustainable coastal development west of Hythe nor a further outward expansion of Hawkinge into the heart of the AONB.

**Settlement Hierarchy – agenda item 3 (question 1.2)**

Policy SS3 recommends a 6 tier hierarchy for settlements shown at Figure 4.3.

The status and strategic role of each settlement is based on its function, role and population, justified by evidence in the Strategic Distribution Report and the Rural Services Study in particular.

The hierarchy recognises the environmental, accessibility and historical background of settlements.

The hierarchy has a key role in directing new development to sustainable locations ensuring that new development is proportionate to the character and function of the settlement.

Folkestone is recognised in the SE Plan policy TC1 as the “premier” Shepway town and the remaining settlements take their order from that.

Hythe is clearly the 2nd best served town while New Romney town centre provides similar services to Hythe, for example a secondary school. Both of these towns are recognised as strategic towns within Shepway.

Lydd and Hawkinge are settlements that are larger than traditional villages and are recognised as service centres. Other settlements are classified within the hierarchy as either rural centres, primary villages or secondary villages depending on characteristics.

There has been no substantive objection to where settlements sit within this hierarchy or in connection with the way that the hierarchy works in directing development in a sustainable way to sustainable locations.

Policy SS3 will form the basis for future plan making, neighbourhood plans and DPDs. It brings together the main issues that define appropriate locational guidance and seeks to facilitate high quality sustainable development in sustainable places, predominantly on brownfield land.

Therefore the Council consider that the settlement hierarchy and its application in policy SS3 is sound and fully justified.

**Priority Centres of activity Network - agenda item 5 (question 1.3)**

The Priority Centres of Activity drive vitality and growth in a sustainable way.
These are illustrated as a network of major employment and economic centres across the district at Table 4.4.

Informed by the ELR, the Strategic Distributions Report and the Rural services Study, Priority Centres of Activity have a number of features including-

- promoting services and jobs;
- maintaining and enhancing the viability of the district, towns and local centres;
- a town centre first sequential approach;
- minimising the need to travel;
- directing development to employment sites as suitable;
- encouraging a greater choice of premises
- providing flexibility in terms of land use where appropriate.

The policy SS4 will ensure that there is a choice of locations for investment and that a sustainable pattern of job opportunities is created.

Designated employment sites were all reconsidered in the Employment Land Review; and individual sites will be reviewed in the Allocations DPD.

Adequate employment land is available to meet robustly identified needs; and it is not anticipated that any additional land (not already considered) will need to be brought forward for allocation.

It is not considered that there are any new or more deliverable employment sites than those assessed in the ELR and no evidence has been produced by other parties to suggest otherwise.

Therefore the Priority Centres of Activity Network is considered robust and sound.

Biodiversity and Landscape Conservation – agenda item 6 (question 1.4)

The Council recognise that the district is rich in landscape and that it is both a national and local priority to enhance the character of the countryside, especially protected areas such as the North Downs AONB.

Therefore the CS has directed development away from the most sensitive areas including the AONB, for example by rejecting at Preferred Options stage a further major expansion of Hawkinge.

Amendment S4 to policy SS1 would amend the spatial priority for development in the North Downs to protect the setting of the AONB, and to protect and enhance the landscape – although specific provisions for ‘setting’ do not seem to feature in the NPPF.

In addition amendment C6, 7 and 8 would ensure that development proposals at each of the three sites include recreational access strategies that adequately mitigate the impact of recreation on Natura 2000 sites.

CSD4 is proposed to be specifically amended to provide for protection of the AONB in response to representations (even though this may replicate national policy).
In the 2011 Core Strategy onwards, CSD4 recognises the opportunities for positive change and improvement in areas of GI but the policies have been strengthened to meet the concerns of NE, who now consider the plan sound.

It is noted that KWT also welcome the changes to CSD4 but are looking for commitment in the policy that up to date visitor information will be collected for the Folkestone to Etchinghill Escarpment and for the Dover to Kingsdown Cliffs so that any necessary mitigation can be incorporated into future development plan policies. The Council are willing to carry out visitor survey work with partner organisations but do not consider that this should be included in policy.

The Council note the comments made by the RSPB in their MIQ but do not consider that any additional safeguards are needed arising from the Habitats Regulations Assessment in respect of nature conservation sites at Dungeness. KCC agree with Shepway.

A statement of Common Ground has been prepared with NE. In this, it is agreed the Core Strategy (July 2011 onwards) has a positive approach, and there is agree on key principles to include a in a green infrastructure policy.

It is not possible to write a strategic policy that integrates several issues whilst providing all the details interested parties aspire to, but the proposed changes improve the policy – ensuring it covers all key topics - and are considered to strike a sound balance.

**Flood Risk – agenda item 7 (Question 1.5)**

The CS does meet national policy regarding flood risk.

A Sequential Test approach has been undertaken in relation to strategic allocations and informed by the SFRA and the CS Flood Evaluation document.

Over half of the district is at risk of flooding according to Environment Agency zones, but the vast majority of development has been directed away from any area of identified flood risk – for instance with a focus on Strategic Corridor locations.

However the Council does not consider that it is appropriate for there to be no development whatsoever in the Romney Marsh Area as this would cause stagnation and add to the economic challenges that this part of the district already faces.

If all development was restricted to zone 1, the SHLAA shows there would be only 87 dwellings constructed across the Romney Marsh area by 2031.

An average of only 4 homes per year across this large area is not sustainable.

Therefore with the support of the EA, sequential testing within the Romney Marsh character area (via the approach taken in the SFRA) has identified locations where development might be appropriate, although there is no specific target or threshold in the CS for a quantum of housing in that character area.
The SLAA assessment identifies no more than 870 possible dwelling units in the Romney Marsh Character Area. This is the number of units that could be provided in the plan period but it is not a requirement, and is subject to detailed sequential testing at the DPD stage.

The Council considers its policy for new development in the Romney Marsh area is a sustainable approach that meets NPPF guidance.

It has been suggested that the SFRA is out of date but the Council do not accept this. It was completed in June 2009 and is a key part of the council’s evidence base.

The Council was advised by the Environment Agency in September 2011 that the NPPF may lead to a change of national policy and contain updated climate change projections and it was therefore considered that it would be premature to update the SFRA in advance of the NPPF however upon publication in March 2012 it was evident it did not include any major changes.

In addition substantial improvements to the Dymchurch sea defences were completed in July 2011 and in February 2011 the Environment Agency provided revised marginal sea level data. The Council recognises that these recent changes mean that it would now be appropriate to update the SRFA prior to preparing the site allocations DPD. However this forms part of an ongoing review process of the document that will need to be considered at regular intervals and does not make the spatial strategy or the strategic allocations unsound.