Shepway District Council Local Development Framework

Examination of the Shepway Core Strategy Development Plan Document (DPD)

Further statement on behalf of Gopak Ltd, Range Road, Hythe Kent CT21 6HG

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Introduction

1. On 4\textsuperscript{th} August 2011, submissions were made to Shepway Council in response to the July 2011 version of the proposed Core Strategy Submission Document. Those representations were intended to give the Council a clear picture of just how the emerging Core Strategy looked from the point of view of a successful, innovative, indigenous business employing some fifty people. The representations set out a list of requested changes together with a full explanation of the reasoning.

2. In a small number of cases the submissions made last August have been taken on board by the Council and are reflected in the Submission Document dated January 2012. However, even with those changes the emerging Core Strategy would not provide a sound local plan for Shepway District. The criticisms made by Gopak reflect objectives which align closely with many of the provisions of the National Planning Policy Framework (NPPF) formally adopted by Central Government on 27\textsuperscript{th} March 2012.

3. In broad terms, the Core Strategy is clearly well meaning but a lot of the text is written in jargon that owes more to municipal development control than an entrepreneurial, collaborative approach that seeks to engage local communities and local businesses in working hard to take advantage of Shepway’s strengths in order to promote prosperity and enhance the built and natural environment.

Changes to Shepway Core Strategy Submission Document sought by Gopak Ltd

4. The aforementioned submission made by Gopak on 4\textsuperscript{th} August 2011 includes a succinct schedule of requested changes, a copy of which is attached for convenience. As stated above, a small number of requests have been taken in to account in the January 2012 version, however the majority have not. Gopak would like to see the emerging Core Strategy take on board all of the requested changes. In many cases, the same changes would be required in order to ensure that the emerging DPD aligns with the NPPF.
National Planning Policy Framework (March 2012)

5. The NPPF makes it clear that the highest priority of the planning system is to ‘contribute to the achievement of sustainable development.’ (Paragraph 6).

6. Paragraph 14 explains that for plan making this means that Local Authorities ‘should positively seek opportunities to meet the development needs of their area.’ It continues in paragraph 15 that ‘all plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that would guide how the presumption should be applied locally.’

7. Paragraph 19 stresses that significant weight should be placed on the need to support economic growth through the planning system. One of the key ways of doing this is explained in paragraph 155 which stresses the need for early and meaningful engagement with local businesses. It is therefore very disappointing for market leading companies like Gopak to find themselves referred to in pejorative terms in the emerging Core Strategy. Paragraph 1.39 of the July 2011 version and paragraph 1.38 of the January 2012 state that:

   “Hythe includes certain areas hosting less appealing by necessary functions, for example productive small industry....”

Furthermore, in paragraph 1.41 (1.40) in a list of Hythe’s strengths and weaknesses, the only mention of local employers is in on the weakness side:

   “A few major employers and a local workforce increasing limited in skill.”

8. These are not the provisions of a Core Strategy soundly based on a National Planning Framework focused on building a strong, competitive economy.

9. One of the most encouraging findings of the background work to the Core Strategy was that the majority of Shepway’s businesses have long term expansion plans and that over three quarters of them wish to remain in Shepway. However, there is little
evidence in the Core Strategy of any concerted effort to grasp this obvious opportunity to create jobs and prosperity. Indeed the evidence is mentioned in passing in paragraph 4.102 (4.97) together with the comment ‘there is a need to renew and expand Shepway’s priority centres of activity.’ It is hardly language designed to inspire companies like Gopak continue to invest substantial resources in expansion. Indeed one struggles to find any such encouragement in the document as drafted.

10. Policy SS5 dealing with infrastructure planning and the relevant explanatory paragraphs make no mention whatsoever of the key tests of viability and deliverability.

11. Paragraph 173 of the NPPF requires careful attention to viability and costs in plan making and decision taking. In order to be sound, the policy and its preamble need to reflect the NPPF requirement to ensure viability in order to provide competitive returns to a willing landowner and a willing developer to enable the development to be deliverable.

Conclusions

12. In its August 2011 submissions Gopak set out a list of requested changes that would make the emerging Core Strategy much more conducive to encouraging innovative local businesses to invest, expand and create more employment. The Local Planning Authority made a number of small changes in the January 2012 version of the DPD. However, Shepway Council will need to go much further if it is to comply with the clearly expressed provisions of more recent National Policy. The attached list of changes is commended to the Inspector.