Shepway Core Strategy
Development Plan Document
Examination in Public

Public Hearing Statement
on behalf of Taylor Wimpey

(Respondent References 900 and 921)

Wednesday 2 May 2012
Matter 1 – Spatial Strategy, Development Distribution & Environment
(Core Strategy Policies: SS1, SS3, SS4, CSD4)
**Issue 1: Is the Core Strategy’s spatial strategy and intended distribution of development sufficiently justified and consistent with the local evidence base and national policy? Has sufficient consideration been given to relevant environmental factors?**

1.1 *Is the Strategic Corridor proposed in policy SS1 robustly defined and adequately justified – specifically in respect of the Kent Downs Area of Outstanding Natural Beauty (AONB)?*

1.1.1 This statement is made on behalf of Taylor Wimpey who have land interests in Sellindge, which lies outside the AONB, but within the Strategic Corridor. Taylor Wimpey’s principal involvement in the EiP Hearing Sessions relates to matter 5 and Policy SS: Sellindge Strategy.

1.1.2 This statement addresses only 1.1 and 1.2 of the questions in the paper entitled “Inspector’s Matters, Issues & Questions” dated 14 March 2012. It is noted that a further opportunity is available to make representations on the matters raised in the National Planning Policy Framework (NPPF), as far as they relate to the Shepway Core Strategy. Whilst this submission refers to the recently published NPPF, the right is reserved to make additional comments by the deadline of 27 April 2012.

1.1.3 The strategic corridor is set out in Figure 2.10: Extent of the strategic corridor and explained in paragraphs 2.33 to 2.35 of the Core Strategy. Figure 4.1: key features of the strategic corridor shows the corridor in relation to AONB, urban settlements and transport infrastructure. Paragraph 4.2 states that the concept of the strategic corridor depicts the centre of Shepway which is critical in respect of population and economic centres and has been the focus of major transport upgrades in previous years. Picture 4.2: The key diagram shows the strategic corridor. Whilst it is clear that the strategic corridor is continuous connecting Folkestone and Hythe on the coast to the western extent of the District, all three strategic allocations and both other mains areas of change (including Sellindge) within the Strategic Corridor lie outside the AONB. This approach, i.e. to accommodate major new development outside of the AONB, is considered to accord with paragraph 115 of the NPPF that states that great weight should be given to conserving landscape and scenic beauty in a number of areas including AONBs.

1.1.4 Policy SS1: District Spatial Strategy sets out a clear approach to development in the strategic corridor. The starting point is that major new development will be delivered within the strategic corridor, with priority given to previously developed land in the urban area. Strategic needs focus on Folkestone and Hythe as the principal urban settlements with mixed
use development also at Folkestone Racecourse, Westenhanger in the Strategic Corridor. These proposals all fall outside the AONB, although Folkestone Racecourse lies relatively close to the AONB. However, Policy SS8: Spatial Strategy for Folkestone Racecourse, Westenhanger makes it clear that planning permission will only be granted where it respects the setting of the nearby AONB, wider and immediate landscape. Policy SS1 states that additionally development should be focused on the most sustainable towns and villages as set out in Policy SS2.

1.1.5 Specifically with regards to the North Downs Area, Policy SS1 states that the future spatial priority for new development in the North Downs area is on accommodating major new development within the Strategic Corridor (outside of the AONB); consolidating Hawkinge’s growth; and sensitively meeting the needs of communities within the AONB at better served settlements. This is considered to strike the right balance, i.e. directing major new development to areas of the strategic corridor outside of the AONB, consolidating Hawkinge’s growth (Hawkinge is in the AONB, but has been subject to significant recent development and as a Service Centre should take a reasonable amount of sensitively planned development) and sensitively meeting the needs of communities within the AONB at better served settlements. This approach is considered to be appropriate and sustainable. Settlements in the AONB must be able to have limited, sensitive development in order to support local economies and help meet some local needs in terms of housing.

1.1.6 The Shepway Core Strategy Sustainability Appraisal Report (URS Scott Wilson – July 2011) reviews, in table 8.2, the proposed submission Core Strategy in relation to the objective – conserve, enhance and make accessible the District’s countryside, heritage and historic environment. This appraisal comments on the strategic corridor and impact on the AONB in considering the broad and detailed spatial approach. In the overall appraisal findings and recommendations the appraisal states that the general spatial approach to delivering new development will ensure that development is prioritised on previously developed land in existing settlements, and development is limited in areas where it might impact on the District’s more sensitive landscapes. No recommendations are made to change the submission Core Strategy insofar as this objective is concerned. This supports the approach to development in terms of the AONB in policy SS1 and the Core Strategy generally.

1.1.7 With respect to Sellindge, which is outside and some distance from the AONB, Policy SS9: Sellindge Strategy seeks the delivery of a core area for the development to the south of the A20. This is supported in that this land lies between the A20 and the M20/CTRL corridor and
as such is contained by existing, permanent and significant built features and does not lie within open countryside. This, in combination with the land’s proximity to existing built form immediately to the north of the A20, will ensure that the setting of Sellindge in the wider landscape is respected and is one of the reasons why the bulk of development at Sellindge is proposed to the south of the A20. Any additional land required at Sellindge to the west, north and east of this core area for development (to the south of the A20) will be the subject of further community engagement and the assessment of constraints and opportunities including any impact on the landscape. It is clear from a review of the significant evidence base that supports Policy SS9 that landscape, including any impact on the AONB, has been properly considered in selecting the broad area for growth at Sellindge.
1.2 Is the Settlement Hierarchy (table 4.3) adequately justified by the local evidence base? Does policy SS3 provide sufficient guidance about where development should be located? Are the Council’s suggested changes to this policy needed for soundness reasons?

1.2.1 The Settlement Hierarchy (table 4.3) is adequately justified by the local evidence base. In summarising the Rural Services Study, the Sustainability Appraisal of the Core Strategy (URS Scott Wilson – July 2011) states that Folkestone and Hythe account for well over half of Shepway’s population and that the town of New Romney accounts for 11% of Shepway’s population. This is reflected in the services offered by these settlements and their position in the Settlement Hierarchy, i.e. Folkestone at the top as a Sub-Regional Town and Hythe and New Romney Town as the two Strategic Towns in the next tier.

1.2.2 The Shepway Rural Services Study (2011) reviews the services offered in the District’s rural settlements. Section 7 looks at service clusters and includes a Settlement Hierarchy Information Table that ranks settlements in terms of their cluster level. Appendix 2: Parish Services List includes other facilities than those shown in the Settlement Hierarchy Information Table and also shows the populations of the settlements. It is clear from a review of the Shepway Rural Services Study, in particular the Settlement Hierarchy Information Table and Appendix 2, that the Settlement Hierarchy in table 4.3 of the Core Strategy is justified by the evidence base.

1.2.3 It is considered that policy SS3: Place Shaping and Sustainable Settlements Strategy provides sufficient guidance about where development should be located. It clearly refers to the overall District Spatial Strategy set out in Policy SS1 and makes reference to change in settlements being managed to occur in a form that contributes to the role of the settlement within the Settlement Hierarchy and local place shaping objectives. The policy goes on to additionally set out that the principle of development is likely to be acceptable on previously developed land, within defined settlements where a list of criteria are met. Clearly policy SS3 also needs to be read in the context of not only policy SS1, but the Core Strategy as a whole including the strategic allocations and the policies on central Folkestone (CSD6), Hythe (CSD7), New Romney (CSD8) and Sellindge (CSD9) and the supporting texts for the three character areas within the District, i.e. the urban area, the Romney Marsh area and the North Downs area.