SHEPWAY DISTRICT
COUNCIL'S CORE
STRATEGY EIP

Matter 5
Areas of Strategic
Change – and Other
Matters

Additional Statement
by Blue Sky Planning
on behalf of
Phides Limited

April 2012
Matter 5 – Areas of Strategic Change – and Other Matters

Issue 5: Are the Core Strategy’s proposals for other identified Areas of Strategic Change realistic, deliverable, adequately justified and consistent with national and regional policies?

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Issue 5.1 Is the level of detail presented in Policies CSD6-CSD9 (and supporting text and diagrams) appropriate for inclusion within a Core Strategy? For example, does the identification of ‘broad locations’ for development prejudice the consideration of detailed sites in future DPDs? Is it clear how these proposals will be taken forward in forthcoming DPDs?

Issue 5.2 Notwithstanding the above, are the details of developments proposed in Policies CSD6-CSD9 (such as broad locations, scale of housing and likely infrastructure needs) adequately justified by the evidence base? Why have other sites (including sites that are being promoted by representors) been discounted?

1. In our opinion, the level of detail could be appropriate, but only if justified by the evidence base, and only if sites or ‘broad locations’ for development are treated in a fair and consistent manner.

2. If the allocation of sites and ‘broad locations’ are not justified by the evidence base, and if the process is not dealt with in a fair and consistent manner, then it is self evident that such allocations or designations will prejudice the consideration of other, and potentially more suitable sites, in future DPDs, in particular the forthcoming Site Allocations DPD.

Policy CSD8 – New Romney

3. For example, Policy CSD8 promotes an area to the north of New Romney as a broad location for new residential development. That area is located within Flood Zone 3, with the highest probability of flooding. No sequential test has been carried out to assess whether there are other suitable sites within Flood Zone 1, as is required by national policy.

4. If the New Romney site is to be allocated as a ‘broad location’ for development in the Core Strategy, this would need to be in the context of a local evidence base which shows that a sequential flood risk assessment has been carried out and that there are no suitable alternative sites within Flood Zones 1 or 2. As this exercise has not even been attempted, there can be no justification for Policy CSD8.
Policy CSD9 - Sellindge

5. With regard to Policy CSD9, which promotes land at Sellindge as a ‘broad location’ for development, we have no objection in principle to the approach adopted in the Core Strategy.

6. However we do have an objection to the lack of consistency shown by SDC, particularly in relation to how it proposes to treat the former Lympne Airport land. Over the past three years the Sellindge and Lympne Airport sites have both engaged with SDC and the LDF process, with the submission of strategic site assessments, substantial public consultations, and masterplanning exercises. In the case of the Lympne Airport land, the Lympne Parish Plan Group conducted its own local consultation exercise which showed local support for development (see paras 109 – 114 of our main representations).

7. We are not at all clear why, at such an advanced stage in the Core Strategy process (i.e. after two years), SDC decided to remove the former Lympne Airport land as a strategic site; not to even include it as a ‘broad location’ for development; to include New Romney (which is located within Flood Zone 3) in preference and without carrying out a sequential test; and treating Sellindge in an inconsistent manner to the former Lympne Airport land.

8. We are not at all clear how SDC proposes to deal with the former Lympne Airport land in the forthcoming Site Allocation DPD. Neither are we clear how SDC proposes to deal with areas identified as ‘broad locations’ for development in comparison to other and potentially more suitable sites.