SHEPWAY DISTRICT COUNCIL’S CORE STRATEGY EIP

Matter 5
Exception Site
- Land at Former Lympne Airport

Additional Statement by Blue Sky Planning on behalf of Phides Limited

April 2012
Matter 5 – Exception Site – Land at Former Lympne Airport

Why is the Site considered to be a strategic site that is central to the achievement of the Core Strategy?

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National Policy on Key Sites

1. The NPPF refers to the need for local planning authorities to boost significantly the supply of housing and ensuring that their local plans meet the full, objectively assessed housing needs for their area:

   ‘including identifying key sites which are critical to the delivery of the housing strategy over the plan period’.

   (NPPF, para 47, 1st bullet point)

Shepway’s Spatial and Housing Strategy

2. The Spatial Strategy (including housing) for the District is set out in Policy SS1 and the Housing Growth Strategy is set out in Policy SS2.

3. The Spatial Strategy for the District in Policy SS1 states:

   ‘Major new development will be delivered within the Strategic Corridor, with priority given to previously developed land in the urban area. Accordingly, the majority of Shepway’s commercial floorspace and the majority of the urban area’s housing development will take place in Folkestone to enhance its role as a sub-regional centre’.

   (Policy SS1 – Our emphasis)

4. As a consequence, the Core Strategy proposes to allocate the Folkestone Sea Front site and Shorncliffe Garrison as strategic housing sites.

5. Policy SS1 also allocates Folkestone Racecourse as a strategic site (Policy SS8) although no justification is given as to whether the allocation of this site is critical to the housing strategy for the LDF. In fact, instead of being seen as critical to the delivery of
the housing strategy, Policy SS8 implies that housing on the Racecourse is seen only as a means of enabling other development:

- 'residential development is provided only as a necessary part of a comprehensive approach for re-constructing the Racecourse as a high quality visitor attraction'.

  (Policy SS8, 1st bullet point – our emphasis)

6. It would appear that SDC does not see the Racecourse as being critical to the delivery of the housing strategy for the District, and therefore in terms of the NPPF it cannot be regarded as a key housing site.

7. Policy SS1 goes on to identify three character areas, one of which is the North Downs Area, within which the former Lympne Airport land is located. The strategic priority for the North Downs Area is stated as:

   'The future spatial priority for new development in the North Downs Character 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'.

   (Policy SS1 – our emphasis)

8. The Housing Strategy for the District is also referred to in Policy SS2 which is essentially concerned with housing targets and we have referred to that elsewhere in our Representations and Statements.

9. In terms of delivering the Housing Strategy, the Core strategy also proposes allocating New Romney (Policy CSD8) and Sellindge (Policy CSD9) as broad locations for new housing development.

   Former Lympne Airport Land

10. The former Lympne Airport land was identified as a potential housing site during the Issues and Options stage of the Core Strategy process in 2008, when SDC was preparing its SHLAA.

11. The evidence base in the SHLAA confirmed that the site was suitable for development (in terms of meeting sustainability, key policy objectives, physical constraints, potential impacts and environmental conditions). The SHLAA also confirmed that the site was deliverable and developable.

12. The LDF Core Strategy Preferred Options was published in June 2009 and it identified the site as a strategic housing site.
13. In terms of being strategically important to the Core Strategy, the site is one of the largest sites within the Strategic Corridor (where development is encouraged); it is within Flood Zone 1 (with the lowest probability of flooding); it is outside the AONB; it is identified as non agricultural land on the MAFF agricultural land map; it is immediately available for development and is not constrained by infrastructure or viability issues.

14. In the Preferred Options Core Strategy, SDC considered the implications of not allocating the site as a strategic housing site and concluded that not allocating the site would be consistent with a ‘minimum change’ strategy for Shepway (i.e. not a growth strategy); or alternatively, it would mean allocating other sites ‘which may not be as suitable’. We have set this out in more detail in paras 93 – 98 of our main representations.

15. We are not clear why the Lympne Airport land has been deleted as a Strategic housing site. Neither are we clear why New Romney and Sellindge have been identified as broad locations for new residential development, ahead of the Lympne site.

16. In our view, the Lympne site must be at least as critical to the delivery of the Housing Strategy as the other identified sites, particularly as Shorncliffe Garrison may or may not be available, the Racecourse may or may not be viable, and the Folkestone Sea Front site has a history of deliverability issues.

17. In our opinion, the site should either be reinstated as a strategic site, or allocated as a ‘broad location’ for development with a similar approach taken to the guidance proposed for Sellindge. We have referred to this in our main representations. The important point is that proper strategic guidance and a planning framework to guide development should be provided for the site. Given SDC’s housing shortfall on housing completions during the first six years of the plan (i.e. 2006-12) and the agreement by SDC that the site is suitable for development, and expected to deliver housing within the next five years, it would be a failure of planning if in these circumstances planning guidance cannot be given to bring forward the site for development.

18. Finally, our client is willing to consider the Neighbourhood Plan route and to work with local residents in bringing forward development, providing that does not result in undue delay. However it is wholly inappropriate for a Core Strategy to propose allowing any local group, such as a Parish Council, to exercise a veto over the principle of any development, particularly when the Parish Council, in contrast to local residents, is wholly opposed to the principle of development.

19. Yet that would appear to be what the Core Strategy proposes to do in Para 4.70, which would be contrary to both national policy and the Localism Act 2011. We refer to this in more detail in paras 122 – 124 of our main representations. We therefore request that the relevant bullet point (para 4.70, 3rd bullet point) in the Core Strategy be deleted.