Shepway Core Strategy Examination

Matter 2: Housing, Economy and Infrastructure

Are the Core Strategy’s proposals for the provision of new housing and economic development deliverable, clear, sufficiently justified and consistent with the local evidence base, the South East Plan and national policy in PPS 3? Does the Core Strategy provide satisfactorily for the delivery of development, with particular reference to transportation infrastructure, and enable adequate monitoring of its effectiveness?

These additional comments have been prepared by Brian Lloyd BSc (Hons) MSc MRTPI on behalf of CPRE Protect Kent (the Kent Branch of the Campaign to Protect Rural England) in conjunction with the Shepway CPRE District Committee. CPRE is a national charity that seeks to retain and promote a beautiful and thriving countryside that is valued by everyone.

These additional comments should be read in the context of representation numbers 70, 90, 91, 94, 98, 100 and 111 made by CPRE Protect Kent on the Proposed Submission Document, July 2011. Consequently, as we made full representations at Regulation 27 stage on this matter we do not propose to repeat in detail the concerns we have. Instead we will seek to answer the specific questions posed by the Inspector.

2.1 Is policy SS2’s housing target, which is in excess of that needed to meet South East Plan requirements, adequately justified by the local evidence base? Specifically:

a) Is this target achievable, given recent housing completion rates?

b) Has a sufficient level of housing supply been identified to meet this target, consistent with PPS 3’s requirements of deliverability and developability?

c) What is the justification for setting a housing target to 2030/31 in addition to 2026/27?

2.1.1 We deal with these matters in detail our representation numbers 70, 90 and 111. As we explain, it is our view that the housing target(s) set in Policy SS2 is not justified by the evidence base. Key to the justification of the target is the report to the Council’s cabinet in April 2011 [A89], but we see little in this that supports a level of growth higher than that
promoted in the South East Plan. The main conclusions in the report (page 22) are reached in comparison to the zero-migration level, which at 4,300 dwellings is significantly lower than the South East Plan target. We cannot see in the report any discernible difference in the social and economic benefits of the higher 8,000 dwelling target compared to the 6,000 dwelling target tested (which is close to the South East Plan target).

2.1.2 It is also the case that at the preferred options stage the overwhelming view expressed by respondents was that there was no case made for going above the South East Plan target. In our analysis of the responses to question 7 in this consultation, 82% of the respondents favoured the South East Plan target rather than the Council’s preferred option which was for a range of 6,000 – 8,000 dwellings (see responses by following the link at C8 in the library list). The respondents felt that the South East Plan target was acceptable because it recognised the environmental constraints present in the district, and that a higher target would have an unacceptable environmental impact. We agree with that view, and consider that the higher figure(s) promoted by the Council will result in unsustainable development in the rural area (for example at Folkestone Racecourse) and development at New Romney that will have an unacceptable risk of flooding. These issues can be avoided if the South East Plan target is retained.

2.1.3 It is also important to note what the South East Plan Examination Panel concluded, as we explain in our representation no. 90:

“We do not suggest any change to housing levels for Shepway or that part of Swale in this sub-region. Although levels proposed in Shepway are again lower than the last Structure Plan and recent completion levels, there were no significant economic drivers identified for further growth of Folkestone, and there are extensive environmental constraints. The District Council did not provide any evidence to suggest that the proposed levels would not give adequate flexibility to meet its objectives of regenerating the Folkestone seafront and other initiatives.”

We consider that Shepway District Council has not presented any evidence to counter this clear conclusion and to justify a higher housing figure.

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2.1.4 With regard to question 2.1a), over the last five years (2006 – 2011) a total of 1,422 dwellings have been completed in Shepway at an annual average of 284.4 [document E1, though the more recent 2011 edition of this report is now available which reports the number of completions for 2010/11 at 132 dwellings\(^2\)].

2.1.5 For the last two years (2009/10 and 2010/11) completions have fallen well below this five year average at 180 and 132 dwellings respectively. With the Plan period actually starting at 2006, the Council is already falling short of both targets set in Policy SS2, and is increasingly doing so. The Policy aims for 400 dwellings per annum (dpa) to deliver 8,000 dwellings by 2026, but a minimum of 350 dpa (7,000 dwellings) by that date would be acceptable. Clearly, for the first five years of the Plan period the Council has failed to deliver the minimum target, let alone the higher one. This means that there is already a shortfall in delivery for the first five years of the Plan period, which will increase the annual rate of provision for the rest of the Plan period. This means that to deliver 8,000 dwellings by 2026 the annual rate from now on will be 438.5 dpa, and for 7,000 dwellings it will be 371.9 dpa. This higher rate has only been achieved in five of the last 20 years [Table 1 in E1]. Given the current and foreseeable future state of the housing market, we consider it highly unlikely that the necessary delivery targets will be achieved based on the evidence of recent housing completions.

2.1.6 With regard to question 2.1b), we are concerned that given the constraints in the District (for example flood risk); the need for significant and costly up-front infrastructure (for example at the Folkestone Racecourse); and complicated brownfield sites and potential land assembly issues (for example at Folkestone Seafront), there are likely to be major issues of deliverability to achieve the proposed housing target(s). We consider that a lower target, as in the South East Plan (5,800 dwellings at 290 dpa), would be much more realistic and deliverable when having regard to historic rates of delivery – but not without its own challenges in the current economic climate.

2.1.7 With regard to question 2.1c), we find the different targets confusing and fail to see the justification for this approach. It suggests to us that the Council is ‘edging its bets’ and that it does not have the confidence that the 8,000 dwelling target is actually achievable.

2.2 Are policy SS2’s targets of approximately 20ha of Class B development (industrial, office and warehousing) and approximately 35,000 sq m goods retailing (class A1) adequately justified by the local evidence base?

2.2.1 We have no comment to make on this issue.

2.3 Have the potential transport effects arising from Core Strategy proposals been fully assessed? Specifically, have the concerns raised by the Highways Agency in respect of the effects on the strategic road network been adequately resolved?

2.3.1 We have no comment to make in addition to those we make in our representation numbers 91 and 94.

2.4 Is the Core Strategy’s approach to affordable housing sufficiently clear and adequately justified, with particular regard to potential effects upon development viability?

2.4.1 We have no comment to make in addition to those we make in our representation number 98.

2.5 Does the Core Strategy provide satisfactorily for the needs of Gypsies, Travellers and Travelling Showpeople? Specifically, (1) does the Core Strategy accord with the national policy requirement that it should set out criteria for the location of sites and (2) is it clear what local needs exist and how they will be met?

2.5.1 We have no comment to make on this issue.

2.6 Are the requirements of policies CSD2 (in respect of Lifetime Homes standards) and CSD5 (in respect of water usage) adequately justified? Has appropriate account been taken of the effects of these requirements on development viability?

2.6.1 In our representation number 90 we highlight concerns about water supply given that Shepway is a designated water scarcity area. This is an even more important issue now given the current drought order that has been issued and the water usage restrictions imposed by the water company.

2.6.2 We note that the local water company (Veolia Water Southeast) support Policy CDS5, which seeks to achieve a maximum water use of 105 litres per day per person. The Environment Agency (EA) also generally supports the Policy, though they seek a number of
detailed changes. We generally support the changes sought by the EA, especially the extension of the policy to include all development, though we do not entirely understand why the 105 litre daily target should be changed to a minimum – this though might just be a matter of being clear what is actually meant by it; that it is a minimum target rather than minimum usage.

2.6.3 However, neither Veolia nor the EA make reference to the water scarcity status of the area when talking about water saving measures and targets for new dwellings. This is not merely a label, but enables Veolia to institute compulsory metering across its area (which it is doing). While the metering will save water, it is unclear when the benefits of this will be realised, and more importantly whether the projected profile of water savings will match the projected profile of new development in District. It is unclear whether there be a period when the demand for water by new homes will exceed the savings made through metering. It is unclear what the net effect will be, and whether the proposed level of development will make the water situation worse in the District.

2.6.4 Also, no mention is made of Veolia’s Water Resource Management Plan 2009. This was prepared in the context of the South East Plan housing target. This would certainly require updating in light of the Core Strategy’s higher housing target, and may result in more demanding water efficiency measures. This, together with the high growth strategy at neighbouring Dover District (also falling in Veolia’s area) gives us serious concern about the future strategy for water management in this water scarce area. We would question whether the necessary joined-up planning and Duty to Co-operate has been achieved between Shepway District, Dover District, Veolia Water and the EA.

2.6.5 Also, no view is offered about the availability of water resources in the area, and what the likely impacts of the housing figures in the Core Strategy are likely to have on these. The EA could easily have drawn attention to further detail in relation to the Water Framework Directive, such as the classification of water bodies in the area (surface and ground), and to the recommendations of their own Catchment Abstraction Management Strategies (CAMS).
2.6.6 In summary, we believe that far more could have been said in the Core Strategy to recognise the water resources situation in the Shepway District /Veolia Water’s area of supply, and urge the two organisations to work together, making their findings and respective plans more transparent in the Core Strategy.

2.7 Are the Core Strategy’s infrastructure requirements clearly expressed, adequately justified and consistent with national policy? Is it clear how these will be carried forward in policy terms?

2.7.1 We have no comment to make in addition to those we make in our representation numbers 94 and 100.