Shepway Core Strategy Examination

Matter 5: Areas of Strategic Change – and Other Matters

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

These additional comments have been prepared by Brian Lloyd BSc (Hons) MSc MRTP 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.

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?

5.1.1 We are not overly concerned with the level of detail included in the policies and the supporting text, but we would question the detail shown in the various figures (figures 5.5 – 5.8) and how they relate to the Key Diagram. These figures do not form part of the Key Diagram, and they also do not comprise amendments to the Proposals Map, and so their status needs to be made quite clear in the Core Strategy. This is particularly important as they do show potential development sites in a relatively precise way. This, we are concerned, will potentially pre-empt more detailed consideration of sites at the Allocations DPD stage and make consultations at that stage more constrained and potentially regarded as a fait accompli by local people.

5.1.2 Even worse, we are concerned that the identification of ‘broad locations’ and potential development sites may prompt the submission and approval of planning applications in advance of the Allocations DPD being prepared. This is exactly what has happened in Dover District, where both the developers involved and the Council took the view that the identification of such ‘broad locations’ for development in the Core Strategy
was tantamount to an allocation and thus supported the grant of planning permission. This we considered was wrong, and meant that the more detailed consideration of these sites, and alternatives, through the DPD process, including the opportunity for independent examination, was denied to the local community – and this was despite the Core Strategy Examination Inspector concluding that the sites should be considered in detail through the DPD process. Therefore, to avoid this potential situation, we would question the level of detail shown in the figures 5.5 – 5.8.

5.1.3 Also, the figures are inconsistent in their approach. Figure 5.5 is clearly overlain on an Ordnance Survey map base, but potential sites are shown by way of stars. Figures 5.6 and 5.7, however, are not shown on an Ordnance Survey base map, but the potential new sites are more specifically shown and by reference to a map they can be readily identifiable. Figure 5.8 is different again, and shows a very precise proposal. There needs to be a consistent approach in the figures, and in our view the more schematic approach taken in Figure 5.5 should be used in all cases.

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 now being promoted by representors) been discounted?

5.2.1 Our primary concern is with the proposals for New Romney as proposed in Policy CSD8, and our representation numbers 82 and 105 set out in detail our concerns. We have already made some additional comments on the proposals for New Romney in response to question 1.5 under Matter 1, in regard to the issue of flood risk. We do not repeat these here, but below we make some additional detailed points.

5.2.2 Policy CSD8 proposes to expand Mountfield Industrial Estate and refers to the need for better vehicular and pedestrian linkages to the town centre. In our view, for this expansion to occur it will be necessary for the junction of Mountfield Road and Littlestone Road to be improved. Alternatively a by-pass around the town High Street, with access from the A259 directly into Mountfield Industrial Estate should be provided to avoid the need for HGV’s and increased traffic to use the junction onto Littlestone Road.
5.2.3 The junction of Mountfield Industrial Estate and Littlestone road is already much busier now that the new and very popular Recycling Centre is open on Mountfield Road. At present this busy junction has restricted visibility for drivers turning to the South (towards the sea) because of the brow of a hill over the Romney Hythe and Dymchurch railway line. Furthermore, the double yellow lines outside the Captain Howey Hotel and public house on Littlestone Road are to be removed in the near future causing further visibility problems for drivers turning towards the seafront because of the increased numbers of parked cars in the area.

5.2.4 Paragraph 5.127 states that it will be necessary to investigate improvements to the junction of the High Street and Littlestone Road (A259/B2071). In addition to this junction the junction with the High Street and Ashford Road (in the middle of the High Street) must also be improved as this will be used by residents of the new development on Cockreed Lane to gain access to the A259.

5.2.5 The closure of the A259 in an emergency necessitates an alternative route be found to Folkestone in one direction and Ashford in the other. After much discussion and investigation by Kent Highways no alternative route can be found for HGVs because of the width restriction and the nature of Romney Marsh roads which, in the main, were originally narrow cart tracks with ditches either side. This problem will be exacerbated by the additional vehicles and increased traffic from the proposed 300 new dwellings on the Cockreed Lane site and any future developments in the New Romney area. This is an issue that must be addressed.

5.2.6 We are concerned that there is no mention in the New Romney policy/strategy for increased medical, dental and school facilities for the residents of the proposed Cockreed Lane dwellings. All of these facilities are running at capacity now without the increased pressure of additional requirements from the residents of the new development and any other developments in the future in the New Romney Parish.

5.2.7 We would also ask the Inspector to note that there is an increased number of elderly and retired people who are buying property within the New Romney area. This aging population will put even more pressure on the already stretched GP surgeries and medical facilities.
5.2.8 We have also made comments on the proposals for Sellindge included in Policy CSD9, but we do not wish to add anything further to our representation number 107.

5.3 Does the Core Strategy adequately explain the Council’s position with respect to Lydd Airport? Is the approach set out in Core Strategy paragraph 5.115 adequately justified by the submitted evidence base? Is it clear how the Council’s support for airport expansion in principle will be carried forward in planning policy terms? At what point is it intended to replace saved Local Plan policy TR15?

5.3.1 This question is essentially for the Council to answer, and given our concerns about the expansion of the airport that we pursued at the recent public inquiry we wait to see how the Council respond and may wish to comment at the hearing session.

5.4 In respect of the duty to co-operate introduced by the Localism Act 2011, can the Council explain how it has responded to the representations made by other local planning authorities – notably: Kent County Council, Dover District Council and East Sussex County Council?

5.4.1 This question is aimed at the Council to answer, and we wait to see how they respond and may wish to comment at the hearing session. However, we do not consider that the Duty to Co-operate is simply a matter of the District Council consulting with neighbouring authorities and other agencies and then responding to their representations. Rather it is a more pro-active engagement exercise to ensure that matters of more than local importance are properly considered. – see paragraphs 155 and 178 - 181 of the National Planning Policy Framework. As we explain in our response to question 1.1 under Matter 1, we consider that this is particularly pertinent in regard to the concept of the ‘Strategic Corridor’, and again in our response to question 2.6 under Matter 2 in regard to water supply.

5.5 Is it clear which Local Plan policies are being superseded by which Core Strategy policies? Would this information be more clearly presented in a separate appendix?

5.5.1 We do not consider that it is particularly clear and easy to discern which Local Plan policies are being superseded by the Core Strategy policies. In our experience it is usual practice for local planning authorities to present a schedule as an appendix to the plan setting out which Local Plan policies are superseded by the policies in the Core Strategy,
and which Local Plan policies are retained. We would support the inclusion of such an appendix in the Shepway Core Strategy.

5.6 Is it necessary or appropriate to include changes to the proposals map arising from a different DPD (the Kent Minerals Plan) in Core Strategy Appendix 4? What is the status of that document?

5.6.1 Paragraph 8.2 of PPS12 required District planning authorities to include on their adopted proposals map “minerals and waste matters including safeguarding areas, and any minerals and waste allocations which are adopted in a development plan document by the county council”. We assume that this is why Shepway District Council has included the changes to the Proposals Map in Appendix 4. However, this requirement has not been carried forward into the National Planning Policy Framework, so it would seem that it is no longer necessary to do this.