SHEPWAY CORE STRATEGY LOCAL PLAN EXAMINATION

Response to the Partial Revocation of the Regional Strategy

1. Introduction


1.2 This note sets out the response of Shepway District Council to the Order following a communication from the Inspector to representors on 18th February 2013. It looks firstly at evidence base issues (plan preparation) and then Core Strategy policies.


2. Core Strategy preparation

2.1 The Core Strategy was published and submitted after the government set out in 2010 its clear intention to abolish regional planning.

2.2 The Core Strategy evidence base (Strategic Distribution Report [A90]) discusses the regional and sub-regional planning context. It highlights the more locally relevant policies in the Regional Strategy:

**Policy SP3** – outlines a focus for new development within urban areas and on previously developed land.

**Policy TC1** – designates Folkestone as a Secondary Regional Centre in the Strategic Network of Town Centres.

**Policy BE4** – sets out an important role for small rural towns (which could presumably include, for example, New Romney)

**Policy EKA1** – highlights a continuing focus at Ashford as a Growth Area, the need for regeneration at coastal towns and for growth at Canterbury.

**Policy EKA4** – sets out the need for urban renaissance and new economic impetus in the heart of coastal towns including Folkestone.

2.3 The Regional Spatial Strategy included generic policies, and with reference to Shepway, simply confirmed the local significance of Folkestone. The scope of the Regional Strategy did not refer to the district of Shepway in any great detail, even when taking into account the specific policies for the ‘East Kent and Ashford Sub-regional Strategy Area’.
2.4 The Report [A90] recognised the value of local evidence that can better inform the consideration of the function and future role of settlements. The wider Core Strategy Local Plan evidence base takes account of the regional context but is not framed by it and primarily consists of district level evidence which is locally specific and relevant, in accordance with the National Planning Policy Framework (NPPF) paragraph 158.

3. Core Strategy policies

3.1 There are no policies within the Core Strategy Local Plan that make reference to the Regional Strategy.

3.2 The Core Strategy housing policy (Policy SS2) did not take forward the dwelling requirement set out under Policy H1 of the Regional Strategy. Independent local evidence underpinned the testing of four strategic options for housing provision in Shepway, with the Regional Strategy requirement one option. An alternative (higher) option was found to be locally justified and the Regional Strategy allowed local planning authorities to test higher housing numbers if they were consistent with sustainable development principles (para 7.7, pg. 58).

3.3 The approach to housing policy is considered in greater detail in the Council response to Matter 2 of the ‘Inspector’s Matters, Issues & Questions’ [Z52].

3.4 In some instances, reference is made to the Regional Strategy in the explanatory text of the Core Strategy Local Plan (July 2011) and these are documented in the table below.

3.5 For the purposes of completeness and ensuring the Core Strategy Local Plan is up-to-date with regard to the impact of the 2013 Order, the fourth column of the table sets out proposed changes to the explanatory text. New text is shown in bold and deleted text has been struck through.

<table>
<thead>
<tr>
<th>Location</th>
<th>Description of reference / SE Plan policy</th>
<th>Implication of revocation (summary)</th>
<th>CS change required (2013)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Para 1.10, pg. 4</td>
<td>Role of the South East Plan in Core Strategy preparation.</td>
<td>Historic reference may still be appropriate.</td>
<td>National and regional planning policy. The former regional ‘South East Plan’ (2009) has influenced the preparation of the Shepway LDF Core Strategy and this document is considered by Shepway District Council to be in general conformity with it. National policy is highly</td>
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<tr>
<td>Paragraph</td>
<td>Page</td>
<td>Plan/Policy</td>
<td>Reference</td>
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<td>Para 1.14, pg. 4</td>
<td>South East Plan period 2006-2026.</td>
<td>The evidence base often covers the period 2006-2026, coinciding with the former South East Plan.</td>
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<tr>
<td>Para 2.36, pg. 24</td>
<td>South East Plan policy CC1.</td>
<td>Use of definition may still be appropriate. Similar provisions are also contained within the ‘Core planning principles’ of the NPPF (para 17). Sustainable development is central to the UK planning system. To achieve this in South East England, the following priorities have been set out: achieving sustainable levels of resource use, conserving and enhancing the physical and natural environment, reducing greenhouse gas emissions, preparing for the impacts of climate change, and achieving safe and secure communities where everyone (including the most deprived) can have equal prospects of a better quality of life (former South East Plan Policy CC1).</td>
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<tr>
<td>Para. 4.33, pg. 40</td>
<td>South East Plan minimum housing target.</td>
<td>Retention of an (updated) reference may still be appropriate. [The remainder of the paragraph remains as included in the July 2011 Core Strategy, apart from the first sentence modified as follows] The former South East Plan featured a minimum housing target for the district of an average of 290 dwellings per annum to 2026.</td>
<td></td>
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<tr>
<td>Para. 4.59, pg. 45</td>
<td>South East Plan policy CC5.</td>
<td>No implication – policy was highly generic, reference only provided as a broad elaboration. [The remainder of the paragraph remains as included in the July 2011 Core Strategy, apart from the final sentence modified as follows] As identified, further lower cost housing is critical to meet housing needs and this should include a mix of tenures to support low-income households, as set out in policy CC5 of the South East Plan.</td>
<td></td>
</tr>
<tr>
<td>Para. 4.83, pg. 52</td>
<td>South East Plan policy NRM11.</td>
<td>No material implication given the provisions contained within the NPPF (i.e. paras 95-98). [The remainder of the paragraph remains as included in the July 2011 Core Strategy, apart from the second sentence modified as follows] Policy NRM11 of the South East Plan requires, if feasible, new developments larger than 10 dwellings or 1,000sqm to secure at...</td>
<td></td>
</tr>
</tbody>
</table>
3.6 All of the changes in the fourth column are considered to be non material. They relate to references to the Regional Strategy as a document and to some of its policies. Where references to the policies are proposed for deletion, it is not considered to materially impact upon the meaning of the explanatory text. Sufficient policy provisions exist in national and development plan policy to avoid any adverse impact on plan making and decision taking and where appropriate, these are noted in the third column.

3.7 Modifications in 2012 have, where applicable, already picked up on the need to delete references to regional policy; for instance Mod. CSD4.4.
4. Conclusion

4.1 This note demonstrates that the Core Strategy Local Plan does not rely upon any of the policies contained in the Regional Strategy. There is also no dependence on any regional studies in the preparation of the Core Strategy evidence base.

4.2 Despite the Partial Revocation of the Regional Strategy and the ‘East Kent and Ashford Sub-regional Strategy Area’ identified within it, the Council will continue to work with neighbouring authorities and other partners under the Duty to Cooperate to secure the sustainable development of the area. An overview of the partnership structures that have been put in place to secure this objective are set out in the Record of Cooperation [G16] at paragraph 2.2.

4.3 The revocation of regional policies is likely to increase the imperative for Local Planning Authorities to have up-to-date local strategic planning policy in place.