Examination of the Shepway Core Strategy Development Plan Document

INSPECTOR’S MATTERS, ISSUES & QUESTIONS

Draft Hearings Programme  
[Please note: this may be subject to change.]

Week 1
Wednesday 2 May 2012
Matter 1 – Spatial Strategy, Development Distribution & Environment  
[Core Strategy policies: SS1, SS3, SS4, CSD4]

Thursday 3 May 2012
Matter 2 – Housing, Economy and Infrastructure  
[Core Strategy policies: SS2, SS5, CSD1, CSD2, CSD3, CSD5, CSD10]

Friday 4 May 2012
Matter 3 – Folkestone Racecourse  [Core Strategy policy: SS8]

Week 2
Wednesday 9 May 2012
Matter 4 – Other Strategic Allocations  [Core Strategy policies: SS6, SS7]  
\textit{am} - Shorncliffe Garrison  
\textit{pm} - Folkestone Seafront

Thursday 10 May 2012
\textit{am} - Matter 5 - Areas of Strategic Change  
[Core Strategy policies: CSD6, CSD7, CSD8, CSD9]  
\textit{pm} - Other Matters – and Exception Sites (if required) \textit{(pm)}

Matter 1 – Spatial Strategy, Development Distribution & Environment  
[Core Strategy policies: SS1, SS3, SS4, CSD4]

Issue 1: Is the Core Strategy’s spatial strategy and intended distribution of development sufficiently justified and consistent with the local evidence base and national policy? Has sufficient consideration been given to relevant environmental factors?

1.1 Is the Strategic Corridor proposed in policy SS1 robustly defined and adequately justified – specifically in respect of the Kent Downs Area of Outstanding Natural Beauty (AONB)?

1.2 Is the Settlement Hierarchy (table 4.3) adequately justified by the local evidence base? Does policy SS3 provide sufficient guidance about where development should be located? Are the Council’s suggested changes to this policy needed for soundness reasons?

1.3 Is the Priority Centres of Activity Network (table 4.4 and figure 4.5) sufficiently clear and adequately justified by the local evidence base? Specifically, what is the status of the Major Employment Sites – and are they clearly defined for planning policy purposes? How can the soundness of the Major Employment Sites be assessed against alternative locations?

1.4 Does Core Strategy as submitted take sufficient account of relevant legislation and national policy in respect of biodiversity and landscape conservation – notably in respect of international nature conservation sites and the Kent Downs AONB? If not, are the changes now proposed by the Council (for example to policies SS1 and CSD4) sufficient to address any
soundness/legal compliance failings? Are additional safeguards needed arising from the Appropriate Assessment in respect of international nature conservation sites at Dungeness?

1.5 Does the Core Strategy correctly apply national policy in relation to planning for flood risk? Specifically, has a sequential approach been applied at a strategic level to determine the amount of housing envisaged in Romney Marsh generally (and New Romney in particular) as opposed to other locations in the Plan area that are a lower risk of flooding.

**Matter 2 – Housing, Economy and Infrastructure**

[Core Strategy policies: SS2, SS5, CSD1, CSD2, CSD3, CSD5, CSD10]

**Issue 2:** 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?

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?

*Inspector’s Note: it would be helpful if the housing supply information in table 4.2 could be further broken down, along the following lines:*

- completions
- outstanding planning permissions
- existing development plan allocations that have not yet been built and remain available (excluding those with outstanding permissions)
- housing supply arising from Core Strategy allocations
- housing supply anticipated to come from sites to be allocated in future DPDs (excluding those with outstanding permissions)
- housing supply anticipated to come from sites that have not been specifically identified as available through the local planning process (“windfall sites”) – if any.

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

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?

*Inspector’s Note: as a general point, it is unclear whether floorspace figures in policy SS2 (and elsewhere in the Plan) are gross or net: this should be clarified.*

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?

2.4 Is the Core Strategy’s approach to affordable housing sufficiently clear and adequately justified, with particular regard to potential effects upon development viability?
2.5 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 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 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?

**Matter 3 – Folkestone Racecourse**

[Core Strategy policy: SS8]

**Issue 3:** Are the Core Strategy’s proposals for Folkestone Racecourse realistic, deliverable, adequately justified and consistent with national and regional policies?

3.1 Has it been demonstrated that the type and amount of development now proposed is necessary in order to achieve improvement of the racecourse facility? What alternative approaches were considered and why were they discounted?

3.2 Is the intended scale, type and location of development proposed at Folkestone Racecourse consistent with national policies that seek to (1) protect the countryside for its own sake and (2) reduce the need to travel and secure more sustainable patterns of transport development?

3.3 Does policy SS8 give sufficient guidance to ensure that the type and amount of development proposed, along with the racecourse’s improvement, will be secured? Specifically, has adequate clarity been provided in respect of:
   a) infrastructure requirements (notably in respect of transport, drainage and green infrastructure);
   b) deliverability and phasing?

**Matter 4 – Other Strategic Allocations**

[Core Strategy policies: SS6, SS7]

**Issue 4:** Are the Core Strategy’s proposals for Shorncliffe Garrison and Folkestone Seafront realistic, deliverable, adequately justified and consistent with national and regional policies?

4.1 Shorncliffe Garrison:
   a) Are the location, boundary and proposed mix of uses in this strategic allocation adequately justified? What alternatives were considered, and why were they discounted?
   b) Has sufficient consideration been given to (1) the transport implications of this proposal and (2) the site’s historic significance?

4.2 Folkestone Seafront:
   a) Are the location, boundary and proposed mix of uses in this strategic allocation adequately justified? What alternatives were
considered, and why were they discounted? Is the extension to this site boundary that is now being proposed by the Council necessary for soundness reasons?

b) Has sufficient consideration been given to the future role of the Folkestone Harbour itself and to existing and proposed linkages (notably the existing harbour rail link)?

**Matter 5 – Areas of Strategic Change – and Other Matters**

[Core Strategy policies: CSD6, CSD7, CSD8, CSD9]

**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?**

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?

5.2 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?

5.3 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?

5.4 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?

5.5 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?

5.6 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?

**Exception Sites Promoted By Representors**

In all cases, the representor is asked to submit a short statement (maximum 3,000 words) by **Thursday 12 April 2012** explaining why the site concerned is considered to be a strategic site that is central to the achievement of the Core Strategy. It should be noted that paragraph 4.6 of PPS 12 states that progress on the Core Strategy should not be held up by the inclusion of non-strategic sites.

Michael J Hetherington
Inspector for the Shepway Core Strategy DPD Examination
14 March 2012