

Shepway Core Strategy Review

Additional comments from [REDACTED] 30th June 2020 on behalf of Acrise Parish Meeting.

The text in black is a transcript of the submission made on 6th March 2020

The text in red are additional comments made by [REDACTED] on 30th June 2020

Core Strategy Local Plan Review

Not justified

There is now overwhelming evidence that human activity threatens to have a disastrous impact on the global natural environment. Recent reports such as the Living Planet Report (WWF 2018) and Intergovernmental Panel on Climate Change report (IPCC 2018) provide robust evidence of the scale and seriousness of this challenge. The UK government is a signatory to the United Nations Framework Agreement on Climate Change, which was devised in Paris in 2015. The UK, along with all other nations also supports the United Nations Sustainable Development Goals or SDGs. The Core Strategy Review fails to acknowledge this international context at any point, nor the UK involvement with it. This omission has a fundamental impact on all parts of the strategy.

Not effective

It is highly questionable whether the aspirations to protect and enhance the landscape and natural environment which permeate the strategy can be reconciled with the desire for continued economic growth and ever-increasing levels of economic prosperity. This tension raises the question as to whether many of the individual policies, whilst laudable in themselves, can actually be delivered and whether they can be measured or evaluated in the ways that are suggested. The proposal for a new 'garden settlement' at Otterpool presents particular problems as it threatens to overload the social and environmental 'carrying capacity' of the district.

Not sound

In summary, whilst the strategy outlines policies for the next two decades it fails to take adequate account of the planetary pressures which are likely to arise in this period. These need to be much more fully factored into the presumptions and policies in the Core Strategy. This means the Core Strategy Review is not sound in its present form.

Suggested modifications

The aims and visions for Folkestone and Hythe District (Section 3) need to be reframed in the light of national and international concerns about ecological overshoot. The four strategic needs should include explicit reference to the imperative of living within planetary limits. There are fundamental problems with the 'Housing and the Economy Growth Strategy' which are difficult to resolve. It needs to be acknowledged that reconciling the target for a minimum of 12.845 dwelling by 2016/17 with carrying capacity of the district is a near impossible dilemma. Acknowledging this openly and honestly will be a first step towards creating a more acceptable Strategy.

Since the submission was made in March 2019 hundreds of groups and organisations around the country (including the UK government) have declared a climate emergency. The strategy needs to

be set much more clearly within this context and include sound and effective policies that outline a local response to this global crisis.

PS Please note the typo in the suggested modifications above. '2016/17' should '2036/37'

Policy SS8 New Garden Settlement Sustainability and Healthy New Town Principles

Not positively prepared

The policy concentrates chiefly on energy and water efficiency but fails to take account of other sustainability principles. These are set out in the United Nations Sustainable Development Goals which the UK government supports and reports upon. There needs to be much more detail on how the new garden settlement will actually become a 'beacon of best practice for environmental sustainability' (para 4.184) as this seems to be little more than an aspiration in the strategy as it stands. A key example is water usage where it is acknowledged that the area is at risk of 'serious water stress' (para 4.185) but there is insufficient detail of how the policy of a 'maximum use of 90 litres per person per day of potable water' (Policy SS8 (1) b) will actually be achieved. Furthermore, it makes little sense to divorce environmental sustainability from social and economic sustainability. The SDGs are explicit in how these may be brought together and the policies set out here should consider how the different dimensions of sustainability - environmental, social and economic - can be realised in the proposed new garden settlement.

Suggested modifications

The policy needs to address each of the 17 Sustainable Development Goals in order to be judged as 'sound. The policy will only be meaningful if it can set out not only what is to be achieved but how this might be done.

I am concerned that the policy as it is currently written appropriates the term sustainability to support and justify a strategy which is fundamentally unsustainable. This is something which needs to be explored in the oral part of the examination.

The evidence of climate disruption has continued to mount over the last 18 months so the assumptions which underpin water supply need to be subjected to increasingly stringent tests.

Policy SS8 New Garden Settlement Sustainability and Healthy New Town Principles

This policy claims to be set out the how the new garden settlement is informed by sustainability principles. However, the policy itself concentrates chiefly on a narrow set of issues - chiefly water and energy. Other aspects of sustainability are ignored. The United Nations Sustainable Development Goals (SDGs) which the UK government supports, provides a set of goals which cover all aspects of sustainability - economic, social and environment - and seeks to integrate them. This policy needs to do the same if the new garden settlement is to be a 'beacon of best practice for environmental sustainability' (para 4.184). It is also unclear how the policy will be implemented or whether it is simply an aspiration. The targets for water use are a case in point. Achieving a maximum use of 90 litres per person per day of potable water is a laudable aspiration but there is little detail about how this will be achieved and whether it is realistic. The suspicion is that having

acknowledged the district is an area of 'serious water stress' (para 4.184) the target of 90 litres has been adopted simply to balance the books.

The policy should consider each of the 17 UN goals in turn if it is genuinely establish sustainability principles as indicated in the title.

It appears that the term 'sustainability' has been appropriated in the strategy as a way of making policies seem desirable. Exploring what a broader vision of sustainability and the way that might be made meaningful requires discussion.

This point about the use of language is an important one. Sustainability is a term which is used in multiple ways. If the new garden settlement is to adopt 'healthy new town principles' there needs to be a clear commitment to enabling people to thrive whilst living within environmental limits.

3.1 District Planning Aims

The Strategy is setting out policies for the next 20 years in a period when there is overwhelming evidence that we can expect environmental stress to become increasingly severe (see WWF State of the Planet report 2018 and the Intergovernmental Panel on Climate Change Report 2018). The UK government has signed up to 2015 Paris Climate Change Agreement and supports the United Nations Sustainable Development Goals (2015-2030). The aims of vision for the district need to be set within this larger context.

The policy is currently focussed on sustainable development and needs to be re-orientated towards sustainable living. This challenges the notion of unlimited growth.

The oral examination needs to explore what is meant by sustainable development and how this might realised within the plan period.

Suggested modification

Reword table 4.2 to set a target of a 'maximum' of 12.845 dwellings.

Given the totally unexpected impact of

Policy SS2 Housing and Economic Growth Strategy

The housing allocation of 12,485 will place huge strains on the environment and physical and social infrastructure of the district. The disadvantages (as well as the advantages) of a development on this scale to be acknowledged in the strategy.

Suggested modification

Why does this policy set a 'minimum' of 12,845 houses not a 'maximum'?

The impact that COVID-19 has already had on the economy and the scale of the economic downturn that is predicted in the coming months and years now challenges the housing and economic growth strategy at a fundamental level. The prospects of Otterpool attracting new businesses and creating employment look bleak and the risk of creating a commuter settlement with thousands of houses and residents is increasingly more real.

Policy CSD4 Green Infrastructure of Natural Networks: Open Spaces and Recreation

This policy needs to make specific reference to the features which contribute to 'diverse local landscapes'. These include coppice, hedgerows, ponds and meadows. What level of protection will be offered to such features?

Suggested modification

Reword sentence two of clause (e) to read 'Elsewhere development must not jeopardise the protection and enhancement of the district's distinctive and diverse landscape features including coppiced woodland, hedgerows, ponds, walkways and ancient meadows (especially where these support the AONB) and must reflect the need for attractive and high quality open spaces throughout the district.'

The value of taking an holistic, rather than a piecemeal, approach to conservation is now being increasingly promoted by conservation groups and this needs to be explicitly acknowledged in the policy. Individual wildlife pockets are not sufficient on their own.