



Authority Monitoring Report 2014

Folkestone
Hythe & Romney Marsh
Shepway District Council



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Note

This document has not been formally adopted/ approved by Shepway District Council and is presented as a factual source of local data. Every effort has been made to provide accurate information but responsibility is not accepted for any errors that may be reproduced from this publication. Interested parties are strongly advised to raise any uncertainties or queries with the Shepway Planning Policy Team via the details below.

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1. Introduction

- 1.1. This is the Authority Monitoring Report (AMR) for the district of Shepway. Its purpose is to report on planning policy performance over the period to enable the success of existing policies and planning decisions to be evaluated, and to assist in the review and maintenance of an up-to-date suite of local planning policies.
- 1.2. This main body of the report is structured according to the aims and monitoring indicators set out in the Shepway Core Strategy Local Plan (2013) chapter topics. The data contained is based upon the most recent information available at the time of writing relating to the monitoring year (2013/14) unless stated.
- 1.3. The AMR is produced in accordance with The Town and County Planning (Local Planning) (England) Regulations 2012:

Regulation 34(1): progress on producing local plan documents

Work has progressed on producing an 'issues and options' Policies and Places Local Plan that will deliver the Core Strategy through new land allocations and replacing the remaining development management policies. The document will also invite land submissions (incorporating a 'call for sites'). It is intended to consult on this document in January 2015. The intended date of November for this consultation as given in the Local Development Scheme has had to be amended due to the Planning Policy team being short staffed for four months.

Regulation 34(2): implementation of local plan policies

As stated in the 2013 AMR the Council is no longer applying a number of saved District Local Plan Review (2006) policies, particularly following adoption of the Shepway Core Strategy Local Plan on 18th September 2013. The Core Strategy introduces five development plan policies under its 'spatial strategy' section, nine 'Core Strategy Delivery' policies, and a 'DSD' policy reflecting the national 'presumption in favour of sustainable development'.

Appendix 5 of the adopted Core Strategy sets out the continuing saved Local Plan (2006) policies effectively supporting the Core Strategy. It also outlines applicable supplementary planning documents.

Regulation 34(3) and 34(7): housing supply and monitoring (respectively)

Other chapters in this Report are devoted to the ongoing monitoring of specific policies that have been applied in decision making and further detail on housing supply (chapter4).

Regulation 34(4): Neighbourhood Development Plans

There has been a lot of interest within the district in neighbourhood planning, but as yet no neighbourhood plans have been adopted within Shepway. The following Neighbourhood Development Plan areas have been agreed:

- Hythe

- New Romney
- Sellindge
- St Mary in the Marsh Parish Council has produced a draft plan, which the district authority is currently considering.
- Lympne Parish Council is currently working towards producing a draft plan having actively engaged with their local community through the Lympne Neighbourhood Plan Committee.

In relation to 'Localism' and community activity more generally, the following have been successfully nominated for assets of community value in the year 2013/14:

- CA1 of 2014 - New Inn, Etchinghill
- CA2 of 2014 - Cherry Pickers, Cheriton
- CA3 of 2014 - Land to the northwest and adjoining Hawkinge Community Centre

Regulation 34(5): Community Infrastructure Levy (CIL)

Consultation on the Community Infrastructure Levy (CIL) Preliminary Draft Charging Schedule took place from Monday 18th August to 5pm Monday 13th October 2014. The Council has been reviewing all the responses that were received. Therefore no CIL has been collected for this year.

Regulation 34(6): Duty to Cooperate

Significant collaborative work in the sub-region has already been established (consistent with the Duty to Cooperate) by the East Kent Regeneration Board (EKRB) to confirm shared infrastructure priorities. This is informing Community Infrastructure Levy activity and influencing strategic funding bids, especially through the Kent and Medway Economic Partnership (a sub-regional board of the South East Local Enterprise Partnership). General information sharing on strategic planning is well established in the county and East Kent through a number of existing professional groups such as the Kent Planning Officers Group (KPOG) and the Planning Policy Forum (PPF).

However the EKRB has also agreed a Memorandum of Understanding, initially drafted by Ashford Borough Council, to help formally tackle the Duty. The Council formally agreed to this in June 2014. The Memorandum provides the basis by setting out the broad objectives/scope, and the topics where “we will work together... where possible”.

Shepway acted under the Duty to Cooperate by contributing to the East Kent Gypsy & Traveller Accommodation Assessment. This assessment was undertaken by Salford University and meetings on this issue continued through 2013/14 that were attended by Shepway, Ashford, Canterbury, Dover, Thanet and Kent County Council officers.

Officers from Shepway have taken part in consultation exercises, in the form of a workshop and formulating responses to the South Marine Plan. Shepway also regularly attends the Kent and Medway Economic Partnership and Local Nature Partnership meetings.

2. Strategic Need A: Challenge to improve employment, educational attainment and economic performance

A1. Increase the population of settlements and their prosperity

The most recent statistics state that the population of the district has increased from 100,300 in 2006 to 108,000 in 2011, a growth of 7,700 over a five year period. Source (Census 2011).

The 2013 mid-year estimates indicate that Shepway continues to have an ageing population with the district having the oldest mean age for residents of any district in Kent at 43.0 years. This compares to a mean age for Kent as a whole of 40.6 years - http://www.kent.gov.uk/_data/assets/pdf_file/0019/14725/Mid-year-population-estimates-age-and-gender-profile-bulletin.pdf

A2. Enhance the viability/vitality and appeal of Town Centres, with Folkestone as a major commercial, cultural and tourism centre featuring upgraded connections and public realm

Policy SS4 requires that all development in Town and District Centres should contribute to a mix of active ground floor uses with predominantly retail goods (A1) frontage shopping retained at the core of the centres. This is measured through an annual survey of town centre vacancy rates in Folkestone Primary, Hythe, New Romney and Cheriton shopping areas. Secondary shopping areas are not monitored. The vacancy rates are reported on shop frontage length not number of units. The target is that vacancy rates by frontage should not exceed 10%. The figures for 2013/14 are as follows:

Shopping Area	Vacancy Rate
Folkestone Primary	6.1%
Hythe	4.7%
New Romney	3.3%
Cheriton	7.8%

A3. Achieve real terms increases in gross incomes

The most recent figures for Shepway (2013) show that the average gross weekly pay for Shepway residents in full-time employment was £498, an increase of £17.20 over the three year period from 2010, equating to an average growth of £5.73 per annum and therefore exceeding the target set out in the Core Strategy of £3.35 per annum.

This compares to an increase for Kent residents of only £10.30 over the same three year period from £530.40 in 2010 to £540.70 in 2013 – an average of £3.43 per annum – and an increase of just over £3 for residents in the South East (Source: KCC Research and Evaluation)

A4. Grow the proportion of residents with higher-level qualifications

In 2013, the percentage of Shepway residents with qualifications at NVQ Level 4 and above was 26.8%. Whilst this is falling short of the target set out in the Core Strategy, there has been somewhat of a recovery since 2011, when the attainment level actually dipped to 20.5%, but then increased by 1.5% in 2012 to 21.5% and then increased sharply by 5.3% to 26.8% in 2013.(Source: KCC Research and Evaluation)

A5. Deliver a flexible supply of employment land in terms of location, size and type

According to the Commercial Information Audit for the period 2013/14, around 0.82 hectares of B-class development was completed in the district, (although a further 0.15 hectares was under construction at the time of survey). However, this was offset by a loss of some 0.54 hectares, leading to a net gain of only 0.28 hectares. The majority of the gains in recent years have been through changes of use and extensions as opposed to the comprehensive development and occupation of new employment sites.

Shearway Business Park – following the success of an existing development at the business park (Glenmore Centre), a detailed application (Y14/0842/SH) has been submitted by Glenmore Commercial Estates for the erection of 8 buildings (Blocks A-H) divided into 31 units for B1, B2 and B8 class uses. This proposal would develop out the remaining 0.75 hectare plot on Shearway Business Park (Phase 1).

Progress is also being made by the council to improve access to Phase 2 land off Caesar's Way, which has recently had an outline planning permission for a mixed use scheme including 77 residential units, 5,142sqm of industrial development and 660sqm of office on this 4.35 hectare site.

Link Park - Following the approval of outline application Y09/0145/SH, the owners of Link Park near Lympne have:

- Completed the required upgrading works to the A20/Otterpool Lane which will allow the delivery of the site.
- Installed a new on site highway which will not only serve the phase 1 land but also the phase 2 land.
- Installed a new on site water main which will again serve both the phase 1 and phase 2 land.

- Installed a new on site foul water sewer which is sized to cater for both the phase 1 and phase 2 land.
- Installed the first phase of a new offsite foul water sewer.
- Installed a new electrical supply to the site from the primary substation in Hythe. There is an ongoing commitment to reserve this supply on an annual basis.
- Installed a new gas supply to the site again from Hythe.
- Commenced the structural landscaping to the phase 2 land (under the terms of the s106 agreement this does not constitute commencement of development). Contracted with potential occupiers of the phase 1 employment land to deposit surplus spoil on the phase 2 land thus allowing the completion of the structural landscaping.

The Ridgepoint site (small business units) is now under offer, as are a further 5 hectares of the site for a potential major employer.

Mountfield Road Industrial Estate, New Romney – progress on the remainder of this site has been relatively slow. Plot 19 on Collins Road has been fenced off and an access constructed in preparation for development. The district council is actively progressing Phase 4 of Mountfield Road Industrial Estate with a view to submitting an outline application in 2015/16.

A6. Maximise the efficient use of infrastructure and secure further improvements unlocking the development of priority sites, communities and areas

Folkestone Seafront Priority Connections – including Tram Road:

Works were completed on Tram Road to make it two-way on 05 May 2014, thereby improving accessibility to and from the harbour and seafront. These improvements constitute the first phase in a number of changes in and around the Folkestone Seafront site that are required to improve accessibility.

Closure of the Harbour Branch Line: In July 2014, the Office of Rail regulation gave formal approval of Network Rail's request for its closure. The removal of signals, sleepers and rail track is likely to take place shortly, creating the opportunity for the swing bridge to be used as an access route in and out of the harbour.

Tontine Street Improvements: Kent County Council have commissioned a draft design for improvements to Tontine Street that will allow for a bus contraflow that will enable bus services to better serve not only the seafront development but also existing residents in East Folkestone. £500,000 has been secured through Central Government's Local Growth Fund, with contributions also coming from the County Council and through developer contributions (s.106 contributions)

Folkestone Central Railway Station Access Upgrades

A comprehensive way-finding initiative to improve linkages between Folkestone Central Railway Station and Folkestone Town Centre and Coastline is well under way. Consultants 'All Points West' have fully designed a scheme that has been funded by KCC, Shepway DC, Folkestone Town Council and the Creative Foundation. This initiative will be fully implemented by April 2015.

Folkestone West Railway Station

In May 2014, a new car park at Folkestone West was completed to meet the increased demand from passengers for its High Speed train services. The project was funded through the Department for Transport.

A7. Provide housing of a quality and type suited to long-term economic development needs

A total of 37 new affordable dwellings were provided over the course of the year, including new build and refurbished units. This figure also includes dwellings within the mortgage rescue scheme.

A8. Regenerate deprived neighbourhoods, including Central and Northern Folkestone and in pockets within Romney Marsh

The Department for Communities and Local Government is updating the indices of deprivation, including the Index of Multiple Deprivation (IMD), for publication in summer 2015. The most recent indices of deprivation are from 2010.

A9. Expand cultural and creative activity in the district, with refurbished premises and spaces in Folkestone's old town forming a vibrant Creative Quarter visitor attraction

In September 2013, the Heritage Lottery Fund announced that the bid for a Folkestone Townscape Heritage Initiative had been successful, awarding £1.3m towards a programme of refurbishment and reinstatement for a number of critical and priority buildings in the Old Town (Creative Quarter) of Folkestone.

Through this scheme, 18-24 the Old High Street and 23-27 Old High Street (both of which have listed features) were awarded funding for their comprehensive refurbishment. Works commenced on both sites in mid-2014 and are expected to be completed by mid-2015.

It is expected that in the region of 12 properties will be refurbished through this scheme in the period up to 2018.

In addition to this scheme, the Creative Foundation are also taking forward a refurbishment and new build programme for a number of their properties in the

Creative Quarter. Folkestone Town Council is also in the process of submitting a Heritage Lottery Fund application to reanimate the Old Town Hall into a museum and exhibition centre.

Strategic Need B: Challenge to enhance the management and maintenance of natural and historic assets

B1. Expand green infrastructure and enhance its connectivity, making a positive contribution to managing the impacts of climate change through adaptation and mitigation

There have been neither gains nor losses in the number of Local Wildlife Sites in Shepway for the period of this AMR.

The Marine and Coastal Access Act 2009 allows for the creation of a type of Marine Protected Area (MPA), called a Marine Conservation Zone (MCZ). MCZs protect a range of nationally important marine wildlife, habitats, geology and geomorphology and can be designated anywhere in English and Welsh inshore and UK offshore waters. In November 2013 the Government designated 27 sites, including one off Folkestone's coast called Folkestone Pomerania. In February 2014 the Government announced a second tranche of candidate sites including one from Dover to Folkestone. A further site at Hythe Bay was proposed for designation as part of the 2013 DEFRA consultation. However as the proposal raised strong opposition from the fishing industry, the decision to designate was deferred to allow for further discussion with local fishing representatives to find a compromise that meets industry wishes and enable conservation of the site to be achieved.

B2. Minimise local carbon emissions, maintain air quality, control pollutants and promote sustainable waste management

The Department of Energy and Climate Change will not produce figures for carbon emissions for local authorities for 2013 until July 2015. The most recent publication shows the per capita Local CO₂ emission estimates; industry, domestic and transport sectors for the years 2005 to 2012. It can be seen from the table that there has been an overall decline in carbon emissions over the seven years in Shepway.

Year	Industry and Commercial	Domestic	Transport	Total
2005	3.2	2.6	2.3	8.1
2006	3.2	2.5	2.3	8.2
2007	3.0	2.4	2.4	7.8
2008	2.2	2.4	2.2	6.9
2009	1.8	2.2	2.1	6.1
2010	1.9	2.3	2.0	6.2
2011	1.7	2.0	1.9	5.7
2012	1.8	2.2	2.0	5.9

There were no planning applications received or determined for sustainable waste handling facilities within the period.

B3. Protect and enhance habitats and species to sustain biodiversity, particularly where of international and national significance including a focus on Dungeness and Folkestone Warren

The status of SSSI land is monitored by Natural England, however the surveys of the land are not carried out every year. In 2012 the status of 60.55% of Folkestone Warren had been surveyed as favourable and 39.45% as unfavourable but recovering. Two units in the Dungeness SSSI complex were surveyed in September 2013 and were as unfavourable but recovering, this was the same as the previous survey in 2009. Overall the status of Dungeness has been assessed as 65.69% favourable, 34.04% as unfavourable but recovering. In 2012 0.13% was assessed as unfavourable – declining due the presence of an invasive freshwater plant species.

B4. Manage sensitive landscapes shaping the character of the district, especially on the edge of settlements or within the Kent Downs AONB and its setting

Last year a new Kent Downs Management Plan and associated Action Plan was developed and published for the years 2014-2019. By the end of the previous plan period, 57 of the indicators/targets had been achieved, 18 had been partially achieved, 10 had amber status and 2 had red status. However those indicators covered the whole of the AONB area that includes 12 local authorities.

Of particular significance to Shepway was the setting up of the Up on the Downs Landscape Partnership, a £2.5 million project that is funded through the Heritage Lottery Fund. This project will provided landscape and nature management investment, community engagement and training, and access improvements. One site to benefit from such investment is Folkestone Warren.

B5. Increase the efficiency of water management to maintain local water resources and to improve the quality of watercourses and the sea

Throughout the summer, the Environment Agency collects scientific data on the cleanliness of our bathing waters. In Shepway, six beaches are measured: Folkestone, Hythe, Sandgate, Dymchurch, St Mary's Bay and Littlestone. Weekly and annual compliance ratings are given to show whether the beaches meet the higher standard, meet the minimum standard or fails to meet the minimum standard.

Folkestone, Dymchurch, Hythe and Sandgate all meet the higher standard, reflecting no change from the previous year. However, St Mary's Bay met the minimum standard which was a fall in standard from the previous year. Environment Agency investigations have identified the New Sewer as a source of pollution to explain

reduced water quality in the past. This river takes the drainage from the surrounding marshland, which includes agricultural runoff and private sewage effluents. Discharge from the long sea outfall in Hythe may also occasionally cause a reduction in water quality.

Littlestone also met the minimum standard, reflecting no change from the previous year. According to the Environment Agency's investigations there is a drainage ditch, which receives the effluent from New Romney sewage treatment works and discharges onto the beach in regular intervals. Diffuse agricultural pollution from the marsh drainage may also affect bathing water quality. There are also a high number of private sewerage systems in place especially towards Greatstone. Since the sewer network was recently extended to serve this previously un-sewered area, the impact of private discharges should start to decrease if households connect to the system. Investigations in Littlestone are ongoing.

B6. Maintain the sense of openness and tranquility of the countryside and undeveloped coast

Information relating to planning permissions for new build residential development is not currently available. Report will be updated shortly when this information is available.

B7. Manage Shepway's coast to ensure resilience to climate change processes, reducing the risk to life and property from flood hazards, and actively managing coastal environments for green infrastructure and sustainable recreational purposes

The Folkestone to Cliff End Strategy is managed by the Environment Agency and not Shepway District Council. It contains various schemes, some of which the Council are responsible for delivering, and one of these is the ongoing beach management work at Folkestone and Hythe. The Council has no involvement in the Hythe Ranges scheme which is again the Environment Agency. When Information relating to the progress of the Folkestone to Cliff End Flood and Erosion Management Strategy has been obtained from the Environment Agency, the report will be updated.

B8. Enhance the character and function of Shepway's historic towns and villages, and the management of historic assets/visitor attractions

Following the adoption of a new Conservation Area Appraisal for Character Area 4 of the Folkestone Conservation Area in 2012/13, a Conservation Area Management Plan for the same area was adopted in 2013/14. This was in support of the Folkestone Old Town Townscape Heritage Initiative which was approved in September 2013.

B9. Promote choice in means of transport through opportunities for walking and cycling and improved public transport networks and information

According to information received from Stagecoach, there was an increase of 2.4% in passenger boardings during the year, reflecting a range of improvements made to bus services. Data gathered by the Office of Rail Regulation in station usage – travelling to or from the station, shows that for the year 2013/14 there was an increase in station usage at Folkestone West of 7.8%, Folkestone Central 1.8%, Sandling 0.19%. At Westenhanger there was a decrease of 5.6%.

Strategic Need C: Challenge to improve the quality of life and sense of place, vibrancy and social mix

C1. Maintain cohesive neighbourhoods and encourage increased voluntary activity, retention of viable local community buildings and civic interest in community development

As was stated earlier in this document, there has been a lot of interest within the district in neighbourhood planning, but as yet no neighbourhood plans have been adopted within Shepway. The following Neighbourhood Development Plan areas have been agreed:

- Hythe
- New Romney
- Sellindge
- St Mary in the Marsh Parish Council has produced a draft plan, which the district authority is currently considering.
- Lympne Parish Council is currently working towards producing a draft plan having actively engaged with their local community through the Lympne Neighbourhood Plan Committee.

C2. Ensure choice of high-quality residential accommodation is maximised within individual neighbourhoods and villages, with a mix of housing size, type and tenure

The target for this aim is that 50% of completions over the plan period to consist of 3 (or more) bedroom dwellings. For the period 2013 to 2014, 82 dwellings out of a possible 175 were 3 or more bedroom dwellings, this represents a percentage of 46.8%.

C3. Assist in meeting the essential needs of vulnerable local social groups and provide more properties that allow people to remain living independently

There have been no dwellings completed within the monitoring period to the Lifetime Homes standard.

C4. Improve sports facilities and reduce relative disparities in the health of communities

Following the opening of the Three Hills Sports Park in Cheriton in 2013, further work has been undertaken to improve the facilities at this sports complex. Funding for a new 3G pitch has been secured from the Football Foundation and Shepway District Council, and work is scheduled to commence in late 2014.

C5. Increase access to services that are appropriate to the needs of the local population and maintain essential rural services

There were no new school premises provided in the year.

C6. Improve the urban environment, including the usage and sense of security of key public spaces including major parks, town centres and public transport stations

There have been a number of improvements to the urban environment in Shepway over the course of 2013/14.

Perhaps the most high profile has been the initiation of the construction of a Memorial Arch and improved public realm at the top of the Road of Remembrance in Folkestone, along with improved planting on the route down to the Harbour. The memorial marks 100 years since the start of the First World War and commemorates the role that Folkestone and its residents played. The Memorial Arch project was led by Step Short, with support from Shepway District Council and Kent County Council.

During 2013/14, improvements were also made to Hythe High Street through s.106 funding. These included new street signage and lighting.

Plans are also well developed for improvements to the following:

- Mackeson Square, Hythe
- Tontine Street, Folkestone

In addition to the above, the parks and public realm in Shepway are the focus of a continuous programme of improvements throughout the year.

C7. Reintegrate physically divided or highly linear villages and neighbourhoods through central social infrastructure or community development

Perhaps the largest amount of progress in this respect has been with the considerable amount of work that has been undertaken to date in Sellindge, a village that is currently highly linear and therefore lacks a central focus that helps to foster community development. Following the adoption of the Core Strategy, discussions were initiated regarding a proposal that would include residential development, community buildings and a village green.

C8. Improve Town Centre environments, facilities and communications for businesses and visitors in the Romney Marsh area

Considerable work to improve town centre environments, facilities and communications for businesses and visitors on the Romney Marsh has been undertaken by the Economic Development team at Shepway District Council and partner organisations. These interventions include:

The Council was awarded £100,000 from Central Government in 2013 to help support the vitality and viability of Shepway town centres. Funding was distributed to a number of innovative schemes across the district, with grants being given to the Lydd Town Partnership for promotion, markets and events during 2014.

In partnership with Kent County Council, the district has also made a number of improvements to broadband provision on the Romney Marsh.

C9. Consolidate communities that are hosting significant new developments including at Hawkinge and Hythe

Considerable progress is being made on a number of 'major' residential developments which will see a many new community facilities, public services and new build employment premises. As set out in the adopted Core Strategy a number of these larger developments will be completed in the latter stages of the plan period, but the following progress has been made:

- Folkestone Seafront – Development Control Committee gave a resolution to approve the outline planning application for the comprehensive redevelopment of the Seafront in September 2013 – this includes 10,000sqm of commercial floorspace as well as sea and beach sports facilities.
- Hawkinge Mixed Use Land – having secured planning consent, discussions have been ongoing with the developer to agree the provision of commercial facilities as part of the overall masterplan for the site.
- Martello Lakes – having secured outline planning permission (including commercial and community facilities) and undertaken considerable ground work to raise levels, a detailed application for Phase 1 of the development was submitted in 2014.
- Shorncliffe Garrison – having been allocated as a strategic site, the district council has been working with a major developer to bring forward this site. A hybrid application will be submitted in 2014 which will include a number community facilities.

Five year supply of deliverable housing sites

FIVE YEAR HOUSING LAND SUPPLY STATEMENT FOR THE PERIOD 01 APRIL 2015 TO 31 MARCH 2020

PUBLISHED JANUARY 2015

SHEPWAY DISTRICT COUNCIL

SUMMARY

Shepway has a supply of deliverable sites of up to 102.7% against the newly adopted Core Strategy Local Plan minimum requirement for the period April 2015 to March 2020 (inclusive);

Delivery rates from 2006/07 and a projection for the current year (2014/15) are taken into account to produce an annual requirement based on both the recognised 'Liverpool' and 'Sedgefield' methodologies;

The number of identified sites is similar to the number of sites included in the 2013 supply and there is a modest increase in the total supply to 2,633 dwellings;

When considered against the requirements of the National Planning Policy Framework (paragraph 47), the five year supply is met with a 20% buffer using the Liverpool Method although it falls short under the Sedgefield Method; and

Just over two thirds of the supply included is on sites that already have planning permission, and a further quarter are allocated sites in the Core Strategy.

1. Introduction:

- 1.1 The National Planning Policy Framework (NPPF) requires local planning authorities to identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements. The NPPF also requires an additional buffer of 5% to ensure choice and competition in the housing market. In the case of Shepway District Council, where there has been a record of persistent under delivery of housing, the buffer has been increased to 20% to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land.
- 1.2 This document sets out Shepway District Council's assessment of its five year supply of deliverable housing sites. It also considers the most appropriate methods of calculation in light of emerging national guidance as well as comments made by Planning Inspector Christina Downes in her Appeal Decision (APP/L2250/A/13/2210752) on the development proposed at the Land at the former Lympe Airfield in September 2014 (currently subject to a judicial challenge).

2. Housing Requirement Considerations:

- 2.1 Following the adoption of the Core Strategy Local Plan in September 2013, the housing delivery target confirmed as a minimum of 350 dwellings a year (Policy SS2: Housing and the Economy Growth Strategy). However further allowances are required to be considered:

An additional buffer:

In previous statements, a 5% additional buffer has been used to calculate the housing requirement in Shepway. This was supported by the Core Strategy Inspector, although this decision was reached on a relatively short term assessment of the Council's delivery performance between 2006/7 and 2011/12. However, since this decision was made, the Planning Practice Guidance advises on a longer term view.

Indeed, in taking a longer term view, that is, starting at the beginning of the Core Strategy period in 2006 and also benefiting from a further 3 years in which things have not improved, Planning Inspector Christina Downes arrived at the conclusion that there had been persistent under delivery in the district, and therefore a buffer of 20% should be added to the housing requirement figure.

Past under delivery

In previous statements, a starting point of 01 April 2011 has been used to assess the extent of past under delivery. However, Planning Inspector Christina Downes concluded in her Appeal Decision that "It is reasonable to start at the beginning of the CS period in 2006", and as such any under delivery during this period should be included in any calculation for housing requirement.

The council's previous housing delivery rates are set out below in Table 1. Overall, this illustrates that in the 8 year period up to 31 March 2014, 2,000 dwellings were delivered in Shepway. This represents a cumulative under delivery of 800 dwellings. Factoring in the estimate for 2014/15, this leads to an under delivery of 850 dwellings over a 9 year period:

Year	Completions	Core Strategy Target	Over/Under Delivery	Cumulative Over/Under Delivery
2006/07	146	350	-204	-204
2007/08	402	350	52	-152
2008/09	562	350	212	60
2009/10	180	350	-170	-110
2010/11	132	350	-218	-328
2011/12	207	350	-143	-471

2012/13	206	350	-144	-615
2013/14	165	350	-185	-800
2014/15 (Est)	300	350	-50	-850
TOTAL	2,300	3,150		

Table 1: Housing Delivery 2006-2014

- 2.2 The figure of 300 dwellings delivered during 2014/15 has been derived from the Housing Information Audit, which highlighted that around 337 dwellings were under construction at the time of the audit (Autumn 2014). This is therefore a relatively cautious approach to the completion figure for 2014/15.

3. Calculating the Five Year Housing Requirement:

- 3.1 In calculating five year housing requirement for Shepway, consideration needs to be given to the approach taken to the under delivery. In effect, there are two approaches recognised nationally – the ‘Liverpool’ method and the ‘Sedgefield’ method. These are explained briefly below:

The Sedgefield Method: fully including past under delivery within the five year supply requirement, incorporating buffers etc. This clearly addresses the wording and sentiments of national policy and its recent interpretation, wholly meeting under delivery within the five years.

The Liverpool Method: the residual requirement (total number of homes left to build taking into account delivery rates) is divided by the number of years remaining in the plan period. This produces an annual residual average amount to factor in the five year supply. This approach is commonplace many parts of the country.

- 3.2 Again, the recent Appeal Decision (APP/L2250/A/13/2210752) provides a useful steer in addressing which method should be used. The conclusion reached by the Planning Inspector in this case was that:

“The fact that the CS has been found sound so recently, and that the Liverpool approach was integral to the requirement on which it was based, is a matter of considerable weight...In relation to the methodology to be applied in dealing with a shortfall, there is no prescription as to approach. It would not be in the interests of good planning or consistency to cast doubt on the CS Inspector’s judgement. I note that a similar conclusion was reached by the Inspector who recently determined the planning application for housing development at Blaby in Leicestershire”.

- 3.3 As such, the Planning Inspector concluded overall that:

a) A 20% buffer should be applied

b) The shortfall (which is calculated by **going back to 2006**) is around 823 (actually 800 due to slightly higher than expected figures for 2013/14)

c) The shortfall should be spread over the remaining Core Strategy period (**Liverpool Method was to be employed**).

3.4 The table below (Table 2) illustrates both methods:

Method A – Sedgefield	Method B – Liverpool
Stage 1A. The basic aggregate requirement in the period: $350 \times 5 = 1,750$	Stage 1B. Calculating the total plan residual, towards which the five year supply makes its proportionate contribution: $(20 \times 350) - 146 - 402 - 562 - 180 - 132 - 207 - 206 - 165 - 300 = 4,700$
2A. Calculating the scale of under delivery: $(350 \times 9) - 146 - 402 - 562 - 180 - 132 - 207 - 206 - 165 - 300 = 850$	2B. Adding in additional buffer, required in national policy: $4,700 + 20\% = 5,640$
3A. Adding all under delivery to the basic aggregate requirement (2A+1A): $850 + 1,750 = 2,600$	3B. Establishing the annual residual (including buffer) element required: $5,640 / 11 = 512.7$
4A. Adding in additional buffer, required in national policy: $2,600 + 20\% = 3,120$	4B. Deriving the requirement with buffered residual given the five year period: $512.7 \times 5 = 2,564$
Total Requirement: 3,120	Total requirement: 2,564

Table 2: Sedgefield vs Liverpool Methods

4. Addressing the Housing Requirement

4.1 Sources of supply can be categorised as set out as follows:

a) Sites with planning permission. Up to and including 31st October 2014. The figure includes sites where there is a resolution to grant permission.

(This estimate is a conservative analysis of the deliverability of individual sites, based on current available information. It could, but *does not* in this instance, include all sites of 5 or more dwellings with extant permissions. In addition to the documented supply, there are currently at least 100 dwellings on a further 11 sites with planning permission that could readily prove their deliverability, however at the time of writing this statement, there is not sufficient information to ensure that these sites will be delivered. These sites and similar developments should be reconsidered whenever an authoritative five year supply figure is required in future).

b) Sites with a residential allocation. This includes sites allocated in the adopted Core Strategy Local Plan 2013 and Local Plan Review 2006. Folkestone Seafront and Nickolls Quarry both have planning permissions and have been included under Category 1. However, Shorncliffe Garrison (Core Strategy Policy SS7), for which a hybrid application has been submitted and will go to committee in January 2015, and land at Sellindge (Core Strategy Policy CSD9) which is also subject to a live planning application are included in this category.

c) Sites in the Strategic Housing Land Availability Assessment (SHLAA). A small number of SHLAA sites have been selected for inclusion here and are all within the settlement boundary. East Station Goods Yard has been included in this list – it currently has a live application for 41 dwellings and has a Registered Social Landlord lined up to deliver 31 affordable homes in 2015/16.

d) Windfall sites. National policy allows recognition (paragraph 48), where appropriate, of an allowance in the five year supply for ‘windfall’ sites – those locations that are not specified as they are not identified in plan making. In line with the Core Strategy, within the 5 year supply, 2 years of windfall allocations has been included (in 2018/19 and 2019/20) totalling 150 units (75 per annum).

4.2 The housing land supply sites are set out in Appendix 1. These can be broken down into the following categories as set out in Table 3:

Source of Land Supply	Dwellings
Sites with planning permission (45 sites)	1,769
Sites with a residential allocation (4 sites)	643
Sites in the SHLAA (4 sites)	71
Sub-total	2,483
Windfall allowance (75pa over two years)	150
GRAND TOTAL	2,633

Table 3: Source of Land Supply

This shows a deliverable supply of 2,633 dwellings (including windfalls) over the forthcoming five year period. Based on the calculations set out under paragraph 3.4, this supply equates to:

Sedgefield Method: $(2,633/3,120) \times 5 = 4.2$ years of supply (84% of requirement)

Liverpool Method $(2,633/2,564) \times 5 = 5.1$ years of supply (102% of requirement)

- 4.3 In addition to the above, there are also a number of Care Home applications (C2) that could be applied to 5 year housing land supply, but which have not in this instance as the 5 year supply has been met without the need to incorporate them via the Liverpool Method. That said, two of the more substantial C2 developments have been incorporated – a retirement village in Hawkinge and a nursing home at Westbrook House in Folkestone. For the latter, a discount of 1/5 has been applied as set out in Appeal Decision APP/R0660/A/14/2212992, paragraph 53. This leads the 80 bedroom nursing home to contribute the equivalent of 64 units.

Appendix 1: Schedule of Five Year Supply Sites

Locations	Years				
	15/16	16/17	17/18	18/19	19/20
Land adjoining Quince Cottage, High Street, Brookland		5			
Units 1, 2 & 3 Westfield Lane, Etchinghill		7			
72 Cheriton High Street, Folkestone	12				
Folkestone Harbour And Seafront, Folkestone		48	44	45	60
Car And Coach Park Marine Parade, Folkestone		30	34		
The Leas Club, The Leas, Folkestone	18	50			
8-9 Marine Parade, Folkestone	12				
Former St Marys Westbrook School, Folkestone	25	3			
Land Rear 18 – 20 Radnor Park Avenue, Folkestone		13			
Royal Victoria Hospital, Radnor Park Avenue, Folkestone			16	20	
Folkestone Primary Academy, Park Farm Road, Folkestone	30	50	50		
Gas Works Site, Ship Street, Folkestone				10	20
Shorncliffe Garrison, Folkestone	64	64	65	77	63
East Stations Goods Yard, Southern Way, Folkestone	31	10			
Westbrook House 50 - 56 Shorncliffe Road And Adjoining School Playing Field, Folkestone (C3)		27	30	30	40
Westbrook House 50 - 56 Shorncliffe Road And Adjoining School Playing Field, Folkestone (C2)	64				
Land rear Carter Wallace, Caesars Way, Folkestone			30	20	27
Shakespeare Centre, 145 - 147 Sandgate Road, Folkestone		12			
Monument House, The Leas, Folkestone			12		
Lawrence House, 15 St Marks Close, Folkestone	17				
5 Trinity Crescent, Folkestone		5			
10 Grimston Avenue, Folkestone	8				
52 - 54 Guildhall Street, Folkestone		14			

Eversley College & Eversley Lodge, Cooling Lane, Folkestone	14				
Land Adjoining 43A, Black Bull Road, Folkestone		7			
14-24 Gray Close, Hawkinge			15	17	
Land adjoining Mill House, Mill Lane, Hawkinge		10			
Land Adjoining The Mayfly, Hawkinge	26				
Land at Hurricane Way, Hawkinge		21	30	30	30
Land Adjoining 9 Victoria Road, Hythe	8				
Land Rear 162 High Street, Hythe		5			
Hotel Imperial, Princes Parade, Hythe	24	20			
Nickolls Quarry, Dymchurch Road, Hythe	22	40	60	70	70
The Fishermans Landing Beach, Range Road, Hythe	30	30			
The Haven, West Parade, Hythe	7				
Squirrels, Cannongate Road, Hythe	9				
19 Seabrook Road, Hythe	5				
31 - 35 Littlestone Road, Littlestone	8				
Land Adjacent Chaklala Marine Parade Littlestone Kent	9				
Land rear 27, Victoria Road, Littlestone			8		
Land Adjoining 143 Queens Road, Littlestone			18		
11 Littlestone Road, Littlestone		11			
24 High Street, Lydd	5	6			
Land To The Rear 74 High Street, New Romney		6			
Allotment Gardens, Church Lane, New Romney	25				
Romney Marsh Potato Co Ltd, Cockreed Lane, New Romney			30	26	
New Romney Broad Location (Policy CSD8)					30
Land adjoining 1 Westview Cottages, Lydd Road, New Romney			15		
Land Adjacent 16 High Street, New Romney	6				
Land Adjoining 20 Encombe, Sandgate		36			
Land Adjoining West Wedge And Part Of Garden Of Hawkhurst	10				

Sandgate Esplanade, Sandgate					
Sellindge Broad Location	30	50	60	60	50
Former St Marys Bay Holiday Village, Dunstall Lane, St Marys Bay	15	20	25	12	
TOTALS (Not including windfalls)	554	600	532	407	390