



Folkestone & Hythe District Council

Core Strategy Review

Sustainability Appraisal Post-Adoption Statement

April 2022

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Sustainability Appraisal Post-Adoption Statement

1. Introduction

- 1.1 In February 2022 the Folkestone & Hythe District Council Core Strategy Review was found legally compliant and sound (subject to modifications) by the Planning Inspectors appointed to examine it.
- 1.2 This report explains how the Sustainability Appraisal (SA) process influenced the development of the Core Strategy Review.

Sustainability Appraisal and Strategic Environmental Assessment

- 1.3 SA identifies the social, environmental and economic impacts of a strategy and suggests ways to avoid or minimise negative impacts and maximise positive impacts. The Planning and Compulsory Purchase Act 2004 requires that SA is undertaken during the preparation of local plan documents, and that an SA Report is published. The Folkestone & Hythe SA also incorporates Strategic Environmental Assessment (SEA), as required by the European Directive on Environmental Assessment of Plans and Programmes 2001/42/EC (transposed into UK legislation through the Environmental Assessment of Plans and Programmes Regulations 2004). This is consistent with advice in the National Planning Policy Framework (2021), which states:

“Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains).”

- 1.4 The main focus of this report is on how the SA and SEA have informed the final Core Strategy Review (CSR). Regulation 16 of the Environmental Assessment of Plans and Programmes Regulations 2004 requires that, as soon as reasonably practicable after the adoption of a plan for which SEA has been carried out, the planning authority must publish a statement, which explains:
 - (a) How environmental considerations have been integrated into the plan;
 - (b) How the environmental report has been taken into account;
 - (c) How consultation opinions on the environmental report have been taken into account;
 - (d) The reasons for choosing the plan as adopted, in the light of the other reasonable alternatives dealt with; and
 - (e) The measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.

- 1.5 As the SA and SEA process have been integrated throughout the plan preparation process, this statement addresses not only environmental aspects but also the wider sustainability (social and economic) aspects.

Habitats Regulations Assessment

- 1.6 Habitats Regulations Assessment (HRA) – assessment of the impacts of plans and projects on the Natura 2000 network of internationally important nature conservation sites – is also required as part of the plan preparation process, by the European 'Habitats Directive' (transposed into UK legislation through the Conservation of Habitats and Species Regulations 2010). The Habitats Directive applies the precautionary principle to designated sites: plans can only be permitted if it has been shown that they will not adversely affect the designated sites, or else can go ahead only under limited and stringent requirements regarding findings of no alternatives, imperative reasons of overriding public interest and provision of compensatory measures.

2. How environmental and wider sustainability considerations have been integrated into the Core Strategy Review

Whether SEA/SA is required

- 2.1 The formal preparation of the Core Strategy Review began after 20 July 2004, so under the EU Directive this plan falls within the timescale of those requiring an SEA. National legislation also requires that sustainability appraisal should be an integral part of the plan preparation process.

Methodology

- 2.2 A framework for the SA process was established by commissioning the consultancy company LUC to produce a methodology. This guided the SA process throughout the development of the Core Strategy Review, which was undertaken by LUC.
- 2.3 The SA process has incorporated the requirements of SEA.

The process of SA/SEA

- 2.4 The various stages of SA/SEA that have been undertaken throughout the development of the Core Strategy Review are summarised in Table 1.
- 2.5 **The scoping stage:** The Scoping Report was produced in 2016. It included baseline data about environmental, economic and social characteristics of the areas likely to be affected by the Core Strategy Review, identified other plans, programmes and policies and their objectives, and identified issues and opportunities associated with each sustainability objective. The baseline data would be updated where applicable at each stage of the SA. The Scoping Report set out the proposed methodology for the remainder of the SA process, including the framework of SA objectives, appraisal questions and associated assumptions that were used to appraise the Core Strategy Review.
- 2.6 At each stage in the scoping process, statutory agencies and other key bodies were consulted on draft documents and comments received were taken into account in the final published document.

Table 1: How Sustainability Appraisal has been integrated into plan-making

Date	Plan-making Stage	SA/SEA Stage
December 2016	-	Scoping Report
March 2018	Regulation 18 Preferred Options	Preferred Options Appraisal
December 2018	Regulation 19 Submission Draft	Submission SA Report

Date	Plan-making Stage	SA/SEA Stage
January 2019	Regulation 19 Submission Draft	Historic Environment Assessment
November 2019	Pre Examination Proposed Changes Revised Housing Requirement	Pre Examination Proposed Changes SA Report Addendum
July 2020	Planning Inspectors' Matters	Sustainability Appraisal Addendum
September 2021	Main Modifications	Main Modifications SA Report

2.7 **Sustainability objectives:** Sustainability objectives to guide the appraisal process were formulated and to meet the requirements of the SEA Directive, the views of the three statutory consultees (Natural England, English Heritage and the Environment Agency) were sought in relation to the scope and level of detail to be covered by the SA of the Core Strategy Review. These objectives cover a range of social, environmental and economic impacts, for example to promote community vibrancy and social cohesion, conserve and enhance biodiversity, support the creation of high quality and diverse employment opportunities (see Annex 1).

2.8 **The appraisal stages:** At each stage of Core Strategy Review preparation, proposals were assessed (in the light of baseline scoping information) against a series of sustainability objectives (see above). The findings of the appraisal process were taken into account as the Core Strategy Review evolved, and at each stage of the process a Sustainability Appraisal Report was produced, and consulted on alongside the relevant Core Strategy Review document. Further information about the appraisal stages is provided in subsequent sections of this statement.

2.9 The SA has contributed to plan development by providing an independent assessment of the sustainability of the Council's proposed options and policies as they were developed. By integrating the SA as part of the wider and ongoing Core Strategy Review development (as demonstrated in Table 1), the recommendations from the appraisal process were able to feed into and inform the Core Strategy Review from the initial to final stages of its production. The various SA Reports provide an audit trail of the appraisal process.

3. How the Sustainability Report (including Environmental Report) has been taken into account

- 3.1 As outlined above, the Folkestone & Hythe Core Strategy Review has gone through a series of stages of preparation. The full suite of SA Reports can be accessed via the Folkestone and District Council [website](#).
- 3.2 Each stage of the SA report contained a summary and the likely significant effects of the Core Strategy Review were identified, described and evaluated. For the Regulation 19 stage a separate non-technical summary was produced. Possible mitigation measures to minimise negative impacts and opportunities to maximise beneficial impacts were identified, reasonable alternative options were considered (and, further into the process, the reasons for selecting or rejecting alternatives) and possible areas for further monitoring were identified. At each stage the assessment and report produced was reflective of the level of detail in the plan, its stage in the plan-making process.

Scoping

- 3.3 The scoping stage of the SA process helped to guide the generation of themes for the first draft of the Core Strategy Review (the Preferred Options stage). The scoping process highlighted the sustainability issues affecting the District and ensured that the sustainability objectives were in the minds of the plan-makers when drafting the policy options. The scoping stage of the SA fed into the drafting of the Local Plan at its most initial stages and influenced policy options such as 'Maximising permeability and enhancing pedestrian and cycle access' in development and 'Develop additional policies to protect, manage and enhance important habitats and species that are not already subject to Core Strategy policy and national planning guidance'. It also provided the baseline information against which subsequent policy options were assessed.

Preferred Options

- 3.4 The Appraisal was carried out on each of the policy options that were included in the Preferred Options Document. Options were scored as positively or negatively affecting the baseline data. Issues that resulted in a negative score under one sustainability objective may have also been addressed by a different objective, so the objectives were also assessed against each other and recommendations were drawn out. The results of this appraisal advised the policy-makers which of the policy options were the most sustainable. It also identified measures for mitigation and to maximise beneficial effects to further improve the sustainability of each policy. The identification of these impacts and proposals for improvement were then fed into the plan-making process.
- 3.5 The appraisal also drew on legal requirements and targets identified by the review of relevant plans, policies and programmes. The SA report, along with direction received from consultation responses, government guidance and higher level policy all contributed to the selection and refinement of the preferred Core Strategy Review policy options.

- 3.6 At this stage in the process, the Core Strategy Review planned to deliver 12,030 new homes and associated employment opportunities, services, facilities and infrastructure over the revised Plan period of 2018/19 to 2036/37. Almost all of the additional growth planned for within the Core Strategy Review was to be located on greenfield land recognised for its agricultural, mineral and ecological value. The scale of this strategic development in the countryside would reduce its openness and historic rural character. Consequently, the Core Strategy Review was found to have the potential to generate adverse effects on the environmental SA objectives, including landscape (SA Objective 3), the historic environment (SA objective 4), biodiversity (SA objective 5), green infrastructure (SA objective 6), water quality (SA objective 8) and flood risk (SA objective 9).¹
- 3.7 However, once design principles and mitigation proposed in the Core Strategy Review and development management policies included in the proposed submission Places and Policies Local Plan were taken into account, residual significant adverse effects were only considered to be generated in relation to the loss of greenfield land (SA objective 7 – Efficient Use of Land). While the loss of greenfield land cannot be mitigated, it was acknowledged that Folkestone & Hythe District Council had considered all other reasonable alternatives for accommodating growth in the District and prioritised the allocation and development of brownfield land before greenfield land.
- 3.8 The new garden settlement within which the majority of Folkestone & Hythe’s additional growth was to be provided was planned in line with garden city principles, with a particular emphasis on integrating the new settlement into the existing landscape and green infrastructure network. The place-making enhancement measures set out within the Core Strategy Review were, at the very least, likely to generate minor positive effects on the same environmental SA objectives. In addition, aspirations to make the new garden settlement as self-sufficient and sustainable as possible were found to generate significant positive effects in relation to the District’s goals to become energy and water efficient and resilient to the effects of climate change (SA objectives 6, 10 and 11). Significant positive effects were recorded in relation to the provision of a new vibrant settlement with its own character and sense of place, with new homes (SA objective 1), employment opportunities (SA objective 2), sustainable transport infrastructure (SA objective 13) and cohesive communities with sustainable access to services and facilities (SA objective 14).
- 3.9 Whilst the SA acknowledged that the detailed design policy requirements in the Council’s Places and Policies Local Plan will safeguard the health and well-being of people living in the planned communities, it recommended that specific noise and air pollution abatement mitigation measures were identified and outlined in Draft Core Strategy policies SS7, SS8 and CSD9, such as distance buffers between the transport corridor and development, tree and hedgerow planting, etc. It was recommended that further heritage work was undertaken to inform heritage strategies and policy measures for site allocations in the final Core

¹ Folkestone and Hythe Draft Core Strategy Review – SA Report 110 March 2018

Strategy Review document (see below). This work informed the SA of the Proposed Submission Core Strategy Review.

Historic Environment Assessment

3.10 The Historic Environment Assessment was published in January 2019. This provided a strategic area-based assessment of the risk of effects to heritage assets in and around the preferred areas for growth at Sellindge and the new garden settlement, and was informed by a desk-based study and site visits. The purpose of the assessment was to provide evidence of:

- The significance of heritage assets within the potential allocation sites, and those with the potential to experience effects as a consequence of setting change in the wider landscape;
- The risk of harm to heritage assets from development on site; and
- Any options available to avoid or minimise adverse effects and deliver enhancement.

3.11 Four options were considered for Sellindge and the effects on heritage assets were considered to range from negligible to significant negative. Two options were considered for the new garden settlement and the effects on heritage assets were considered to range from negligible to significant negative.

3.12 Draft policies for Sellindge and the new garden settlement were also assessed and effects were considered to range from minor negative to significant negative.

3.13 Recommendations were made to amend the Sellindge and new garden settlement policies and supporting text; these recommendations were carried forward into the wording of the Submission document.

Submission Document

3.14 After extensive public consultation on the policy approaches, the submission policies were produced in December 2018. At this stage of the appraisal it was found that in general, the policy approaches and site options that were taken forward in the Core Strategy Review were those that performed more positively or at least as well against the SA objectives than the rejected options.

3.15 At this stage in the process, the Core Strategy Review planned for the development of 12,845 new homes over the plan period 2018/19 to 2036/37, or 676 new homes a year, following the introduction of a new national methodology for calculating housing need.

3.16 Following the findings of the Historic Environment Assessment, it was recommended in the SA that Policy CSD9 be amended to include:

- The setting of the nearby listed buildings and non-designated historic buildings in the masterplanning stage of development; and

- The requirement for archaeological evaluation and mitigation (in accordance with PPLP Policy HE2).

3.17 It was also recommend that Policy SS7 paragraph 5 be amended to further inform the policy measures concerning the heritage assets within the Garden Settlement proposal area including a requirement that the heritage strategy be informed by a Conservation Management Plan for Westenhanger Castle, Manor and Barns; and, that a Historic Environment Clerk of Works be appointed to oversee implementation of the heritage strategy.

3.18 The SA further recommended that although the mitigation and enhancement measures included within Policies SS6-SS9 and CSD9 were comprehensive and detailed, the implementation of the policies would require ongoing consultation with the Kent Downs AONB and Natural England through the planning application process, including the definition and discharge of relevant planning conditions.

Pre Examination Proposed Changes Addendum

3.19 Whilst the Council was preparing the Core Strategy Review, the Government consulted on and then introduced further changes to the standard national methodology for calculating housing need. This was brought into force following the introduction of a revised National Planning Policy Framework (NPPF) in February 2019. The local housing need calculated using the standard methodology indicated that Folkestone & Hythe District Council should plan for 738 new homes a year (13,284 new homes over the revised plan period 2019/20 to 2036/37). The Core Strategy Review planned for 13,515 new homes over the plan period, which is 231 more homes than the identified need (13,284).

3.20 As a result the Council prepared a schedule of amendments to the Proposed Submission version of the Core Strategy Review, to reflect the changes as well as any evidence base updates. The schedule contained changes to the wording within Policies SS2 (Housing and the Economy Growth Strategy) and SS6 (New Garden Settlement – Development Requirements), as well as the text in chapters 4 and 5 of the Core Strategy Review. The changes did not alter the overall findings of the SA.

Sustainability Appraisal during the Examination in Public

3.21 **Second Sustainability Appraisal Addendum:** This was prepared at the request of the Planning Inspectors nominated by the Secretary of State to examine the Proposed Submission Core Strategy Review. It is an SA of the likely significant effects of Core Strategy Review policies SS5, SS10, SS11, CSD3, CSD4, CSD6, CSD7 and CSD8. The effects of these policies were not reported in detail in the full SA Report because it was considered that the policies had not changed enough to generate new significant effects not previously identified during the SA of the adopted Core Strategy in 2013. The Inspectors requested that for the SA to clearly meet the requirements of Section 19(5) of the Planning and Compulsory Purchase Act 2004 it must *'carry out an appraisal of the*

sustainability of the proposals in each Development Plan Document, i.e. the effects of every component of the Core Strategy Review (the proposals of the Plan).

- 3.22 The overall conclusion was that the policies would have an overall positive effect when considered against the SA objectives. The only negative effect (on all but three policies) was on Objective SA7 'Use land efficiently and safeguard soils, geology and economic mineral reserves'. This reflects the high proportion of best and most versatile agricultural land and the large areas of blanket mineral safeguards in the district. A minor negative effect was recorded for Objective SA4 'Conserve and enhance the fabric and setting of historic assets' on the Garden Settlement and Sellindge policies but this was reduced/offset by the heritage-related requirements the policies put forward.
- 3.23 **Proposed Amendments (Main Modifications) stage:** Throughout the course of the hearing sessions, a number of modifications were proposed to the Core Strategy Review. Prior to consulting on these, the modifications were appraised and a SA Addendum was published alongside the consultation document for comments. It was found that most of the proposed main modifications would not alter the findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020) because they corrected factual errors or represented minor updates to the wording of policies and supporting text for clarity rather than meaning. The majority at the very least enforced, strengthened or tempered some of the effects already identified through the SA without changing the significance of the effects previously recorded.
- 3.24 The SA findings resulting from these revisions were made available to the Planning Inspectors, before they were provided for public consultation alongside the main modifications themselves, to raise awareness of implications, and to ensure any significant effects arising from the policy revisions were flagged to the Inspectors before they finalised their report. The SA concluded that the Proposed Modifications would lead to changes in the assessment scoring of the following:
- Policy CSD3 Rural and Tourism Development (minor positive effect SA7);
 - Policy CSD 4 Green Infrastructure of Natural Networks, Open Spaces and Recreation (minor positive effect SA7); and
 - Policy CSD9 Sellindge Strategy (minor positive effect SA4).
- 3.25 Although some main modifications lessen the contribution of certain policies in delivering positive effects on certain SA objectives (for example, the weakening of affordable housing, water efficiency and energy efficiency standards), it was found that the modified policies would still deliver significant benefits over and above equivalent national standards. Therefore, these negative changes were not considered to result in changes to the significance of effects previously recorded, including the cumulative effects of the Core Strategy Review as a whole.
- 3.26 The HRA Addendum assessed the Proposed Main Modifications to the Submission Draft Core Strategy Review. It concluded that the main modifications

would have no implications to the conclusions reported previously as part of the HRA of the Proposed Submission Core Strategy Review and subsequent addenda and would serve to further strengthen mitigation of potential effects on European sites. Therefore, the conclusions of the HRA for the Proposed Submission Core Strategy Review when taking into account the proposed modifications were that the Core Strategy Review would not be likely to have an adverse effect on the integrity of European sites, either alone or in-combination with other plans and projects, providing the mitigation set out in the plan is secured and delivered successfully.

4. How opinions expressed through public consultation have been taken into account

- 4.1 As shown in Table 1, during the preparation of the Core Strategy Review there have been a number of stages of public consultation relating to the SA, many of which have been linked to consultation on the Local Plan development stages.

Consultation on SA Scoping Report stages

- 4.2 In accordance with the SEA Regulations the relevant statutory bodies (Environment Agency, English Heritage (now Historic England) and the Countryside Agency and English Nature (later Natural England)) were consulted, along with other key stakeholders on emerging scoping reports and baseline data documents prior to these being finalised. Comments received in relation to these documents were incorporated prior to the documents being finalised.

Consultation on SA Reports throughout development of the Core Strategy Review

- 4.3 Whenever the Council undertook formal consultation on the Core Strategy Review, the relevant SA Report was published alongside it. Documents were made available to view and download on the Council's website, and were also available for inspection at local libraries during normal opening hours. Letters of notification, inviting comments, were sent to relevant consultees as detailed in the District Council's Consultation Statement.
- 4.4 A separate Consultation Statement was prepared detailing the various stages of consultation, the responses received and how these were taken into account. Statements about consultation responses and how these were addressed were published and made available to inform decision makers throughout the plan preparation process. During the formal examination stages of the plan preparation, all comments were made available to the Planning Inspectors and where appropriate discussed at Examination hearing sessions.
- 4.5 Throughout the preparation of the Core Strategy Review, comments received at the consultation stages generally related to the emerging Core Strategy Review document rather than specifically the SA, however in some instances the points being made were related. Where relevant these were reflected in subsequent appraisals.

5. The reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with

- 5.1 The Core Strategy Review was prepared in an iterative way, with the SA, other evidence and the results of public consultation informing plan production.
- 5.2 A wide range of alternative options have been considered as part of the Core Strategy Review development. A number of strategic spatial growth options were identified for the District. Also, a number of supporting policy options were subject to consideration by the Council and consideration was also given to selecting suitable strategic growth sites to satisfy the chosen spatial growth strategy. The SA commented on how sustainable each of these options would be along with any considerations that would need to be taken into account when implementing them.
- 5.3 Importantly, there were certain limitations on the range of possible alternatives considered for the Core Strategy Review. This is because the plan was required to comply with existing and emerging national planning policy and guidance. These requirements set the framework for the plan, ensuring that local development was considered in conjunction with wider national objectives. As such, any reasonable alternatives needed to have regard to higher level policy. The results of public consultation were also taken into account in selecting plan options, along with the recommendations of the Planning Inspectors appointed to examine the Core Strategy Review in order to secure soundness.
- 5.4 Nevertheless, the SA did investigate in detail all reasonable alternatives within the scope and remit of the Core Strategy Review, and this has informed decision-making for the plan. The findings of the sustainability appraisal of potential options for each policy approach identified a preferred approach, and / or rejection of a particular approach. The SA process also identified opportunities to avoid or to mitigate potential negative sustainability impacts. This enabled emerging policies to be amended to ensure the Core Strategy Review's sustainability was enhanced.
- 5.5 The [Core Strategy Review Preferred Options](#) includes commentary on how the sustainability appraisal contributed to selecting options and developing the policies.
- 5.6 The [Core Strategy Review Sustainability Appraisal](#) that informed the Regulation 18 document included an appraisal of potential reasonable alternative policy approaches and sites for allocation.
- 5.7 The policies and sites included in the adopted Core Strategy Review were selected largely because they progress and support delivery of the vision, objectives and policies set out in the Core Strategy Review, whilst achieving the most benefits and least negative effects for sustainable development.

6. The measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme

- 6.1 The Environmental Assessment of Plans and Programmes Regulations 2004 require that local authorities *“monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action.”*
- 6.2 A Monitoring Framework has been developed in support of the Local Plan which will help:
1. To provide baseline data for the next SA and to provide a picture of how the environment / sustainability criteria of the area are evolving;
 2. To monitor the significant effects or uncertainties of the plan identified through the SA process; and
 3. To ensure that action can be taken to reduce / offset the significant effects of the plan.
- 6.3 Where possible, in implementing the monitoring identified as part of the SA, use will be made of existing monitoring processes to avoid duplication of effort.
- 6.4 Although developed under the 2013 Core Strategy, the Places and Policies Local Plan will also help to deliver the overarching development vision, objectives and strategy of the Core Strategy Review. As such, there is overlap between the monitoring of implementation of the Local Plan and the monitoring framework which was developed for the Core Strategy Review. Baseline contextual indicators and policy-specific performance data is reported annually through the Council's suite of topic focused monitoring reports, and then subsequently drawn together in the Authority Monitoring Report, all of which are available on the Council's website.
- 6.5 The Council's regular reporting includes:
- Commercial development: covering the characteristics of employment, business and retail development and local property market data (including vacancy);
 - Environment and sustainability: covering the condition of, and impact of development upon, areas of nature conservation, landscape, flood risk and heritage; the environmental performance of new buildings and wider environmental issues such as air pollution (including within any Air Quality Management Areas, although none are currently designated);
 - Housing delivery: covering housing supply and delivery, including affordable housing;

- Industrial estates: covering the occupancy, vacancy and performance of designated employment areas within the district; and
- Town and local centres monitor: covering the occupancy, vacancy and performance of designated town and local centres within the district.

6.6 The monitoring measures proposed as part of the SA process relate to the significant adverse effects and uncertainties that have been predicted to result from policy implementation. These include the uncertainties highlighted during the comparison of the Core Strategy Review policies against the SA sub objectives and recommendations.

6.7 Table 2 below sets out the indicators that are proposed to monitor the significant effects and sets out a number of suggested indicators for monitoring the potential significant effects of implementing the Core Strategy Review and the relevant SA Objective. Indicators are drawn from the Scoping Report and the Core Strategy Review Monitoring Framework (Proposed monitor indicator). Relevant indicators from the Core Strategy Review, Places and Policies Local Plan (PPLP) and Corporate Plan are also included (Monitoring Indicator).

Table 2: Indicators to monitor significant and potential significant effects

SA Indicator	Proposed monitoring indicator	Monitoring Indicator	Target /data
SA1: Improve the provision of homes, including affordable housing, having regard to the needs of all sections of society, including the elderly.	<ul style="list-style-type: none"> • Affordable housing completions • Average house prices • Number of people in housing need (SHMA) • Annual housing completions – total houses built, types, sizes and tenures • Total vacant dwellings • Number of permanent Gypsy and Traveller Pitches delivered • Number of statutory homeless people • Number or proportion of local authority homes meeting Lifetime Homes/Decent Homes Standards 	Housing Flows Reconciliation Form	Affordable Housing cumulative provision in excess of 139 dwellings per year over plan period 50 per cent of completions over the period of the plan to consist of 3 (or more) bedroom dwellings New built schemes over 10 dwellings to include a minimum of 20 per cent of market dwellings meeting Building Regulations M4(2) Category 2 (Accessible and Adaptable Dwellings)
		Annual Housing Completions (total homes built per annum)	Set out in Policy SS2
		Housing Delivery Test	

SA Indicator	Proposed monitoring indicator	Monitoring Indicator	Target /data
		Building for Life 12 Kent Design Building Control space standards	Adherence to local plan policies
SA2: Support the creation of high quality and diverse employment opportunities.	Amount of new employment land delivered • Extent of employment land lost to residential development • Number of people claiming Jobseekers' Allowance/Universal Credit • Qualifications of the working age population • Extent and speed of broadband coverage	NVQ4+ qualifications	In 2017/18, 32 per cent of people in the district and 41.5 per cent of people in the South East have NVQ level 4 or higher. The district's proportion to grow by 0.5 per cent pa over and above any South East growth to close that gap in plan period
		Commercial Information Audit	Average 1ha pa increase in B-class developments, and review progress at Shearway (Folkestone), Link Park (Lympne), and Mountfield Road (New Romney)
		Nomis; Labour Market Profile	In 2016, Labour density was 0.72.
		Commercial Information Audit	Review progress towards appropriate milestones in Table 4.2
		Industrial Land Survey	
		Interventions to address market failure in fast broadband for isolated communities	Average of at least one major new facility completed every third year over plan period in Romney Marsh
SA3: Conserve, and where relevant enhance, the quality, character and local distinctiveness of the landscape and townscape.	• Percentage of new development taking place on brownfield/previously developed land • Number of new proposals in the AONB	Kent AONB Unit (2004) Kent Downs AONB Management Plan actions	On track for full implementation of district applicable Management Plan actions by end of plan period (proportion completed)

SA Indicator	Proposed monitoring indicator	Monitoring Indicator	Target /data
	and other 'sensitive landscape areas'	<p>Development outside of settlement boundaries</p> <p>Conservation Area Appraisals</p> <p>Where possible opportunities to co-ordinated major physical improvement programmes to parks, railway stations or public realm</p>	<p>No planning permissions for new build residential development other than in line with specific Core Strategy Review provisions e.g. Rural exceptions (CSD1)</p> <p>Adoption of reviews to all conservation area boundaries</p>
SA4: Conserve and enhance the fabric and setting of historic assets.	<ul style="list-style-type: none"> • Number of entries on the Heritage at Risk Register 	<p>Building for Life 12 Locally Listed Buildings List</p> <p>Heritage at Risk Register</p> <p>Conservation Area Appraisals</p>	<p>Adherence to local plan Policies</p> <p>Adoption of reviews to all conservation area boundaries</p>
SA5: Conserve and enhance biodiversity, taking into account the effects of climate change.	<ul style="list-style-type: none"> • Amount of greenfield land lost to development • Change in condition of SSSIs • Number of Local Wildlife Sites • Amount of development that takes place on Local Green Spaces, open spaces and other outdoor sports facilities. 	<p>Status of SSSI land</p> <p>Status of Dungeness/ Folkestone Warren</p> <p>Designated wildlife sites</p>	<p>No net increase and progress towards nil land units in 'unfavourable/declining' condition</p> <p>Improve status of units at Dungeness/ Folkestone Warren</p> <p>To achieve continuous positive gains in designated wildlife sites: number and total area (additional ha.)</p>
SA6: Protect and enhance green infrastructure and ensure that it meets strategic needs.	<ul style="list-style-type: none"> • Extent of new and loss of green, open space and sport and recreation facilities 	Standards set out in Open Space, Play Space and Sports Studies	<p>Adherence to local plan policies and study standards</p> <p>Adherence to local plan</p>

SA Indicator	Proposed monitoring indicator	Monitoring Indicator	Target /data
		Recommendations set out in the Green Infrastructure Study update	policies
SA7: Use land efficiently and safeguard soils, geology and economic mineral reserves.	<ul style="list-style-type: none"> • Percentage of development taking place on brownfield/previously developed land • Number of planning applications approved within a Minerals Consultation Area or Mineral Safeguarding Area • Quantity of minerals extracted prior within Mineral Safeguarding Areas prior to surface development • Amount of development that takes place on best and most versatile agricultural land 	Development outside of settlement boundaries	No planning permissions for new build residential development other than in line with specific Core Strategy Review provisions e.g. Rural exceptions (CSD1)
SA8: Maintain and improve the quality of groundwater, surface waters and coastal waters and the hydromorphological (physical) quality of rivers and coastal waters.	<ul style="list-style-type: none"> • Amount of greenfield land lost to development • Water Framework Directive status of the District's water bodies, watercourses and coastal waters 	Environment Agency water quality data; ground, surface and sea	Performance guidelines set by Water Framework and Bathing Directives
SA9: Reduce the risk of flooding, taking into account the effects of climate change.	<ul style="list-style-type: none"> • Number of properties built in areas of flood zones 2 and 3 • Number of planning permissions granted contrary to EA advice • Number of new developments incorporating SUDS 	Implementation of the Folkestone to Cliff End Flood and Erosion Management Strategy	Review progress in implementation of flood defence actions
SA10: Increase energy efficiency in the built environment and the proportion of energy use from renewable sources.	<ul style="list-style-type: none"> • Number of new developments incorporating low carbon technologies • Installed renewable energy capacity 	Dept. for Business, Energy & Industrial Strategy (BEIS) carbon emission figures	<p>Continuous relative improvements in the district's emissions performance</p> <p>The council will monitor roadside NOx at regular</p>

SA Indicator	Proposed monitoring indicator	Monitoring Indicator	Target /data
	<ul style="list-style-type: none"> Number of Air Quality Management Areas declared 	<p>Roadside NO_x any improving or deteriorating trends.</p> <p>New sustainable waste handling facilities</p>	<p>intervals over the plan period in order to identify any improving or deteriorating trends. Any deterioration may trigger the need for local mitigation measures and could lead to a review of the plan</p> <p>Development of new low-carbon waste handling centres</p>
SA11: Use water resources efficiently	<ul style="list-style-type: none"> Number of new developments incorporating water efficiency Water consumption per head of population 	<p>Percentage of new residential development meeting the requirements of water efficiency regulating – 110 litres per person per day (PPLP indicator)</p>	<p>Building Regulations data</p>
SA12: To reduce waste generation and disposal, and achieve the sustainable management of waste.	<ul style="list-style-type: none"> Volume of waste generated per head of population Proportion of household waste recycled Proportion of commercial waste recycled Proportion of waste sent to landfill 	<p>Volume of waste generated per head of population</p> <p>Proportion of household waste recycled</p> <p>Proportion of commercial waste recycled</p> <p>Proportion of waste sent to landfill</p>	<p>KCC Minerals and Waste Plan targets (CSW4 Strategy for Waste Management Capacity)</p>
SA13: Reduce the need to travel, increase opportunities to choose sustainable transport modes and avoid development that will result in significant traffic congestion and poor air quality.	<ul style="list-style-type: none"> Proportion of people who travel to work by public transport Railway Station footfall Bus patronage levels Number of Travel Plans implemented with new development Number of users of cycle paths Number of junctions at or exceeding capacity Number of Air Quality Management Areas declared 	<p>Expand bus routes</p> <p>Bus patronage levels</p> <p>Building for Life 12</p> <p>Kent Design</p> <p>Number of users of cycle paths</p> <p>Public transport; new routes / increased</p>	<p>Increase in number of routes with a 7-day a week service</p> <p>Adherence to local plan policies</p>

SA Indicator	Proposed monitoring indicator	Monitoring Indicator	Target /data
		<p>frequency</p> <p>Completion of walking and cycling routes</p> <p>Annual highway improvement schemes</p> <p>Where possible opportunities to co-ordinate major physical improvement programmes to parks, railway stations or public realm</p>	
<p>SA14: Promote community vibrancy and social cohesion; provide opportunities to access services, facilities and environmental assets for all ages and abilities and avoid creating inequalities of opportunity for access.</p>	<ul style="list-style-type: none"> • New education and/or training facilities permitted (sqm) • Extent of new and loss of community facilities (sqm) • Amount of additional 'town centre use' floorspace provided in Folkestone and Hythe town centres • Amount of open space and sport and recreation facilities • Percentage of people living in fuel poverty • Number of people claiming Jobseekers' Allowance / Universal Credit • Affordable home completions 	<p>GVA per head; Office of National Statistics</p> <p>Town Centre Vacancy Rates (F&HDC annual survey)</p> <p>Earnings by residence (real terms)</p> <p>Index of Multiple Deprivation</p>	<p>In 2016, GVA per head in the district was £18,923. GVA per head to increase year on year in plan period</p> <p>Vacancy rates by frontage not to exceed 10 per cent Shopfront survey incorporating: Changes in occupancy; Mix of uses; and Proportion of multiple store</p> <p>In 2017/18 average gross weekly pay of the district's residents was £524.80, whilst South East average was £596.80. The district's gross weekly pay to increase by £3.60 pa over and above any South East growth to close that gap in plan period</p> <p>Improve relative position of relevant IMD neighbourhoods in Folkestone East, Foord, Harbour & Harvey Central, Lydd ward and the westernmost part of</p>

SA Indicator	Proposed monitoring indicator	Monitoring Indicator	Target /data
		<p>Creative Quarter Refurbishment</p> <p>Community buildings</p> <p>Adoption of community plans including Neighbourhood Development Plans</p> <p>Assets of Community Value designated</p> <p>Improvements to district sports facilities</p> <p>Additional school and GP premises</p> <p>New locally-led public open space, community buildings, pedestrian/cycle upgrades, or public services</p> <p>Community facility, public services or new build retail/employment premises to develop in parallel with residential development</p> <p>Annual Housing Completions (Types, sizes and tenures)</p> <p>Commercial Information Audit</p>	<p>Romney Marsh ward</p> <p>Refurbished properties (permissions including external alterations) in Seafront/Creative Arc (policy CSD6) to average at least one a year</p> <p>No net loss of community buildings.</p> <p>Delivery of improvements to existing sports grounds and development of major new sports facilities in the urban area</p> <p>No net loss of school and GP premises per year</p> <p>Average of at least one new community/commercial planning permission per 'major' residential permission over the plan period</p> <p>Set out in Policies SS2 and CSD2</p>

SA Indicator	Proposed monitoring indicator	Monitoring Indicator	Target /data
		<p>Open Space Study</p> <p>Standards set out in Open Space, Play Space and Sports Studies</p> <p>Recommendations set out in the Green Infrastructure Study update</p>	<p>Open Space Study Standards</p> <p>Adherence to local plan policies and study standards</p> <p>Adherence to local plan policies</p>
<p>SA15: Reduce crime and the fear of crime.</p>	<p>• Number of crimes committed</p>	<p>Creating Tomorrow Together Folkestone and Hythe District Council Corporate Plan 2021-30</p> <p>Safer Communities</p>	<p>Community safety will be at the heart of everything we do. We recognise that ensuring that residents, businesses and visitors will flourish and enjoy a place which looks, feels and is safe. The district's Community Safety Partnership will be at the forefront of this through continuing to develop proactive and responsive services to address crime and anti-social behaviour.</p>

7. Conclusions

- 7.1 The Core Strategy sets out the long-term spatial vision, objectives and strategy for the District and provides a framework for delivering development for the period up to 2037. The Places and Policies Local Plan includes the detailed development management policies and site allocations that will help to deliver the strategic part of the District's development plan.
- 7.2 This SA post-adoption statement demonstrates that a robust process of sustainability appraisal (incorporating the strategic environmental assessment requirements) has been applied throughout the process of preparing the Core Strategy Review, and has informed its development.
- 7.3 To inform the preparation of the Plan, an Appropriate Assessment under the Habitats Regulation Assessment has also been undertaken to assess the impacts of the Plan on the Natura 2000 network of internationally important nature conservation sites.
- 7.4 In including policies designed so that development and use of land in the district contributes to the mitigation of, and adaptation to, climate change, the Council has complied with the relevant legal requirements concerning climate change.
- 7.5 The Inspectors' Report on the Core Strategy Review (paragraphs 28) confirms that the CSR complies with all other relevant legal requirements, including in the 2004 Act (as amended) and the 2012 Regulations. In paragraph 127 they state: "We conclude that the duty to co-operate has been met and that with the recommended main modifications set out in the Appendix, the Folkestone and Hythe District Core Strategy Review satisfies the requirements referred to in Section 20(5)(a) of the 2004 Act and is sound."

Annex 1: Sustainability Appraisal Objectives and appraisal questions

SA Indicator	Appraisal questions: will the Plan/option lead to...?
<p>SA1: Improve the provision of homes, including affordable housing, having regard to the needs of all sections of society, including the elderly.</p>	<p>Create strategic-scale developments that make significant contributions to local housing needs in the short, medium and long term?</p> <p>Provision of a high-quality mix of housing developments suitable for the full range of ages and abilities in need of affordable accommodation?</p> <p>The provision of the range of types and tenure of housing as identified in the housing market assessment</p>
<p>SA2: Support the creation of high quality and diverse employment opportunities.</p>	<p>An adequate supply of land, skills and infrastructure (such as ICT and high speed broadband) to meet the requirements of sectors targeted for economic growth and diversification, including those set out in the District's Economic Strategy?</p> <p>New and improved education facilities which will support raising attainment and the development of skills, leading to a work ready population of school and college leavers?</p> <p>The promotion of the development of education services which retain young people through further and higher education in order to develop and diversify the skill needed to make Folkestone & Hythe prosper?</p> <p>Improved access to jobs for local people from all sectors of the community that will lift standards of living?</p> <p>Enhanced vitality and vibrancy of town centres?</p> <p>Expansion or upgrading of key visitor attractions to support the visitor economy?</p> <p>Employment opportunities which address the economic consequences of the decommissioning of Dungeness nuclear power station?</p> <p>Provision of high quality employment sites and associated infrastructure suitable for the likely continuation in a shift from manufacturing to higher skill, service industries?</p>
<p>SA3: Conserve, and where relevant enhance, the quality, character and local distinctiveness of the landscape and townscape.</p>	<p>Areas of the highest landscape sensitivity (i.e. Kent Downs AONB) being protected from adverse impacts on character and setting?</p> <p>Development which considers the existing character, form and pattern of the District's landscapes, buildings and settlements?</p> <p>The protection and enhancement of local distinctiveness and contribution to a sense of place?</p>
<p>SA4: Conserve and enhance the fabric and setting of historic assets.</p>	<p>Development that avoids negative effects on listed buildings, conservation areas, scheduled ancient monuments, registered historic parks and gardens, and registered battlefields and their settings?</p>

SA Indicator	Appraisal questions: will the Plan/option lead to...?
	<p>Provision of appropriately scaled, designed and landscaped developments that relate well to and enhance the historic character of the District and contribute positively to its distinctive sense of place?</p> <p>Promotes the enhancement of the District's archaeological resource and other aspects of heritage, such as, parks and open spaces, and areas with a particular historical or cultural association?</p> <p>Promotes access to as well as enjoyment and understanding of the local historic environment for people including the District's residents?</p> <p>Improves participation in local cultural activities?</p> <p>Helps to foster heritage-led regeneration and address heritage at risk?</p> <p>Improves existing and provides new leisure, recreational, or cultural activities related to the historic environment?</p>
<p>SA5: Conserve and enhance biodiversity, taking into account the effects of climate change.</p>	<p>Protect and where possible enhance internationally and nationally designated biodiversity sites and species?</p> <p>Avoidance of net loss, damage to, or fragmentation of locally designated and non-designated wildlife sites, habitats and species (including biodiverse brownfield sites)?</p> <p>Opportunities to enhance and increase the extent of habitats for protected species and priority species identified in the Kent BAP or the England Biodiversity Strategy 2020?</p> <p>Opportunities for people to come into contact with resilient wildlife places whilst encouraging respect for and raising awareness of the sensitivity of these sites?</p> <p>Development which includes the integration of ecological habitats and contributes to improvements in ecological connectivity and ecological resilience to current and future pressures, both in rural and urban areas?</p> <p>Maintenance and enhancement of the ecological networks in the District?</p> <p>N.B. Climate change is likely to impact upon habitats and thereby biodiversity. Plan policies which achieve the goals listed above should all help to enhance the ability of wildlife to adapt to a changing climate.</p>
<p>SA6: Protect and enhance green infrastructure and ensure that it meets strategic needs.</p>	<p>Provision, stewardship and maintenance of green infrastructure assets and networks (including green open space, river/canal corridors and the coastline), ensuring that this is linked into new and existing developments, to</p>

SA Indicator	Appraisal questions: will the Plan/option lead to...?
	<p>improve the connectivity of green spaces and green networks?</p> <p>N.B. The East Kent Green Infrastructure (GI) Working Group has identified an East Kent GI Typology which encompasses the following GI types:</p> <ul style="list-style-type: none"> - Biodiversity e.g. Natura 2000 sites, SSSIs, LNRs, Local Wildlife Sites. - Civic Amenity e.g. parks, allotments, cemeteries. - Linear features e.g. the Royal Military Canal, railway corridors. <p>The full list of GI components of this typology is available from the District's GI Report, 2011.</p>
<p>SA7: Use land efficiently and safeguard soils, geology and economic mineral reserves.</p>	<p>Development that avoids high quality agricultural land?</p> <p>Remediation of contaminated sites?</p> <p>Re-use and re-development of brownfield sites?</p> <p>Efficient use of recycled/ secondary materials?</p> <p>Protection of mineral resources and infrastructure?</p> <p>Development that protects sites valued for their geological characteristics?</p> <p>Development that avoids sterilising local mineral reserves and can be accommodated by existing or planned local mineral reserves?</p>
<p>SA8: Maintain and improve the quality of groundwater, surface waters and coastal waters and the hydromorphological (physical) quality of rivers and coastal waters.</p>	<p>Development that will not lead to the deterioration of groundwater, surface water, river or coastal water quality, i.e. their Water Framework Directive status?</p> <p>Development where adequate foul drainage, sewage treatment facilities and surface water drainage are, or can be made, available?</p> <p>Development which incorporates SuDS (including their long-term maintenance) to reduce the risk of combined sewer overflows and to trap and break down pollutants?</p>
<p>SA9: Reduce the risk of flooding, taking into account the effects of climate change.</p>	<p>Avoid development in locations at risk from flooding or that could increase the risk of flooding elsewhere having regard to the District's Strategic Flood Risk Assessment, taking into account the impacts of climate change?</p> <p>Create development which incorporates SuDS (including their long-term maintenance) to reduce the rate of run-off and reduce the risk of surface water flooding and combined sewer overflows?</p>
<p>SA10: Increase energy efficiency in the built environment and the proportion of energy use from renewable sources.</p>	<p>Create strategic-scale developments that make significant and lasting contributions to the UK's national carbon target of reducing emissions by at least 80% from 1990 levels by 2050?</p>

SA Indicator	Appraisal questions: will the Plan/option lead to...?
	Create connected energy networks that provide local low carbon and renewable electricity and heat?
SA11: Use water resources efficiently.	Development where adequate water supply is, or can be made, available? Water efficient design and reduction in water consumption (e.g. rainwater recycling/grey water reuse and BREEAM)?
SA12: To reduce waste generation and disposal, and achieve the Sustainable management of waste	Will it promote sustainable waste management practices through a range of waste management facilities? Will it reduce hazardous waste? Will it increase waste recovery and recycling? Will it protect existing waste facilities and infrastructure or support the delivery of new facilities or infrastructure?
SA13: Reduce the need to travel, increase opportunities to choose Sustainable transport modes and avoid development that will result in significant traffic congestion and poor air quality.	A complementary mix of land uses within compact communities that minimises the length of journeys to services and facilities and employment opportunities, increases the proportion of journeys made on foot or by cycle, and are of a sufficient density to support and enhance local services and public transport provision? Development in locations well served by public transport, cycle paths and walking routes? Development of new and improved sustainable transport networks, including cycle and walking routes, to encourage active travel and improve connectivity to local service centres, transport hubs, employment areas and open/green spaces?
SA14: Promote community vibrancy and social cohesion; Provide opportunities to access services, facilities and environmental assets for all ages and abilities and avoid creating inequalities of opportunity for access.	Create well-designed developments that contain compact communities with a sufficient critical mass or density to support local services and public transport provision? Create new opportunities to improve educational attainment, qualification levels and participation in education and training through access to existing or the provision of new educational infrastructure? Provision of new or enhancement of existing leisure facilities for young people, where thresholds/standards require these? Create opportunities to lead healthier lifestyles, including development that enhances existing and /or makes provision for and maintenance towards open spaces, sports and recreational facilities e.g. publicly available pitches, allotments, swimming pools, courts, etc.? Provision of new or enhanced local health services to support new and growing communities?

SA Indicator	Appraisal questions: will the Plan/option lead to...?
	<p>Improvements to strategic public transport infrastructure?</p> <p>Reintegration of physically divided or highly linear villages or neighbourhoods through, for example, provision of central social infrastructure?</p> <p>Provision for the specific needs of disabled and older people?</p>
SA15: Reduce crime and the fear of crime.	<p>Reduced levels of crime, anti-social behaviour and the fear of crime through high quality design and intervention, i.e. street layout, public space provision, passive surveillance, lighting etc.?</p>