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## **Folkestone & Hythe Core Strategy Review**

Sustainability Appraisal Addendum - Proposed Changes to the Proposed Submission Folkestone & Hythe Core Strategy Review

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# Sustainability Appraisal Addendum

## Introduction

- 1.1 Folkestone & Hythe District Council commissioned LUC in October 2016 to carry out a Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) of the Review of the Core Strategy Local Plan. There have been three key stages in the Sustainability Appraisal of the Core Strategy Review to date:
  - An SA Scoping Report for the Shepway Core Strategy was published for consultation in 2007<sup>1</sup>. In 2014, a second SA Scoping Report was published for consultation, this time for the District's Places and Policies Local Plan.
  - An initial SA Report was prepared and consulted upon with the Draft Shepway Core Strategy Review in February 2018.
  - A full SA Report was prepared and consulted upon with the Proposed Submission Core Strategy Review in January 2019.
- 1.2 This SA Addendum presents the SA of the updated Core Strategy Review, which contains a new housing need figure following the publication of the Government's new standard methodology for calculating housing need. It considers the implications of the new calculated housing need for the SA findings reported previously.
- 1.3 In combination with the December 2018 SA Report, this addendum represents an appraisal of the Core Strategy Review, incorporating the Proposed Changes with regard to the new local housing need figure, updating the findings that were presented in the December 2018 SA Report. It should be noted that this is an addendum to that SA Report and that the two documents should therefore be read together.

## Proposed Changes to the Core Strategy Review

- 1.4 Whilst the Council was preparing the Core Strategy Review, the Government consulted on and then introduced a 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.
- 1.5 The new standard methodology uses a formula to identify the minimum number of homes expected to be planned for in a way which addresses projected household growth and historic under-supply. The local housing need calculated using the standard methodology indicates that Folkestone & Hythe District Council should plan for 738 new homes a year (13,284 new homes over the plan period 2019/20 to 2036/37)<sup>2</sup>.
- 1.6 The Core Strategy Review plans for 13,515 new homes over the plan period, which is 231 more homes above the identified need (13,284). These houses will be delivered in the following ways:
  - Delivery through the allocated garden settlement over the plan period: **5,925 net dwellings** (previously 6,375 net dwellings).

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<sup>1</sup> SA of Shepway District Council Local Development Framework Scoping Report, Scott Wilson for Shepway District Council, 2007

<sup>2</sup> This figure can be relied upon for two years from the time that the plan is submitted to the Planning Inspectorate for examination, after which it may change.

- Delivery through the further expansion of Sellindge: **188 net dwellings** (previously 350 net dwellings, the difference being that part of the originally proposed allocation has been granted planning consent).
  - Delivery through allocated development sites (remaining Core Strategy Policy CSD8 and Places and Policies Local Plan allocations) without permission: **1,703 net dwellings** (previously 1,400 net dwellings).
  - 'Windfall' sites – allowance of 95 units per annum for 15 years. Windfall development accounts for the housing delivery arising from small sites of one to nine dwellings: **1,425 net dwellings** (previously 935 net dwellings, representing an increase from 55 to 95 dwellings per annum over 15 rather than 17 years, and now including sites of up to and including nine dwellings, rather than four dwellings).
  - Delivery (minimum) through extant planning permissions and sites under construction (5% deducted from sites where construction has not started to take account of non-delivery): **4,274 net dwellings** (previously 4,100 net dwellings).
- 1.7 With regard to the reduction in homes to be delivered at the new garden settlement within the Core Strategy Review plan period, the planning application for the new garden settlement submitted on 28 February 2019 puts forward an upper and lower rate of housing delivery. Delivery at the upper rate would lead to 5,925 homes being built within the Core Strategy review period. An independent review on build-out rates of large sites conducted by Sir Oliver Letwin MP found that the median percentage of the total number of homes built out each year was 6.5%. For the Otterpool Park planning application of 8,500 homes, if 6.5% of the total was to be built-out each year, around 550 homes would be delivered each year on average. However, the average build-out rate assumed in the upper rate of delivery is below this, around 395 homes or 4.6% of the total of the planning application each year.
- 1.8 With regard to the Sellindge expansion, 188 net dwellings will be delivered instead of 350 net dwellings. This is due to the fact that 162 of the 350 dwellings now have planning permission and are therefore included within the sum of extant planning permissions and sites under construction. Figures for the end of year 2018/19 indicate that, extant planning permissions and sites under construction could deliver 4,499 homes, if all permissions were implemented. The 4,274 figure came as a result of an assessment that was undertaken to identify how many planning permissions are not implemented each year. Although the rate of lapsed planning permissions varied from year to year, overall lapsed permissions averaged 2.06% of all homes that had permission. Therefore, Folkestone & Hythe District Council considered an allowance of 5% of the total number of permitted homes assumed to lapse, as a worst-case scenario, giving the 4,274 figure (this figure was previously 4,100 net dwellings).
- 1.9 1,703 net dwellings will be delivered through allocated development sites (remaining Core Strategy Policy CSD8 and Places and Policies Local Plan allocations) without planning permission. This figure was previously 1,400 but has changed following the Council's review of current planning permissions and sites under construction. The remaining site at New Romney (2013 Core Strategy Policy CSD8) is expected to contribute 117 homes and remaining sites in the draft Places and Policies Local Plan are expected to contribute 1,586 homes towards the housing supply. This results in a total of 1,703 homes from allocated sites without planning permission.
- 1.10 Lastly, there is a windfall allowance of 1,425 net dwellings (previously 935 net dwellings). This represents an increase from 55 to 95 dwellings per annum over 15 rather than 17 years, and includes sites of up to and including nine rather than four dwellings. The figure was generated through a review of housing completions from 2012/13 to 2017/18 on sites not allocated in the development plan. Three categories of sites were assessed: one to four dwellings net; five to nine dwellings net; and ten dwellings net and over. The number of completions from these sources varied from year to year, and over the long term, a continuing supply of homes has come forward on windfall sites. Therefore, it was considered by the Council that there was a justifiable case for including a windfall allowance in the Core Strategy Review.
- 1.11 Folkestone & Hythe District Council has prepared a schedule of Proposed Changes to the Proposed Submission version of the Core Strategy Review, to reflect the changes set out above as well as any evidence base updates. The schedule contains changes to the wording contained 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.

## Review of policies, plans and programmes

1.12 Since the publication of the Proposed Submission Core Strategy Review, the following documents have been updated/published:

- **National Planning Policy Framework (2019)<sup>3</sup>**: The NPPF sets out the government’s planning policies for England and how these are expected to be applied. The original NPPF was published in March 2012, before being updated in July 2018. The latest version of the NPPF was published in June 2019. Notable changes made since the publication of the original 2012 version include:
  - Design policies are considered instrumental in delivering new homes, and local planning authorities (LPAs) must make sure that the quality of approved developments does not materially diminish between permission and completion.
  - Planning policies and decisions should promote the diversification of town centres as this is key to their long-term vitality and viability. They should clarify the range of uses permitted in such locations.
  - Planning policies and decisions should promote effective use of land, giving substantial weight to the value of using suitable brownfield land. There is also support for upward extensions and for local authorities to take a positive approach to applications for alternative uses on land which is currently developed but not allocated.
  - Planning policies and decisions should consider the social, economic and environmental benefits of estate regeneration. There is also additional recognition of the role that planning can play in promoting social interaction and healthy lifestyles.
  - Clarity on the ways in which transport should be considered as part of the planning process from the earliest stages of plan-making and development proposals.
  - Plans are to have regard to the cumulative impacts of flood risk, rather than just to or from individual development sites.
  - Updates also align with the 25 Year Environment Plan, including taking air quality into account in planning policies and decisions.
- **National Planning Practice Guidance (NPPG)<sup>4</sup>**: The NPPG is an online resource that is continuously being updated. Since the preparation of the Proposed Submission version of the SA Report, the following updates have been made:
  - 9 May 2019 – updated guidance on 'Neighbourhood planning' and 'Viability'.
  - 26 June 2019 – new information on 'Housing for older and disabled people'.
  - 22 July 2019 – new information on 'Appropriate assessment', 'Effective use of land', 'Green Belt', 'Housing needs of different groups' and 'Housing supply and delivery'.
  - 1 October 2019 – updated guidance on 'Design: process and tools'.
- **National Design Guide<sup>5</sup>**: This document reinforces the aim of the NPPF, which is to create high quality places and buildings. The guide has been prepared in the context of anticipated climate change, changing home ownership models and changes in technology. It provides a structure of high-level direction which can be referenced in local design guides, removing the

<sup>3</sup> National Planning Policy Framework, MHCLG, 2019: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>.

<sup>4</sup> National Planning Practice Guidance, MHCLG, 2019: <https://www.gov.uk/government/collections/planning-practice-guidance>.

<sup>5</sup> National Design Guide, MHCLG, 2019: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/843468/National\\_Design\\_Guide.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/843468/National_Design_Guide.pdf) f.

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need for every design guide to include a description of what is good design and why it should be delivered.

- **A Green Future: Our 25 Year Plan to Improve the Environment<sup>6</sup>** : This document was published in January 2018 and last updated in May 2019. It sets out government actions to help the natural world regain and retain good health. It aims to deliver cleaner air and water in our cities and rural landscapes, protect threatened species and provide richer wildlife habitats.
- **The Road to Zero<sup>7</sup>** : This document was published in July 2018. It puts the UK at the forefront of the design and manufacturing of zero emission vehicles and aims for all new cars and vans to be effectively zero emission by 2040.
- **UK Plan for tackling roadside nitrogen dioxide concentrations<sup>8</sup>** : This document was published in July 2017 and last updated in October 2018. It is the UK air quality plan for bringing nitrogen dioxide (NO<sub>2</sub>) air pollution within statutory limits in the shortest possible time. It contains a number of actions to be undertaken across the UK.
- **Clean Air Strategy 2019<sup>9</sup>** : This document was published in January 2019, replacing the draft version published in 2018. It sets out what actions are required to tackle air pollution, such as Clean Air Zones. The strategy will help ensure that targets set by government to tackle air pollution are met.
- **Making the country resilient to a changing climate<sup>10</sup>** : This document was published by the National Adaptation Programme in July 2018 and replaces the previous version published in July 2013 that covered the period 2013 to 2018. This document covers the period 2018 to 2023. It sets out the actions the government is and will be taking to address the risks and opportunities posed by a changing climate.
- **Heritage Statement 2017<sup>11</sup>** : This document was published in 2017. It sets out how the government will support the heritage sector and help it to protect and care for our heritage and historic environment in coming years.

### Sub-Regional/County

- **Local Transport Plan 4: Delivering Growth without Gridlock 2016-2031<sup>12</sup>** : This document builds on the previous Local Transport Plan for Kent (2016-2011) and incorporates strategic policies from Kent's transport delivery plan: Growth without Gridlock. Transport priorities for Folkestone & Hythe include the following:
  - Upgrades to M20, Junction 11.
  - Upgrading of Westenhanger Station.
  - Newingreen junction improvements.
  - Highway improvements and sustainable access to support Lydd Airport.
  - Cheriton High Street/A20.
  - South of Hawkinge A20/A260 Junction Improvements.

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<sup>6</sup> A Green Future: Our 25 Year Plan to Improve the Environment, HM Government, 2019: <https://www.gov.uk/government/publications/25-year-environment-plan>.

<sup>7</sup> The Road to Zero, HM Government, 2018: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/739460/road-to-zero.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/739460/road-to-zero.pdf).

<sup>8</sup> UK Plan for tackling roadside nitrogen dioxide concentrations, DEFRA, 2018: <https://www.gov.uk/government/publications/air-quality-plan-for-nitrogen-dioxide-no2-in-uk-2017>.

<sup>9</sup> Clean Air Strategy, DEFRA, 2019: <https://www.gov.uk/government/publications/clean-air-strategy-2019>.

<sup>10</sup> Making the country resilient to a changing climate, HM Government, 2018: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/727259/pb13942-nap-20130701.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/727259/pb13942-nap-20130701.pdf).

<sup>11</sup> Heritage Statement 2017, DDCMS, 2017: <https://www.gov.uk/government/publications/the-heritage-statement-2017>.

<sup>12</sup> Kent County Council (date of publication unknown). Available online: [https://www.kent.gov.uk/\\_data/assets/pdf\\_file/0011/72668/Local-transport-plan-4.pdf](https://www.kent.gov.uk/_data/assets/pdf_file/0011/72668/Local-transport-plan-4.pdf).

- Seafront schemes: Grace Hill system and Tontine Street Junction.
- Folkestone Seafront.
- Tram Road Link walkway and cycleway.
- New Romney South Spine Road, A259 west of New Romney to Mountfield Road.
- **Network Rail South East Route: Kent Area Route Study<sup>13</sup>** : This document was published in May 2018 and sets out the strategic vision for the future of this part of the rail network over the next 30 years. The study builds on the recommendation in the Shaw Review that the railway is planned based on customer, passenger and freight needs. The Route Study seeks to identify capacity requirements in the medium and long term to allow the railway to play its part in delivering economic growth, in addition to improving the connections between people and jobs and businesses and markets. It identifies some potential sources of capacity to meet needs into the early 2020s but uncertainty remains beyond that.

## Local

1.13 The following documents were published between 2011 and 2017 but were not included in the previous iteration of the SA Report.

- **Sustainable Access and Recreation Management Strategy Action Plan:** This report was taken to Cabinet on 17<sup>th</sup> July 2019. It sets out ways to protect sites of international and European importance for nature conservation from increased recreational activities.
- **Healthier Housing Strategy 2018-2023 (Draft)<sup>14</sup>** : This document was published in 2018 and sets out how the Council and its local partners intend to work together to address the housing and related needs of the District. The key focus of the Strategy is the delivery of affordable housing (for rent and low-cost home ownership) and the improvement of housing conditions within the private housing sector within the District.
- **Shepway Cycling Plan (2011)<sup>15</sup>** : Sets out the reasons for promoting cycling within the District. The reasons include the contribution towards lessening congestion, health and economic benefits and promoting accessibility. Additionally, it aims to achieve better maintenance of cycle routes.
- **East Kent Homelessness Prevention Strategy 2014-2019 (2014)<sup>16</sup>** : Sets out six priorities for tackling homelessness in East Kent:
  1. Preventing and responding to homelessness before a crisis point is reached.
  2. Preventing and responding to rough sleeping.
  3. Providing high quality housing options advice before a crisis point is reached and appropriate advice, accommodation and support if crisis occurs.
  4. Providing good quality housing that local people can afford and making best use of the housing stock (including temporary accommodation).
  5. Promoting partnership working and shared good practice.
  6. Deliver excellent homelessness services.

<sup>13</sup> Network Rail (2018). Available online: <https://cdn.networkrail.co.uk/wp-content/uploads/2018/06/South-East-Kent-route-study-interactive-version-1.pdf>.

<sup>14</sup> Folkestone & Hythe (date of publication unknown). Available at: <https://www.folkestone-hythe.gov.uk/downloads/file/978/healthier-housing-strategy-2018-2023>

<sup>15</sup> Kent Highway Services (2011) Shepway Cycling Plan. Available at: [https://www.kent.gov.uk/\\_data/assets/pdf\\_file/0007/7864/Shepway-cycling-strategy.pdf](https://www.kent.gov.uk/_data/assets/pdf_file/0007/7864/Shepway-cycling-strategy.pdf).

<sup>16</sup> Kent County Council (2014) East Kent Homelessness Prevention Strategy. Available at: <https://www.folkestone-hythe.gov.uk/downloads/file/980/homelessness-prevention-strategy>

- **Kent Joint Health and Wellbeing Strategy: Outcomes for Kent 2014-2017 (extended to 2021)**<sup>17</sup> : Identifies four priorities:
  1. Tackle key health issues where Kent is performing worse than the England average.
  2. Tackle health inequalities.
  3. Tackle the gaps in provision.
  4. Transform services to improve outcomes, patient experience and value for money.
- **Kent Healthy Weight Strategy 2015-2020**<sup>18</sup> : It is a three-year strategy organized into four themes and 17 priorities representing the major challenges and opportunities for Kent over the next 10 to 20 years. The four themes are: take action on the environmental and social causes of unhealthy weight, give every child the best start in life and into adulthood, develop a confident workforce skilled in promoting healthy weight and provide support to people who want to lose weight, prioritising those from specific groups.
- **Kent & Medway Air Quality Planning Guidance (2015)**<sup>19</sup> : Developed to:
  - Introduce a method for assessing the air quality impacts of a development which includes the quantification of impacts, calculation of damage costs and the identification of mitigation measures to be implemented to negate the impact of development on air quality.
  - Tackle cumulative impacts.
  - Provide clarity and consistency of the process for developers, the local planning authority and local communities.
- **Kent Environment Strategy (2016)**<sup>20</sup> : Sets out a strategy for the economy and environment in Kent and considers the challenges and opportunities Kent faces, most notably the sustained austerity on public sector finances and the need to work more efficiently. This means identifying opportunities to deliver across outcomes, working in partnership and accessing external funding wherever possible to deliver priorities.
- **Renewable Energy for Kent 2017 Update**<sup>21</sup> : Sets out the existing energy demand and supply profiles in Kent, and an associated carbon emissions baseline, potential for deployment of various renewable energy sources in Kent, scenarios for how new renewable could be deployed and an action plan to help unlock this potential.
- **Draft Folkestone & Hythe District Heritage Strategy (2018)**<sup>22</sup> : The strategy seeks to:
  - Ensure that heritage plays a positive role in all areas of strategic planning – place shaping, economic, tourism, health and wellbeing, education.
  - Enable and inform regeneration and growth, building places and communities with a stronger sense of place, pride and interest in their surroundings.
  - Contribute to and hence enhance the District's's tourism and visitor experience and economy.

<sup>17</sup> Kent County Council (2014) Kent Joint health and Wellbeing Strategy. Available at:

[https://www.kent.gov.uk/\\_data/assets/pdf\\_file/0014/12407/Joint-health-and-wellbeing-strategy.pdf](https://www.kent.gov.uk/_data/assets/pdf_file/0014/12407/Joint-health-and-wellbeing-strategy.pdf).

<sup>18</sup> Kent County Council, Kent Healthy Weight Strategy 2015-2020 [online] Available at: <https://www.folkestone-hythe.gov.uk/downloads/file/2267/11-4-the-kent-healthy-weight-strategy-2015-20>

<sup>19</sup> Kent and Medway Air Quality Partnership (2015) Kent and Medway Air Quality Planning Guidance. Available at: [http://kentair.org.uk/documents/K&MAQP\\_Air\\_Quality\\_Planning\\_Guidance\\_Mitigation\\_Option\\_A.pdf](http://kentair.org.uk/documents/K&MAQP_Air_Quality_Planning_Guidance_Mitigation_Option_A.pdf).

<sup>20</sup> Kent County Council (2016) Kent Environment Strategy. Available at: [http://www.kent.gov.uk/\\_data/assets/pdf\\_file/0020/10676/KES\\_Final.pdf](http://www.kent.gov.uk/_data/assets/pdf_file/0020/10676/KES_Final.pdf).

<sup>21</sup> AECOM (2017) Renewable Energy for Kent 2017 update. Available at: [https://www.kent.gov.uk/\\_data/assets/pdf\\_file/0011/89498/Renewable-energy-for-Kent-2017-action-plan-update.pdf](https://www.kent.gov.uk/_data/assets/pdf_file/0011/89498/Renewable-energy-for-Kent-2017-action-plan-update.pdf).

<sup>22</sup> Folkestone and Hythe District Council (2018) Draft Folkestone & Hythe District Heritage Strategy [online] Available at: [https://www.folkestone-hythe.gov.uk/media/5495/Heritage-Strategy/pdf/SHS\\_Vol\\_1\\_Combined\\_V9\\_Consultation\\_Copy\\_Cabinet\\_draft.pdf](https://www.folkestone-hythe.gov.uk/media/5495/Heritage-Strategy/pdf/SHS_Vol_1_Combined_V9_Consultation_Copy_Cabinet_draft.pdf)



- Increase wider understanding of the District's heritage and the ways in which the community can engage with and experience their heritage.
- Provide strong social and health benefits through improving quality of life and activities that encourage physical and mental health and wellbeing, reduce social exclusion and crime.
- Provide a valuable educational resource that can contribute local context to curriculums at all stages and an available and accessible resource for local schools and colleges.

### **Folkestone & Hythe Neighbourhood Plans**

- 1.14 Since the publication of the 2018 SA report, the Council has formally adopted the St Mary in the Marsh Neighbourhood Plan. The St Mary in the Marsh Neighbourhood Plan covers the period 2017-2028 and includes a range of planning policies designed to make provision for younger people through the creation of suitable housing, leisure and employment opportunities, whilst also improving the physical environment of the area.

### **Neighbouring authorities' Local Plans**

- 1.15 The Ashford Local Plan 2030 was adopted in February 2019. This Plan sets out the land that needs to be provided in Ashford Borough to accommodate new homes and jobs up to 2040. It contains a number of sites across the Borough proposed for development as well as establishing planning policies and guidance to ensure local development is built in accordance with the principles of sustainable development. There are no development sites within Ashford Borough that are close to Folkestone & Hythe District.
- 1.16 Canterbury City Council (CCC) adopted a new Local Plan in July 2017 which sets out policies and proposals for the development of land in the district until 2031. There are no development sites close to the boundary with Folkestone & Hythe district. The City Council has now just started the initial review of this plan.
- 1.17 Dover District Council (DDC) adopted its Core Strategy in February 2010 which allocates a number of strategic sites. The Land Allocations Local Plan was adopted in January 2015 and allocates specific sites for employment, retail and housing development to deliver the aims of the Core Strategy. There are no development sites close to the boundary with Folkestone & Hythe district. DDC is currently producing a new Local Plan to cover the period from 2018 to 2038. The aim is to publish the Regulation 18 draft between January and March 2020, with a view to adopt in January 2022.
- 1.18 Rother District Council (RDC) adopted its Core Strategy in September 2014 which sets out the overall vision and objectives for development in the district to 2028. RDC produced Part 2 of the new Local Plan, the Development and Site Allocations Local Plan (DaSA), which allocates specific sites in line with the Core Strategy. The Inspector's report into this Plan was published on 5th November 2019 and concludes that the DaSA Local Plan provides an appropriate basis for the planning of Rother District, provided that a number of main modifications are made to it. There are no development sites close to the boundary with Folkestone & Hythe district.

## **SA of Proposed Changes to the Core Strategy Review**

- 1.19 There has been an overall change in the number of homes to be delivered over the plan period, from a minimum of 13,160 net additional dwellings over the period 2018/19 to 2036/37 to a minimum of 13,515 net additional dwellings over the period 2019/20 to 2036/37. This is as a result of the government's introduction of a standard national methodology for calculating housing need, and a revised start date for the plan period.
- 1.20 Policy SS2 in the Core Strategy Review has been updated to reflect the new minimum housing need figure, and the change in the start of the plan period from 2018/19 to 2019/20, whilst Policy SS6 has been updated to reflect revisions in the planning application trajectories for the new garden settlement. The other wording changes that have been made to the Core Strategy Review

are contained within the supporting text to the policies set out in chapters 4 and 5, but do not alter the overall findings of the SA.

### **Policy SS2: Housing and the Economy Growth Strategy**

- 1.21 As set out in Policy SS2, the new standard methodology identifies a minimum need of 13,284 new homes over the plan period (738 dwellings per year). This is 439 more homes than previously identified (12,845), although to be delivered over 18 years rather than 19 years.
- 1.22 The Council is proposing the delivery of 13,515 net additional dwellings over the plan period (2019/20 to 2036/37), which is 231 homes above the identified minimum need. The above section entitled 'Proposed Changes to the Core Strategy Review' outlines the various ways in which housing will be delivered, as well as an explanation as to why the housing figures have changed.
- 1.23 The minimum annual delivery rate increases from 693 dwellings per year (13,160 dwellings over 19 years) to 751 dwellings per year (13,515 dwellings over 18 years), representing an 8.4% increase in the number of dwellings to be delivered on average every year.
- 1.24 The increase includes an upward revision to the number of dwellings to be delivered through allocated development sites (remaining Core Strategy Policy CSD8 and Places and Policies Local Plan allocations) without planning permission. These allocations have already been subject to SA – they do not represent new allocations.
- 1.25 The increase also includes an upward adjustment to the number of dwellings on sites that already have planning consent, where it is considered that 5% (rather than 10%) are likely to lapse. These form part of the baseline for the SA, and therefore do not require further appraisal.
- 1.26 The overall amount of development allowed for in Policy SS6 for the new garden settlement remains the same. However, there has been a revision downwards of the number of dwellings (by 450 dwellings or 7% of the original number) to be delivered at the garden settlement during the plan period. This does not alter the overall findings of the SA in relation to the overall growth strategy, which remains fundamentally the same.
- 1.27 The revision downwards of the allocation for Sellindge represents the granting of planning consent for part of the allocation originally subject to SA, and therefore does not alter the findings of the SA.
- 1.28 The increase in the number of dwellings to be delivered by windfalls is a more significant change, from 55 dwellings per annum to 95 dwellings per annum, an increase of 72.7%. Windfalls now represent 12.9% of the total housing delivery. It is not possible to predict what the impacts of individual sites will be, as by their very nature the locations of windfalls are unknown. However, 95 dwellings per annum on small sites of nine homes or fewer can be considered likely to generate primarily localised effects, rather than strategic effects. In addition, there are policies within the Core Strategy Partial Review and the Places and Policies Local Plan which will ensure that applications for windfall development will not result in unacceptable effects. It is therefore considered that, in terms of the overall growth strategy, there is no change to the findings of the SA.
- 1.29 In summary, the Proposed Changes to Policy SS2 do not alter the effects previously recorded against this policy in the December 2018 SA Report. Paragraphs 8.21 to 8.26 in the previous SA Report set out the reasoning behind the effects recorded against Policy SS2.

### **Policy SS6: New Garden Settlement – Development Requirements**

- 1.30 The overall amount of growth allowed for in Policy SS6 has not changed. However, as set out in Policy SS6, there has been a reduction in the number of homes to be delivered at the garden settlement within the plan period from 6,375 to 5,925. As mentioned previously, this reflects revised trajectories in the planning application for Otterpool Park that were submitted to the Council during the consultation on the Proposed Submission Core Strategy Review, but which are also more achievable. Appendix 2 contains minor wording updates in the appraisal matrix for Policy SS6, from the December 2018 SA Report. These minor updates have not altered the effects previously recorded in the December 2018 SA Report against Policy SS6.

## Reasonable alternatives to the Proposed Changes in the Core Strategy Review

- 1.31 The SEA Regulations<sup>23</sup> require the consideration of reasonable alternatives to the plan that is proposed to be adopted. All reasonable alternatives to date have been set out in the December 2018 SA Report.
- 1.32 As mentioned above, Policy SS2 has been updated to reflect the results of the government's new standard national methodology for calculating housing need, as well as evidence base updates. Although the standard methodology identified a need for 13,284 new homes, the Council are proposing the development of 13,515 homes (231 homes above the identified minimum need). This represents a 1.7% buffer to allow for potential fluctuations in the housing market. No reasonable alternative to this Proposed Change has been identified by the Council.
- 1.33 With regard to the garden settlement, the housing figure in Policy SS6 has been changed from 6,375 to 5,925 net additional dwellings over the revised plan period. This reflects revised trajectories in the planning application for Otterpool Park, which are more achievable, although there are no changes to the overall amount of growth planned for in Policy SS6. The Council has not identified any reasonable alternatives to this Proposed Change.
- 1.34 With regard to growth at Sellindge, the number of homes to be delivered has changed from 350 to 188. This reflects the fact that part of the draft Sellindge allocation in the Proposed Submission version of the Core Strategy Review now has planning permission; the overall housing number figure hasn't changed.
- 1.35 1,703 net dwellings will be delivered through allocated development sites (remaining Core Strategy Policy CSD8 and Places and Policies Local Plan allocations) without planning permission. This figure was previously 1,400 but has changed following the Council's review of current planning permissions and sites under construction. The Council has not identified any reasonable alternatives to this Proposed Change, which reflects the updated evidence base.
- 1.36 Lastly, there is a windfall allowance of 1,425 net dwellings (previously 935 net dwellings). This represents an increase from 55 to 95 dwellings per annum over 15 rather than 17 years and includes sites of up to and including nine rather than four dwellings. This figure was generated through a review of housing completions from 2012/13 to 2017/18 whereby the Council considered there to be a justifiable case for including a windfall allowance in the Core Strategy Review. The Council considers that this revision more accurately reflects past rates and future trends of windfall development than the figures previously relied on for the 2013 Core Strategy and earlier versions of the Core Strategy Review. The Council has not identified any reasonable alternatives to this Proposed Change

## Cumulative and in-combination effects of the Proposed Changes to the Core Strategy Review

- 1.37 The cumulative effects set out in paragraphs 8.94 to 8.111 in the December 2018 SA Report which accompanied the Proposed Submission version of the Core Strategy Review dated January 2019, remain unchanged.

## Monitoring indicators

- 1.38 The proposed monitoring indicators for monitoring the effects of the Core Strategy Review in the December 2018 SA Report which accompanied the Proposed Submission version of the Core Strategy Review dated January 2019, remain unchanged.

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<sup>23</sup> The Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004 No. 1633)

**Appendix 1**

SA Framework for the Folkestone & Hythe Core Strategy Review

SA Objective Reference	SA Objective	Appraisal questions: will the Plan/option lead to...?	Relationship with the SEA Topics / District's Health and Well Being
SA1	Improve the provision of homes, including affordable housing, having regard to the needs of all sections of society, including the elderly.	<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>	Population, Human Health and Material Assets
SA2	Support the creation of high quality and diverse employment opportunities.	<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 skills needed to make Folkestone &amp; 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 de-commissioning of Dungeness nuclear power station?<sup>24</sup></p>	Population, Human Health and Material Assets

<sup>24</sup> Power generation at Dungeness 'A' finished in 2006; that at Dungeness 'B' is currently scheduled for 2018 but EDF has applied to extend this to 2028; employment levels at the site are typically maintained for several years after operation ceases to carry out de-commissioning.

SA Objective Reference	SA Objective	Appraisal questions: will the Plan/option lead to...?	Relationship with the SEA Topics / District's Health and Well Being
		Provision of high quality employment sites and associated infrastructure suitable for the likely continuation in a shift from manufacturing to higher skill, service industries?	
SA3	Conserve, and where relevant enhance, the quality, character and local distinctiveness of the landscape and townscape.	<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>	Landscape, Biodiversity, Flora and Fauna
SA4	Conserve and enhance the fabric and setting of historic assets.	<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> <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>	Cultural Heritage, including architectural and archaeological heritage
SA5	Conserve and enhance biodiversity, taking into	Protect and where possible enhance internationally and nationally designated biodiversity sites and species?	Biodiversity, Flora and Fauna

SA Objective Reference	SA Objective	Appraisal questions: will the Plan/option lead to...?	Relationship with the SEA Topics / District's Health and Well Being
	account the effects of climate change.	<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>	
SA6	Protect and enhance green infrastructure and ensure that it meets strategic needs.	<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 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"> <li>- Biodiversity e.g. Natura 2000 sites, SSSIs, LNRs, Local Wildlife Sites.</li> <li>- Civic Amenity e.g. parks, allotments, cemeteries.</li> <li>- Linear features e.g. the Royal Military Canal, railway corridors.</li> </ul> <p>The full list of GI components of this typology is available from the District's GI Report, 2011.</p>	Landscape, Biodiversity, Flora and Fauna
SA7	Use land efficiently and safeguard soils,	Development that avoids high quality agricultural land?	Soil, Climatic Factors and Landscape

SA Objective Reference	SA Objective	Appraisal questions: will the Plan/option lead to...?	Relationship with the SEA Topics / District's Health and Well Being
	geology and economic mineral reserves.	Remediation of contaminated sites? Re-use and re-development of brownfield sites? Efficient use of recycled/ secondary materials? Protection of mineral resources and infrastructure? Development that protects sites valued for their geological characteristics? Development that avoids sterilising local mineral reserves and can be accommodated by existing or planned local mineral reserves?	
SA8	Maintain and improve the quality of groundwater, surface waters and coastal waters and the hydromorphological (physical) quality of rivers and coastal waters.	Development that will not lead to the deterioration of groundwater, surface water, river or coastal water quality, i.e. their Water Framework Directive status? Development where adequate foul drainage, sewage treatment facilities and surface water drainage are, or can be made, available? Development which incorporates SuDS (including their long-term maintenance) to reduce the risk of combined sewer overflows and to trap and break down pollutants?	Water, Biodiversity, Fauna and Flora
SA9	Reduce the risk of flooding, taking into account the effects of climate change.	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? 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?	Water, Soil, Climatic Factors and Human Health



SA Objective Reference	SA Objective	Appraisal questions: will the Plan/option lead to...?	Relationship with the SEA Topics / District's Health and Well Being
SA10	Increase energy efficiency in the built environment and the proportion of energy use from renewable sources.	<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> <p>Create connected energy networks that provide local low carbon and renewable electricity and heat?</p>	Air, Climatic Factors, and Human Health
SA11	Use water resources efficiently.	<p>Development where adequate water supply is, or can be made, available?</p> <p>Water efficient design and reduction in water consumption (e.g. rainwater recycling/grey water reuse and BREEAM)?</p>	Water and Climatic Factors
SA12	To reduce waste generation and disposal, and achieve the sustainable management of waste.	<p>Will it promote sustainable waste management practices through a range of waste management facilities?</p> <p>Will it reduce hazardous waste?</p> <p>Will it increase waste recovery and recycling?</p> <p>Will it protect existing waste facilities and infrastructure or support the delivery of new facilities or infrastructure?</p>	Soil, Climatic Factors and Material Assets
SA13	Reduce the need to travel, increase opportunities to choose sustainable transport modes and avoid development that will result in significant traffic	<p>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?</p> <p>Development in locations well served by public transport, cycle paths and walking routes?</p> <p>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?</p>	Air, Climatic Factors, Population and Human Health

SA Objective Reference	SA Objective	Appraisal questions: will the Plan/option lead to...?	Relationship with the SEA Topics / District's Health and Well Being
	congestion and poor air quality.		
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>Create well-designed developments that contain compact communities with a sufficient critical mass or density to support local services and public transport provision?</p> <p>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?</p> <p>Provision of new or enhancement of existing leisure facilities for young people, where thresholds/standards require these?</p> <p>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.?</p> <p>Provision of new or enhanced local health services to support new and growing communities?</p> <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>	Population, Human Health and Material Assets
SA15	Reduce crime and the fear of crime.	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.?	Population and Human Health

# Appendix 2

## Updated SA matrices

## Policies SS6, SS7, SS8 and SS9: Guiding Development within a New Garden Settlement

SA Objectives	SA Score	Policies SS6, SS7, SS8 and SS9
SA1. Improve the provision of homes, including affordable housing, having regard to the needs of all sections of society, including the elderly.	++	<p>The new standard national methodology for calculating housing need indicates a need for 738 new homes a year over the plan period 2019/20 to 2036/37. Policy SS6 of the Core Strategy Review sets out that the new garden settlement will provide for a minimum of 5,925 new homes in a phased manner within the plan period (2019/20 to 2036/37) with potential for future growth to provide a total of 8,000-10,000 homes beyond the plan period. Policy SS6 reiterates the policy requirement for 22% of all the homes to be provided to be affordable, subject to viability. In addition, a proportion of proposed dwellings shall be provided as self-build or custom-build plots. As such the policies contribute significantly to the District's housing requirements.</p> <p>A significant positive effect is therefore expected on this SA objective.</p>
SA2. Support the creation of high quality and diverse employment opportunities.	++	<p>Policy SS6 seeks to provide approximately 36,760sqm net of employment floorspace (B use classes) by 2037 with a broad mix of office, manufacturing and distribution uses. The settlement's location near the Channel Tunnel is to be used to promote employment opportunities in the new garden settlement. The indicative spatial plan for the new garden settlement set out in Policy SS6 locates the settlement's centre as well as an innovation/business hub in close proximity to the existing Westenhanger Railway Station and Junction 11 of the M20, which will help facilitate and maintain employment growth in the garden settlement.</p> <p>Policy SS7 seeks to deliver the new garden settlement in line with a number of place shaping principles which places the town centre as the focal point of the settlement. This will include a comprehensive and diverse range of facilities, services and business which will help to improve the vibrancy and ultimately vitality and viability of the town centre, creating job opportunities for local residents and facilitating sustainable economic growth.</p> <p>Policy SS9 requires that the garden settlement is enabled for ultra-fast fibre-optic broadband. In addition, new homes will be designed to provide space for home working and the settlement's cafes and public realm will include space to work on the go.</p> <p>A significant positive effect is therefore expected on this SA objective.</p>
SA3. Conserve, and where relevant enhance, the quality, character and local distinctiveness of the landscape and townscape.	+/-	<p>The development of the new settlement would occur on mostly undeveloped greenfield land and as such would have an adverse impact on the openness and rural character of the countryside. It has been highlighted in the District's High Level Landscape Appraisal (2017) that the new settlement would be located within LCA 11 (Lympne). LCA 11 is identified as being within the setting of the AONB however it is described as being of medium landscape sensitivity.</p> <p>However, Policy SS6 sets out that the new settlement is to be delivered in line with garden town principles which is to include an emphasis upon landscape-led development that responds to its setting within the Kent Downs AONB landscape <u>and the adjacent Lympne Escarpment</u>, notably views from the AONB, with an emphasis on a network of green and blue spaces including woodland and other planting and the maintenance of green open spaces within the settlement boundaries. The requirement for a landscape-led approach is strengthened through Policy SS7 and Policy SS8. Policy SS7 requires that proposals within the new settlement should respect its topography and key views, with particular consideration of key views from the AONB.</p> <p>The indicative spatial plan for the new garden settlement set out in Policy SS6 follows the defensible boundaries of the M20 and HS1 railway line to the north, the A20 to the east and the B2067/Aldington Road to the south. The new settlement would be adjacent to and partially enclose the settlements of Barrowhill to the north west, Westenhanger/Stanford to the north east and the Lympne Industrial Estate would also be adjacent to the south. A strategic green gap is retained between the new garden settlement and the existing village of Lympne to the south east to maintain the settlements' separate identities and prevent coalescence. The indicative spatial plan also identifies that strategic open space is to be maintained towards the western boundaries by Harringe Lane. Previous SA work has</p>

SA Objectives	SA Score	Policies SS6, SS7, SS8 and SS9
		<p>found that this elevated area of land has the potential to have significantly adverse impacts on the openness of the countryside surrounding this area and as such the approach set out in Policy SS6 would help to prevent these impacts.</p> <p>The town centre of the new settlement is to be provided around the existing development at Westenhanger with the business hub delivered to the east between this development and the existing hard edges of the A20 and M20. Denser development in this location will be set back from the heritage assets in this location – the Grade I listed Scheduled Ancient Monument of Westenhanger Castle and its associated barns – maintaining their special character and setting. Despite the hard edge provided by the southern arm of the M20 Junction 20, the innovation/business hub will directly abut the Registered Park and Garden of Sandling Park to the east.</p> <p>Finally, a significant amount of new development is located in close proximity to the busy transport corridor of the M20 and the highspeed railway line, both of which generate a significant amount of noise. The volume and constant nature of the noise is likely to generate adverse effects on the quality and character of the neighbourhoods, with potential adverse implications for the health and wellbeing of new residents. However, Policy SS8 states that noise and air pollution mitigation measures such as distance buffers and appropriate landscaping will be required. Furthermore, references are made to the policy requirements of the Council’s Places and Policies Local Plan throughout the Core Strategy Review, specifically its detailed design requirements which safeguard the health and wellbeing of people living in the planned communities.</p> <p>Overall, it is considered that the close proximity of the garden settlement to the AONB and the area’s historic landscapes may result in adverse impacts on their settings, although it is recognised that this land has not been identified as having high landscape sensitivity. The significant focus of policies SS6-SS9 to ensure the landscape setting and special qualities of the countryside are safeguarded and enhanced is considered to mitigate the significant adverse effects generated by the loss of such a significant area of open countryside. Furthermore, the potential for green and blue infrastructure enhancement, in combination with the definition of lost historic views and the creation of a new town with its own distinctive character and setting, opens up the possibility of generating positive effects on the current landscape as well as generating a new high quality townscape for the District’s growing population to enjoy.</p> <p>A mixed effect (minor positive/minor negative) effect is therefore expected on this SA objective.</p>
SA4. Conserve and enhance the fabric and setting of historic assets.	-	<p>The development has the potential to result in physical change to a number of heritage assets including archaeological assets of high importance; it is largely as a result of this that an overall significant negative score was derived at. Potential effects to setting are generally considered to be minor negative or negligible, as a result of the protection offered by the open strategic land. Effects to the historic landscape are judged to have a minor negative effect.</p> <p>The policy requires the enhancement of the setting of assets where possible. There is an unavoidable change in the setting of Westenhanger Castle, Manor and Barns that will result in a minor negative effect, despite the provision of strategic open land around it. Nonetheless, the policy should ensure that the setting of Westenhanger Castle, Manor and Barns will be conserved – maintaining the elements most important to its significance - as well as enhanced, if possible. Depending on the action taken this could result in a minor positive effect. However, in this respect it is to be reiterated that improved visual or experiential qualities of the asset’s context would not result in a beneficial effect on the heritage significance of an asset but would be townscape/ visual benefits.</p> <p>The policy recognises that there may be some archaeological assets that may require preservation in-situ, which should help to reduce the potentially significant negative physical effects to heritage assets such as the scheduled remains at Westenhanger or the non-designated Bronze Age Barrows and Roman Villa (or unexpected remains of national importance). However, there is still the potential for setting change to these assets, which would result in a minor negative effect.</p> <p>The requirement to ‘conserve’ other non-designated heritage and archaeological assets should also ensure that extant above-ground non-designated heritage assets are retained and, if possible, their setting enhanced. It should also ensure that, where appropriate,</p>

SA Objectives	SA Score	Policies SS6, SS7, SS8 and SS9
		<p>archaeological remains are recorded via the necessary means of field investigation and that historic structures are recorded via historic building recording. This would reduce the significant - minor negative effects predicted as a result of potential physical change to minor negative-negligible. Again, some setting change of minor negative – negligible effect, may still occur.</p> <p>In light of the policy, the effect of the development of heritage may be reduced to minor negative. Some limited minor beneficial effects may be possible but these would not reduce or offset the negative effect.</p>
<p>SA5. Conserve and enhance biodiversity, taking into account the effects of climate change.</p>	<p>+/-</p>	<p>The development of the new settlement would occur on mostly undeveloped greenfield land and as such would have an adverse impact on the ecological habitats and species currently living within the area as a result of habitat loss and fragmentation. The development pattern and density of development proposed in Policy SS6 has however been identified in consultation with Natural England and is designed to minimise the potential for significant adverse impacts occurring on biodiversity and green and blue infrastructure of the area, and help enhance local biodiversity and mitigate impact on views from the scarp of the Kent Downs.</p> <p>Of particular relevance is Otterpool Quarry SSSI which is located in the centre of the proposed settlement area. The area immediately surrounding the SSSI is to be maintained as strategic open space. The Ancient Woodland and Local Wildlife Site at Harringe Woods Brook is also located within the settlement boundary; however, this area and the area to the immediate north, south and west of this location are also to be maintained as strategic areas of open space.</p> <p>The new settlement is to be designed and delivered in line with garden town principles, to include an emphasis on the provision of woodland and green, open space. Policy SS7 sets out the place shaping principles for the new settlement and these are to include the adoption of a landscape-led approach to development. This approach is to allow for clear net biodiversity gains over and above residual losses to be achieved through the planting of native species and the creation of green ecological corridors. Enhancement of the nearby ancient woodlands, Local Wildlife Sites, the Otterpool Quarry SSSI and other sensitive ecological features, including the existing pond at the former Folkestone Racecourse is also to be achieved as part of the development of the new settlement. Policy SS7 also requires the preparation of a long term Green Infrastructure management plan which ensures long term community involvement and custodianship and an Access Strategy that protects and enhances existing PRoW, and creates new PRoW, whilst balancing demands for public access with ecological and landscape protection.</p> <p>Therefore, overall, a mixed effect (minor positive/minor negative) is expected on this SA objective.</p>
<p>SA6. Protect and enhance green infrastructure and ensure that it meets strategic needs.</p>	<p>++/-</p>	<p>The development of the new settlement would occur on mostly undeveloped greenfield land and as such will significantly reduce the area of open green space in the area. Policy SS7 sets out that the landscape-led approach to the design and development of the new garden settlement. The new settlement is to be designed and delivered in line with garden town principles, to include an emphasis on the provision of advanced woodland planting and green, community open space. Green and blue infrastructure corridors will be incorporated into the masterplan for the settlement. These areas of strategic green infrastructure will protect existing wildlife habitats and corridors and offer residents the opportunity to access the countryside, including existing residents in the villages of Westenhanger and Lympne. A new country park close to the centre of the new settlement and other areas of strategic open space will provide access to residents and workers of all ages and abilities, improving opportunities for leisure and recreation, as well as general access to the countryside in the area. Policy SS7 also requires the preparation of a long term Green Infrastructure management plan which ensures long term community involvement and custodianship and an Access Strategy that protects and enhances existing PRoW, and creates new PRoW, whilst balancing demands for public access with ecological and landscape protection.</p> <p>Overall, a mixed effect (significant positive/minor negative) is expected on this SA objective.</p>

SA Objectives	SA Score	Policies SS6, SS7, SS8 and SS9
SA7. Use land efficiently and safeguard soils, geology and economic mineral reserves.	--	<p>The new settlement is largely located on undeveloped greenfield land, most of which is designated as Grade 2 agricultural land, with a smaller proportion designated as Grade 3 agricultural land. Furthermore, much of the land at this location has been identified in the Kent Minerals and Waste Local Plan (2013 – 2030) to be safeguarded for sandstone and limestone mineral extraction.</p> <p>Policy SS8 requires that construction at the new settlement is soil neutral to avoid any importing or exporting of earth and that proposals for new development should set out measures for the remediation of contaminated land. Furthermore, the settlement is to contain large areas and corridors of open green space, providing opportunities to protect the higher quality soil and mineral resources.</p> <p>Despite the proposed measures to help mitigate loss of agricultural land and mineral resources, the significant scale of the development proposed will generate significant adverse effects on this SA objective.</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>The new settlement is largely located on undeveloped greenfield land, increasing the risk of surface water flooding and run-off into the District's nearby rivers and ponds. While there are no Source Protection Zones (SPZ) within the development boundary, major aquifers recognised for their intermediate and higher vulnerability are located below the settlement. Coupled with the District's identification as an area of serious water stress, a surface water safeguard zone and surface water Nitrate Vulnerable Zone (NVZ), the introduction of a significant new settlement in the area has the potential to have a significant and lasting adverse effect on the quantity and quality of the District's ground, surface and coastal waters.</p> <p>The District's Water Cycle Study (2011), highlights that there is insufficient capacity at the strategic wastewater treatment network in the Westenhanger and Sellindge areas. However, Southern Water has undertaken a preliminary assessment of the impact of the proposed development on the existing public sewer network. This investigation indicates that network reinforcement will be required at the "practical point of connection" (as defined in the New Connections Services implemented from 1st April 2018). Any upgrades in treatment capacity at Southern Water's Wastewater Treatment Works (WTWs) that may be required to service the new garden settlement would be funded and delivered through the water industry's five yearly price review process, and would align with the provisions of Policy SS5 of the Core Strategy Review. The requisite network reinforcement will be provided through the New Infrastructure charge but Southern Water will need to work with site promoters to understand the development program and to review if the delivery of infrastructure upgrades aligns with the occupation of the development.</p> <p>Policy SS6 requires that the design and development of the new town is landscape-led, including enhancements to the area's green infrastructure networks (woodland, green spaces, ponds, rivers and streams). Policy SS7 recognises that the settlement falls within an area of 'serious water stress' and that the supply of water and water usage must be effectively managed. Sustainable drainage systems (SuDS) are to be integrated throughout the development, to minimise surface water flooding and downstream flooding along the East Stour River. Policy SS8 requires that water quality is to be protected and improved in compliance with the Water Framework Directive. Policy SS9 requires that the settlement should be self-sufficient with regards to the provision of infrastructure. Provision is to be secured or funded through Section 106 and Section 278 legal agreements to ensure it is delivered at the appropriate phase of the development. Therefore, it is expected that the current capacity issues in the local waste water treatment infrastructure will be resolved as part of the delivery of the new town.</p> <p>A mixed effect (minor positive/minor negative) is therefore expected for this SA objective.</p>
SA9. Reduce the risk of flooding, taking into account the effects of climate change.	+/-	<p>The new settlement is largely located on undeveloped greenfield land, increasing the risk of surface water flooding and run-off into the District's nearby rivers and ponds. The area contains a small area of Flood Zone 2 and 3 along the East Stour River and its tributaries towards the hamlet of Barrowhill. Some of this area has been identified for a higher level of mixed-use neighbourhood development and the provision of the new town centre.</p>

SA Objectives	SA Score	Policies SS6, SS7, SS8 and SS9
		<p>The Environment Agency has expressed concern about the significant scale of development proposed which is likely to significantly shorten the lag time of surface water drainage into the River Stour and the potential for this to increase the risk of flooding downstream in the Borough of Ashford, particularly around the Aldington Reservoir.</p> <p>Policy SS6 requires that the design and development of the new town is landscape-led, including enhancements to the area's green infrastructure networks (woodland, green spaces, ponds, rivers and streams). Sustainable drainage systems are to be integrated throughout the development, to minimise surface water flooding and downstream flooding along the East Stour River. To ensure there is no off-site impact on the East Stour in terms of downstream flood risk a site based Water Cycle Strategy has been prepared which identifies and reports that there will be no increase in peak flood volume as a result of development at the garden settlement, indeed the proposals decrease greenfield flow rate from 3.04 l/s / ha to 2 l/s / ha. The off-site impact on Aldington reservoir is expected to be minimal.</p> <p>A mixed effect (minor positive/minor negative) is expected on this SA objective.</p>
SA10. Increase energy efficiency in the built environment and the proportion of energy use from renewable sources.	++	<p>The new garden settlement as guided by Policy SS6 is to be delivered in such a way as to follow garden town principles. This is expected to include a comprehensive and flexible efficient, low-carbon and renewable energy strategy. Policy SS8 states that the new garden settlement should include micro and macro technologies, including decentralised heat and power networks. There is an aspiration to achieve carbon neutrality across the settlement, through a fabric-first approach that minimises embedded carbon and maximises the energy efficient properties of the components and materials that make up the new development's built fabric. In addition, the policy requires that the settlement includes the infrastructure to incorporate slow, fast and rapid electric vehicle charging points throughout. Importantly the supporting text of Policy SS9 explains that the uplift in land value which will be created through the granting of planning permission is to be captured to deliver high standards of energy efficiency.</p> <p>A significant positive effect is therefore expected on this SA objective.</p>
SA11. Use water resources efficiently	++	<p>The District is recognised as an area of serious water stress. Significant growth in the area will put greater stress on its water resources. The new garden settlement as guided by Policy SS6 is to be delivered in such a way as to follow garden town principles. This is expected to include development that ensures the highest levels of water efficiency and climate change resilience.</p> <p>Policy SS7 recognises that the settlement falls within an area of 'serious water stress' and that the supply of water and water usage must be effectively managed. Policy SS8 aspires to achieve the highest possible levels of water efficiency in both residential and commercial buildings in the new settlement and requires that water quality is to be protected and improved in compliance with the Water Framework Directive. An aim of achieving water neutrality is to be set across the settlement with demand management measures to be implemented so as to minimise water use and maximise the recycling and reuse of water resources across the settlement, utilising integrated water management solutions.</p> <p>A significant positive effect is therefore expected on this SA objective.</p>
SA12. To reduce waste generation and disposal, and achieve the sustainable management of waste.	++	<p>The new garden settlement as guided by Policy SS6 is to be delivered in such a way as to follow garden town principles. The policy contains specific reference to the need for the design of the settlement to support low waste production and sustainable waste management. The policy supports the exploration of masterplanning and policy approaches to achieve waste neutrality across the garden settlement. Policy SS8 identifies that applications for development at the new settlement should be accompanied by a site-wide waste strategy that demonstrate how a significant reduction in household waste and an increase in recycling rates will be delivered. Furthermore Policy SS8 requires that internal and external storage is provided for recycling and waste at all homes and businesses. Waste generation at all new homes, businesses and community buildings will be monitored as set out in Policy SS9.</p>



SA Objectives	SA Score	Policies SS6, SS7, SS8 and SS9
		A significant positive effect is therefore expected on this SA objective.
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.	++	<p>The indicative spatial plan for the new garden settlement set out in Policy SS6 sets out a comprehensive and aspirational plan for the delivery of a self-sufficient new settlement built on garden town principles. New homes, businesses, education, health, community, transport and other infrastructure facilities and services will be provided to meet the needs of the new community. Walking, cycling and access to sustainable public transport are to be prioritised. Policy SS7 requires that all homes in the new settlement are within 800m (walking distance) of a local centre, including a primary school. New road infrastructure in the settlement is going to be designed for low speed, with priority to be given to pedestrians and cyclists. Policy SS7 identifies that the focal point of the settlement will be the town centre and business hub, which is to be located close to the existing Westenhanger railway station and Junction 11 of the M20 motorway, so providing excellent transport links to the wider region and London.</p> <p>Bus route 10/10A currently services the area along Aldington Road, Otterpool Lane, A20 Ashford Road and Stone Street allowing for access to Ashford, Sellindge, Hythe and Folkestone. Policy SS7 sets out that the capacity of Junction 11 on the M20 should be upgraded and that Westenhanger Station will be subject to improvements. Improvements are also to be made to the existing bus services. It is also notable that Policy SS6 would limit development to west, with strategic open space to be maintained towards Harringe Lane which is rural and narrow in character and is limited in terms of its future potential for improving capacity of the road network. The proposed measures will significantly reduce the adverse effects generated by the need to accommodate a significant amount of growth in the District, as well as improve the capacity and sustainability of the existing public transport network.</p> <p>A significant positive effect is therefore expected on this SA objective.</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>The indicative spatial plan for the new garden settlement set out in Policy SS6 sets out a comprehensive and aspirational plan for the delivery of a self-sufficient new settlement built on garden town principles. New homes, businesses, education, health, community, transport and other infrastructure facilities and services will be provided to meet the needs of the new community. However, the significant growth at the new garden settlement will affect the existing communities in the surrounding villages of Lympne, Barrowhill, Newingreen and Westenhanger in the short to medium term until the new settlement is constructed and its services and facilities are established.</p> <p>Policy SS6 states that new services, facilities and infrastructure should be provided in line with new homes to minimise strain on the District's existing services, facilities and infrastructure. Policy SS6 states that a health centre, and primary, secondary, special and nursery facilities shall be provided. Policy SS7 sets out the place-shaping principles of these new centres, which will be designed to maximise convenience to new residents and workers. All homes are to be within 800m (walking distance) of a local centre. The new settlement will include a vibrant town centre and several neighbourhood centres containing a full range of retail and community facilities. This policy also requires that nearby local village centres and other town centres including Folkestone, Hythe, Dover and Ashford are not to be negatively impacted upon in terms of their vitality and viability. Policy SS8 focusses on the sustainability and wellbeing of the new community and requires that the new community have access to a well-designed public realm and open space network that encourages community cohesion and physical activity. Community spaces for gathering, leisure and recreation will be provided, including community allotments and orchards. Policy SS9 requires that the new infrastructure provides access to the existing neighbouring communities at Lympne, Barrow Hill, Sellindge, Westenhanger, Saltwood, Stanford and Postling. It is expected that these policies would thereby help not only to ensure that the new settlement will have an appropriate degree of self-sufficiency but is still appropriately integrated with the surrounding communities.</p> <p>A significant positive effect is therefore expected on this SA objective.</p>

SA Objectives	SA Score	Policies SS6, SS7, SS8 and SS9
SA15. Reduce crime and the fear of crime.	+	<p>The new garden settlement is to be designed to a high standard in line with garden town principles. High quality public realm and green infrastructure have been prioritised in Policy SS7. It is expected that this approach should allow for the inclusion of appropriate safety and security features to support the 'designing out' of crime. The approach of Policy SS8 is to allow for homes orientated to encourage informal overlooking which would further help to limit the potential for crime across the new settlement.</p> <p>A minor positive effect is therefore expected on this SA objective.</p>

