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Sustainability Appraisal of Shepway District Council's Places and Policies Local Plan

Proposed Submission Draft Version

Prepared by LUC
January 2018

Project Title: SA/SEA of Places and Policies Local Plan

Client: Shepway District Council

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1 Introduction

- 1.1 Shepway District Council (SDC) has commissioned LUC to undertake a Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) of its Local Plan.
- 1.2 This is the SA Report to accompany SDC's consultation on the proposed Submission Draft version of the Places and Policies Local Plan (PPLP, January 2018), covering the plan period 2013-2031, in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 1.3 This SA Report follows on from two previous iterations of the SA Report. The first SA Report accompanied the Issues and Options version of the PPLP published for consultation in January 2015. No consultation comments were received on the SA of the Issues and Options version of the PPLP. The second SA Report accompanied the Preferred Options version of the PPLP published for consultation in October 2016. Three representations relevant to the SA of the Preferred Options version of the PPLP were received. These representations have been reviewed as part of the preparation of this third iteration of the SA Report accompanying the proposed Submission Draft of the PPLP. Summaries of, and responses to, these representations are set out in **Appendix 3** of this SA Report. Relevant policy context, baseline information and the SA methodology have been updated in this latest SA Report to reflect the most up-to-date information.
- 1.4 As with the previous two iterations, this SA Report is being made available for consultation in line with requirements of the SEA Directive and Regulations.
- 1.5 It should be recognised that the SA findings are not the only factors taken into account by Local Planning Authorities when determining which plan options to take forward. In addition to the positive and negative sustainability effects of each option, public opinion, the deliverability of each option, and conformity with national policy have also been taken into account by SDC.

Shepway Places and Policies Local Plan

- 1.6 The Shepway PPLP is a planning document that will form part of the statutory Development Plan for the District. It sets out a framework that provides clear and firm guidance to ensure that the Council's main issues relating to planning and land use in the District are achieved. The Development Plan currently includes the adopted 2013 Shepway Core Strategy Local Plan¹ and saved policies from the 2006 Shepway District Local Plan.
- 1.7 The Core Strategy Local Plan is the overarching planning policy document for the District and sets out the long term vision until 2031. It identifies the overall economic, social and environmental aims for the District and the amount, type and strategic development locations that are needed to fulfil those aims. There are three aims:
 1. To improve employment, educational attainment and economic performance in Shepway;
 2. To enhance the management and maintenance of the rich natural and historic assets in Shepway; and
 3. To improve the quality of life and sense of place, vibrancy and social mix in neighbourhoods, particularly where this minimises disparities in Shepway.
- 1.8 The PPLP will sit below the Core Strategy and has two functions. The first is to allocate smaller site allocations (i.e. non-strategic sites) to meet the requirements set out in the Core Strategy for residential, employment and community developments. The second is to set out development

¹ A Review of the District's adopted Core Strategy (2013) is currently underway to plan for development and growth to at least 2036. New strategic allocations will be included within this Review to meet the growth needs of the District. Work on the Core Strategy Review will be consulted upon and appraised separately from the Council's Places and Policies Local Plan.

management policies that will be used to assess planning applications and guide future development (and will replace the Saved 2006 Local Plan policies).

- 1.9 The PPLP will, therefore, play an important role in shaping the future of the District and ensuring that the Council's aims set out in the Core Strategy Local Plan are met. The policies in the PPLP will ensure that new developments will be sustainable, the natural and historic environment will be maintained and that new developments through their design will improve the quality of life of residents and help to foster healthy lifestyles.
- 1.10 When adopted the PPLP will replace the remaining saved policies in the 2006 Shepway District Local Plan.

Sustainability Appraisal and Strategic Environmental Assessment

- 1.11 An SA is a systematic process that must be carried out during the preparation of a Local Plan. Its role is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.
- 1.12 This process is an opportunity to consider ways by which the Local Plan can contribute to improvements in environmental, social and economic conditions, as well as a means of identifying and mitigating any potential adverse effects that the plan might otherwise have. By doing so, it can help make sure that the proposals in the plan are the most appropriate given the reasonable alternatives. It can be used to test the evidence underpinning the plan and help to demonstrate how the tests of soundness have been met. SA should be applied as an iterative process informing the development of the Local Plan.
- 1.13 Under the Planning and Compulsory Purchase Act 2004, SA is mandatory for Local Plans. For these documents it is also necessary to conduct an environmental assessment in accordance with the requirements of the SEA Directive (European Directive 2001/42/EC), and the SEA Regulations which transpose the SEA Directive into English law. Therefore, it is a legal requirement for the PPLP to be subject to SA and SEA.
- 1.14 The requirements to carry out SA and SEA are distinct, although it is possible to satisfy both using a single appraisal process. Government guidance provides information to assist users in complying with the requirements of the SEA Directive and Regulations through a single integrated SA process – this is the process that is being undertaken for the PPLP. In addition, the guidance widens the approach of SEA to include social and economic as well as environmental issues. From here on, the term 'SA' should therefore be taken to mean 'SA incorporating the requirements of the SEA Directive and SEA Regulations'.
- 1.15 The SA process comprises a number of stages, as shown in **Figure 1.1**.

Figure 1.1: Main Stages of Sustainability Appraisal

Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope
Stage B: Developing and refining options and assessing effects
Stage C: Preparing the Sustainability Appraisal Report
Stage D: Consulting on the preferred options for the Local Plan and the SA report
Stage E: Monitoring the significant effects of implementing the Local Plan

Meeting the requirements of the SEA Regulations

- 1.16 This SA Report includes the required elements of the final 'Environmental Report' (the output required by the SEA Regulations). **Table 1.1** signposts the relevant sections of the SA Report that meet the SEA Regulations' requirements. This table will be included in the SA Report at each stage of the SA process to show how the SEA Regulations' requirements have been met.

Table 1.1: Meeting the requirements of the SEA Regulations

SEA Regulations' Requirements	Covered in this SA Report?
Environmental Report	
<p>Where an environmental assessment is required by any provision of Part 2 of these Regulations, the responsible authority shall prepare, or secure the preparation of, an environmental report in accordance with paragraphs (2) and (3) of this regulation. The report shall identify, describe and evaluate the likely significant effects on the environment of:</p> <p>(a) implementing the plan or programme; and (b) reasonable alternatives taking into account the objectives and geographical scope of the plan or programme. (Regulation 12(1) and (2) and Schedule 2).</p>	<p>This SA Report for the Shepway District Council proposed Submission Draft PPLP constitutes the 'environmental report'.</p>
<p>1) An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes.</p>	<p>Chapters 1, 3 and 4 and Appendices 2 and 4.</p>
<p>2) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.</p>	<p>Chapter 3 and 4.</p>
<p>3) The environmental characteristics of areas likely to be significantly affected.</p>	<p>Chapter 4.</p>
<p>4) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC on the conservation of wild birds and the Habitats Directive.</p>	<p>Chapter 4.</p>
<p>5) The environmental protection, objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation.</p>	<p>Chapters 3 and 4 and Appendices 2 and 4.</p>
<p>6) The likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive effects, and secondary, cumulative and synergistic effects, on issues such as:</p> <p>(a) biodiversity; (b) population; (c) human health; (d) fauna; (e) flora; (f) soil; (g) water; (h) air; (i) climatic factors; (j) material assets; (k) cultural heritage, including architectural and archaeological heritage; (l) landscape; and (m) the interrelationship between the issues referred to in sub-paragraphs (a) to (l).</p>	<p>Chapters 6, 7 and 8 and Appendices 6, 7 and 8.</p>
<p>7) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.</p>	<p>SA recommendations in Chapters 6, 7, 8 and 10 and Appendix 7.</p>
<p>8) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.</p>	<p>Chapter 5, 6, 7 and 8 and Appendix 5.</p>
<p>9) A description of the measures envisaged concerning monitoring in accordance with regulation 17.</p>	<p>Chapter 9.</p>
<p>10) A non-technical summary of the information provided under paragraphs 1 to 9.</p>	<p>See separate accompanying report to the proposed Submission Version of the PPLP.</p>
<p>The report shall include such of the information referred to in Schedule 2 to these Regulations as may reasonably be required, taking account of:</p> <p>(a) current knowledge and methods of assessment; (b) the contents and level of detail in the plan or programme; the stage of the plan or programme in the decision-making process; and (c) the extent to which certain matters are more appropriately</p>	<p>Methodology set out in Chapter 2, the objectives and criteria in Chapter 5, and the assumptions used in the SA in Appendix 1.</p>

SEA Regulations' Requirements	Covered in this SA Report?
<p>assessed at different levels in that process in order to avoid duplication of the assessment. (Regulation 12 (3))</p>	
Consultation	
<p>When deciding on the scope and level of detail of the information that must be included in the environmental report, the responsible authority shall consult the consultation bodies. (Regulation 12(5))</p>	<p>Consultation with the relevant statutory environmental bodies on the Scoping Report was undertaken during Spring 2014.</p> <p>No consultation comments of relevance to the SA process were received during the consultation on the Issues and Options version of the PPLP.</p> <p>Three representations relevant to the SA were received during the consultation on the Preferred Options version on the PPLP.</p> <p>Responses to these representations are set out in Appendix 3 of this SA Report.</p>
<p>Every draft plan or programme for which an environmental report has been prepared in accordance with regulation 12 and its accompanying report ("the relevant documents") shall be made available for the purposes of consultation in accordance with the following provisions of this regulation.</p> <p>As soon as reasonable practical after the preparation of the relevant documents, the responsible authority shall:</p> <ul style="list-style-type: none"> (a) send a copy of those documents to each consultation body; (b) take such steps as it considers appropriate to bring the preparation of the relevant documents to the attention of the persons who, in the authority's opinion, are affected or likely to be affected by, or have an interest in the decisions involved in the assessment and adoption of the plan or programme concerned, required under the Environmental assessment of Plans and Programmes Directive ("the public consultees"); (c) inform the public consultees of the address (which may include a website) at which a copy of the relevant documents may be viewed, and the period within which, opinions must be sent. <p>The period referred to in paragraph (2) (d) must be of such length as will ensure that the consultation bodies and the public consultees are given an effective opportunity to express their opinion on the relevant documents. (Regulation 13 (1), (2), and (3))</p>	<p>In addition to the Scoping consultation, SA findings have been consulted upon at the Issues and Options stage (January 2015), preferred options stage (October 2016) and proposed submission stage (January 2018) of the PPLP.</p> <p>This SA Report meets the requirements of Regulation 13.</p>
<p>Where a responsible authority, other than the Secretary of State, is of the opinion that a plan or programme for which it is the responsible authority is likely to have significant effects on the environment of another Member State, it shall, as soon as reasonable practicable after forming that opinion:</p> <ul style="list-style-type: none"> (a) notify the Secretary of State of its opinion and of the reasons for it; and (b) supply the Secretary of State with a copy of the plan or programme concerned, and of the accompanying environmental report. (Regulation 14 (1)) 	<p>Not relevant as there will be no effects beyond the UK from Shepway PPLP.</p>
Taking the environmental report and the results of the consultations into account in decision-making (relevant extracts of Regulation 16)	
<p>As soon as reasonably practicable after the adoption of a plan or programme for which an environmental assessment has been carried out under these Regulations, the responsible authority shall:</p> <ul style="list-style-type: none"> (a) make a copy of the plan or programme and its accompanying environmental report available at its principal office for inspection by the public at all reasonable times and free of charge. (Regulation 16(1)) 	<p>Requirement will be met at the adoption stage in the SA process.</p>
<p>As soon as reasonably practicable after the adoption of a plan or programme:</p> <ul style="list-style-type: none"> (a) the responsible authority shall inform (i) the consultation bodies; 	<p>Requirement will be met at the adoption stage in the SA process.</p>

SEA Regulations' Requirements	Covered in this SA Report?
<p>(ii) the persons who, in relation to the plan or programme, were public consultees for the purposes of regulation 13; and (iii) where the responsible authority is not the Secretary of state, the Secretary of State,</p> <p>that the plan or programme has been adopted, and a statement containing the following particulars:</p> <p>(a) how environmental considerations have been integrated into the plan or programme;</p> <p>(b) how the environmental report has been taken into account;</p> <p>(c) how opinions expressed in response to: (i) the invitation in regulation 13(2)(d); (ii) action taken by the responsible authority in accordance with regulation 13(4), have been taken into account;</p> <p>(d) how the results of any consultations entered into under regulation 14(4) have been taken into account;</p> <p>(e) the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and</p> <p>(f) the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.</p>	
Monitoring	
<p>The responsible authority shall monitor the significant 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. (Regulation 17(1))</p>	Chapter 9.

Habitats Regulations Assessment

- 1.17 Under Article 6 (3) and (4) of the Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (Habitats Directive) land-use plans, including Local Plans, are also subject to Habitats Regulations Assessment (HRA). The purpose of HRA is to assess the impacts of a land-use plan against the conservation objectives of a European site and to ascertain whether it would adversely affect the integrity of that site. European sites comprise²:
- Special Protection Areas (SPAs) classified under the European Council Directive "on the conservation of wild birds" (79/409/EEC; 'Birds Directive') for the protection of wild birds and their habitats (including particularly rare and vulnerable species listed in Annex 1 of the Birds Directive, and migratory species), including potential SPAs (pSPAs).
 - Special Areas of Conservation (SACs), which are designated under the Habitats Directive and target particular habitats (Annex 1) and/or species (Annex II) identified as being of European importance, including candidate SACs (cSACs).
 - Ramsar sites, which support internationally important wetland habitats and are listed under the Convention on Wetlands of International Importance especially as Waterfowl Habitat (Ramsar Convention, 1971).
- 1.18 The following European sites fall within 10km of Shepway District:
- Dungeness, Romney Marsh and Rye Bay Ramsar.
 - Dungeness, Romney Marsh and Rye Bay SPA.
 - Dungeness SAC.
 - Wye and Crundale Downs SAC.
 - Lydden and Temple Ewell Downs SAC.
 - Folkestone to Etchinghill Escarpment SAC.
 - Blean Complex SAC.

² Department of Communities and Local Government (March 2012) National Planning Policy Framework (para 118).

- Dover to Kingsdown Cliffs SAC.
 - Parkgate Down SAC.
- 1.19 The HRA process for the PPLP has also been undertaken by LUC on behalf of Shepway District Council during later stages of the production of the Local Plan and the findings have been taken into account in the SA where relevant.
- 1.20 The broad steps followed in carrying out the HRA are set out in **Table 1.2**.

Table 1.2: Approach to HRA of People and Places Local Plan

1. Identify European sites	To identify which European sites may be affected by the PPLP the approach adopted for the HRA of the Core Strategy was followed. The sites information recorded in the 2012 HRA of the Core Strategy was reviewed and updated as necessary to understand the factors contributing to their integrity.
2. Assess in-combination effects	Other plans and projects and their potential effect on the European sites identified in Task 1 were reviewed for their potential for in-combination effects with the PPLP. This drew on and updated the work carried out for the HRA of the Core Strategy.
3. Screen second consultation draft of PPLP and produce HRA commentary.	The site allocation and policy options within the PPLP were screened for their potential for likely significant effects on European sites. Any recommendations made by the HRA of the Core Strategy were considered to determine whether they have been implemented. Measures to mitigate any potentially significant effects were identified. A HRA Report was produced, outlining the potential for likely significant effects of each option or group of related options. ³
4. Review consultation responses	Consultation comments received on HRA of PPLP were reviewed and further work on the HRA carried out as appropriate.
5. Amend HRA Report for proposed Submission Local Plan	Plan changes were assessed and the HRA Report amended to reflect these. The in-combination assessment was updated, as necessary. ⁴

- 1.21 The HRA Report of the proposed Submission Draft PPLP concluded that the PPLP will not have any significant adverse effects on the integrity of European sites, either alone or in-combination with other plans or projects. The HRA made the following recommendations to ensure that the PPLP protects the integrity of the Folkestone to Etchinghill Escarpment SAC:
- **Air pollution:** For the A20 in particular the PPLP should include a commitment to monitoring roadside NOx at regular intervals over the plan period in order to track the projected improvements in air quality. This would also enable the introduction of any specific local measures if an improving trend is not recorded in practice. Reporting on this metric could be tied to the planned cycle of 5-year reviews of the PPLP.
 - **Recreation:**
 - **Visitor Study** – it is recommended that a visitor study of the Folkestone to Etchinghill Escarpment SAC is completed. This would provide a detailed baseline of recreation at the site, against which future successes or failures could be measured and depending on the findings, should be repeated during the implementation of the PPLP. This would ensure that the Council adopts a proactive and flexible approach to managing the potential effects of recreation, and would provide a means of recognising potential adverse effects at the earliest opportunity, enabling changes in site management or provisional of additional mitigation measures to be implemented as appropriate, before significant effects on the SAC are realised.
 - **Monitoring** – as specified by Natural England in their response to the Core Strategy HRA, a monitoring programme should be put in place, which repeats the method of the Visitor

³ Shepway Places and Policies Preferred Options Local Plan HRA Report, LUC, November 2016

⁴ Shepway Places and Policies Proposed Submission Local Plan HRA Report, LUC, December 2017

Study, to identify whether the mitigation measures provided remain effective, and to identify where future modifications to management or provision of additional mitigation is required to avoid significant effects on the SAC. It is recommended that the appropriate frequency of monitoring is agreed via consultation with Natural England, and informed as an ongoing iterative process in line with the latest survey findings.

- **Project Level Assessment** – site specific planning applications, especially larger ones in proximity to the SAC, will need to consider the requirement to undertake project level HRA, and where appropriate would be expected to incorporate necessary safeguards in line with the policy safeguards included within the PPLP.
- **Green Infrastructure Plan** – the proposed updated Green Infrastructure Plan will identify areas such as Biodiversity Opportunity Areas (BOAs) where enhancements to biodiversity can be targeted. It is recommended that this study recognises and promotes opportunities for provision of strategic high quality alternative open space as this may help to future-proof future development by focusing recreational activities away from Folkestone to Etchingill Escarpment SAC.

1.22 The HRA made the following recommendations to ensure that the PPLP protects the integrity of the Dungeness, Romney Marsh and Rye Bay SPA, SAC and Ramsar:

- **Recreation:** to enable a finding of no adverse effect on integrity, the Council will need to recognise the findings of the Sustainable Access Strategy (SAS) when published and adopt a flexible approach in delivering the PPLP by ensuring that any additional recommendations and mitigation measures are provided in line with the conclusions made.
- **Habitat Loss/Damage (offsite):** in order to ensure that there are no significant effects specific wording should be added to policies E1, RM2 and RM4 to require a detailed project level assessment for species and mitigate any identified impacts through the provision of alternative habitat, and/or contributions towards enhancing strategic sites for these species elsewhere if required.

Structure of SA report

1.23 The remainder of this report is structured as follows:

- **Chapter 2** sets out the methodology for the SA process; **Appendix 3** sets out the representations received on the SA Scoping Report and Preferred Options PPLP and LUC's responses to them.
- **Chapter 3** outlines the PPLP, its relationship with other relevant plans and programmes and the environmental protection objectives of relevance to the SA objectives and the PPLP, drawing on a detailed policy review set out in **Appendix 2**.
- **Chapter 4** provides a sustainability profile of Shepway District, which has informed the SA framework and appraisal of the PPLP and which addresses SEA Regulations' reporting requirements.
- **Chapter 5** includes the SA framework, including SA objectives and associated appraisal questions being used to appraise the PPLP. Detailed assumptions for the SA of site allocations are set out in **Appendix 1**. **Appendix 4** demonstrates how the SA framework has been derived from the sustainability issues facing Shepway District, relevant policy objectives and the requirements of the SEA Regulations.
- **Chapter 6** summarises the results of the SA of the Issues and Options version of the PPLP, appraised in January 2015.
- **Chapter 7** summarises the results of the SA of the site alternatives, originally appraised in September 2016 and updated in response to representations received on the Preferred Options version of the PPLP and updates in evidence.
- **Chapter 8** summarises the results of the SA of the site allocations and development management policies in the proposed Submission Draft version of the PPLP, appraised in July 2017.

- **Chapter 9** outlines the plans for monitoring the effects of the PPLP.
- **Chapter 10** outlines the conclusions of the SA and next steps.

2 Appraisal methodology

Schedule 2(18) of the SEA Regulations requires that the Environmental Report shall include:

"...a description of how the assessment was undertaken including any difficulties (such as technical difficulties or lack of know-how) encountered in compiling the required information."

- 2.1 The purpose of SA is to promote sustainable development through the better integration of sustainability considerations into the preparation and adoption of plans. It should be viewed as an integral part of good plan making, involving ongoing iterations to identify and report on the likely significant effects of the emerging plan and the extent to which sustainable development is likely to be achieved through its implementation.
- 2.2 In addition to complying with legal requirements, the approach taken to the SA of the Shepway PPLP was based on current best practice and the guidance on SA/SEA set out in the National Planning Practice Guidance⁵. **Table 2.1** below sets out the main stages of the plan-making process and shows how these correspond to the SA process.

Table 2.1: Corresponding stages in Plan-making and SA

Local Plan Step 1: Evidence Gathering and engagement
SA stages and tasks
<p>Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope</p> <ul style="list-style-type: none"> • 1: Identifying other relevant policies, plans and programmes, and sustainability objectives • 2: Collecting baseline information • 3: Identifying sustainability issues and problems • 4: Developing the SA Framework • 5: Consulting on the scope of the SA
Local Plan Step 2: Production
SA stages and tasks
<p>Stage B: Developing and refining options and assessing effects</p> <ul style="list-style-type: none"> • 1: Testing the Plan objectives against the SA Framework • 2: Developing the Plan options • 3: Evaluating the effects of the Plan • 4: Considering ways of mitigating adverse effects and maximising beneficial effects • 5: Proposing measures to monitor the significant effects of implementing the Plan
<p>Stage C: Preparing the Sustainability Appraisal Report</p> <ul style="list-style-type: none"> • 1: Preparing the SA Report

⁵ <http://planningguidance.communities.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/>

Stage D: Seek representations on the Plan and the Sustainability Appraisal Report

- 1: Public participation on Plan and the SA Report
- 2(i): Appraising significant changes

Local Plan Step 3: Examination

SA stages and tasks

- 2(ii): Appraising significant changes resulting from representations

Local Plan Step 4 & 5: Adoption and Monitoring

SA stages and tasks

- 3: Making decisions and providing information

Stage E: Monitoring the significant effects of implementing the Plan

- 1: Finalising aims and methods for monitoring
- 2: Responding to adverse effects

Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope

- 2.3 The scoping stage of the SA was undertaken by LUC and included the preparation and publication of a Scoping Report which was published for consultation in April 2014.
- 2.4 The scoping stage of the SA involves understanding the social, economic and environmental baseline for the plan area as well as the sustainability policy context and key sustainability issues. The Scoping Report presented the outputs of the following tasks:
- Policies, plans and programmes of relevance to the PPLP were identified and the relationships between them were considered, enabling any potential synergies to be exploited and any potential inconsistencies and incompatibilities to be identified and addressed (see **Chapter 3** and **Appendix 2**).
 - In line with the requirements of the SEA Regulations, baseline information was collected on the following 'SEA topics': biodiversity, flora and fauna; population and human health; water; soil; air; climatic factors; material assets; cultural heritage; and the landscape. Data on social and economic issues were also taken into consideration. This baseline information provided the basis for predicting and monitoring the likely effects of the PPLP and helps to identify alternative ways of dealing with any adverse effects identified (see **Chapter 4**).
 - Drawing on the review of relevant plans, policies and programmes and the baseline information, key sustainability issues for the District were identified (including environmental problems, as required by the SEA Regulations) (see **Chapter 4**).
 - Setting out the proposed methodology for the remainder of the SA process, including the framework of SA objectives, appraisal questions and associated assumptions that have been used to appraise the three iterations of the PPLP.
- 2.5 The Scoping Report was made available to the three SEA 'Consultation Bodies' (the Environment Agency, Historic England, and Natural England) and the public for a five week consultation period. Where appropriate, revisions were made to information in the Scoping Report in light of consultation responses, and these are presented within this SA report (the reviewed review of plans, policies and programmes can be found in **Appendix 2** and the reviewed baseline information is in **Chapter 4**). A full list of consultation comments received in relation to the Scoping Report, together with a description of how each has been addressed is included in **Appendix 3**. The SA Framework is contained in **Chapter 5** of this Report, and includes minor changes in response to consultation responses to the Scoping Report.

Stage B: Developing and refining options and assessing effects

- 2.6 Developing options for a Local Plan is an iterative process, usually involving a number of consultations with the public and relevant stakeholders. Consultation responses and the SA can help to identify where there may be other 'reasonable alternatives' to the options being considered for a plan.

Regulation 12 (2) of the SEA Regulations requires that the Environmental Report (also known as the SA Report) shall:

"identify, describe and evaluate the likely significant effects on the environment of—

(a) implementing the plan or programme; and

(b) reasonable alternatives, taking into account the objectives and the geographical scope of the plan or programme."

- 2.7 Work on the preparation of the Shepway PPLP entered a third phase following the consultation of the Issues and Options in January 2015 and Preferred Options in October 2016. Throughout this process, the SA remained an integral component of plan preparation. Each time there has been a formal consultation on the PPLP it has been accompanied by a SA Report.
- 2.8 Following the consultation in October 2016, the detailed preferred policies and site allocations set out in the Preferred Options version of the PPLP have been refined further in light of consultation comments, updated evidence and the SA findings.
- 2.9 The SA must appraise not only the preferred policies and site allocations in the PPLP but "*reasonable alternatives*" to those policies and allocations. The SEA Regulations do not require all alternatives to be subject to appraisal, just "*reasonable alternatives*". This implies that alternatives that are not reasonable do not need to be subject to appraisal. Examples of unreasonable alternatives could include policy options that do not meet the overarching Vision and Objectives of the plan or national policy (NPPF), or site options that are unavailable or undeliverable.
- 2.10 It also needs to be recognised that the SA findings are not the only factors taken into account when determining what should be included in a Local Plan. Indeed, there will often be an equal or similar number of positive or negative effects identified for each option, such that it is not possible to 'rank' them based on sustainability performance in order to select preferred options. Factors such as public opinion, deliverability and conformity with national policy are also taken into account by plan-makers.
- 2.11 Consultation comments received on SA work to date, and how they have been responded to, are included in **Appendix 3**.
- 2.12 The detailed methodology applied to appraise the sustainability effects of the Shepway PPLP is described later in this Chapter.

Alternatives considered to date in the preparation of the Shepway PPLP

- 2.13 The effects of the options which the Council considered in the first draft of the PPLP (Issues and Options version) and which have been subject to SA are outlined in **Chapter 6**. **Chapter 7** sets out the findings of the SA of the proposed and reasonable alternative site allocations (policy-off, which means appraising each site against the SA objectives, based on the site's intrinsic characteristics and context before any policy intervention is applied to the site) considered to date, including reasonable site options proposed before and after the consultation on the Preferred Options version of the PPLP. **Chapter 8** sets out the findings of the SA of the site allocation and development management policies outlined in the proposed Submission Draft version of the PPLP published for consultation in January 2018. The findings of the SA of the preferred site allocation and development management policies outlined in the Preferred Options version of the PPLP published for consultation in October 2016 are set out in the previous iteration of SA Report published alongside the Preferred Options PPLP in October 2016. All appraisal work has been undertaken to a consistent level of detail at each stage, including the consideration of reasonable alternatives.

2.14 LUC has provided SDC with recommendations for changes to all versions of the PPLP in order to improve its likelihood of delivering sustainable development. SDC has taken the findings of the SA work into account when preparing the proposed Submission Draft version of the PPLP.

Housing and the settlements alternatives

2.15 Strategic housing allocations have already been allocated through the Core Strategy process and were subject to SA at that time. However, small to medium sized housing site options have been identified through a number of 'Call for Sites' exercises, notably in late 2013, early 2014 and late 2016, and supplemented by the Council's own desktop analysis. This evidence has been reviewed as part of the Council's Strategic Housing Land Availability Assessment (SHLAA) with a view to sieving sites based on their:

- **Suitability** – whether the site offers a suitable location for development, taking into account policy restrictions such as designations; physical problems or limitations such as access or flood risk; potential impacts such as on landscape or biodiversity; contribution to regeneration priority areas; and the environmental conditions which would be experienced by prospective residents and neighbouring areas.
- **Availability** – whether there are no legal or ownership problems.
- **Achievability** – whether there is a reasonable prospect that housing will be developed on the site at a particular point in time, in light of the economic viability of the site and the capacity of the developer to complete and sell the housing over a certain period.

2.16 The Issues and Options version of the PPLP described a single policy option, 'Policy option for housing distribution', which was subject to SA (see **Chapter 6**). Unlike other policy options in the PPLP, no alternative aspects of, or alternatives to, the policy were described. The option set out principles for determining the number of dwellings to be provided at each tier in the settlement hierarchy and applied those principles to calculate guideline numbers of dwellings for each tier in total and average new dwellings per settlement in the tier.

2.17 Housing sites assessed by the Council as being suitable, available and achievable have been appraised as reasonable alternatives and are reported upon in this SA report in **Chapters 7 and 8**. The Preferred Options version of the PPLP, published in October 2016, outlined the preferred site allocations in Part 1 of the Plan. Appendix 1 of the Preferred Options version of the PPLP listed the reasonable alternatives. The proposed Submission Draft version of the PPLP, published in January 2018, sets out the final set of proposed site allocation and development management policies of the Plan.

Economic development alternatives

2.18 The Issues and Options SA did assess development management policy options relating to the principles for determining locations for economic development.

2.19 The Preferred Options version of the PPLP contained one employment policy which listed the preferred locations for employment development over the Plan period. Appendix 1 of the Preferred Options version of the PPLP lists the reasonable alternative site allocations. The proposed Submission Draft version of the PPLP contains a number of mixed-use site allocation policies in Part 1 of the Plan. Furthermore, Part 2 of the PPLP contains Policy E1 (Allocated Employment Sites) which, like the previous iteration of the Plan, lists the locations of employment development over the Plan Period and RL11 (Silver Spring Site, Park farm) a mixed-use allocation for business uses (B1), leisure (D), retail (A1) and hotel (C1). All the development locations listed in Policy E1 are already recognised as existing employment sites in the Shepway Employment Land Review (2011)⁶ or allocated for such uses in the adopted Core Strategy (2013)⁷.

Town centres alternatives

2.20 The Council's Town Centre Study was underway during the preparation of the Issues and Options version of the PPLP meaning that only emerging findings could be reported on quantitative requirements for retail, food and drink floorspace over the Plan period, broad locations for town

⁶ Shepway Employment Land Review, NLP, 2011

⁷ Shepway Core Strategy, Shepway District Council, 2013

centre allocations and a range of potential site allocations to meet these needs. Therefore, it was not until the preparation of the Preferred Options version of the PPLP that detailed Town Centre policies were appraised following the Council's assessment of site deliverability (see **Chapter 8**). However, the SA of the Issues and Options version of the PPLP assessed development management policy options relating to the principles for determining locations for allocating town centre development in policies E8 to E11 (see **Chapter 6**). **Chapter 8** sets out the findings of the proposed Submission Draft versions of the town centre policies within Chapter 11 of the proposed Submission Draft version of the PPLP.

Gypsy and Travellers alternatives

- 2.21 A Gypsy, Traveller and Travelling Showpeople needs assessment carried out by the four East Kent Local Authorities recommended a need of seven pitches for the period 2013-2027, to include an immediate need in the first five years of five pitches. However, the new definition of Gypsies and Travellers has significantly reduced the number of households in the District conforming to this category, and advises that Travelling Showpeople sites should be assessed under general housing policies. The Issues and Options version of the PPLP did not identify site options but set out alternative criteria in Development Management policy option H3 and H4 for identifying sites at a later stage, which were subject to SA (see **Chapter 6**). The Preferred Options and proposed Submission Draft versions of the PPLP both contain a development management policy for the provision of accommodation for Gypsies and Travellers which has been subject to SA and reported on in this SA report in **Chapter 8**.

Infrastructure alternatives

- 2.22 The Issues and Options version of the PPLP did not identify site options for infrastructure but rather set out different approaches to funding infrastructure via developer contributions. These alternatives were subject to SA (see **Chapter 6**).
- 2.23 The Preferred Options and proposed Submission Draft versions of the PPLP both contain development management policies for the provision of multiple types of infrastructure including open space and public rights of way, community facilities and broadband and parking provision (see **Chapter 8**).

Local Green Spaces alternatives

- 2.24 The Issues and Options version of the PPLP reiterated the Core Strategy policy commitment to safeguarding existing open space in the District and proposed to achieve this by designating existing open spaces as Local Open Spaces in line with NPPF criteria. Site options were identified through a call for sites and from any further potential sites suggested during consultation on the Issues and Options version of the PPLP. However, no allocations were subject to SA at the Issues and Options Stage.
- 2.25 The Preferred Options version of the PPLP contained a Local Green Spaces policy which listed the preferred locations for Local Green Spaces over the Plan period. Reasonable alternative locations for Local Green Spaces were listed in Appendix 2 of the Preferred Options version of the PPLP. These alternative locations represented existing public open and green spaces which generally already make a positive contribution to SA objectives 1, 3, 8, 9 and 14. As it is unlikely that their individual designation as Local Green Spaces would generate significant adverse effects against any of the SA objectives, the alternative locations for the Local Green Space designations were not individually appraised.
- 2.26 The proposed Submission Draft version of the PPLP does not contain a Local Green Spaces policy.

Heritage alternatives

- 2.27 The Issues and Options version of the PPLP provided contextual information and asked questions in relation to possible policy approaches to protection of the historic environment that did not relate to site allocations. Related development management policy options (HE1, HE2 and HE3) were subject to SA (see **Chapter 6**).
- 2.28 The Preferred Options and proposed Submission versions of the PPLP contain preferred development management policies related to the protection of the historic environment, which have been appraised and reported on in **Chapter 8**.

Development management policies alternatives

- 2.29 Part Two of the Issues and Options version of the PPLP described emerging development management policy options under a range of topic areas, including housing, the economy, community, transport, the natural environment, the coast, climate change, health and well-being and the historic environment. At this stage of the plan making process it was unclear, in many cases, whether the final policy would ultimately contain just one of the policy elements put forward or many of them. As such, an overarching sustainability commentary was provided for each policy which drew out, where appropriate, the separate effects of different elements of each emerging policy, without assuming that it represented an alternative to the other policy aspects described unless this was explicitly the case (see **Chapter 6**).
- 2.30 In the Preferred Options and proposed Submission Draft versions of the PPLP preferred development management policies are organised under several topic areas including housing, economy, retail and leisure, community, transport, natural environment, climate change, health and well-being and historic environment. Each policy has been subject to SA and reported on in **Chapter 8**.

Stage C: Prepare the SA Report

- 2.31 This SA Report represents the 'environmental report' required under the SEA Regulations. It describes the process undertaken in carrying out the SA of the Shepway People and Policies Local Plan. It sets out the findings of the appraisal, highlighting any likely significant effects, both positive and negative, and the measures proposed in the Local Plan to mitigate negative effects and maximise the benefits of the plan. It also proposes monitoring measures.
- 2.32 Three SA Reports have been prepared to date:
- The first SA Report appraised and was published alongside the options set out in the Issues and Options version of the PPLP in January 2015.
 - The second SA Report appraised and was published alongside the preferred options and reasonable alternatives set out in the Preferred Options version of the PPLP in October 2016.
 - This third version of the SA Report appraises, and will be published alongside, the site allocations and development management policies and any new reasonable alternatives set out in the proposed Submission Draft version of the PPLP in January 2018.
- 2.33 Each iteration of the SA report has provided the basis for the next iteration at each stage in the PPLP's preparation. At each stage, the SA Report has been updated to reflect the latest changes in the baseline sustainability issues or the policy context.
- 2.34 Not all of the earlier SA work included in the SA Reports which accompanied the Issues and Options (January 2015) and Preferred Options (October 2016) versions of the PPLP has been included in this latest version of the SA Report to accompany the proposed Submission Draft of the PPLP in order to keep the length of this SA Report reasonable and proportionate. However, the key findings of all the work undertaken at earlier stages are included in **Chapters 6, 7 and 8**:
- The SA findings for the Issues and Options version of the PPLP are summarised in **Chapter 6**.
 - The SA findings for the site options tested for the Preferred Options and proposed Submission version of the PPLP are summarised in **Chapter 7**.
 - **Chapter 8** includes the SA findings for the site allocation and development management policies set out in the Submission Draft PPLP, including an assessment of the potential cumulative impacts of the Local Plan as a whole. Furthermore, Chapter 8 contains a summary of the recommendations made following the SA of the site allocation and development management policies in the Preferred Options PPLP and proposed Submission PPLP, including how these recommendations influenced the Plan.
 - Detailed appraisal matrices of the proposed Submission Draft site allocation and development management policies and reasonable alternative site allocations are included in **Appendices 7 and 8**.
- 2.35 The detailed SA Reports at the earlier stages are available on the SDC website.

Stage D: Seek representations on the SA Report from consultation bodies and the public

- 2.36 SDC sought stakeholder views on the Issues and Options and Preferred Options PPLP and their accompanying SA Reports and is now seeking stakeholder views on the proposed Submission Draft of the PPLP and this accompanying SA Report. In responding to representations, the Council may propose changes to policy approaches in the final Submission version of the PPLP and, where necessary, these will be subject to further SA. Any comments made on this SA Report will also be reviewed and addressed where appropriate.
- 2.37 The Submission Draft of the PPLP and the SA Report will be subject to Public Examination before a Government appointed Inspector. Should any modifications to the Submission Draft PPLP be proposed as a result of the Examination, these may require further SA, and the SA Report updated accordingly, with potentially a further round of public consultation prior to adoption.

Stage E: Post adoption reporting and monitoring

- 2.38 The SEA Regulations require certain information to be made available following the adoption of a plan or programme for which SA/SEA has been undertaken.
- 2.39 This SA Report sets out recommendations for monitoring the significant sustainability effects of the proposed Submission Draft version of the PPLP identified by the SA. However, these recommendations will need to be revisited to reflect the final set of significant effects identified as likely to occur as a result of implementing the PPLP once adopted. The monitoring proposals should be considered within the context of the broader monitoring framework for the SA Report and the data collection for SDC's Annual Monitoring Report.
- 2.40 Once the Council is ready to adopt the PPLP, LUC will draft an Adoption Statement, as a separate report to the final SA Report. It will contain sections describing how each of the requirements in SEA Regulation 16(4) (a)-(f) have been met during the integrated SA/SEA process for the Local Plan. The sections will therefore cover:
- How environmental considerations have been integrated into the plan.
 - How the environmental report and the opinions expressed during consultations have been taken into account.
 - The reasons for choosing the plan as adopted, in the light of the other reasonable alternatives dealt with.
 - The measures decided concerning monitoring of significant environmental effects.

3 Relevant policy context

Schedule 2 of the SEA Regulations requires:

(1) "an outline of the...relationship with other relevant plans or programmes"; and

(5) "the environmental protection objectives established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation"

- 3.1 Shepway District Council, as the Local Planning Authority (LPA), is preparing a Local Plan in accordance with the Planning and Compulsory Purchase Act, 2004. The PPLP is not prepared in isolation, being greatly influenced by other plans, policies and programmes and by broader sustainability objectives. It needs to be consistent with international and national guidance and strategic planning policies and should contribute to the goals of a wide range of other programmes and strategies, such as those relating to social policy, culture and heritage. It must also conform to environmental protection legislation and the sustainability objectives established at the international, national and regional levels.
- 3.2 It is necessary to identify the relationships between the PPLP and the relevant plans, policies and programmes so that any potential links can be built upon and any inconsistencies and constraints addressed.
- 3.3 During the Scoping stage of the SA, a review was undertaken of the other plans, policies and programmes that are relevant to the Local Plan. This review has been revised and updated since it was originally presented in the SA Scoping Report, in light of comments received during the Scoping consultation and to make the review more concise, ensuring that it reviews an appropriate range of up-to-date plans, policies and programmes in an appropriate level of detail.
- 3.4 The updated review can be seen in full in **Appendix 2** and the key findings are summarised below. **Appendix 4** links the SA objectives to the sustainability issues outlined in the **Chapter 4**, the policy objectives outlined in **Appendix 2** and the SEA Directive topics.
- 3.5 The review is not exhaustive. It seeks to identify the main policies, plans and programmes of relevance to the SA and the PPLP.

Key international plans, policies and programmes

- 3.6 At the international level, Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the 'SEA Directive') and Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (the 'Habitats Directive') are particularly significant as they require Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) to be undertaken in relation to the emerging PPLP. These processes should be undertaken iteratively and integrated into the production of the plan in order to ensure that any potential negative environmental effects (including on European-level nature conservation designations) are identified and can be mitigated.
- 3.7 There are a wide range of other EU Directives relating to issues such as water quality, waste and air quality, most of which have been transposed into UK law through national-level policy; however the most relevant international directives have been included in **Appendix 2** for completeness.

Key national plans, policies and programmes

- 3.8 The most significant policy context for the PPLP is the National Planning Policy Framework (NPPF) and accompanying National Planning Policy Guidance (NPPG). The Local Plan must be consistent with the requirements of the NPPF. The NPPF sets out information about the purposes of local plan-making, stating that:

"Local Plans must be prepared with the objective of contributing to the achievement of sustainable development. To this end, they should be consistent with the principles and policies set out in this Framework, including the presumption in favour of sustainable development."

- 3.9 The NPPF also requires Local Plans to be *"aspirational but realistic"*. This means that opportunities for appropriate development should be identified in order to achieve net gains in terms of sustainable social, environmental and economic development; however significant adverse impacts in any of those areas should not be allowed to occur.
- 3.10 The NPPF requires local planning authorities to set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver:
- the homes and jobs needed in the area;
 - the provision of retail, leisure and other commercial development;
 - the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
 - the provision of health, security, community and cultural infrastructure and other local facilities; and
 - climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.
- 3.11 In addition, Local Plans should:
- plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of the NPPF;
 - be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date;
 - be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations;
 - indicate broad locations for strategic development on a key diagram and land-use designations on a proposals map;
 - allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate;
 - identify areas where it may be necessary to limit freedom to change the uses of buildings, and support such restrictions with a clear explanation;
 - identify land where development would be inappropriate, for instance because of its environmental or historic significance; and
 - contain a clear strategy for enhancing the natural, built and historic environment, and supporting Nature Improvement Areas where they have been identified.

Local plans, policies and programmes

- 3.12 At the sub-regional and local levels there are a wide range of plans and programmes that are specific to Kent and Shepway District and which provide further context for the PPLP. These plans and programmes relate to issues such as housing, transport, renewable energy and green infrastructure, and have also been reviewed in **Appendix 2**.

3.13 The key relationship of the PPLP is with other components of the Local Plan as follows.

Shepway District Council Core Strategy Local Plan

3.14 The highest tier document of the Local Plan, the Core Strategy Local Plan, was adopted in September 2013. It is a strategic planning policy document and interprets national planning policy from the National Planning Policy Framework (NPPF) in the context of the District of Shepway.

3.15 Shepway's Core Strategy Local Plan was adopted on 18th September 2013 and is the long term plan for the District up to 2031. It brings together the objectives and actions of the Government, the Council, residents, businesses and voluntary groups for managing land use and development. The adopted Core Strategy seeks to strike an overall balance between regeneration aspirations and protecting the District's sensitive landscapes and habitats.

3.16 Taking into account the economic, social and environmental issues relevant to Shepway, the Core Strategy sets out three over-arching strategic objectives:

- To improve employment, educational attainment and economic performance in Shepway.
- To enhance the rich natural and historic assets in Shepway.
- To improve the quality of life and sense of place, vibrancy, and social mix in neighbourhoods, particularly where this reduces existing socio-economic disparities in Shepway.

3.17 The Core Strategy seeks to deliver these strategic objectives through a series of strategic policies and strategic allocations to guide development and land use.

3.18 The adopted Core Strategy plans to deliver a target of 8,000 new homes (with a minimum requirement of 7,000 new homes) during the plan period from 2006-2026.

3.19 Supplementing the Core Strategy is the Shepway District Local Plan Review (2006, policies saved in 2009) which includes policies to manage development applications. However, due to the age of the document, some of these policies are out of date, insufficient or non-compliant with the NPPF which was adopted in March 2012. These policies are being reviewed in preparing the PPLP to inform the new policies that will replace them.

Review of the Core Strategy Local Plan

3.20 Shepway District Council is in the early stages of a Review of the District's adopted Core Strategy to plan for development and growth to at least 2036 and possibly beyond based on an updated assessment of housing needs. At this stage in the review, it is considered unlikely that all policies within the adopted Core Strategy will require review.

3.21 The latest demographic evidence indicates that its future housing need will not be met by the adopted Core Strategy unless new growth initiatives are brought forward. Therefore, the Council has started work on an updated strategic response to providing significant medium and long term housing growth in the District.

3.22 While the Council prioritises development on brownfield land, Strategic Housing Land Availability Assessment (SHLAA) work undertaken to inform the preparation of the PPLP has confirmed that the options for providing significant housing growth in the District appear to be restricted due to the limited availability of brownfield land, the statutory designation of the Kent Downs Area of Outstanding Natural Beauty (AONB) and the coverage of Romney Marsh by flood zone restrictions. The Council therefore envisages that future growth (beyond that allocated in the adopted Core Strategy and PPLP) cannot be provided by in-filling within existing settlement boundaries and therefore a new, visionary response to meeting future housing need will need to be identified.

3.23 Consequently, the Council has commissioned two key updates to its Local Plan Evidence Base:

- An update to the District's Strategic Housing Market Assessment (SHMA) to establish what the housing needs of the District are likely to be over the remaining period of the Core Strategy plan period and beyond.

- A Growth Options Study to identify and test potential approaches to strategic planning for growth in Shepway, to determine whether the District can meet its housing needs, and if so the most appropriate approach to do so.

- 3.24 The updated SHMA⁸ jointly commissioned by Shepway District Council and Dover District Council sets out an annual Objectively Assessed Housing Need (OAN) for housing in the District for the period 2014-2037 of 633 dwellings per annum (dpa), 14,559 homes over the full period. Taking into account housing completions, sites with planning permission, allocations yet to be brought forward, and the preferred site allocations within the PPLP, there is a need to find land for a further 6,292 additional dwellings. The SHMA recommends that an appropriate buffer over and above this shortfall figure is identified to ensure that the housing need is met within the period 2014-2037.
- 3.25 Informed by the updated SHMA, the Growth Options Study, reviewed Corporate Plan and other updates to the District's Local Plan evidence base, the Review of the Core Strategy will plan for development and growth to at least 2036 and possibly beyond.
- 3.26 Work on the Partial review of the Core Strategy will be consulted upon and appraised separately from the Council's Places and Policies Local Plan. For the purposes of the proposed Submission Draft of the PPLP, the adopted Core Strategy (2013) continues to provide the local strategic policy framework.

Shepway District Council Places and Policies Local Plan

- 3.27 This SA Report supports the proposed Submission Draft version of the Shepway Places and Policies Local Plan (PPLP) which must be in general conformity with the Core Strategy. Its purpose is to outline development sites for new homes and business, to recognise important areas of open space and to provide new development management policies to replace those remaining policies that are still being used from the 2006 Local Plan.

Other Local Plan Documents

- 3.28 The Council published a first draft of the Shepway Community Infrastructure Levy (CIL) Charging Schedule for public consultation during September-October 2014. Following two rounds of consultation and an examination in public, the Council adopted the CIL Charging Schedule on the 20th July 2016. CIL charges came into effect in Shepway on the 1st August 2016 and facilitate charges on new development to provide funding for associated infrastructure requirements, alongside other sources.
- 3.29 New Neighbourhood Planning measures that came into force in April 2012 allow communities to shape new development by coming together to prepare Neighbourhood Plans. These Plans, which must be in general conformity with higher tier plans in the Local Plan, are currently being prepared for Sellindge and St Mary in the Marsh. In addition, Hythe, Lympne and New Romney have been designated as Neighbourhood Areas.

⁸ Shepway District Council and Dover District Council Strategic Housing Market Assessment (SHMA), PBA, 2017

4 Baseline information and key sustainability issues

Introduction

- 4.1 The collection of information on the current state of the environment is a key component of the SA process and a requirement of the SEA Directive. It provides a baseline from which to predict and subsequently monitor the sustainability effects of the Plan's policies and proposals.

The Environment Report should include:

- *"The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme"*
- *"the environmental characteristics of areas likely to be significantly affected"*
- *"any existing environmental problems which are relevant to the plan or programme, including in particular, those relating to any areas of a particular environmental importance, such as any areas designated pursuant to Council Directive 79/409/EEC on the conservation of wild birds and the Habitats Directive."*

SEA Regulations Schedule 2 (2, 3 and 4)

- 4.2 Sufficient baseline information to meet these requirements has been collected and is organised below by SA theme.
- 4.3 It should not be assumed that all baseline data are currently available, or, that it will be possible to collect missing data in the future. SEA Guidance recognises that data gaps will exist, but suggests that where baseline information is unavailable or unsatisfactory, authorities should consider how it will affect their assessments and determine how to improve it for use in the assessment of future plans. The collection and analysis of baseline data is regarded as a continual and evolving process, given that information can change or be updated on a regular basis.
- 4.4 Relevant baseline information has been updated during the SA process as and when new data has been published.

Baseline information, sustainability issues and their likely evolution without the Places and Policies Local Plan

- 4.5 The baseline information included within this Report supersedes the baseline profile published in the Issues and Options version of the PPLP published in January 2015 and the Preferred Options version of the PPLP published for consultation in October 2017. It provides a snapshot of the current social, economic and environmental situation in the District including the key sustainability issues of relevance to each SA theme, their relevance to the Shepway Local Plan, and their likely future evolution in the absence of the Local Plan.

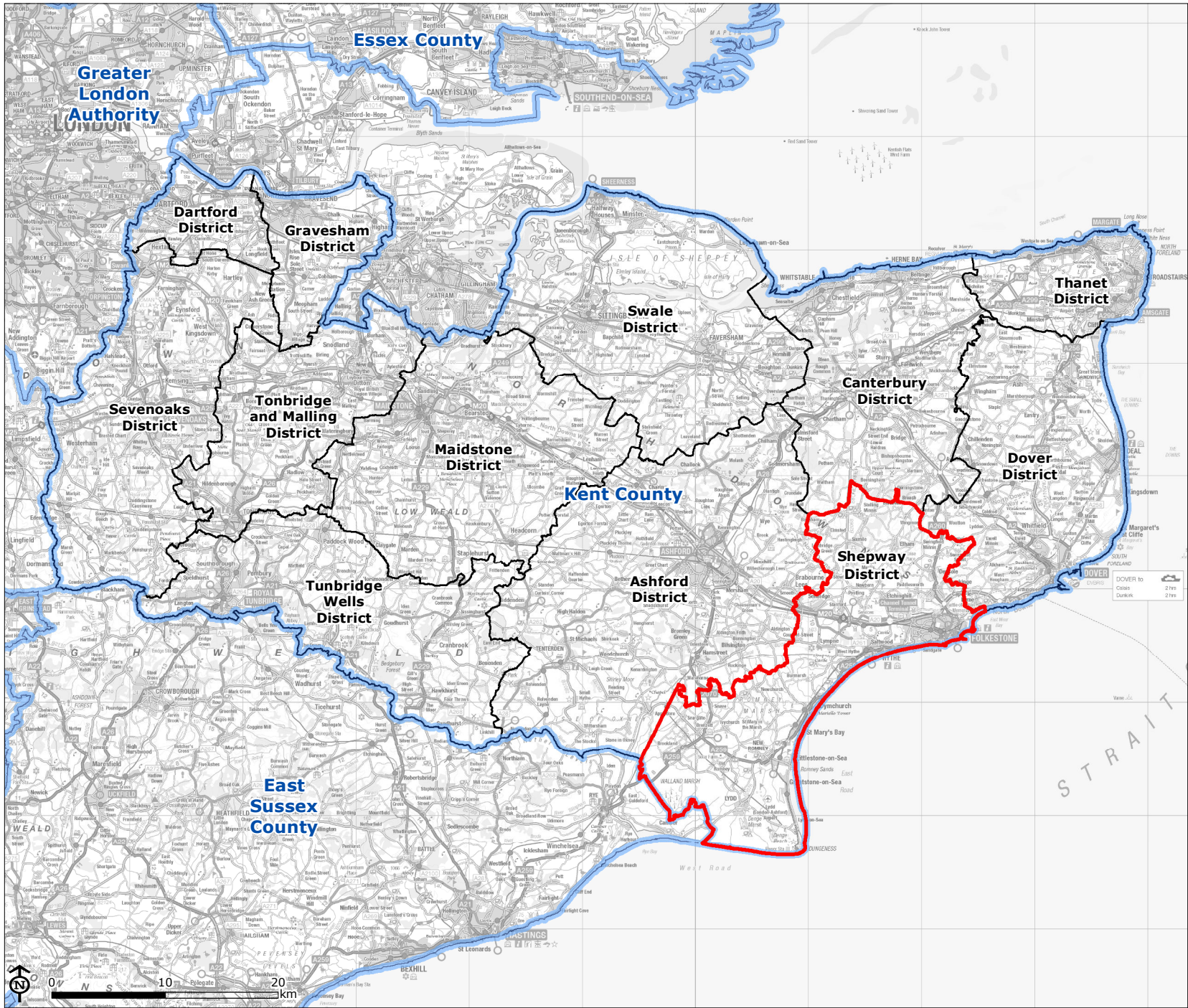
Location of Shepway District

- 4.6 Shepway is located in the south east of England on the southern coast of the County of Kent (see **Figure 4.1**).

Shepway Places and Policies Local Plan Sustainability Appraisal

Figure 4.1: Location of Shepway District

- Shepway District
- County boundary
- District boundary



Source: OS

Map Scale @ A4: 1:480,000

LUC Folkestone
 Hyke & Romney Marsh
 Shepway District Council

Climatic factors

- 4.7 There is widespread scientific consensus that the Earth's climate is changing and that human activity could be the principal cause. Scientific forecasts suggest that the UK's climate will continue to get warmer and that heavy rainfall will be more frequent. Weather extremes, such as heat waves would become more common and others such as snowfall would become less common. Sea levels will continue to rise and storm surges will become more frequent, increasing the risk of flooding in coastal areas.

Climate change mitigation

- 4.8 The Government publishes data on the CO₂ emissions per capita in each Local Authority that are deemed to be within the influence of Local Authorities. The latest available data⁹ show that CO₂ emissions per capita in Shepway fell by approximately 30% over 2005-2013 although this masks widely different falls in the three broad sectors measures: Industry & Commerce -48.5%; Domestic -20%; and Road Transport -17.5%.
- 4.9 Dungeness 'B' nuclear power station is a significant generator of low carbon energy for the UK Grid. It is currently due to be decommissioned in 2028¹⁰. Planning for nuclear power generation however, is carried out at the national level and is not a direct current concern for the Shepway Local Plan.
- 4.10 The Local Plan is concerned, though, with ways in which renewable energy generation can be achieved at the macro and the micro scales. During 2015, the installation of a 10m high wind turbine at The Grannary, Densole Lane was approved with conditions. In 2012, one onshore 15m high 5.5m diameter freestanding horizontal axis wind turbine was granted planning permission on appeal at Beech Tree Farm, Elmsted and two solar farms have been granted permission: 204 free standing ground solar panels at Lydd Camp and Solar farm at Sycamore Farm, Old Romney. In 2008, 26 wind turbines at Little Cheyne Court, East Guldeford near Brookland started exporting electricity to the National Grid¹¹, the scheme was granted planning permission on appeal. The wind farm has the capacity to generate approximately 52-78 MW, which is enough to power around 32,500 homes. The site raised considerable controversy, not least because of the potential for risk to wildlife and the sensitive landscape more generally.
- 4.11 The energy efficiency of new dwellings is measured in Shepway using the Standard Assessment Procedure (SAP). The SAP is the Government system for rating energy efficiency of dwellings. Targets to improve the SAP rating across the District have been set by Shepway District Council.

Sustainability issues and relevance to Shepway Local Plan

- The need to meet national sustainability and carbon reduction targets. Local Plans can address these through sustainable design and construction standards, reducing reliance on fossil fuels by support for renewables and other low carbon technologies, and reducing the need to travel, especially by private car.
- The sensitivity of the natural environment in Shepway may limit the number of acceptable locations for further large scale renewable energy developments.

Climate change adaptation

- 4.12 Changes to the climate will bring new challenges to the District's built and natural environments. Hotter drier summers may have adverse health impacts and may exacerbate the adverse environmental effects of air and water pollution. The UK Climate Projections (UKCP09) predicts that by the 2050s the climate in the South East is set to get warmer, with wetter winters and drier summers than at present.¹² Specifically:

⁹ DECC (2015) 2005 to 2013 UK local and regional CO₂ emissions full dataset

¹⁰ EDF Energy (2016) Dungeness B power station <http://www.edfenergy.com/energy/power-stations/Dungeness-b> Accessed 23rd May 2017

¹¹ RWE (no date) Little Cheyne Court Wind Farm <http://www.rwe.com/web/cms/en/310488/rwe-innogy/sites/wind-onshore/united-kingdom/in-operation/little-cheyne-court/> Accessed 19th February 2016

¹² UK Climate Projections (2014) Map and Key Findings <http://ukclimateprojections.metoffice.gov.uk/21708> Accessed 23rd May 2017

- Under Medium emissions, the increase in winter mean temperature is estimated to be 2.2°C; it is very unlikely to be less than 1.1°C and is very unlikely to be more than 3.4°C.
- Under Medium emissions, the increase in summer mean temperature is estimated to be 2.8°C; it is very unlikely to be less than 1.3°C and is very unlikely to be more than 4.6°C.

4.13 A changing climate may place pressure on some native species and create conditions suitable for new species, including invasive non-native species. Adaptation to changes in flood risk that may result from climate change is dealt with in the separate section on flood risk below.

Sustainability issues and relevance to Shepway Local Plan

- Hotter, drier summers expected under climate change have the potential for adverse effects on human health.
- Local Plans can take hotter, drier summers into account in the design of new buildings and green infrastructure.
- Climate change is likely to impact upon habitats and thereby biodiversity. The sensitivities of these networks should be reflected in the GI Strategy and the Local Plan's commitment to protect and enhance habitat networks.

Flood Risk

- 4.14 There is a long history of flooding within Shepway including over 101 flooding events in the last decade.¹³ Over half of homes in the District are at risk of flooding from either coastal or fluvial sources.¹⁴ There are 11 watercourses that have been categorised as main rivers in the District and have been sources of flooding in the past. Additionally, 55% of the District at or below sea level and the majority of Districts 41km coastline lies below the mean high water mark.¹⁵
- 4.15 Virtually all of the Romney Marsh area is within flood zone 3 due to its topography (see **Figure 4.2**). However, the degree of risk varies significantly within the area, being dependent on factors such as topography, hydrological features and position in relation to flood defences¹⁶. Much of the coastline is protected by a number of sea defences ranging from 'hard' structures to naturally forming shingle barrier beaches that are continually managed, so flooding from the sea will generally result from either the current sea defences breaching or being overtopped by wave action.¹⁷

¹³ Herrington Consulting Ltd (2015) Strategic Flood Risk Assessment Shepway District Council

¹⁴ Shepway District Council (2016) Flooding <http://www.shepway.gov.uk/flooding> Accessed 23rd May 2017





¹⁵ Herrington Consulting Ltd (2015) Strategic Flood Risk Assessment Shepway District Council

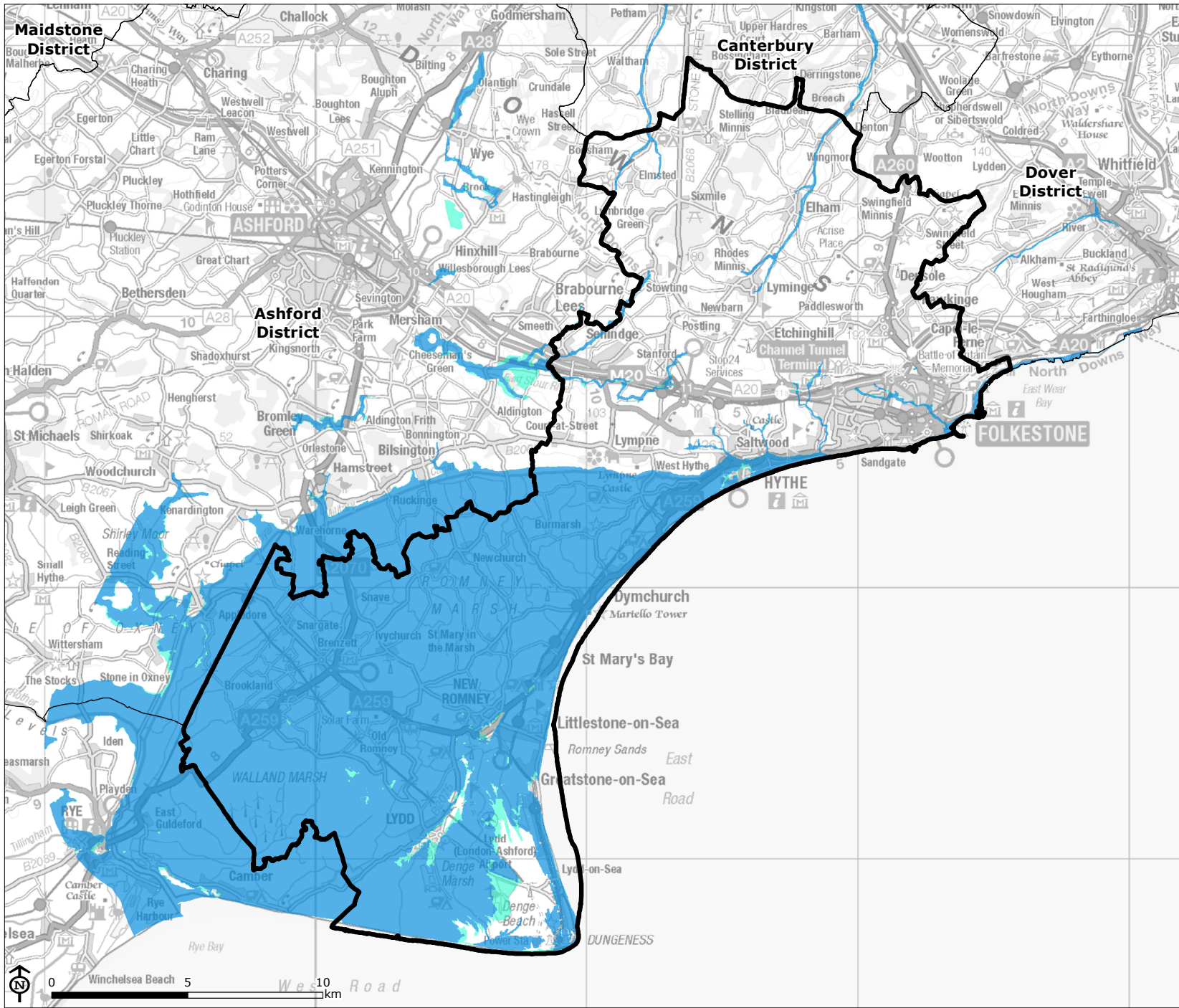
¹⁶ Shepway District Council (2011) Annual Monitoring Report

¹⁷ Herrington Consulting Ltd (2015) Strategic Flood Risk Assessment Shepway District Council

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Figure 4.2: Flood Risk

-  Shepway District
-  District boundary
-  Flood Zone 2
-  Flood Zone 3



Source: OS, Shepway District Council,

Map Scale @ A4: 1:200,000



- 4.16 The UK Climate Projections (UKCP09) predicts that by the 2050s in the South East, the overall change in annual mean precipitation is estimated to be 0%, but with the change in winter mean precipitation estimated at +16% and the change in summer mean precipitation at -19%.¹⁸ It is predicted that the net sea level rise (relative to 1990) between 1999 and 2025 will be 4mm/yr, between 2025 to 2055 8.5mm/yr and 2055 to 2085 12mm/yr.¹⁹
- 4.17 In terms of climate change adaptation, flood defence works have been undertaken at sites across the District. These include a £30 million defence scheme at Dymchurch, covering 2.2km of coastline. This is one of six projects in the 'Folkestone to Cliff End Strategy', which is envisaged to protect 14,000 dwellings across Romney Marsh.²⁰

Sustainability issues and relevance to Shepway Local Plan

- Risk of flooding is a major concern in Shepway with 55% of the District at or below sea level.
- The expected magnitude and probability of significant fluvial, tidal, ground and surface water flooding is increasing in the District due to climate change.
- Coastal erosion and the associated flood risks are a considerable spatial constraint on new development in the District.
- Local Plans should seek an integrated approach to reducing flood risk.

Likely evolution of the issues without Shepway Places and Policies Local Plan

- 4.18 National renewable energy and carbon reduction targets and the NPPF require local authorities to reduce greenhouse gas emissions and actively support energy efficiency and renewable energy. Additionally, the Building Regulations are setting ever-tighter energy efficiency and carbon reduction requirements for new buildings. The Local Plan can contribute to climate change mitigation through policies which require higher energy efficiency standards (e.g. for larger allocations) and provide a positive policy approach to the consideration renewable energy applications. The Local Plan also has a role to play in implementing climate change adaptation, for example through appropriate building design and the identification of less vulnerable locations for development. It can also help to ensure that less environmentally sensitive locations are chosen, thereby reducing development pressure on wildlife which may already be under pressure from climate change.
- 4.19 The severity and likelihood of flooding is likely to increase with current trends of climate change. Without a Local Plan it will be more difficult to manage the effects of developments on flood risk, although all developments would need to take account of national policy on flood risk, including the NPPF requirement that *"inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere"* (paragraph 100).
- 4.20 Climate change and a rising local population are in combination and at certain times of the year, likely to exacerbate water and air pollution independently of any Local Plan. However, without a planned approach to development through the Local Plan, there is less opportunity to adopt a co-ordinated, spatial approach that would help to manage health and environmental risks.

Population and human health

Demographics

- 4.21 The latest data²¹ shows that in 2015 the population of Shepway was 110,000 people (an increase of 1.7% between 2011 and 2015) which is predicted to increase to 125,300 people in 2037.²² However, past trends may be disrupted by changes in policies relating to future housing and

¹⁸ Map and Key Findings (2014) UK Climate Projections <http://ukclimateprojections.metoffice.gov.uk/21708> Accessed 23rd May 2017

¹⁹ Strategic Flood Risk Assessment Shepway District Council (2015) Herrington Consulting Ltd

²⁰ Shepway District Council (2010) Annual Monitoring Report

²¹ Nomis – Labour Market Profile – Shepway. Accessed 23rd May 2017.

²² Shepway District Council Equality and Diversity Report (2016) Shepway District Council

economic growth and for this reason Kent County Council produces population forecasts which take account of future house building plans in each of the Kent Districts' Core Strategies. The Shepway Core Strategy aim of delivering 8,000 dwellings between 2006 and 2026 (which would result in a rate of house building in line with trends of recent decades) would result in less population growth of 7.3% for 2011-2031.²³ The Core Strategy states that this is expected to lead to a more manageable change in the social balance and labour supply and only limited decrease in the size of the labour force.

- 4.22 The majority of residents in Shepway live in urban areas (60.6%), with the remaining 39.4% to be found living in rural areas.²⁴ Approximately 1 in 10 people in Shepway (9%) live in isolated dwellings, hamlets or small villages (below 1,000 people). Romney Marsh ward is the largest and the most sparsely populated area in the District.
- 4.23 The rate of household formation in Shepway for the period 2001-2011 was 15.6%, very high relative to the England and Wales average of 7.5%; this is the 11th highest in England and Wales (the next highest increase in Kent is Dartford at 14.6% and ranked 18th).²⁵ Average household size in Shepway was projected to decrease notably during 2006-2016 under all housing growth scenarios, although slightly less so under higher growth scenarios.²⁶ 50% of housing completion between 2006 and 2031 needs to consist of 3 or more bedroom dwellings, however this was unmet between 2013 and 2014, as only 46.8% of the 175 dwellings comprised 3 or more bedrooms.²⁷
- 4.24 The average age in Shepway (mid 2015) was 43.5 years (44.6 for females, 42.3 for males) which is slightly higher than the mean age in Kent at 40.8 years and the national average age of 39.7 years.²⁸ Approximately 23% of the population in Shepway is aged 65 and over. Around 34% of all households include people over the state retirement age²⁹ and 51% of the District's population in aged 45 or over.³⁰ Shepway is forecast to continue to have a large proportion of older people in its population compared to the Kent County average over the period 2010-2035. This will be in conjunction with a decline in the number of residents who are of working age (16-64).

Qualifications

- 4.25 In 2014, the percentage of Shepway residents with qualifications at NVQ Level 4 and above was 25.7%. Whilst this is falling short of the target set out in the Core Strategy, there has been somewhat of a recovery since 2011, when the attainment level actually dipped to 20.5%, but then increased by 1.5% in 2012 to 21.5% and then increased sharply by 5.3% and 26.8% in 2013.³¹

Crime

- 4.26 Crime rates are not disproportionately high in Shepway as a whole, but local pockets of higher crime rates exist.

Health

- 4.27 Compared to other English authorities, Shepway has a high proportion of people with limiting long term illness. A high percentage of the population claim disability related benefits, with the District ranked amongst the top 20% of authorities in England for this indicator. At 83.4 years, life expectancy from birth in females is 3.7 years higher than males in Shepway (at 79.7 years) in line with the UK figures, although below that of Kent and the South East.³²

²³ Interactive Population Forecast Toolkit available from <http://www.kent.gov.uk/about-the-council/information-and-data/Facts-and-figures-about-Kent/population-and-census#tab-3>

²⁴ Kent County Council (2015) 2014 Mid-year population estimates: Ward level population in Kent

²⁵ Shepway District Council (2013) Annual Monitoring Report

²⁶ Shepway LDF Core Strategy Cabinet Report April 2011 Appendix 1: Strategic Requirement

²⁷ Shepway District Council (2014) Annual Monitoring Report

²⁸ 2015 Mid-Year Population Estimates: Age and gender profile (2016) Kent County Council

²⁹ Shepway District Council (2011) Shepway Housing Strategy 2011-2016

³⁰ Shepway District Council Equality and Diversity Profile (2016) Shepway District Council

³¹ Shepway District Council (2015) Authority Monitoring Report

³² Shepway District Equality and Diversity Profile (2016) Shepway District Council

Deprivation

- 4.28 Based on death rates over the period 2006-2010, the difference in life expectancy between the most and least deprived members of the population is 9.4 years in males and 6.9 years in females. Over a fifth (21.5%) of children in Shepway lived in poverty (defined as children living in families in receipt of out of work benefits), which is higher than most of the areas in Kent.³³
- 4.29 The English Indices of Deprivation 2015³⁴ is a measure of multiple deprivation in small areas or neighbourhoods, called Lower-layer Super Output Areas (LSOA), which are a similar size to electoral wards. Seven domains of deprivation are measured: Income Deprivation; Employment Deprivation; Health Deprivation and Disability; Education, Skills and Training Deprivation; Crime; Barriers to Housing and Services; and Living Environment Deprivation. Each domain contains a number of indicators. The seven domains are combined to give a multiple deprivation score. There are 32,844 LSOAs nationally and 67 LSOAs in the Shepway District.³⁵ An examination of the 2015 Index of Multiple Deprivation (illustrated in **Figure 4.3**) data reveals that:
- Shepway is ranked 113th in the IMD out of 326 local authorities nationally, and is the third most deprived authority in Kent.³⁶
 - Shepway has moved down in the rankings which indicate that levels of deprivation have reduced between 2010 and 2015 relative to other local authorities in England.³⁷
 - The District has four LSOAs that are in the top 10% most deprived nationally which are to be found in or around the urban area of Folkestone with the most deprived of these having been ranked 572nd out of 32,844 SOAs nationally; Folkestone Harbour (014A), Folkestone Harvey Central (014B), Folkestone East (003C) and Folkestone Harvey Central (014D).
 - Whilst much deprivation is concentrated in the urbanised coastal areas of the District, there are also significant areas of high deprivation in the rural south.
 - The majority of least deprived SOAs in Shepway are located in the north of the District, in the vicinity of the M20 motorway, the Kent Downs and on the outskirts of Folkestone/Hythe. In 2015 the least deprived SOA ranked 31,159th nationally.

³³ Shepway District Equality and Diversity Profile (2016) Shepway District Council

³⁴ The English Indices of Deprivation (2015), DCLG

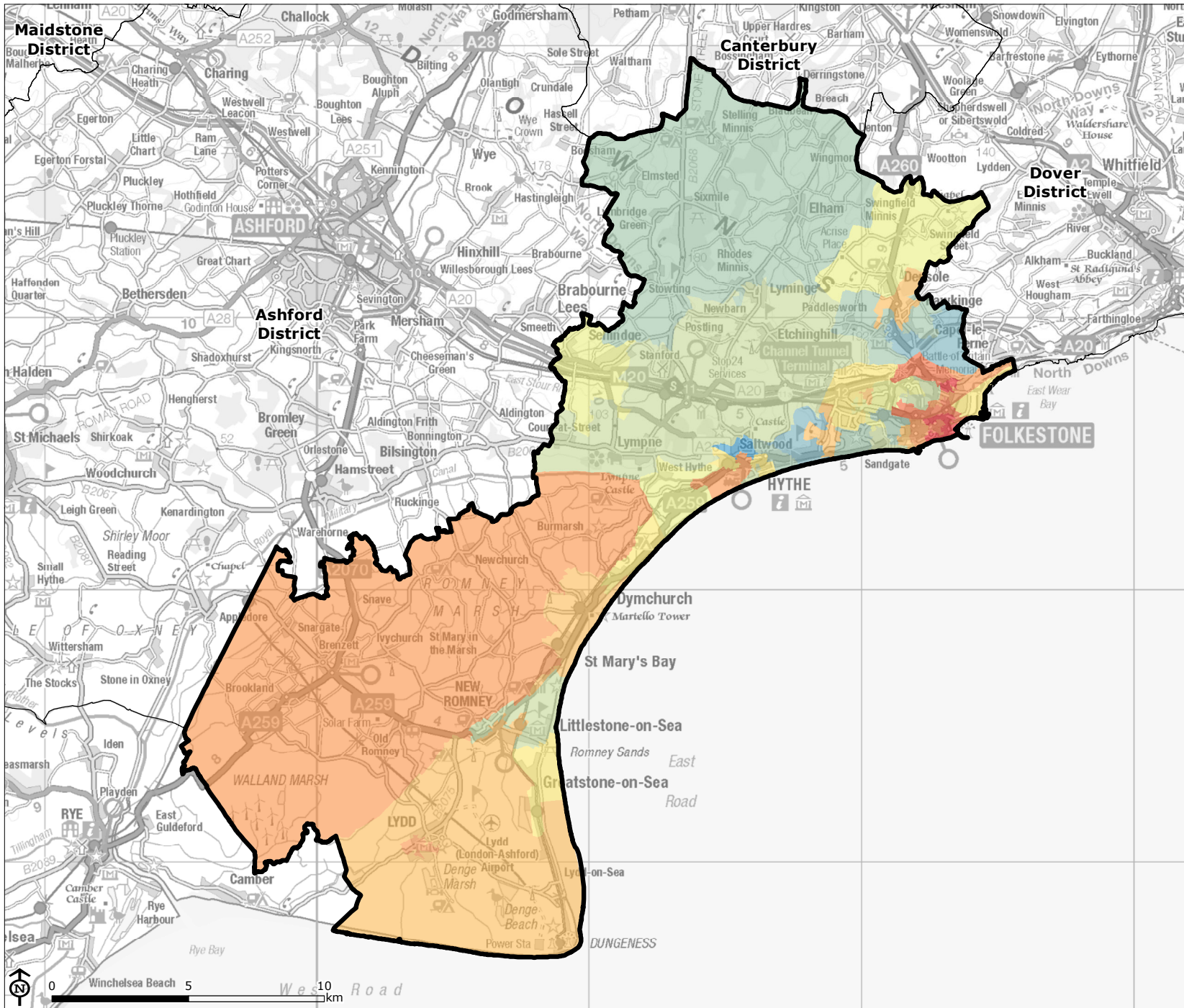
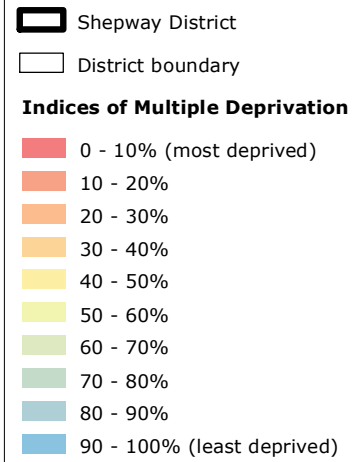
³⁵ The English Indices of Deprivation (2015), DCLG: File 1: Index of multiple deprivation

³⁶ The English Index of Multiple Deprivation (IMD 2015): Headline findings for Kent (2015) Kent County Council

³⁷ The English Index of Multiple Deprivation (IMD 2015) Headline findings for Kent (2015) Kent County Council

Shepway Places and Policies Local Plan Sustainability Appraisal

Figure 4.3: Indices of Multiple Deprivation



Source: OS, DCLG

Map Scale @ A4: 1:200,000



Access to services

- 4.30 Folkestone has the largest concentration of shops and services in the District. However, due to accessibility factors, residents in the west of the District at New Romney may choose to visit Ashford, whilst those to the north around Elham and Stelling Minnis may look to Canterbury.
- 4.31 Within the rest of the District's town centres, Hythe and New Romney continue to maintain a mixture of essential services and goods provision. Other centres, such as Sandgate and Lydd, have retained convenience goods and local service provision in their small retail units. There is limited future retail need for additional convenience floorspace in the District.
- 4.32 In terms of access to healthcare services, for example, the proportion of households within walking distance in rural areas is approximately half that of urban areas. This relative isolation from health services is coupled with a generally older population. Around 52% of rural dwellings are within 0.5 mile of a post office service and nearly 50% of rural dwellings are within 500 metres of a primary school.

Sustainability issues and relevance to Shepway Local Plan

- Shepway as a whole suffers from considerable deprivation relative to the national average and there is also significant inequality within the District with deprivation concentrated in the urbanised coastal areas and the rural south. Rural areas have poorer access to services and facilities.
 - Shepway suffers from high levels of disability / long term illness, reflecting, in part, the relatively high proportion of older people living in the District.
 - Population growth, household growth and demographic change will place additional and changing demands on key services and facilities such as housing, health, education and social care.
 - There are some areas of Shepway where crime is likely to have a significant effect on the health and well-being of individuals and communities, as well as the potential for economic growth and diversification.
- 4.33 The Local Plan can set out to reduce deprivation and inequality. It should provide for the needs of older people and tackle the health of its residents more generally in an integrated fashion by providing for, or encouraging access to, healthcare facilities, opportunities to walk or cycle, access to natural greenspace, as well as addressing deprivation and social inequality. By addressing deprivation and providing for jobs, housing, services, facilities and other opportunities the Local Plan can help to deal with the causes of criminality. It can also have more direct effects by development management policies which help to 'design out' crime.

Likely evolution of the issues without Shepway Places and Policies Local Plan

- 4.34 The issues described above are likely to continue without appropriate policy responses. Although there are many other factors that affect the issues, including health and education policy, planning does have a role to play. For example, responding to the housing needs of an ageing population may be less co-ordinated in the absence of the Local Plan.
- 4.35 According to the NPPF, "*local planning authorities should work with public health leads and health organisations to understand and take account of the health status and needs of the local population (such as for sports recreation and places of worship), including expected future changes, and any information about relevant barriers to improving health and well-being*". Despite this, the spatial distribution of deprivation and social exclusion in the District is likely to continue without a local policy response e.g. providing opportunities to access jobs, community services and education facilities in areas where these are lacking.

Housing

- 4.36 The housing stock in the District is relatively old, with almost 80% constructed prior to 1980, 42% prior to 1945 and 32% prior to 1919. The worst housing conditions are focused in the older housing stock. There are currently around 450 long-term empty homes in the District. Despite this, homelessness in Shepway is a growing issue.

- 4.37 The number of households that approached the Council for help between 2009/10 was 714 which rose by 38% to 987 in 2010/11; however this figure fell in 2013/14 to 834.³⁸ Access to the local housing market in the District is an issue as the average house price is more than six times the average household income. There is a high demand for affordable homes in Shepway. In 2014, there were approximately 2,700 households registered on the District's Housing List with only 350-470 affordable homes becoming available.³⁹ Shepway has the lowest average household size in Kent and it continues to decline partly driven by the older age profile of the District.⁴⁰
- 4.38 Homelessness in Shepway is a growing issue. The number of households that have approached the Council for help with housing difficulties has risen from 714 in 2009/10 to 987 households in 2010/11. This represents an increase of approximately 38%. There are key challenges to housing delivery including the development restrictions posed by the Kent Downs AONB and a lack of large sites, which limits the potential to deliver affordable housing. Shepway has the lowest average household size in Kent and it continues to decline partly driven by the older age profile of the District.⁴¹
- 4.39 House prices have fallen from a peak in 2007, but remain relatively buoyant. In 2013, the average price of a home in Shepway was £206,048 which is lower than the Kent and national averages of £235,261 and £241,156 respectively.⁴² Highest values are found in the vicinity of Hythe and in rural areas of the District⁴³. Average house prices in 2011 stood at more than six times the average household income in the District and for newly forming households, closer to 9.5 times the average household income.⁴⁴
- 4.40 The adopted Core Strategy sets out a minimum delivery target of 8,750 dwellings by 2031 under policy SS2. This equates to a minimum delivery of 350 dwellings per annum from 2006/7 to 2030/31 inclusive.⁴⁵
- 4.41 From dwellings already completed, and identified potential housing locations in the Core Strategy, it is expected that:
- At least 7,500 dwellings will be on previously developed land.
 - The requirements of Policy CSD1 will provide approximately 2,000–2,500 affordable housing units.
 - Approximately 6,500–7,000 dwellings will be in the Urban Area (Folkestone/Hythe).⁴⁶
- 4.42 The updated SHMA⁴⁷ jointly commissioned by Shepway District Council and Dover District Council sets out an annual Objectively Assessed Housing Need (OAN) for housing in the District for the period 2014-2037 of 633 dwellings per annum (dpa), 14,559 homes over the full period. Taking account of the housing completions between 2014 and 2016 (694), the supply of sites with planning permission (4,785) and allocations yet to be brought forward (257) there is a need to find land for a further 8,823 additional dwellings. The SHMA goes on to recommend that an appropriate buffer over and above this shortfall figure is identified to ensure that the housing need is met within the period 2014-2037. The SHMA states that 139 dpa must be affordable homes and 90 dpa must be new Starter Homes.

Gypsies and travellers

- 4.43 There is relatively limited local need for Gypsy and Traveller accommodation. A 2014 assessment of the needs of Gypsies and Travellers identified a current provision of four authorised residential pitches in Shepway and a possible need for seven additional pitches between 2013 and 2027.⁴⁸

³⁸ Shepway District Council (2014) Shepway Equality & Diversity Profile

³⁹ Shepway District Council (2014) Shepway Equality & Diversity Profile

⁴⁰ Shepway District Council (2011) Shepway Housing Strategy 2011-2016

⁴¹ Shepway District Council (2011) Shepway Housing Strategy 2011-2016

⁴² DCLG (2014) Table 581 Housing market: mean house prices based on Land Registry data, by district, from 1996

⁴³ Shepway District Council (2011) Shepway Housing Strategy 2011-2016

⁴⁴ Shepway District Council (2011) Shepway Housing Strategy 2011-2016

⁴⁵ Shepway Adopted Core Strategy (2013)

⁴⁶ Shepway Adopted Core Strategy (2013)

⁴⁷ Shepway District Council and Dover District Council Strategic Housing Market Assessment (SHMA), PBA, 2017

⁴⁸ East Kent Gypsies, Travellers and Travelling Showpeople Accommodation Assessment, Salford University, 2014

Sustainability issues and relevance to Shepway Local Plan

- There are key challenges to housing delivery including the development restrictions posed by the Kent Downs AONB and a lack of large sites, which limits the potential to deliver affordable housing.
- Lack of affordability of housing is a growing issue in the District.

4.44 The Local Plan should seek to meet the growing housing needs by reference to up to date evidence on the required mix of dwelling types, sizes and tenures to decrease the number of people living in unfit housing and reduce the increasing number of homeless people in Shepway.

Likely evolution of the issues without Shepway Places and Policies Local Plan

4.45 The NPPF states that local authorities should “*plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes)*”. However, the issue of housing affordability is likely to continue without a positive and proactive approach to delivery of local housing through an up to date Local Plan for the District, for example delivery of a range of dwelling types and tenures to meet need. A coordinated approach to housing allocation is essential to ensure that housing delivery takes place in a sustainable manner and to ensure that those sites which are both suitable (e.g. with fewer environmental constraints) and deliverable are selected.

Economy and labour market

- 4.46 The recent economic performance of Shepway has been characterised by high unemployment and long-term contraction of established local industries. There has been relatively strong growth in certain areas, such as business financial and other services; however, this has been insufficient to offset the losses to the Shepway’s manufacturing base, and distribution and catering sectors. Shepway’s future growth is likely to be characterised by continuing rationalisation of traditional manufacturing activities and shift into the service sector, including some movement into higher value activities.⁴⁹
- 4.47 If recent demographic trends of an ageing population and shrinking average household sizes continue there is the potential for Shepway’s working age population to fall, with resulting labour supply issues having a negative effect on economic performance. The amounts and type of development proposed by the Core Strategy are designed to address this and are expected to almost maintain the labour supply to 2026.⁵⁰
- 4.48 Unemployment in Shepway has dropped significantly from 6.7% (Jul 13-Jun 14) to 5.3% (Jan 2016-Dec 2016).⁵¹ The most recent figure is higher than the regional and national average (4.0% and 4.8% respectively),⁵² as well as the majority of the Districts in Kent (Thanet, Gravesham, Medway and Swale have a higher unemployment rate). Youth unemployment (aged 18-24 years) in the District during April 2017 stood at 6.0%, over the rate than amongst those aged 25-49 (3.4%). Levels of youth unemployment are higher than Kent (208%) and National levels (2.9%).⁵³
- 4.49 A large proportion of the employment available within the District is relatively low paid. Recent figures for Shepway (2014) show that the average gross weekly pay for Shepway residents in full-time employment was £481.40, a decrease of £16.60 since last year. The target set out in the Core Strategy is an increase of £3.35 per annum. Resident based weekly earnings for Kent as a whole was £541.50⁵⁴. Employment within higher skilled managerial and professional occupations is comparably low in relation to overall Kent and South East England levels.⁵⁵ Employment in the

⁴⁹ Shepway District Council (2011) Shepway Employment Land Review

⁵⁰ Shepway District Council (2011) Development Requirements Report

⁵¹ Nomis – Labour Market Profile – Shepway. Accessed 23rd May 2017

⁵² Nomis – Labour Market Profile – Shepway. Accessed 23rd May 2017

⁵³ Kent County Council (2017) District Unemployment Bulletin http://www.kent.gov.uk/__data/assets/pdf_file/0019/8182/District-unemployment-bulletin.pdf

⁵⁴ Shepway District Council (2015) Authority Monitoring Report

⁵⁵ Shepway District Council (2015) Shepway Economic Development Strategy 2015-2020

knowledge economy has seen a decline from its peak of 15% in 2007, in contrast to Kent as a whole which has seen a steady overall rise over the period 2003-2010.⁵⁶

- 4.50 Shepway has a number of economic strengths, including its good transport links (M20 motorway, High Speed rail links to London, and proximity to the Channel Tunnel), low wage levels and land/building costs relative to the wider South East region, a large working age population and a high quality natural environment. The number of jobs increased by 24% between 2000 and 2012 in the District has - faster than any other comparator area, except for Ashford which has experienced a comparable growth rate.⁵⁷
- 4.51 Economic weaknesses include its relative remoteness, relatively low rates of entrepreneurship and few residents with higher skills.⁵⁸ There is a need to increase the take up rate of further education courses and diversify the skills base of the local labour market, to ensure local business sectors are able to improve the long term prosperity of residents.
- 4.52 Due to its high quality natural environment and its visitor attractions (such as Port Lympne Wild Animal Park; Romney, Hythe and Dymchurch Railway; Medieval castles and Roman remains; the Battle of Britain Museum at Hawkinge) the tourism, leisure and hospitality sector represents a significant proportion of the local economy. Research conducted in 2013 estimated that this sector contributes £235.2 million to the local economy and supports around 4,500 jobs. This equates to approximately 12% of total jobs in the District.⁵⁹
- 4.53 Folkestone and Hythe is the District's main centre, with the largest concentration of shops and services in Shepway and is a key focus for economic activity.⁶⁰ It has suffered a decline over recent years but continues as a tourist destination. In 2013/2014 the primary shopping vacancy rates in Folkestone Primary were 6.1%, 4.7% in Hythe, 3.3% in New Romney and 7.8% in Cheriton.⁶¹
- 4.54 In recent years the District has seen a considerable amount of regeneration activity, most notably through socio-economic programmes such as the Single Regeneration Budget in Folkestone and the Romney Marsh. Recent positive changes include that Folkestone has begun to carve out an identity as an up-and-coming coastal destination; the arrival of High Speed One; the considerable investment in the Old Town to create a Creative Quarter; and plans for the regeneration of Folkestone Seafront.⁶²
- 4.55 Outside of Folkestone, the main centres of economic activity and employment are industrial estates within the larger towns. On Romney Marsh it is Lydd Airport and Dungeness Power Station that provide much of the employment.⁶³ Having been an element of the Romney Marsh economy for around 50 years, Dungeness 'A' nuclear power station is currently being decommissioned, with this work to be mostly completed by 2015. A Romney Marsh Socio-Economic Plan jointly produced by the Council and partner organisations is being used to co-ordinate regeneration projects and as a basis for attracting funding for projects designed to offset the loss of employment associated with the loss of Dungeness 'A'. These projects seek to broaden the employment base and develop education and skills in the local population; associated project locations include Mountfield Road Industrial Estate in New Romney, Kitewell Lane Industrial Estate in Lydd, Lydd Airport and areas around the periphery of Romney Marsh (given the constraints on development within the Marsh posed by flood risk and nature conservation designations).
- 4.56 Dungeness 'B' nuclear power station is still operational; decommissioning is set to commence in 2028.⁶⁴ At present the Government has not included Dungeness as a site for new generation

⁵⁶ Shepway District Council (2012) Shepway Economic Development Strategy 2012-2017

⁵⁷ Shepway District Council (2015) Shepway Economic Development Strategy 2015-2020

⁵⁸ Shepway District Council (2015) Shepway Economic Development Strategy 2015-2020

⁵⁹ Cool Tourism (2015) The Economic Impact of the Kent Visitor Economy 2013

⁶⁰ Shepway District Council (2015) Shepway Economic Development Strategy 2015-2020

⁶¹ Shepway District Council (2015) Authority Monitoring Report

⁶² Shepway District Council (2012) Shepway Economic Development Strategy 2012-2017

⁶³ Shepway District Council (2012) Shepway Economic Development Strategy 2012-2017

⁶⁴ EDF Energy (2016) Dungeness B power station <https://www.edfenergy.com/energy/power-stations/dungeness-b> Accessed 23rd May 2017

power stations due to concerns over potential damage to the Dungeness Special Area of Conservation.

- 4.57 The District has an ample quantity of employment land allocated.⁶⁵ Despite this quantitative oversupply of employment land in the District, for various qualitative reasons and to help meet the economic aims for Shepway, there is a need for new employment land/space as follows⁶⁶:
- Up to 5 ha more land for industrial development on a well located, readily available site in Folkestone if the existing industrial allocations there appear unlikely to come forward and particularly if the Park Farm industrial area continues to experience losses to retail warehouse uses.
 - Between 5,000 and 8,000 m² of office space in and around Folkestone town centre, potentially including some space within the Harbour redevelopment and/or other town centre or edge of centre development sites.
 - Further small incubation premises for business start-ups in Folkestone to encourage indigenous business formation and widen employment opportunities; 3,000 to 5,000 m² of such space could be aimed for by 2026.
- 4.58 In addition, the District's Employment Land Review states the employment mix on the existing Nickolls Quarry site should include:
- A broad mix of office and industrial B1 space, of which 2-3 ha should be office space to serve the wider Hythe area;
 - Approximately 2-3 ha more land for industrial development or a similar amount of new land within Hythe if Nickolls Quarry does not provide such space.⁶⁷
- 4.59 While Shepway is assessed as having a sufficient supply of employment land to meet future needs in broad quantitative terms, a cautious approach is required to managing the competing pressures on employment sites within the District.⁶⁸
- 4.60 A Town Centre Study based upon quantitative and qualitative need and focussing on sites in Folkestone, Hythe and New Romney town centres, but also covering other centres was completed in 2015⁶⁹. The study recognises Folkestone as the District's major town centre, followed by Hythe town centre, the District centres of Cheriton and New Romney and the Local Centres of Lydd, Hawkinge, Lyminge, Elham and Dymchurch. The Study identifies a qualitative need for larger retail units within Folkestone town centre to meet the needs for national retailers particularly clothing retailers, as well as Cheriton and Hawkinge. The study identifies an acute qualitative need for an improved evening economy within Folkestone town centre, particularly in respect of 'family dining' restaurants and cinema provision. The Study goes on to identify the Folkestone Bus Station and the existing retail units on Guildhall Street and Shellons Street and the Sainsbury's Store and adjacent areas at Bouverie Place West as offering the greatest opportunity for redevelopment.
- 4.61 **Figure 4.4** illustrates the location of the District's existing employment areas and education facilities.

Sustainability issues and relevance to Shepway Local Plan

- Shepway's economic growth is relatively poor. It has suffered from a decline in manufacturing and dependence on relatively low paid and seasonal tourism jobs and on nuclear power generation at Dungeness.
- Unemployment in general and youth unemployment in particular are high in Shepway and many of the jobs available are relatively low paid.
- Shepway has relatively low levels of educational attainment and skills which could hinder economic growth in the District.

⁶⁵ Shepway District Council (2015) Authority Monitoring Report

⁶⁶ Shepway District Council (2011) Shepway Employment Land Review







⁶⁷ Shepway District Council (2011) Shepway Employment Land Review

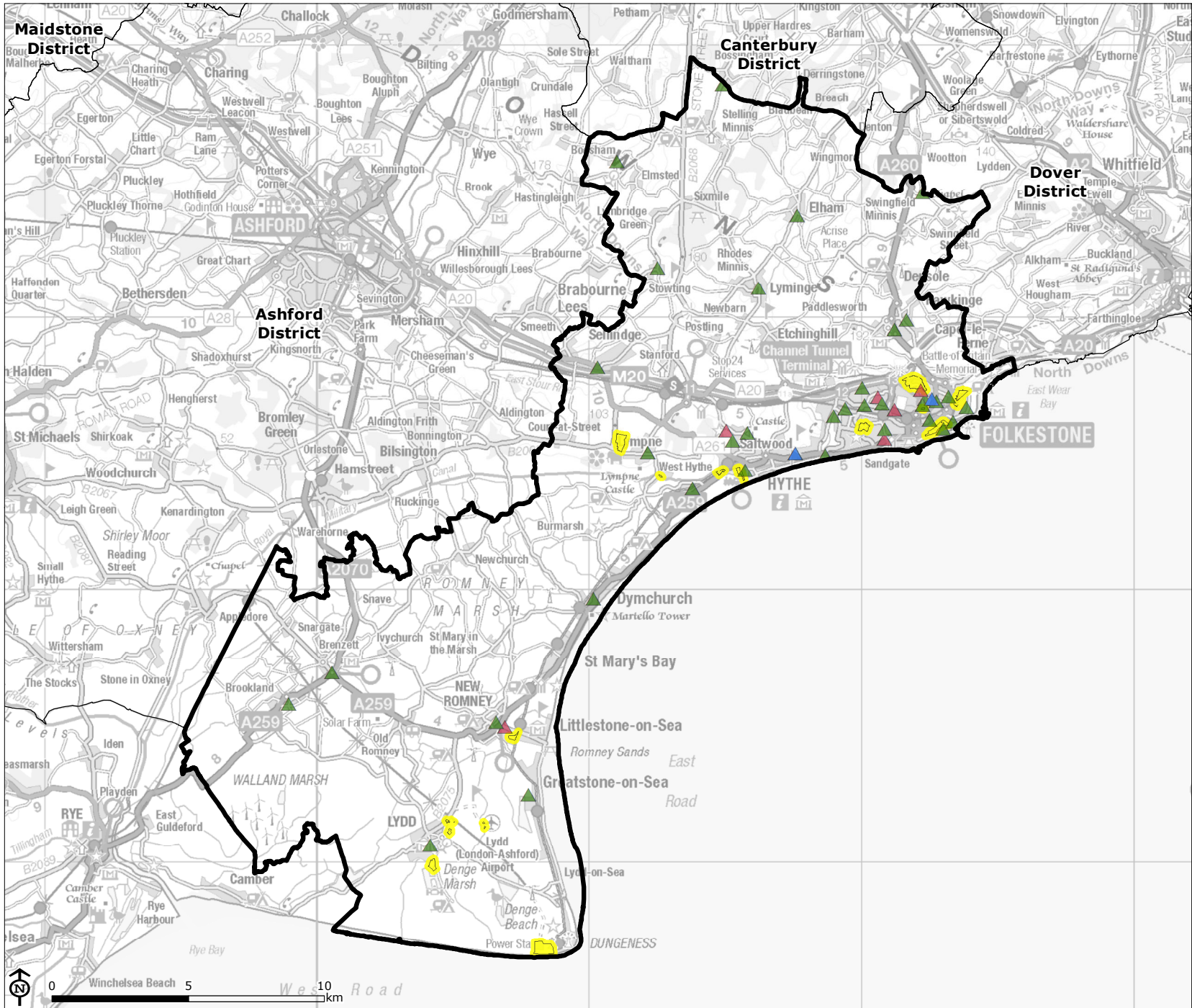
⁶⁸ Shepway District Council (2011) Shepway Employment Land Review

⁶⁹ PBA (2015) Shepway Town Centres Study

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Figure 4.4: Employment Areas and Educational Facilities

-  Shepway District
-  District boundary
-  Employment site
-  Primary school
-  Secondary school
-  Special school



Source: OS, Shepway District Council

Map Scale @ A4: 1:200,000



- Parts of Folkestone, notably several areas of the 'secondary frontage', suffer from high vacancy rates of retail premises.

4.62 There is a need for the Local Plan to:

- Support the regeneration of the District's principal urban centre, Folkestone.
- Provide employment land suitable for the likely continuation in a shift from manufacturing to service industries and encourage higher skill, higher paid sectors through provision of high quality employment sites.
- Support access to education.
- Protect and promote appropriate access to its high quality natural environment.
- Support expansion or upgrading of key visitor attractions.
- Plan for the consequences of the de-commissioning of Dungeness 'B' nuclear power station.

Likely evolution of the issues without Shepway Places and Policies Local Plan

4.63 Shepway's economy is lagging behind that of others in the South East. However, the NPPF states "the Government is committed to securing economic growth in order to create jobs and prosperity, building on the country's inherent strengths, and to meeting the twin challenges of global competition and of a low carbon future" (Para 18). Therefore, without the new Local Plan this issue is being addressed to some extent by other policy.

4.64 Despite this, Shepway's economy is likely to continue to lag behind others without coordinated action from the Local Plan to promote regeneration of its towns, provision of appropriate employment space and access to education and training.

Open Space

4.65 Shepway features a number of significant open spaces. These include four with greater than local importance for their facilities or natural features: the Coastal Park in Folkestone; Brockhill Country Park in Hythe; Dungeness National Nature Reserve; and The Warren, Folkestone. The majority of parks and major open spaces of Shepway are within urban areas, predominantly Folkestone. The Lower Leas Coastal Park, Brockhill Country Park and the Royal Military Canal have Green Flag status in recognition of their value to local people as a recreational resource.⁷⁰

4.66 Shepway's latest Annual Monitoring Report records the loss of a number of open spaces to residential development but no gains in the extent of open space were noted.⁷¹ Shepway's Open Space Strategy⁷² found that, despite being a green District, a significant proportion of the District's residents are deficient in access to open space. This is due, in part, to the large areas of land that are not available for informal recreation in the District, such as agricultural land, marshland or sports pitches with restricted access. The study also found that whilst the quantity of open space provision in the District is generally adequate, there are some issues with the quality of open spaces, particularly natural and semi-natural greenspace.

4.67 The Shepway Play Area Review⁷³ and Shepway Play Area Strategy⁷⁴ identified deficiencies in play areas within the centre of New Romney, intermittent areas along coastal residential areas in Romney Marsh, to the south-east of Folkestone harbour and within Broadmead. The results of the audit show that Shepway has a variety of play areas, which are generally well located and offering good play value. However, there tend to be issues with the quality of the play areas across the District.

Sustainability issues and relevance to Shepway Local Plan

- There is a need for the quality of some open spaces, particularly natural and semi-natural greenspace, to be improved. Recent development has resulted in some open spaces in the

⁷⁰ Green Flag Award (2016) South East <http://www.greenflagaward.org/media/1164/winners-16-17.pdf> Accessed on 23rd May 2017

⁷¹ Shepway District Council (2013) Annual Monitoring Report

⁷² LUC (2017) Shepway Open Space Strategy

⁷³ LUC (2017) Shepway Play Area Review

⁷⁴ LUC (2017) Shepway Play Area Strategy

District being lost with no net gains. Future development could lead to further losses and greater demand.

- 4.68 The Local Plan should seek to ensure that existing open spaces are protected, and where necessary, enhanced. Open space quality improvements should be sought, where relevant.

Likely evolution of the issues without Shepway Places and Policies Local Plan

- 4.69 With the rising population of the District, pressures on the quality and availability of open space are likely to continue without a planned approach to development. Without the Local Plan there is less opportunity to adopt a co-ordinated, spatial approach to the development of open green spaces/green networks for recreation, walking and cycling networks, and wildlife.
- 4.70 Core Strategy Policy CSD4 states that "*Green infrastructure will be protected and enhanced and the loss of GI uses will not be allowed, other than where demonstrated to be in full accordance with national policy, or a significant quantitative or qualitative net GI benefit is realised or it is clearly demonstrated that the aims of this strategy are furthered and outweigh its impact on GI.*"

Historic environment

- 4.71 There is a wealth of notable heritage in the District – Iron Age and Roman settlements, medieval churches, Tudor castles and Napoleonic fortifications and other defensive sites⁷⁵. The District contains over a thousand listed buildings, with over a hundred of these listed as Grade I or Grade II*⁷⁶, and 59 Scheduled Monuments. Listed buildings are not evenly distributed throughout the District but concentrated in the Folkestone area, which is home to 200, and in Hythe and Elham, which feature 100 each.
- 4.72 Shepway District Council has designated 21 Conservation Areas, which make up 1% of the District's land area.⁷⁷
- 4.73 The English Heritage at Risk Register 2014⁷⁸ lists three buildings in Shepway deemed at risk: Church of St George, Ivychurch; Church of St Peter, The Durlocks, Folkestone and the Parish Church of St James, Elmsted. One of these heritage assets (Church of St George, Ivychurch) is deemed to be in 'very bad' condition with the rest rated as Poor or Fair.⁷⁹
- 4.74 The Register also identifies monuments deemed to be at risk. In Shepway there are nine: Martello Towers Nos. 4, 5, 6, 7 and 9; Dymchurch Redoubt; Motte and Bailey Castle 200m north west of Stowting Church; Bowl barrow 150m north east of Red House Farm, Swingfield; and Bowl barrow at Minnis Beeches, Swingfield. Two of these are described as having 'extensive significant problems' whilst one (Motte and Bailey) is deemed to be 'generally unsatisfactory'.⁸⁰ The remaining sites are described as being in 'poor' or 'very bad' condition.
- 4.75 **Figure 4.5** illustrates the location of the District's main heritage assets.

Sustainability issues and relevance to Shepway Local Plan

- There are many sites, features and areas of historical and cultural interest in the District, a number of which are at risk, and which could be adversely affected by poorly planned development.
- 4.76 The Local Plan should seek to conserve and enhance the historic environment, appropriate to its significance, taking into account character and setting. Where possible, the Local Plan should aim to bring 'at risk' historic assets into sympathetic productive use.

⁷⁵ Shepway District Council (2013) Annual Monitoring Report

⁷⁶ Shepway District Council (2011) Annual Monitoring Report

⁷⁷ Shepway District Council (2013) Annual Monitoring Report









⁷⁸ English Heritage Risk Register (2016)

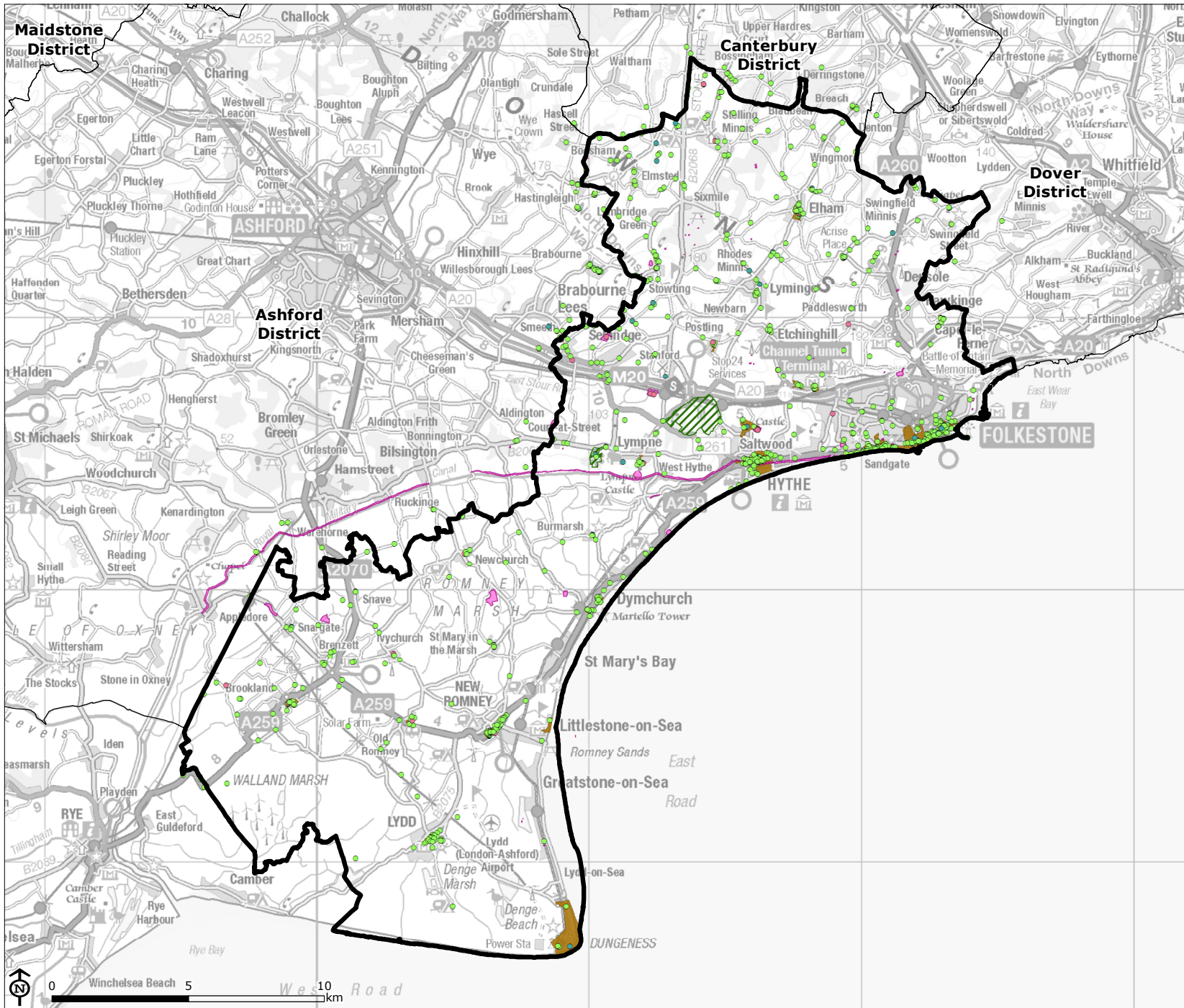
⁷⁹ Shepway District Council (2013) Annual Monitoring Report

⁸⁰ Shepway District Council (2013) Annual Monitoring Report

Shepway Places and Policies Local Plan Sustainability Appraisal

Figure 4.5: Heritage Assets

-  Shepway District
-  District boundary
-  Grade I Listed Building
-  Grade II Listed Building
-  Grade II* Listed Building
-  Scheduled Monument
-  Registered Park & Garden
-  Conservation Area



Source: OS, Shepway District Council, Historic England

Map Scale @ A4: 1:200,000

Likely evolution of the issues without Shepway Places and Policies Local Plan

- 4.77 In the absence of a Local Plan, issues are likely to continue be exacerbated without a planned local approach to development. National policy should help to protect and enhance heritage assets but whether or not this will help specific sites is uncertain.

Landscape

- 4.78 Shepway is a coastal District with over 20 miles of coastline, a section of which is designated as Heritage Coast. Over 33% of the District falls within the Kent Downs Area of Outstanding Natural Beauty (AONB). The District has a number of locally designated 'Local Landscape Areas' concentrated around Romney Marsh and also parts of the Sandgate Escarpment and Seabrook Valley, Eaton Lands, Coolinge Lane, Enbrook Valley and Mill Lease Valley.⁸¹
- 4.79 Shepway features a variety of landscape types, from chalk downland and wooded valleys to areas of marshland. The District of Shepway spans three National Character Areas (NCA).
- The southern half of Shepway is within the Romney Marsh NCA:
 - A flat, open and agricultural landscape, with distinctive drainage dykes, marshes and open skies. Dungeness is the largest shingle foreland in Europe, with a real sense of isolation and remoteness especially along the coast. 20th century development is evident in the towns along the coastal strip. Much of this area is dominated by the imposing power station and associated transmission lines. Past gravel extraction pits, now flooded, military uses and expanding holiday resorts add to the general clutter along the coast.
 - The Wealden Greensand NCA runs in a narrow band west from Folkestone:
 - Belt of Greensand typified by woodlands, scattered settlements and scarp / dip-slope topography. The East Kent section has a gentler, more open aspect and can be described as less intimate and less distinctive than other areas. It is also more marked by development, with the presence of major towns and communication corridors.
 - The northern quarter of the District lies within the North Downs NCA:
 - Distinctive chalk downland with a steep scarp, and broad dip slope incised by valleys or "coombes". Unimproved, species rich grassland and ancient woodland are found on some less fertile soils, although much of the lower dip slope in Kent is fertile and is used for intensive arable agriculture. Rural with scattered and distinctive farmsteads and large houses.⁸²
- 4.80 The Kent Downs Management Plan was adopted in 2014 and sets a 20 year vision for the AONB seeking to protect this special designated landscape. 'Up on the Downs Landscape Partnership' is a £2.5 million Heritage Lottery Fund which will operate until 2017 and was set up to provide landscape and nature management investment, community engagement and training, and access improvements to areas including Folkestone Warren.⁸³

Sustainability issues and relevance to Shepway Local Plan

- The District contains a number of distinct rural landscapes as well as those more influenced by human development which could be harmed by inappropriate development.
- 4.81 The Local Plan should ensure that designated landscapes (such as the Kent Downs AONB and its setting) are protected and enhanced as appropriate and that development outside these designations takes account of the variation in landscape character across the District.

Likely evolution of the issues without Shepway Places and Policies Local Plan

- 4.82 Pressures on local landscapes are likely to increase with the rising population of the District, new development and climate change. Without the Local Plan, there is increased potential for a rise in direct pressures on wildlife as well as less opportunity to adopt a co-ordinated, spatial approach to the development of open green spaces/green networks for recreation, walking and cycling

⁸¹ Shepway District Council (2013) Annual Monitoring Report

⁸² Natural England, National Character Areas Profiles (2013) [online] available at: <http://www.naturalengland.org.uk/publications/nca/>

⁸³ Shepway District Council (2014) Annual Monitoring Report

networks, and wildlife. Strategic developments allocated through the Local Plan will need to provide capacity for new residential and employment developments without compromising the local integrity of the District's environmental assets, including the District's most sensitive landscapes.

Biodiversity

- 4.83 Shepway District contains a wide range of habitats including species-rich chalk grassland, ancient woodland, low lying marsh, shingle, and dune areas. Within the county of Kent the greatest cover of the habitat type is arable and horticulture (35%). Improved grassland covers the second largest portion of the county at 29.7%. Broadleaved, mixed and yew woodland is the largest of the semi-natural habitats, covering 44,490ha (11.4%) of the county, followed by neutral grasslands which cover 28,531ha (7.3% of Kent)⁸⁴.
- 4.84 Parkgate Downs, Dungeness and the Folkestone to Etchinghill Escarpment have been designated Special Areas of Conservation (SACs) and Dungeness, Romney Marsh and Rye Bay have recently been designated as a Special Protection Area (SPA) and Ramsar site, which means these areas are regarded as being of international importance under the EU Habitats Directive⁸⁵. Dungeness is also a National Nature Reserve.
- 4.85 There are 13 Sites of Special Scientific Interest (SSSIs) in Shepway District of varying condition. Although the status of these SSSIs is monitored by Natural England, the surveys are not carried out every year. The most recent surveys, found that eight of the SSSIs are considered to be broadly in 'favourable' condition and three broadly in 'unfavourable recovering' condition. One site is classified as 'unfavourable no change' and another 'unfavourable declining'.⁸⁶
- 4.86 There is a significant amount of Ancient Woodland in Shepway, concentrated to the west, north-west and north of Folkestone. 26 of the 40 Ancient Woodlands are considered to be in positive management.⁸⁷ The distribution of this woodland is patchy leading to limited ecological connectivity between the areas, although there are some less fragmented areas in the north-west of the District.
- 4.87 The District contains 40 Local Wildlife Sites. Located mainly to the west and north of Shepway these sites are primarily woodland and species-rich grassland sites, in contrast to the District's SSSIs, which are primarily coastal or wetland habitats.
- 4.88 **Figure 4.6** illustrates the location of the District's main ecological assets.

⁸⁴ Kent County Council (2012) Kent Habitat Survey

⁸⁵ Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Fauna and Flora











⁸⁶ Natural England (2014) Condition of SSSI units [online] available at:

<http://www.sssi.naturalengland.org.uk/special/sssi/report.cfm?category=R,RF>

⁸⁷ Shepway District Council (2011) Annual Monitoring Report

Shepway Places and Policies Local Plan Sustainability Appraisal

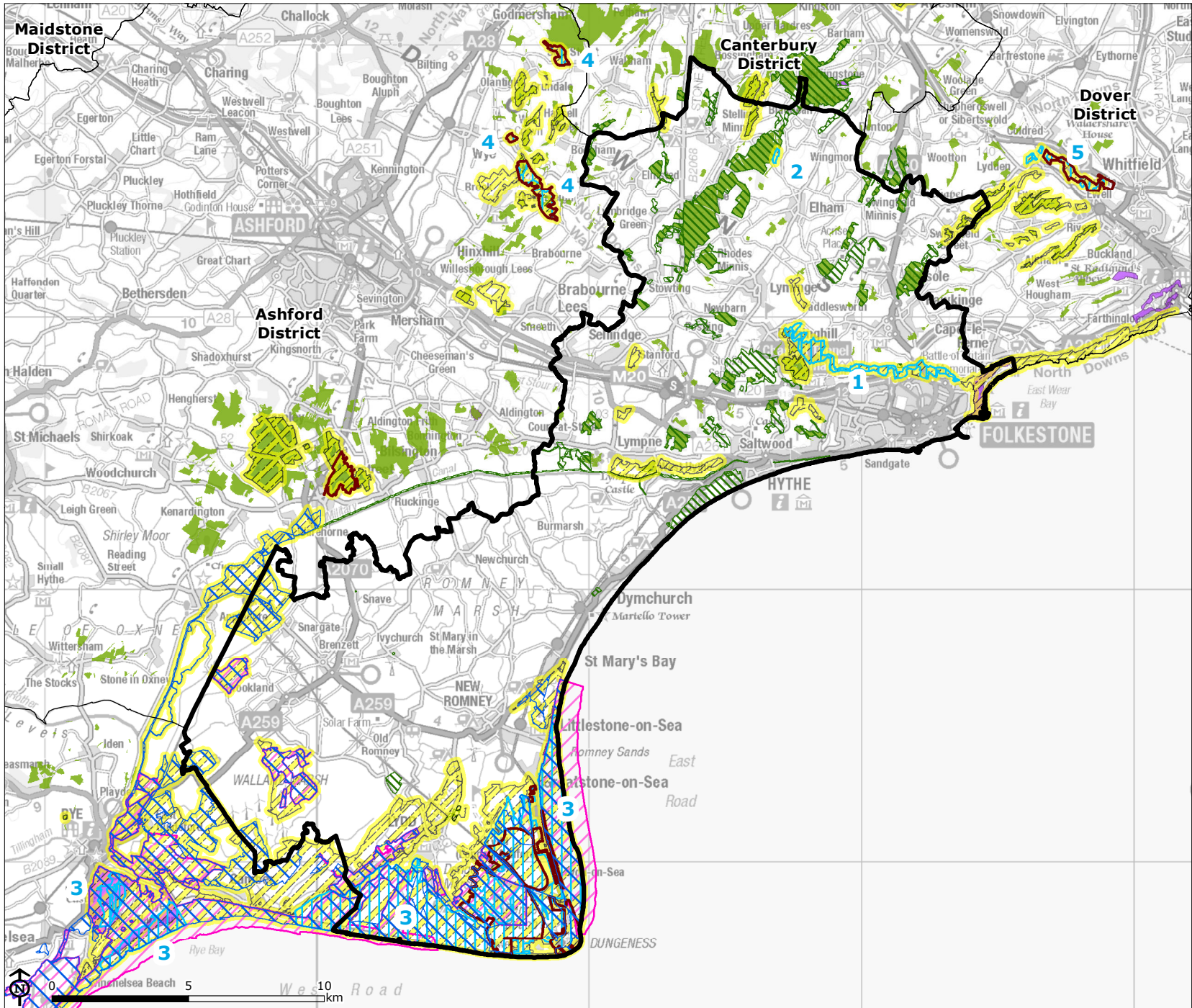
Figure 4.6: Ecological Assets

-  Shepway District
-  District boundary
-  Dungeness to Pett Level Ramsar site
-  Dungeness, Romney Marsh and Rye Bay SPA
-  NNR
-  SSSI
-  Local Wildlife Site
-  Ancient Woodland
-  LNR
-  SAC (labelled in blue text on map)

- 1: Folkestone to Etchinghill Escarpment
- 2: Parkgate Down
- 3: Dungeness
- 4: Wye & Crundale Downs
- 5: Lydden & Temple Ewell Downs

Source: OS, Shepway District Council, Natural England, JNCC

Map Scale @ A4: 1:200,000



- 4.89 In support of a 'Living Landscapes' approach, Biodiversity Opportunity Areas (BOAs) in Kent have been mapped to indicate where the delivery of Kent Biodiversity Action Plan (BAP) targets was to be focused to secure the maximum biodiversity benefits and the best opportunities for establishing large habitat areas and/or networks. This Plan has subsequently been replaced by the Kent Biodiversity 2020 and beyond – a strategy for the natural environment 2015-2025. However targets have been set up to 2015 for maintaining, enhancing, restoring and creating habitats occurring in each Biodiversity Opportunity Area and for species conservation. Targets to 2020 are currently being reviewed and updated. It is not intended that nature conservation becomes the primary land-use within the BOAs, so long as the targets and objectives for each area can be met, and development of any kind is not precluded. However, consideration may in some cases need to be given to ensuring that development within a BOA does not significantly increase the fragmentation of wildlife habitats within target areas or preclude significant opportunities for habitat restoration or recreation. Four BOAs have been identified in Shepway:
- Dover and Folkestone Cliffs and Downs (KT08).
 - Low Weald Woodlands (KT14).
 - Romney Marsh and Rye Bay (KT15).
 - East Kent Woodlands and Downs (KT07).^{88, 89}
- 4.90 Some brownfield sites in Kent support some of the country's most important populations of reptiles and invertebrates.⁹⁰
- 4.91 There are two Marine Conservation Zones designated along the Districts Coastline; the Folkestone Pomerania was designated in November 2013⁹¹ and more recently, in January 2016, the Dover to Folkestone MCZ was designated.⁹² MCZs protect a range of nationally important marine wildlife, habitats, geology and geomorphology and can be designated anywhere in English and Welsh inshore and UK offshore waters.

Sustainability issues and relevance to Shepway Local Plan

- Shepway contains a significant resource of designated biodiversity sites, a number of which are in unfavourable condition. It also contains a significant but fragmented resource of Ancient Woodland. Shepway's landscape outside of designated sites contains important habitats, including a number which have the potential to contribute to large scale ecological networks. All of these biodiversity assets could be harmed by inappropriate development.
 - Green networks for wildlife and natural green spaces need to be fully reflected in the GI Strategy to provide a framework for the consideration of development proposal, and for avoiding harm and gaining enhancements where appropriate.
- 4.92 The Local Plan should ensure that designated wildlife sites are conserved and enhanced and also seek to maintain and enhance the four large scale ecological networks identified in the District.

Likely evolution of the issues without Shepway Places and Policies Local Plan

- 4.93 With the population of the District increasing, pressure on recreation and wildlife areas is likely to be exacerbated.
- 4.94 Paragraph 109 of the NPPF seeks to minimise impacts on biodiversity and provide net gains in biodiversity where possible, which may afford some protection to the SSSIs and local designations in the District. Furthermore paragraph 118 of the NPPF requires that to conserve wildlife and cultural heritage in designated areas (National Parks, the Broads and Areas of Outstanding Natural Beauty) permission should be refused for major developments except in exceptional circumstances and where it can be demonstrated to be in the public interest. The Habitats and Birds Directives provide protection to the internationally designated biodiversity sites and certain

⁸⁸ The Wildlife Trust, A Living Landscape for the South East available online at:

http://www.kentwildlifetrust.org.uk/sites/kent.live.wt.precedenthost.co.uk/files/A_Living_Landscape_for_the_South_East.pdf

⁸⁹ <http://www.kentbap.org.uk/kent-boas/> Accessed on 23rd May 2017

⁹⁰ <http://www.kentbap.org.uk/habitats-and-species/priority-habitat/built-up-areas-and-gardens/>

⁹¹ Shepway District Council (2014) Annual Monitoring Report

⁹² DEFRA (2016) Dover to Folkestone Marine Conservation Zone

species in proximity to the District. Adopting a strategic, local approach to the allocation of development will ensure that the impacts of development (both singularly and in combination) on all nature conservation interest can be better managed.

- 4.95 Without the Local Plan there is less opportunity to adopt a co-ordinated approach to the development of green networks for wildlife and natural green spaces designed to steer recreational pressure away from sensitive wildlife sites. Strategic developments allocated through the Local Plan will need to provide capacity for new residential and employment developments without compromising the local integrity of the District's biodiversity assets and ecological networks.
- 4.96 The severity and likelihood of adverse impacts on local ecosystems is also likely to increase with predicted climate change. Without an up to date Local Plan, there is less opportunity to adopt a co-ordinated, spatial approach to managing the effects of this change through careful site allocations and targeted wildlife conservation and enhancement initiatives.

Air pollution

- 4.97 The Council monitors air quality across the District. According to the results for 2014/15, air quality pollution levels of NO₂ – Nitrogen Dioxide - have increased in 11 out of 12 monitoring points. However the results are still within the DEFRA air quality objectives levels of below 40µm/m² annual mean.
- 4.98 Shepway District currently has no Air Quality Management Areas⁹³. In 2013, all prescribed air quality objectives were met.⁹⁴

Sustainability issues and relevance to Shepway Local Plan

- Air quality is not currently judged to be a significant issue in the District. However, locations targeted for large scale development could experience significant increases in road traffic from residents and/or employees, resulting in localised adverse effects, in urban areas such as Folkestone and along major roads such as the A20.
- 4.99 The Local Plan should seek to minimise the need to travel by car by promoting sustainable locations for development and travel by sustainable modes.

Likely evolution of the issues without Shepway Places and Policies Local Plan

- 4.100 The need to travel by unsustainable modes and associated emissions of air pollutants are likely to increase without action from the Local Plan to direct development to sustainable locations and to increase provision of sustainable transport infrastructure. Nevertheless, the ability of the Local Plan to influence air pollution in the District is limited by the fact that much of the traffic passing through it is on the strategic road network and driven by regional and national factors.
- 4.101 Kent's Local Transport Plan⁹⁵ has a lead role to play in managing transport related issues and its objectives include reducing emissions, encouraging a shift to sustainable transport and tackling congestion, all of which should help to manage transport-related air quality issues, even in the absence of the Local Plan.

Soil and minerals

- 4.102 The 2002 Agricultural Land Classification Survey defined approximately 60% of the District's land area as 'Excellent' or 'Very Good' for agricultural purposes.⁹⁶ Romney Marsh ward is the most productive area, containing virtually all of the 'Grade I' agricultural land in the District and a significant proportion of the County's.
- 4.103 There are a range of potentially contaminated sites within the District of which the Council is aware. Contamination can be the result of historic land uses and current uses such as the handling and storage of fuels and the transportation and storage of waste.

⁹³ Defra, Air Quality Management Areas [online] available at: <http://aqma.defra.gov.uk/aqma/home.html> Accessed 23rd January 2016

⁹⁴ Bureau Veritas Air Quality (2013) Shepway District Council LAQM Progress Report 2013

⁹⁵ Kent County Council (2011) Local Transport Plan for Kent 2011-2016

⁹⁶ Shepway District Council (2011) Shepway Rural Services Study

4.104 Construction aggregates - sand, gravel and crushed rock - are the most significant (in quantity terms) worked and imported into Kent. Within Shepway, sharp sand and gravel deposits have historically been exploited in the southern part of Romney Marsh although these reserves are to some extent becoming worked out.⁹⁷

Sustainability issues and relevance to Shepway Local Plan

- Shepway contains some of the most productive agricultural land in the South East but this could be lost to development.
- Shepway contains areas of historically contaminated land which could pose a risk to human health and the natural environment or which could be remediated and brought into appropriate use.
- Shepway contains valuable sand and gravel reserves which could be sterilised by development.

4.105 The Local Plan should seek to avoid development on the best and most versatile agricultural land. Where such use is permitted it should, where possible, be temporary and reversible.

4.106 Previously developed land should be prioritised for development, recognising that brownfield sites may include priority habitats and/or support significant biodiversity interest. The Local Plan should support development which achieves remediation of contaminated sites and avoid development which poses a risk to human health or the wider natural environment.

4.107 The Local Plan should seek to avoid sterilising economic minerals reserves.

Likely evolution of the issues without Shepway Places and Policies Local Plan

4.108 The NPPF requires local planning authorities to take into account the benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be used in preference to those of a higher quality.

4.109 The NPPF also requires local planning authorities to encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value.

4.110 In relation to minerals, the NPPF requires local planning authorities to avoid needlessly sterilising known locations of minerals resources of local and national importance by non-mineral development. The Kent Minerals and Waste Local Plan⁹⁸ seeks to deliver a sustainable, efficient supply of land-won minerals and to safeguard economic mineral resources for future generations and provides a mechanism by which to implement these requirements via its land allocations for minerals extraction.

Water quality and water resources

4.111 Kent has one of the lowest levels of rainfall in the country and is extremely dependent on groundwater for drinking water supplies. The condition of aquifers under Shepway in terms of both water quality and quantity is a matter of concern. It is important for security of drinking water supplies and the health of sensitive surface water habitats that new development does not adversely affect the quality or place unsustainable demands on the quantity of these water resources. The Stour Catchment is of particular importance as it contains the District's principal aquifers. A number of Source Protection Zones have been established, mainly in the north of the District, to protect groundwater quality in sensitive areas.⁹⁹ The Core Strategy states that Source Protection Zones must be protected and that effective pollution prevention measures are required, as appropriate.

4.112 The majority of surface water bodies in Shepway have been classified as having a 'moderate' Water Framework Directive (WFD) status. Some areas to the north of the District are classified as being 'poor', but none receive the lowest category of 'bad'. The Seabrook Stream / eastern end

⁹⁷ Kent County Council (2016) Kent Minerals and Waste Local Plan 2013-30

⁹⁸ Kent County Council (2016) Kent Minerals and Waste Local Plan 2013-30

⁹⁹ Shepway District Council (2011) Shepway Water Cycle Study

of the Royal Military Canal is the only current example of a water course in 'good' condition. Given the WFD requirement for all surface waters to have achieved 'good' status by 2015 it is important, as a precursor to improvements, that the Local Plan prevents any further deterioration in the quality of surface water and where possible supports improvement of water quality.¹⁰⁰

- 4.113 The quality of Shepway's coastal waters is important, particularly to the District's tourism economy. These are ultimately the 'sink' for urban runoff and whilst the volume of marine water available to dilute pollutants is significant, the Council acknowledges the importance of protecting its generally 'excellent' bathing water quality.¹⁰¹
- 4.114 The settlements of Shepway have a good level of coverage from waste water treatment works (WWTWs). Most of them have a current or planned capacity sufficient to meet planned growth although there is potentially insufficient capacity in the strategic wastewater connection between the Westenhanger and Lympne area and the Sellindge WwTW, an issue which the Water Cycle Study recommends is addressed via developer contributions to support strategic development in this area.¹⁰²
- 4.115 Many parts of Shepway are served by combined sewers, creating the risk that extreme rainfall events (which are increasingly likely under climate change) could lead to combined sewer overflows (CSOs) and associated risks of flooding and adverse effects on water quality. The Water Cycle Study recommends a positive but selective approach to Sustainable Drainage Systems (SuDS) to reduce the amount of water discharged to combined sewers and WwTWs, where technically feasible.¹⁰³
- 4.116 As Shepway falls within a designated Water Scarcity Status Area, water efficiency measures are appropriate in new development and supported by the Environment Agency.¹⁰⁴ The Water Resources Management Plan (WRMP)¹⁰⁵ concludes that a supply demand deficit has been demonstrated to theoretically exist through the WRMP update over the next 25 years of 2.29 MI/d at average and 2.67 MI/s at peak. The Shepway Water Cycle Report¹⁰⁶ has considered the implications of the Core Strategy on the Water Resources Management Plan and found that the two are consistent but that it is appropriate for local planning policy to directly support efforts to significantly reduce average domestic consumption. The Core Strategy requires all residential developments to achieve a maximum water usage of 105 litres/person/day (as required by Code for Sustainable Homes 'level 3 and level 4') with a more stringent standard of 90 litres/person/day applied to strategic residential allocations at Folkestone Seafront (Policy SS6) and Shorncliffe Garrison, Folkestone (Policy SS7).¹⁰⁷

Sustainability issues and relevance to Shepway Local Plan

- Surface water and groundwater quality are a significant issue in the District. There is the potential for impacts from development on water quality due to increases in contaminated surface runoff, runoff to combined sewers, and increased discharges of treated wastewater from WwTWs.
 - Drinking water is a scarce resource in the District and population and household growth will place further pressure on this resource.
 - There is potentially insufficient capacity in the strategic link wastewater connection between the Westenhanger and Lympne area and the Sellindge WwTW.
- 4.117 The Local Plan should seek to ensure that the location of development takes into account the sensitivity of the water environment and that wastewater infrastructure (notably in the Westenhanger area) and processes are in place such that development will not result in deterioration in water quality. It should also ensure that development is designed so as to make

¹⁰⁰ Shepway District Council (2011) Shepway Water Cycle Study

¹⁰¹ Shepway District Council (2011) Shepway Water Cycle Study

¹⁰² Shepway District Council (2011) Shepway Water Cycle Study

¹⁰³ Shepway District Council (2011) Shepway Water Cycle Study

¹⁰⁴ Shepway District Council (2013) Shepway Core Strategy, Policy SS6

¹⁰⁵ Veolia (2014) Water Resources Management Plan

¹⁰⁶ Shepway District Council (2011) Shepway Water Cycle Study

¹⁰⁷ Shepway District Council (2012) Shepway Core Strategy, Policy SS6

efficient use of water resources. Efficient use of water resources can also help to safeguard surface water quality by helping to maintain flows within surface water and reducing the risk of combined sewer overflows.

Likely evolution of the issues without Shepway Places and Policies Local Plan

- 4.118 National plans and strategies encourage new development to meet water efficiency standards and water companies must plan to reduce leaks from the water supply network as well as improve water efficiency. Without the Local Plan, however, it will be more difficult to adopt a co-ordinated approach to water resource planning with water companies and more difficult to implement water efficient design in new development.
- 4.119 The Core Strategy (Policy CSD5) requires that “*new buildings and dwellings must be delivered in line with wastewater capacity*” and that “*the quality of water passed on to watercourses and the sea must be maintained or improved*”. Supporting text specifies that if there is insufficient capacity in the sewerage system to accommodate the increased volumes of flow arising from a new development, the development will need to connect off-site to the nearest point of adequate capacity.

Transport

- 4.120 Whilst the District is primarily of a rural nature there have been significant improvements in transport connections in and out of Shepway over recent decades. Rail connections have been improved by the High Speed 1 domestic rail service which began to operate in December 2009, reducing the journey time from Folkestone to London to under an hour. According to the operators of the Southeastern rail franchise, High Speed 1 has been steadily drawing additional users from around Kent who wish to take advantage of the reduced journey times it offers to and from central London. In 2014, the Department of Transport funded a new car park at Folkestone West to meet this increased passenger demand.¹⁰⁸
- 4.121 All of the four railway stations in Shepway provide direct connections to Dover to the east and Ashford to the northwest, as well as direct rail access into London, at London Bridge, via Ashford and Tonbridge. Of the four stations, it is noted that Folkestone Central is the most intensely used, reflecting its mainline and high speed rail services and its location in Folkestone town centre.¹⁰⁹ There are plans to improve the linkages between Folkestone Central Railway Station and Folkestone Town Centre and Coastline.¹¹⁰
- 4.122 Stanford West lorry area has been proposed within the District to alleviate the traffic congestion along the M20 which results due to the procedure of holding lorries on the motorway, known as Operation Stack. Up to 11,000 lorries per day make use of Kent’s roads given its strategic location for international freight passing through the Strait of Dover. The Secretary of State for Transport announced that a single lorry area would be provided at Stanford West in July 2016. Consultation on the £250 million site to the west of the village of Stanford took place between August and September 2016¹¹¹. Future development in the District will be required to be considerate of the potential impact of this site.
- 4.123 **Figure 4.7** maps the District’s transport network.

¹⁰⁸ Shepway District Council (2014) Annual Monitoring Report

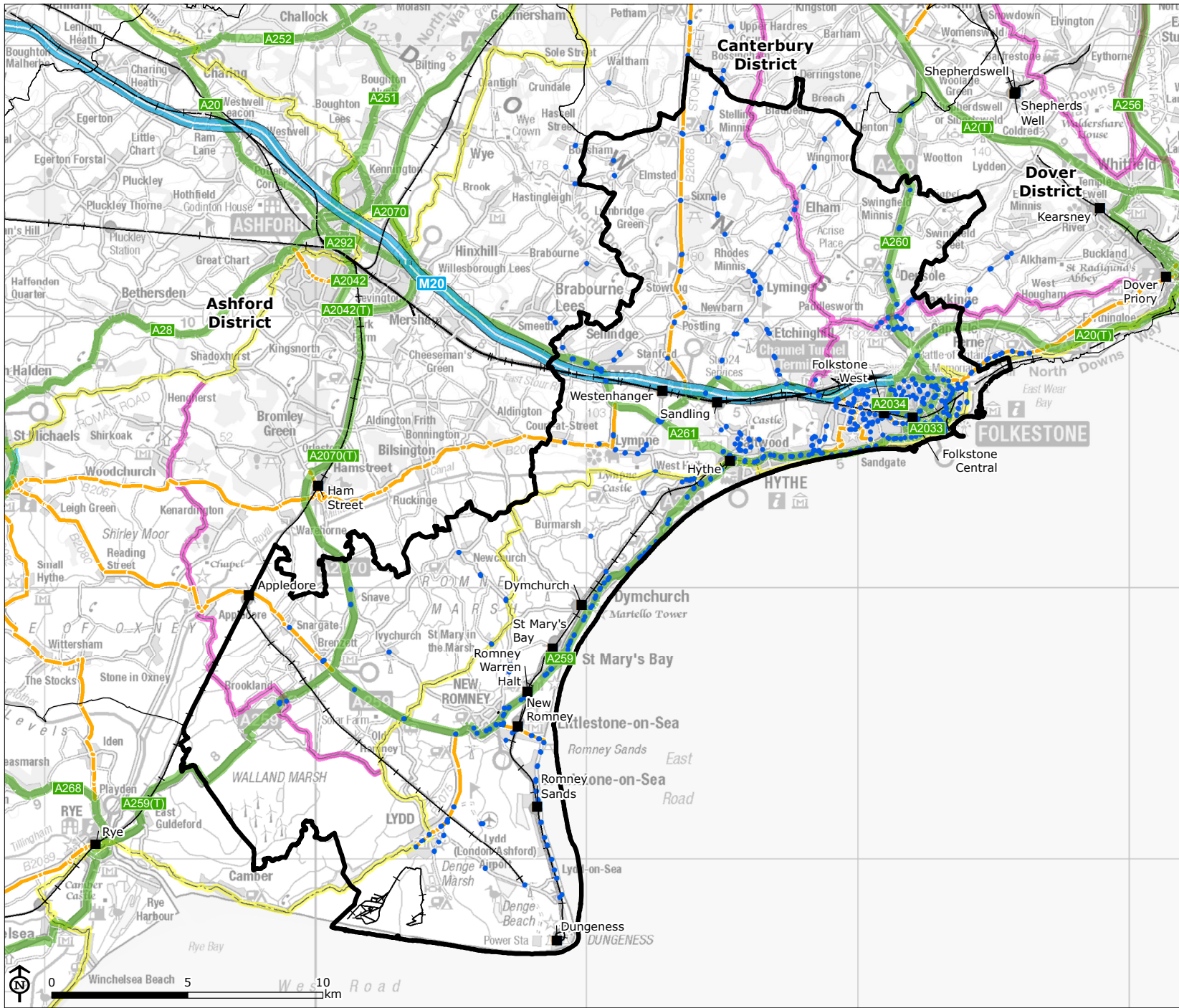
¹⁰⁹ Shepway District Council (2011) Annual Monitoring Report

¹¹⁰ Shepway District Council (2014) Annual Monitoring Report

¹¹¹ Highways England (2016) Managing freight vehicles through Kent: A consultation on proposals for a lorry area at Stanford West

Shepway Places and Policies Local Plan Sustainability Appraisal

Figure 4.7: Transport Network



- Shepway District
- District boundary
- Train station
- Bus stop
- Railway track
- Motorway
- A road
- B road
- Cycle routes**
- National route
- Regional route
- NCN link

Source: OS, Shepway District Council, Sustrans

Map Scale @ A4: 1:200,000



- 4.124 2001 Census information¹¹² indicated that approximately 59% of the Shepway working population travelled to work by car, which is a slightly higher than the average for England. Of those who drive to work, approximately 65% travel to work by car within the District itself. More recent data show that although there is a heavy dependency on the use of private transport to access employment, relatively few people commute out of Shepway (73% of Shepway's working residents worked in Shepway and 77% of its workforce was resident in the District in 2011¹¹³). This creates a good starting point for efforts to promote decreased car dependency.
- 4.125 According to the 2011 census data¹¹⁴, Shepway has slightly lower than the national average for car ownership categories, but higher compared to Kent especially in and surrounding Folkestone, which may well be related to the large elderly population. Nearly a quarter (23.7%) of residents in Shepway had no cars or vans in their household, with the national average of 25.6% and county average of 20%. 44.3% of Shepway's households had one car or van with national average of 42.2% and Kent's average of 42.7%. 24.4% of Shepway households had two cars or vans in household and the national average being of 24.7% and Kent's average of 28.0%.
- 4.126 Commuting estimates¹¹⁵ reveal that nearly 10,000 travel into Shepway with approximately half originating from Dover and 2,000 journeys from Ashford and another 2,000 from Canterbury. Around 12,600 people commute from Shepway with 3,400 commuting to Ashford and 3,000 to Dover. A small proportion of people commute to London. There is a lower than the national average modal share of bus use, with 4% travelling to work by this means in comparison to 8% across England.¹¹⁶ In March 2011 the Shepway Joint Transport Board adopted the 2011 Shepway Cycling Plan which was endorsed as Council policy in 2013.¹¹⁷ The document sets out a five year plan promoting cycling across the District. The plan recognises the scope for people to switch to using the bicycle to make local trips, particularly across Romney Marsh, and in parts of Hythe and Folkestone where there is a flat terrain.¹¹⁸
- 4.127 An update of the Shepway Transport Model was commissioned in October 2013 and this is currently being undertaken by AECOM. The update will reflect the adopted Core Strategy Local Plan 2013 and will incorporate any recent traffic surveys which have been undertaken as part of major development proposals. Whilst updated maps showing results for key junctions were not yet available at the time of writing, the Council has confirmed that the new modelling work has not revealed any additional junctions which are predicted to be over-capacity based on the latest assumptions. Additionally, surveys of Dungeness and Romney Marsh have been confirmed for the preparation of a Sustainable Access Strategy/SPD. The details of both documents will be incorporated in the baseline of the SA once they have been published.

Sustainability issues and relevance to Shepway Local Plan

- A significant number of people in Shepway do not have access to a car. Where this combines with poorer public transport provision, such as in rural areas with a dispersed population, it leads to difficulty in accessing services and facilities. Inappropriately located development could exacerbate this.
 - There is a heavy dependency on the private car to access employment. If this pattern continues, planned housing and employment growth could lead to problems of traffic congestion and increasing emissions of greenhouse gases and air pollutants.
- 4.128 The Local Plan could address these issues by promoting sustainable locations for development, provision of sustainable transport infrastructure and support for the Shepway Cycling Plan.

¹¹² 2011 Census data not available for this measure

¹¹³ Commuting Patterns from the Annual Population Survey, Great Britain, 2010 and 2011, ONS, 2013

¹¹⁴ ONS (2011) Table KS404EW Car or Van availability, Local Authorities in England and Wales

¹¹⁵ Commuting flows from the Annual Population Survey, Great Britain (2011)

<http://webarchive.nationalarchives.gov.uk/20160105160709/http://ons.gov.uk/ons/publications/re-reference-tables.html?edition=tcm%3A77-300966> Accessed 23rd May 2017

¹¹⁶ URS/Scott Wilson (2011) Shepway District Council Transport Strategy

¹¹⁷ Shepway District Council (2013) Annual Monitoring Report

¹¹⁸ Kent County Council (2011) Shepway Cycling Plan

Likely evolution of the issues without Shepway Places and Policies Local Plan

- 4.129 The need to travel is likely to increase and car dependence is likely to continue without action from the Local Plan to direct development to sustainable locations and increase provision of sustainable transport infrastructure.

Waste

- 4.130 During 2014/2015, 39,347 tonnes of household waste was collected in the District where nearly half (47.6%) of this was sent for recycling/composting/reuse.¹¹⁹ In comparison, during 2011/2012, 38,000 tonnes of household waste was collected where 27% of this waste was recycled and 17% composted (44.2% in total).

Sustainability issues and relevance to Shepway Local Plan

- Shepway performs relatively well in terms of recycling and composting of household waste in comparison to other local authorities in the UK. Whilst poorly planned new development could reduce recycling rates and increase waste generation from construction and demolition, achievement of waste and recycling objectives is mainly dependent on factors outside the scope of the Places and Policies Local Plan, as described under 'Likely evolution of the issues without Shepway Places and Policies Local Plan' below.
- 4.131 The Places and Policies Local Plan is not judged to be capable of having significant effects on this topic and therefore no corresponding sustainability objective has been included in the SA framework.

Likely evolution of the issues without Shepway Places and Policies Local Plan

- 4.132 Achievement of the waste reduction and recycling objectives will mainly depend on the success of policies in Kent County Council's Minerals and Waste Plan, the County Council being the Waste Planning Authority for Shepway. The increasingly stringent national sustainability requirements of the building regulations will also have a positive contribution.

¹¹⁹ DEFRA (2015) Local authority collected waste generation from April 2000 to March 2015 (England and regions) and local authority data April 2014 to March 2015

5 SA framework

The SEA Regulations, Schedule 2(6) require the Environmental Report to consider:

The likely significant effects on the environment, including short, medium and long term effects, permanent and temporary effects, positive and negative effects and secondary, cumulative and synergistic effects, on issues such as (a) biodiversity, (b) population, (c) human health, (d) fauna, (e) flora, (f) soil, (g) water, (h) air, (i) climatic factors, (j) material assets, (k) cultural heritage including architectural and archaeological heritage, (l) landscape and (m) the inter-relationship between the issues referred to in sub-paragraphs (a)–(l).

SA framework

- 5.1 The development of a set of SA objectives is a recognised way in which the likely environmental and other sustainability effects of a plan can be described, analysed and compared. The SA has therefore taken an 'objectives-led' approach to the assessment i.e. the Shepway PPLP policies and allocations have been assessed in relation to a framework of sustainability objectives and supporting assessment criteria (known as the 'SA framework').
- 5.2 The SA objectives set out in this chapter took those developed for the SA of the Shepway Core Strategy as a starting point and amended them to reflect an up to date assessment of sustainability issues facing the District as well as the different scope of the PPLP (i.e. containing site allocations and development management policies rather than strategic policies and allocations). The objectives were consulted on during the SA Scoping stage and the representations received were considered when deciding whether any amendments were required to the SA objectives, supporting assessment criteria and detailed assumptions for SA of site allocations. LUC's response to each of the consultation comments is documented in **Appendix 3**.
- 5.3 As demonstrated in **Appendix 4**, the framework of SA objectives:
- Addresses the sustainability issues identified in **Chapter 4**.
 - Takes into account the environmental protection objectives set out at the international and national level (a requirement of the SEA Directive and Regulations) insofar as they are relevant to the PPLP (see **Appendix 2**).
 - Ensures that all of the SEA Directive topics ((a) to (l)) are covered.
- 5.4 The framework of SA objectives is set out in **Table 5.1**. The SA framework also provides indicative appraisal questions to illustrate the types of consideration that will be relevant when assessing Plan policies and allocations against them.
- 5.5 A few minor changes were made to the SA framework following the consultation on the SA Scoping Report in 2014. These minor changes are described in **Appendix 3**.

Table 5.1: SA Framework objectives and appraisal questions

SA Objective Reference	SA Objective	Appraisal questions: will the Plan/option lead to...?
SA1	Reduce the risk of flooding, taking into account the effects of climate change.	Development which supports and corresponds with the Water Framework Directive, the NPPF, Technical Guidance to the NPPF and the flood risk management policies of the EA? Development which has regard to the Shepway Strategic Flood Risk Assessment? Development which incorporates SuDS (including their long-term

SA Objective Reference	SA Objective	Appraisal questions: will the Plan/option lead to...?
		maintenance) to reduce the rate of run-off and reduce the risk of surface water flooding and combined sewer overflows?
SA2	Increase energy efficiency in the built environment, the proportion of energy use from renewable sources and resilience to a changing climate and extreme weather.	<p>Developments that are energy efficient in their design and construction and which provide opportunities for combined heat and power?</p> <p>Greater consideration of climate change adaptation within planning and design?</p> <p>An increase in the number of large scale renewable energy schemes</p> <p>An increase in the local/on-site renewable energy generating capacity?</p> <p>A decrease in oil consumption?</p> <p>Opportunities for modal shift away from private motor vehicles?</p> <p>Support for managing the natural environment in a way that recognises its potential to deliver climate change adaptation services?</p> <p>N.B. Climate change is also likely to impact upon habitats and thereby biodiversity. This issued is dealt with under SA objective 9.</p>
SA3	Promote community vibrancy, provide opportunities to access services, facilities and environmental assets for all and avoid creating inequalities of opportunity for access.	<p>Well-designed, compact communities which are of a sufficient critical mass or density to support local services and public transport provision?</p> <p>Opportunities to improve educational attainment, qualification levels and participation in education and training through access to existing or the provision of new educational infrastructure in relation to new residential developments?</p> <p>Provision of new or enhancement of existing leisure facilities for young people at the neighbourhood level, where thresholds/standards require these?</p> <p>Opportunities to lead healthier lifestyles, including development that enhances existing and /or makes provision for and maintenance towards sports and recreational facilities e.g. publicly available pitches, allotments, swimming pools, courts, etc.?</p> <p>Adequate provision of health services to support new communities through the enhancement of existing facilities or through the creation of new?</p> <p>Developments, especially in deprived communities, which reduce car dependence by ensuring employment opportunities, health services, educational facilities, shops and recreational opportunities are accessible by foot, cycle or public transport?</p> <p>Improvements to local public transport infrastructure, especially in deprived communities?</p> <p>Reintegration of physically divided or highly linear villages or neighbourhoods through, for example, provision of central social infrastructure?</p>
SA4	Reduce crime and the fear of crime.	Reduced levels of crime, anti-social behaviour and the fear of crime through design i.e. improvements to the environment, street layout, public space provision, passive surveillance, lighting etc.?
SA5	Improve the provision of homes, including affordable housing, having regard to the needs of all sections of society, including the elderly.	<p>Sufficient amounts of housing to meet the needs of the community and local economy?</p> <p>Development which delivers an appropriate mix of housing, including affordable housing and dwellings for older people?</p>
SA6	Support the creation of high quality and diverse employment opportunities.	<p>An adequate supply of land, skills and infrastructure (such as ICT) to meet the requirements of sectors targeted for economic growth and diversification, including those set out in the Shepway Economic Strategy?</p> <p>Improved access to jobs for local people from all sectors of the</p>

SA Objective Reference	SA Objective	Appraisal questions: will the Plan/option lead to...?
		<p>community?</p> <p>Enhanced vitality and vibrancy of town centres?</p> <p>Expansion or upgrading of key visitor attractions?</p> <p>Employment opportunities which address the economic consequences of the de-commissioning of Dungeness nuclear power station?¹²⁰</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>
SA7	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>Development that is well related to the natural environment and characteristic scale, form materials and detailing of the settlement and contributes to a sense of place?</p> <p>Promotes the enhancement of the archaeological resource and other aspects of heritage, such as, parks and open spaces, and areas with a particular historical or cultural association?</p> <p>Opportunities for the enhancement of historic assets, townscapes and landscapes?</p>
SA8	Conserve, and where relevant enhance, the quality, character and local distinctiveness of the landscape and townscape.	<p>Areas of the highest landscape sensitivity being provided with the highest level of policy protection?</p> <p>Development which considers the existing character, form and pattern of the landscape, buildings and settlements?</p> <p>The protection and enhancement of local distinctiveness and contribution to a sense of place?</p> <p>The provision of and maintenance towards green infrastructure assets and networks (including green open space and river/canal corridors) and ensure that this is linked into new and existing developments, to improve the connectivity of green spaces and green networks?</p>
SA9	Conserve and enhance biodiversity, taking into account the effects of climate change.	<p>Avoidance of net loss, damage to, or fragmentation of designated and non-designated wildlife sites and habitats?</p> <p>Opportunities to enhance 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 robust wildlife places whilst encouraging respect for and raising awareness of the sensitivity of these sites?</p> <p>Development which includes the integration of ecological conditions and contributes to improvement in ecological connectivity in rural and urban areas?</p> <p>The maintenance and enhancement of the four large scale 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>
SA10	Reduce the need to travel; increase opportunities to choose sustainable transport modes and avoid development that	<p>A complementary mix of land uses within compact communities that minimises the length of journeys to services and employment, increases the proportion of journeys made on foot or by cycle, and are of a sufficient density to support local services and public transport provision?</p> <p>Development in locations well served by public transport, cycle paths</p>

¹²⁰ 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...?
	will result in significant traffic congestion.	and walking routes? Support for the objectives of the Shepway Cycling Plan?
SA11	Use land efficiently and safeguard soils, geology and economic mineral reserves.	Development that avoids high quality agricultural land? The remediation of contaminated sites? Development on brownfield sites? Development that protects soil processes and functions? Development that protects sites valued for their geological characteristics? Development that avoids sterilising economic mineral reserves?
SA12	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: the quality of groundwater, surface waters or coastal waters; the physical quality of rivers and coastal waters; Water Framework Directive status? Development where adequate foul drainage, sewage treatment facilities and surface water drainage are available? Development which incorporates SuDS (including their long-term maintenance) to reduce and the risk of combined sewer overflows and to trap and break down pollutants?
SA13	Use water resources efficiently.	Development where adequate water supply is available? Water efficient design and reduction in water consumption (e.g. rainwater recycling/grey water reuse and BREEAM/ EcoHomes Excellent Standard)?
SA14	Protect and enhance green infrastructure and ensure that it meets local needs.	The provision and maintenance of green infrastructure assets and networks (including green open space and river/canal corridors) and ensure that this is linked into new and existing developments, to improve the connectivity of green spaces and green networks? N.B. The East Kent Green Infrastructure (GI) Working Group has identified an East Kent GI Typology which encompasses the following GI types:- <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. The full list of GI components of this typology is available from the Shepway GI Report, 2011.

- 5.6 The SA findings for the first 'Issues and Options' draft PPLP are summarised in **Chapter 6**, including an assessment of the potential cumulative impacts of the PPLP options when taken together.
- 5.7 **Chapter 7** sets out the findings of the SA of preferred and reasonable alternative site allocations (policy-off) considered to date, including reasonable site options proposed before and after the consultation on the Preferred Options version of the PPLP.
- 5.8 **Chapter 8** sets out the findings of the SA of the site allocation and development management policies outlined in the proposed Submission version of the PPLP published for consultation in January 2018. The detailed findings of the SA of the preferred site allocation and development management policies outlined in the Preferred Options version of the PPLP published for consultation in October 2016 are set out in the previous iteration of SA Report published alongside the Preferred Options PPLP in October 2016.

Determining significance

- 5.9 It is the role of SA to identify those effects of the Plan which are significant. Schedule 1 of the SEA Regulations sets out criteria for determining the likely significance of effects. These criteria relate to:
- The characteristics of the plan or programme, in this case the Shepway PPLP.
 - The characteristics of the effects and of the area likely to be affected, in this case baseline conditions and sustainability issues facing the District, as set out in **Chapter 4**.
- 5.10 The first 'Issues and Options' draft of the PPLP contained initial, high level options for policy direction and did not identify reasonable alternative site allocations. As such it was judged inappropriate to attempt to distinguish between minor and significant sustainability effects. Instead, commentary was provided on the likely type and direction (positive or negative) of effects on the baseline in relation to sustainability objectives.
- 5.11 The 'Preferred Options' PPLP contained more fully defined development management policies and site allocations, including reasonable alternatives. Therefore, the SA Report that accompanied the publication of the Preferred Options PPLP in October 2016 contained more detailed assessments to establish which of the identified effects are significant and which are minor. Each preferred development management policy and site allocation option was assessed against each SA objective, and a judgement made as to the likely significance of the effects of the option on the SA objective. In addition new reasonable alternatives, i.e. policies and allocations which were not appraised as part of the first draft 'Issues and Options' draft of the PPLP, e.g. alternative site allocations, were appraised to the same level of detail. The same approach taken to appraise preferred options and their reasonable alternatives in the Preferred Options PPLP has been taken to inform the appraisal of options for the proposed Submission Draft PPLP.
- 5.12 The dividing line between sustainability scores is often quite small. Where we distinguish significant effects from more minor effects this is because, in our judgement, the effect of the allocation or policy on the SA objective will be of such magnitude that it will have a noticeable and measurable effect compared with other factors that may influence the achievement of that objective.
- 5.13 When applying the SA framework to potential allocations a series of assumptions were set out for each SA objective to show how the effects were identified and evaluated for each site option appraised. These were also consulted upon at the SA Scoping Stage and consultees' responses taken into account in making refinements to the assumptions. The use of assumptions to evaluate significance is a recognised technique in SA and ensures consistency in the SA of each potential site allocation. The SA assumptions are presented in **Appendix 1**.
- 5.14 While the SA objectives and appraisal questions remained the same, the detailed assumptions for the SA of the preferred site allocations and their reasonable alternatives were updated in 2016 to ensure that they were fit for purpose for the appraisal of more detailed preferred and alternative site allocations. The updated assumptions draw on relevant baseline data, available GIS data and reference documents where available, for example the latest guidance from Historic England. The same assumptions used in 2016 have been used to appraise the site options tested to inform the preparation of the proposed Submission Draft PPLP.
- 5.15 The judgements differentiate between significant effects and other more minor effects through the use of colour coded symbols, as shown in **Table 5.2** below. Mixed effects are recorded for an SA objective where there is potential for both positive and negative effects.

Table 5.2: Key to symbols of effects used in the SA of the Shepway PPLP

++	Significant positive effect likely
+	Minor positive effect likely
0	Negligible effect likely
-	Minor negative effect likely
--	Significant negative effect likely
+/-	Mixed effect likely
?	Likely effect uncertain

Data limitations and difficulties encountered

- 5.16 The SEA Regulations require that the environmental report should include information on "*any difficulties (such as technical deficiencies or lack of know how) encountered in compiling the required information*" (Schedule 2(8)). The difficulties encountered in carrying out the SA are described below.
- 5.17 The first 'Issues and Options' draft of the Shepway PPLP sought to gather early opinions on issues facing the District and on possible ways in which the Plan might address these. As such, the first draft lacked details and contained few concrete proposals which could be subject to SA.
- 5.18 In many cases, the policy options described in the first 'Issues and Options' draft of the PPLP under each policy number were not necessarily mutually exclusive, resulting in the preferred policies contained within the second 'Preferred Options' version of the PPLP often reflecting one, several or all of them. As such, an overarching sustainability commentary was provided in the SA Report which accompanied the first 'Issues and Options' Draft of the PPLP for each policy number, drawing out, where appropriate, the separate effects of different elements of each emerging policy, without assuming that it represented an alternative to the other policy aspects described (unless this was explicitly stated).
- 5.19 There were no significant technical difficulties encountered during the preparation of the SA of the Preferred Options PPLP and proposed Submission Draft PPLP. Certain data limitations did arise during the course of the SA, notably:
- The sheer number of strategies, plans, programmes, policy documents, advice and guidance produced by a range of statutory and non-statutory bodies means that it has been impossible within the resources available to prepare the Scoping Report to consider every potentially relevant document in detail. However, every effort has been made to draw out the key generic messages relevant to the preparation of the Local Plan and the SA.
 - The actual impacts of policies will depend very much upon how they are applied in specific locations. Professional judgement has therefore had to be applied to identify likely effects of implementing strategic policies. For sites, a series of assumptions have been used as a guide to ensure consistency in the identification of the nature of the effects on each SA objective (see **Appendix 1**).
 - The appraisal process included a considerable amount of liaison between LUC as the SA consultants and the officers at Shepway District Council, particularly with respect to the appraisals of the site allocations and reasonable alternatives. There have been a number of alterations to the number of sites, and also the site boundaries, as well as the development proposed for each site, and the policy criteria applying to them. This has happened throughout the SA process. All reasonable effort has been made to ensure that the final version of this SA Report reflects the final version of the proposed Submission Local Plan in order to reduce the likelihood of errors being reported.

- Similarly, the evidence base upon which effects have been identified has continued to evolve and was often updated throughout the plan preparation process. All reasonable effort has been made to ensure that the final version of this SA Report reflects the latest evidence base.

6 SA findings of Issues and Options version of the Places and Policies Local Plan

- 6.1 This section summarises the sustainability effects identified for each of the spatial policy options for housing and the settlements and the more numerous PPLP policy options in the first 'Issues and Options' draft of the PPLP appraised in November 2014. The sustainability effects of the Policy Options are summarised in relation to each of the first 'Issues and Options' draft Plan's policy topics. In addition, this chapter also includes the recommendations for future development of the PPLP options into policy made in November 2014.
- 6.2 The detailed appraisal of the options (referenced below) which accompanied the first 'Issues and Options' version of the PPLP is included in **Appendix 6** of this SA Report.

Part one of PPLP: Shepway areas and future site allocations

Housing and the settlements

- 6.3 Only one policy option was appraised and consulted upon in the 'Housing and the settlements' section of the Issues and Options version of the PPLP:
- **Policy 1** – Policy Option for Housing Distribution
- 6.4 Policy 1 is consistent with Policy SS2 of the Core Strategy and the evidence which informed it. Policy 1 contains five principles to help establish the scale of housing to be provided at each tier in the settlement hierarchy:
- Core Strategy policy must be applied.
 - Core Strategy evidence, notably the 2012 technical note/ SHLAA, should be the starting point for identifying sufficient land in an area to allow subsequent testing of site development options.
 - The total amount of housing planned across settlements in tiers of the Hierarchy should proportionate, it must not be less than the total planned in any tier of the Hierarchy below.
 - There is the scope for flexibility within each tier within the Settlement Hierarchy in order to meet the total figure.
 - With an adopted Core Strategy in place it is beyond the scope of this plan to review strategic urban extensions (Core Strategy Allocations at Folkestone, or the existing major allocations with planning permission at Nickolls Quarry, Hythe). These are not included.
- 6.5 Principles 1 and 5 rely on existing policy in the Core Strategy and therefore had no effect on the baseline in relation to SA objectives. Principles 2, 3 and 4 were considered likely to maximise the benefit of housing in the District by reinforcing application of the settlement hierarchy so that housing is directed towards the most sustainable settlements and to where housing land is available, with positive effects for new and improved public service and facility provision (SA3 and SA14); crime prevention (SA4); affordable housing schemes (SA5); sustainable travel patterns (SA10); and urban regeneration and greening (SA7, SA8, SA9, SA11 and SA12). The flexibility introduced by principle 4 was considered a pragmatic way of meeting objectively assessed housing need in the District, with further benefits for SA5.
- 6.6 Broad sustainability advantages and disadvantages of directing housing towards each major settlement or tier in the settlement hierarchy were set out in Appendix 1 of the SA Report which accompanied the Issues and Options version of the PPLP. A summary is provided below.

1,519 dwellings in Folkestone

- 6.7 **Likely positive sustainability effects:** The Core Strategy made strategic housing allocations to Folkestone Seafront (SS6: up to 1,000 dwellings) and Shorncliffe Garrison (SS7: up to 1,200 dwellings) in Folkestone. The Issues and Option version of the PPLP allocated an additional 1,519 dwellings in the town. The SA found that new housing in Folkestone would help to meet affordable housing need in the settlement of the District where the SHMA indicates that it is greatest, as well as meeting market demand which is likely to be high in this large population centre with positive effects on SA5. It would allow for the efficient use of land through the development of previously developed land (SA11) before greenfield land (SA2 and SA9) with indirect benefits associated with urban regeneration (SA4, SA6, SA8). Positive effects on SA10 were considered likely to result from directing housing towards a Sub Regional Town where the availability of employment, services and facilities will reduce the need for new residents to travel.
- 6.8 **Likely negative sustainability effects:** Although development in the District's Sub Regional Town of Folkestone would provide new residents with access to the town's public transport links, including Folkestone Central Station, it was considered also likely to result in significant increases in traffic in the area of the District where congestion is already greatest, with negative effects on SA10.

959 dwellings in Hythe and New Romney Town, incorporating Littlestone-on-Sea (480 per settlement)

- 6.9 **Likely positive sustainability effects of residential development at Hythe:** The Core Strategy makes reference to a strategic housing allocation to Nickolls Quarry, Hythe of 1,050 dwellings (saved policy HO2). The Issues and Option version of the PPLP made an additional allocation of approximately 480 dwellings in Hythe. Hythe is one of two Strategic Towns in Shepway and the SA considered that the new housing would have a positive effect in meeting housing need in the area of the District where need is high (SA5) and would maximise the efficient use of land through the development of previously developed land (SA11) before greenfield land (SA2 and SA9) with indirect benefits associated with urban regeneration (SA4, SA6, SA8). Positive effects on SA10 were found likely to result from directing housing towards a Strategic Town where the availability of employment, services and facilities would reduce the need for new residents to travel.
- 6.10 **Likely positive sustainability effects of residential development at New Romney Town (incorporating Littlestone-on-Sea):** New Romney is one of two Strategic Towns in Shepway and was allocated for significant residential development in the region of 480 dwellings in the Issues and Options version of the PPLP. The SA found that the new housing in New Romney would have a positive effect in meeting housing need in the area of the District where need is high (SA5) and would maximise the efficient use of land through the development of previously developed land (SA11) before greenfield land (SA2 and SA9) with indirect benefits associated with urban regeneration (SA4, SA6, SA8). Positive effects on SA10 were found likely to result from directing housing towards a Strategic Town where the availability of employment, services and facilities will reduce the need for new residents to travel.
- 6.11 **Likely negative sustainability effects of residential development at Hythe:** Although development in a Strategic Town would provide new residents with access to public transport links, the SA found that the significant scale of development proposed in the Issues and Options version of the PPLP would have the potential to have an adverse effect on traffic (SA10). Furthermore, significant development could have an adverse effect on the historic core of the town and the Royal Military Canal (SA7 and SA8).
- 6.12 **Likely negative sustainability effects of residential development at New Romney Town (incorporating Littlestone-on-Sea):** Although development in a Strategic Town would provide new residents with access to public transport links, the significant scale of development proposed within the town in the Issues and Options version of the PPLP would have the potential to have an adverse effect on traffic (SA10). Furthermore, significant development could have an adverse effect on the strong historic character of the town (SA7 and SA8).

373 dwellings in Lydd Town and Hawkinge (187 per settlement)

- 6.13 **Likely positive sustainability effects of residential development at Lydd:** Lydd is a Service Centre in the Shepway settlement hierarchy. The SA found that the policy's allocation of

approximately 187 dwellings in the town would serve to help sustain, grow and consolidate the position of the town as a District Centre serving the local hinterland with shops, employment and public services with positive effects on meeting local affordable housing needs (SA5), public services and facilities (SA3) and employment (SA6). Some positive effects on SA10 were considered likely to result from directing housing towards a Service Centre where the availability of employment, public services and shops will reduce the need for new residents to travel.

- 6.14 **Likely positive sustainability effects of residential development at Hawkinge:** Hawkinge is a service centre. The SA found that the policy's allocation of approximately 187 dwellings in the town would serve to help sustain, grow and consolidate the position of the town as a District Centre serving the local hinterland with shops, employment and public services with positive effects on meeting local affordable housing needs (SA5), public services and facilities (SA3) and employment (SA6). Some positive effects on SA10 were considered likely to result from directing housing towards a Service Centre where the availability of employment, public services and shops will reduce the need for new residents to travel.
- 6.15 **Likely negative sustainability effects of residential development at Lydd:** The SA found that the scale of development proposed within the town would have the potential to put increased pressure on existing local services and facilities, unless new and improved public services and facilities can be provided. Furthermore, the construction of roughly 187 dwellings in this relatively small town could have an adverse effect on baseline traffic levels in the town and wider area (SA10).
- 6.16 **Likely negative sustainability effects of residential development at Hawkinge:** The SA considered that the scale of development proposed within the town would have the potential to put increased pressure on existing local services and facilities, unless new and improved public services and facilities can be provided. Furthermore, the construction of roughly 187 dwellings in this relatively small town could have an adverse effect on baseline traffic levels in the town and wider area (SA10).

263 in Dymchurch, Elham, Lyminge and Sellindge (66 per settlement)

- 6.17 **Likely positive sustainability effects of residential development at Dymchurch:** Dymchurch is a rural centre for tourism, local shops and public services and facilities. The SA found that the policy's allocation of approximately 66 dwellings would help to sustain, grow and consolidate its role as a Rural Centre serving the local hinterland with shops, employment and public services with positive effects on meeting local affordable housing needs (SA5), public services and facilities (SA3) and employment (SA6).
- 6.18 **Likely positive sustainability effects of residential development at Elham:** Elham is a rural centre for tourism, local shops and public services and facilities. The SA found that the policy's allocation of approximately 66 dwellings would help to sustain, grow and consolidate its role as a Rural Centre serving the local hinterland with shops, employment and public services with positive effects on meeting local affordable housing needs (SA5), public services and facilities (SA3) and employment (SA6).
- 6.19 **Likely positive sustainability effects of residential development at Lyminge:** Lyminge is a rural centre for tourism, local shops and public services and facilities. The SA found that the policy's allocation of approximately 66 dwellings would help to sustain, grow and consolidate its role as a Rural Centre serving the local hinterland with shops, employment and public services with positive effects on meeting local affordable housing needs (SA5), public services and facilities (SA3) and employment (SA6).
- 6.20 **Likely positive sustainability effects of residential development at Sellindge:** Sellindge is a rural centre for tourism, local shops and public services and facilities. The SA found that the policy's allocation of approximately 66 dwellings would help to sustain, grow and consolidate its role as a Rural Centre serving the local hinterland with shops, employment and public services with positive effects on meeting local affordable housing needs (SA5), public services and facilities (SA3) and employment (SA6).
- 6.21 **Likely negative sustainability effects of residential development at Dymchurch:** Dymchurch has significant natural and cultural heritage assets. The SA considered that the development of approximately 66 new dwellings could put these assets at risk unless appropriate mitigation measures are put in place to protect and enhance these assets (SA7 and SA9).

Furthermore, the construction of roughly 66 dwellings in this relatively small settlement could increase the numbers of private cars on the road with adverse effects on local efforts to reduce congestion (SA10) and mitigate climate change (SA2).

- 6.22 **Likely negative sustainability effects of residential development at Elham:** Elham has significant natural and cultural heritage assets. The SA considered that the development of approximately 66 new dwellings could put these assets at risk unless appropriate mitigation measures are put in place to protect and enhance these assets (SA7 and SA9). Furthermore, the construction of roughly 66 dwellings in this relatively small settlement could increase the numbers of private cars on the road with adverse effects on local efforts to reduce congestion (SA10) and mitigate climate change (SA2).
- 6.23 **Likely negative sustainability effects of residential development at Lyminge:** Lyminge has significant natural and cultural heritage assets. The SA considered that the development of approximately 66 new dwellings could put these assets at risk unless appropriate mitigation measures are put in place to protect and enhance these assets (SA7 and SA9). Furthermore, the construction of roughly 66 dwellings in this relatively small settlement could increase the numbers of private cars on the road with adverse effects on local efforts to reduce congestion (SA10) and mitigate climate change (SA2).
- 6.24 **Likely negative sustainability effects of residential development at Sellindge:** Sellindge has significant natural and cultural heritage assets. The SA considered that the development of approximately 66 new dwellings could put these assets at risk unless appropriate mitigation measures are put in place to protect and enhance these assets (SA7 and SA9). Furthermore, the construction of roughly 66 dwellings in this relatively small settlement could increase the numbers of private cars on the road with adverse effects on local efforts to reduce congestion (SA10) and mitigate climate change (SA2).

209 dwellings in the primary villages (30 per settlement)

- 6.25 **Likely positive sustainability effects:** The modest scale of development within the District's primary villages was considered by the SA as unlikely to have a significant effect against any of the SA objectives. However, it was noted that there would be potential for minor benefits meeting local affordable housing needs in the rural areas of the District.
- 6.26 **Likely negative sustainability effects:** The modest scale of development within the District's primary villages was considered by the SA as unlikely to have a significant effect against any of the SA objectives. However, the cumulative effects associated with increased populations in the rural areas of the District could result in pressures on small scale and disparate public facilities and services (SA3), increase reliance on the private car with adverse effects on local efforts to reduce congestion (SA10) and mitigate climate change (SA2).

32 dwellings in the secondary villages (5 per settlement)

- 6.27 **Likely positive sustainability effects:** The modest scale of development within the District's secondary villages was considered by the SA as unlikely to have a significant effect against any of the SA objectives. However, there it was noted that there would be potential for minor benefits meeting local affordable housing needs in the rural areas of the District.
- 6.28 **Likely negative sustainability effects:** The SA found that the modest scale of development within the District's secondary villages would be unlikely to have a significant effect against any of the SA objectives. However, the cumulative effects associated with increased populations in the rural areas of the District could result in pressures on small scale and disparate public facilities and services (SA3), increase reliance on the private car with adverse effects on local efforts to reduce congestion (SA10) and mitigate climate change (SA2).

Infrastructure

- 6.29 All policy options considered are likely to result in local investment in infrastructure. However, site-focussed policy options could fail to allow for investment in District-wide infrastructure schemes, reducing the Council's ability to tackle strategic issues with negative effects in relation to reduced ability to provide flood defences and flood alleviation schemes (SA1 and SA12); climate change mitigation and adaptation schemes (SA2 and SA13); new and improved public service and facility provision (SA3 and SA14); crime prevention schemes (SA4); affordable

housing schemes (SA5); local employment and training schemes (SA6); sustainable travel schemes (SA10); and urban regeneration and greening (SA7, SA8, SA9, SA11 and SA12).

Part two of PPLP: Development management policies options

- 6.30 As might be expected, many of the development management policies had broadly positive effects on the topic areas they address. In order to secure positive outcomes in the relevant topic area, many of the policy options set out criteria which acceptable developments must meet. Many such criteria inevitably place a greater financial and/or administrative burden on potential developers than existing national or Core Strategy planning policy or the Building Regulations, creating the risk that fewer developments will be delivered than would otherwise be the case. This results in potential negative effects in relation to SA objectives on provision of housing (SA5) and employment land (SA6). Where other types of negative effects were identified by the SA, these are summarised below.

General development management

- 6.31 The following policy options were appraised and consulted upon in the 'General Development Management Policy Options' section of the Issues and Options version of the PPLP:
- **GD1** (Options A and B) – Provide for high quality design in new development, designing out crime and enhancing a sense of place
 - **GD2** (Options A, B and C) – Ensuring satisfactory amenity for existing residents and the future occupiers of new dwellings
 - **GD3** (Options A, B, C, D and E) – Ensuring the consideration of environmental issues such as land instability, contamination and pollution
 - **GD4** (Options A and B) – Address localised flooding and flood risk management
 - **GD5** (Options A and B) – Incorporating public art in new development
 - **GD6** – To guide telecommunications development (including provision of broadband)
- 6.32 Most policy options were considered to have generally positive sustainability effects on the topics they addressed. The only negative effect identified for one policy option was a failure of design to respond to local character.

Housing

- 6.33 The following policy options were appraised and consulted upon in the 'Housing' section of the Issues and Options version of the PPLP:
- **H1** (Options A, B and C) – Providing a mix of housing type and size to meet the needs of Shepway's residents
 - **H2** (Options A, B and C) – Recognising the role of residential garden land in housing delivery
 - **H3** (Options A, B and C) – Providing for the accommodation needs of specific sections of the community
 - **H4** (Options A and B) – To provide a criteria based policy that can be applied to applications for sites for Gypsies, Travellers and Travelling Showpeople that are not designated
 - **H5** (Options A and B) – Recognising the need to develop housing at an appropriate density to make better use of previously developed land and existing infrastructure
 - **H6** (Options A, B, C and D) – Providing for accommodation for our ageing population and vulnerable members of our community
 - **H7** (Options A, B and C) – To consider the impact that converting large homes to flats has on the character of an area and the amenity of other residents (for example parking problems)

- **H8** (Options A and B) – To ensure that the conversion of rural buildings to houses, replacement dwellings and extensions respect the character of their surroundings and reflect local vernacular and design
- **H9** – To provide for self-build housing

6.34 Most policy options were considered to have generally positive sustainability effects on the topics they addressed. Negative effects identified for certain policy options being considered included:

- Reducing the integration of Gypsies, Travellers and Travelling Showpeople into the local community by allowing development that is remote from existing settlements (potential negative effects on SA3).
- Risking inefficient use of land and increasing potential impacts on the countryside by limiting the density of housing development (potential negative effects on SA8, SA9, and SA11).
- Reducing the integration of elderly people into the local community by allowing development of retirement communities (potential negative effects on SA3).
- Risking poor design quality by providing flexibility in policies governing self-build homes or stifling innovation in sustainable design by being over-prescriptive (potential negative effects on SA1, SA7, SA8, SA9).

Economy

6.35 The following policy options were appraised and consulted upon in the 'Economy' section of the Issues and Options version of the PPLP:

- **E1** (Options A and B) – Making the best and most sustainable use of existing employment land
- **E2** (Options A and B) – Directing business to sustainable locations, in particular office uses to town centre /edge of centre areas
- **E3** (Options A and B) – Ensuring that economic development contributes to climate change avoidance and mitigation (energy efficiency/ renewable energy)
- **E4** (Options A, B and C) – Securing new economic development on designated employment land with good transport connections to meet identified needs and encourage inward investment
- **E5** (Options A, B and C) – Managing economic development outside designated employment sites
- **E6** (Options A, B and C) – Offices and employment areas supporting economic innovation and the knowledge economy
- **E7** (Options A, B and C) – Providing for the needs of small and medium sized businesses
- **E8** (Options A, B, C and D) – Town centre and shopping areas (primary and secondary) Policies that protect the vitality and viability of retailing in town centres
- **E9** (Options A and B) – Promoting the vitality and viability of town centres, or isolated parades, by maintaining an appropriate proportion of non-shopping uses
- **E10** (Options A and B) – Improving sites of poor visual amenity which detract from the appearance of town centres and stimulate beneficial redevelopment
- **E11** (Options A and B) – Managing a lively, safe and social evening economy in the larger town centres which does not detract from the retail offer of town centres or harm residential amenity
- **E12** (Options A and B) – Education/training
- **E13** (Options A, B, C and D) – Tourism and tourist facilities
- **E14** (Options A, B, C, D, E and F) – Caravan and camping sites

6.36 Most policy options were considered to have generally positive sustainability effects on the topics they addressed. Negative effects identified for certain policy options being considered included:

- Risking economic development in unsustainable locations or those likely to suffer from traffic congestion by allowing a flexible approach to economic development (potential negative effect on SA10).
- Risking inefficient use of land, hindering urban regeneration and increasing potential impacts on the countryside by encouraging economic development outside designated employment sites (potential negative effects on SA3, SA8, SA11).
- Risking an insufficient supply of employment land by allowing it to be redeveloped for other uses (potential negative effect on SA 6).
- Failing to maximise the potential for growth of the knowledge economy by not focussing office development in settlements with the greatest potential to become knowledge industry clusters (potential negative effect on SA6).
- Failing to support start-ups and other small and medium sized businesses by not setting size thresholds on business units in certain town centre areas (potential negative effect on SA6).
- Risking a loss of town centre vibrancy and provision of accessible services by not allowing change of use away from retail to other public services and facilities, regardless of occupancy levels (potential negative effects on SA3, SA10).
- Risking a loss of town centre vibrancy and provision of accessible shopping by allowing too much flexibility for change of use away from retail (potential negative effects on SA3, SA6).
- Encouraging the provision of food, drink and entertainment uses in town centres has the potential to increase crime and antisocial behaviour in town centres and reduce residential amenity if not carefully managed. Increased provision of certain hot food outlets could promote unhealthy lifestyles (potential negative effects on SA3, SA4).
- Promoting the expansion and improvement of tourism facilities in the District could have an adverse effect on the integrity of biodiversity assets that are sensitive to visitor pressure. Conversely, failure to protect existing visitor accommodation could have an adverse effect on the sustainability of the tourism industry in the District (potential negative effects on SA6, SA9).
- Promoting the expansion and improvement of caravan and camping sites in the District has the potential for negative effects on the setting of heritage assets and landscapes. They would also be likely to attract more tourists to the area, which could have a negative effect on the integrity of biodiversity assets that are sensitive to visitor. Conversely, restricting such development could have an adverse effect on the sustainability of the tourism industry in the District (potential negative effects on SA6, SA7, SA8, SA9).

Community

6.37 The following policy options were appraised and consulted upon in the 'Community' section of the Issues and Options version of the PPLP:

- **C1** (Options A and B) – To safeguard existing community facilities
- **C2** (Options A, B and C) – The provision of upgraded community and formal recreation facilities
- **C3** (Options A and B) – Providing open space, informal recreation provision and other green infrastructure to meet the current and future needs of the District, addressing deficiencies and taking into account planned development
- **C4** (Options A and B) – Creating a balance between permitting appropriate use of the countryside for recreation and protecting natural resources and the character of the rural areas
- **C5** (Options A and B) – Rural services and creating a balance between protecting the countryside and supporting the rural economy
- **C6** (Options A, B and C) – Providing enhancements to existing open spaces and formal and informal recreation facilities
- **C7** (Options A and B) – Local Green Space

- **C8** (Options A and B) – Protection and enhancement of Public Rights of Way (PROW). Create a network to link up open spaces and provide an improved network of pedestrian and cycle routes
- **C9** (Options A, B and C) – Provision of new community facilities in Hythe

6.38 Most policy options were considered to have generally positive sustainability effects on the topics they addressed. Negative effects identified for certain policy options being considered included:

- The allocation of new sites for new open space and informal recreation facilities is more likely to result in the allocation of greenfield land than provision as part of regeneration of larger sites, which has the potential to have a minor adverse effect on efficient use of land relative to regeneration of brownfield sites (potential negative effects on SA11).
- Site-focussed policy options for open space provision do not facilitate investment in District-wide green infrastructure schemes. This may reduce the Council's ability to tackle deficiencies in larger scale open spaces or improve the connectivity of biodiversity networks (potential negative effects on SA9, SA14).
- Major development of community facilities on the edge of Hythe has the potential for adverse effects in relation to historic assets, landscape and biodiversity (potential negative effects on SA7, SA8, SA9).

Transport

6.39 The following policy options were appraised and consulted upon in the 'Transport' section of the Issues and Options version of the PPLP:

- **T1** (Options A, B C and D) – Parking Standards
- **T2** (Options A, B, C, D, E and F) – Site Layout
- **T3** (Options A, B and C) – Sustainable Transport
- **T4** (Options A and B) – Highway Safety and Highway Congestion
- **T5** (Options A and B) – Traffic Management and New Transport Schemes
- **T6** (Options A and B) – London Ashford (Lydd) Airport
- **T7** (Options A and B) – Lorry Parking

6.40 Most policy options were considered to have generally positive sustainability effects on the topics they addressed. Negative effects identified for certain policy options being considered included:

- Provision for private vehicles in areas with poor access to public transport and reducing permeability for sites to meet secure by design principles have the potential to have an adverse effect on the adoption of alternative modes of transport to the private car, with indirect adverse effects on climate change mitigation and the promotion of healthier lifestyles (potential negative effects on SA2, SA3, SA10).
- Support for expansion of facilities at London Ashford (Lydd) Airport is likely to have adverse effects on the District's ability to mitigate and adapt to the effects of climate change as well as increasing noise levels experienced by local communities (potential negative effects on SA2, SA3, SA5).
- Restrictions on the scale of lorry parking facilities have the potential to have an adverse effect on employment in the District (potential negative effects on SA6).

Natural environment

6.41 The following policy options were appraised and consulted upon in the 'Natural Environment' section of the Issues and Options version of the PPLP:

- **NE1** (Options A and B) – To enhance access to the natural environment
- **NE2** (Options A and B) – To provide for biodiversity offsetting
- **NE3** (Options A, B and C) – Protecting the District's landscapes and countryside

- **NE4** (Options A, B and C) – Achieving a balance between accommodating new growth and ensuring the protection of important habitats and species that contribute to the biodiversity of the District
- **NE5** (Options A, B, C and D) – Promoting the positive enhancement of biodiversity in the District
- **NE6** (Options A and B) – Ensuring that increased recreational pressure does not have an adverse impact upon the SAC/SPAs
- **NE7** (Options A and B) – Development and Disturbance of Birds in Dungeness Special Protection Areas and Ramsar site

6.42 Most policy options were considered to have generally positive sustainability effects on the topics they addressed. Negative effects identified for certain policy options being considered included:

- Policy options to enhance access to the natural environment have the potential to put biodiversity at risk where habitats and species are sensitive to visitor pressure (potential negative effects on SA9).
- Policy options for biodiversity offsetting risk adverse effects on local biodiversity. It will be important to ensure that measures taken to offset loss significantly improve the condition and diversity of the wider habitat resource (potential negative effects on SA9).
- Policy options which focus on protecting the landscapes and countryside within and immediately adjacent to the AONB risk neglecting other areas of the District with high quality landscapes and countryside (potential negative effects on SA8).
- Restricting ecological assessments to major development limits the ability to manage the cumulative effects of small-medium scale development on local biodiversity (potential negative effects on SA9).

The coast

6.43 The following policy options were appraised and consulted upon in the 'The Coast' section of the Issues and Options version of the PPLP:

- **CP1** (Options A and B) – Integrated Coastal Zone Management
- **CP2** – To designate Coastal Change Management Areas and manage proposed development within those areas
- **CP3** (Options A, B, C, D, E and F) – Development around the Coast

6.44 Most policy options were considered to have generally positive sustainability effects on the topics they addressed.

Climate change

6.45 The following policy options were appraised and consulted upon in the 'Climate Change' section of the Issues and Options version of the PPLP:

- **CC1** (Options A, B and C) – Carbon emissions/ carbon reduction policy
- **CC2** (Options A and B) – Wind Turbine Development
- **CC3** (Options A and B) – Wind turbines and existing residential development
- **CC4** (Options A and B) – Solar Farms
- **CC5** (Options A, B and C) – Renewable energy/ Off site renewable energy
- **CC6** (Options A and B) – Encouraging and promoting sustainable transport measures
- **CC7** (Options A and B) – Waste/Recycling
- **CC8** (Options A and B) – Sustainable design measures for extensions to existing buildings
- **CC9** (Options A, B and C) – Efficient and sustainable water use

- 6.46 Most policy options were considered to have generally positive sustainability effects on the topics they addressed. Negative effects identified for certain policy options being considered included:
- Development of wind turbines/farms in the District could have an adverse effect on the landscapes/ townscapes/ seascapes as well as the settling of heritage assets. Furthermore, it has the potential to increase the rates of bird strike in the District, with adverse effects on biodiversity (potential negative effects on SA7, SA8, SA9).
 - Policy options which restrict the development of wind turbines in connection with residential uses or which restrict the development of solar farms could have an adverse effect on promoting climate change mitigation in the District (potential negative effects on SA2).

Health and wellbeing

- 6.47 The following policy options were appraised and consulted upon in the 'Health and Well-being' section of the Issues and Options version of the PPLP:
- **HW1** (Options A, B and C) – To consider the effects of hot food takeaways on health and potential planning policy actions
 - **HW2** (Options A, B and C) – Development should contribute to addressing the causes of ill-health, improving the health and well-being of the local population and reducing health inequalities.
 - **HW3** (Options A and B) – Development that supports healthy, fulfilling and active lifestyles
- 6.48 Most policy options were considered to have generally positive sustainability effects on the topics they addressed. Negative effects identified for certain policy options being considered included:
- Restricting the number of hot food takeaways in the District has the potential to have an adverse effect on employment in the District (potential negative effects on SA6).

Historic environment

- 6.49 The following policy options were appraised and consulted upon in the 'Historic Environment' section of the Issues and Options version of the PPLP:
- **HE1** (Options A, B and C) – Promoting and reinforcing the special character of designated conservation areas in the District
 - **HE2** (Options A, B, C and D) – Balancing the need for change and new development against the need to protect the historic environment and heritage assets
 - **HE3** (Options A, B and C) – Ensuring adequate and proportional protection of buildings, gardens, landscapes, structures and archaeological features which are of local historical merit, but which do not meet the national standards for statutory listing
- 6.50 Most policy options were considered to have generally positive sustainability effects on the topics they addressed.

SA recommendations

- 6.51 In carrying out the SA of the Issues and Option version of the PPLP, LUC identified a number of opportunities to clarify the policy options, to strengthen their potential positive sustainability effects or to avoid or mitigate their potential negative sustainability effects. These recommendations are presented in **Appendix 1** of the SA Report which accompanied the Issues and Option version of the PPLP alongside the policy options to which they relate and have also been brought together below for ease of reference. These were used as part of the policy formulation for the Preferred Options draft.

Economy

- 6.52 **Policy E1:** This policy should set out how it will determine that employment land is surplus to requirements, particularly in light of the conclusion of the Employment Land Review that "*There is no strong case for releasing most existing employment sites and allocations in Shepway*". It

should also explain how safeguarding of existing employment land will reflect the needs of priority locations for economic regeneration and of emerging or target employment sectors for the District.

- 6.53 **Policy E2:** Both policy options should be explicitly linked to an assessment of market demand for business space and to the anticipated future economic growth of the particular town centre and its role in the settlement hierarchy.
- 6.54 **Policy E3:** As a well as energy efficiency and renewable energy generation, climate-change related criteria could also address efficient use of water resources, mitigation of surface water flood risk and building design that is adapted to a warmer climate.
- 6.55 **Policy E6:** This policy should be explicitly linked to evidence on the spatial distribution of economic development opportunities in the District and on market demand for the types of employment premises provided, including the Shepway Economic Development Strategy, Shepway Employment Land Review and forthcoming Town Centre Study.
- 6.56 **Policy E8:** This policy should be explicitly linked to available evidence on the likely effects of replacing town centre retail units with other services and facilities, including the findings of the forthcoming Town Centre Study.
- 6.57 **Policy E10:** The policy should define what is meant by an 'opportunity area'. The policy should clarify whether it applies to all sites of poor visual amenity or only those that are currently in employment use. Any requirement for good design should be extended to cover benefits for biodiversity and the green infrastructure network. This policy should set out how it will determine whether employment land of poor visual amenity is surplus to requirements, particularly in light of the conclusion of the Employment Land Review that "*There is no strong case for releasing most existing employment sites and allocations in Shepway*".
- 6.58 **Policy E11:** The Issues and Option version of the PPLP recognises that "*good design will be required to design out crime and provide a more inclusive place for people to socialise*". This policy should explicitly address this need, for example by:
- Requiring developer contributions to provision of additional late night transport, public toilets, street cleaning, security/policing, good quality street lighting and so on.
 - Avoiding concentrations of licensed premises and/or promoting non-alcohol focused uses/activities.
 - Indicating the types of issue likely to be subject to planning conditions, such as acoustic insulation of bars and music venues.
 - Indicating the types of issue to be addressed by residential design requirements for new dwellings in locations where the night time economy is to be promoted.
- 6.59 Shepway District Council has largely followed these recommendations in the development of their employment policies. In addition to the Issues and Options SA Report, the policies have also been influenced by the conclusions of the District's most recent Town Centre Study and Employment Land Review. Consequently, the policies seek to broaden out the uses in the District's town and local centres to encourage other business uses there. Many of the recommendations relating to design have been incorporated into design policies HB1: Quality Places through Design and HB2: Cohesive Design. Measures relating to the energy efficiency of new developments have been incorporated in policy CC1: Reducing Carbon Emissions and CC2: Sustainable Design and Construction.

Community

- 6.60 **Policy C2:** It was suggested that the elements of option C relating to conversion of vacant retail units to business or residential use be moved to another policy to ensure that this policy remains focused on community/recreation provision.
- 6.61 **Policy C9:** Provide links in the PPLP to evidence of the need for new community facilities in Hythe. Consider biodiversity enhancement as a requirement of planning permission for new community facilities in Hythe.

- 6.62 Shepway District Council has largely followed these recommendations in the development of their town centre and specific site development allocations policies.

Transport

- 6.63 **Policy T6:** If policy option B is pursued it should safeguard the internationally important wildlife communities in the Lydd/Dungeness area, have regard to the likely effect of proposals on other special features in the area and address the potential effects of increased noise on residential amenity, otherwise there is potential for adverse effects on the District's ecological assets (SA9), landscapes and townscapes (SA8) and the amenity of residents (SA3, SA5) and businesses (SA6).
- 6.64 Since the publication of the Issues and Options version of the PPLP, a planning application for Lydd Airport has been permitted which safeguards internationally important wildlife communities in the Lydd/Dungeness area. In addition, Shepway District Council has largely followed the nature conservation aspects of this recommendation in the development of their policies NE1: Enhancing and Managing Access to the Natural Environment and NE2: Biodiversity.

Natural environment

- 6.65 **Policy NE1:** Have regard in this policy to the need to avoid negative effects on biodiversity assets that are sensitive to visitor pressure.
- 6.66 **Policy NE2:** It will be important to ensure that measures taken to offset loss significantly improve the condition and diversity of the wider habitat resource.
- 6.67 **Policies NE2, NE4, NE5:** Target biodiversity enhancement to the Biodiversity Opportunity Areas to address targets in the Kent Biodiversity Action Plan and support the establishment or enhancement of landscape scale ecological networks, thereby maximising biodiversity benefits.
- 6.68 **Policy NE7:** Provide links in the PPLP to existing evidence in relation to recreational pressure on the District's two European sites and on the most appropriate strategy for mitigating such pressure, if relevant. If such evidence is absent, engage with Natural England to explore this issue and, if relevant, to agree an appropriate mitigation strategy.
- 6.69 **Policy NE8:** Provide links in the PPLP to existing evidence in relation to recreational pressure on the Dungeness SAC/pSPA and on the most appropriate strategy for mitigating such pressure, if relevant. If such evidence is absent, engage with Natural England to explore this issue and, if relevant, to agree an appropriate mitigation strategy.
- 6.70 Shepway District Council has largely followed these recommendations in the development of their policies NE1: Enhancing and Managing Access to the Natural Environment and NE2: Biodiversity. Work on the recreational pressures in and around Dungeness has informed the draft policies in the proposed 'Submission Version' of the PPLP.

Climate Change

- 6.71 **Policy CC3:** Option B should expand on what represents a 'reasonable alternative' renewable energy source, e.g. does this mean that an alternative is only reasonable if it can deliver the same amount of energy for the same installation cost?
- 6.72 **Policy CC4:** In line with national Planning Practice Guidance, policy criteria should include consideration of the need to conserve heritage assets, the need for and impact of security measures such as lights and fencing, and consideration of the energy generating potential of the proposed site.
- 6.73 Shepway District Council has largely followed these recommendations in the development of their policies in Chapter 13 of the proposed 'Submission Draft' version of the PPLP. Notable policies include CC4: Wind Turbine Development, CC5: Small Scale Wind Turbines and Existing Development and CC6: Solar Farms.

Health and wellbeing

- 6.74 **Policy HW3:** Consider adding Grades 1 and 2 agricultural land to policy option 3(c); protection of moderate quality land without protection of excellent and very good quality seems illogical.

- 6.75 Shepway District Council has followed this recommendation in the development of their preferred policies in the proposed 'Submission Draft' version of the PPLP. Notable preferred policies include specific site development allocation policies and development management policies NE4: Equestrian Development, CC6: Solar Farms and HW3: Development That Supports Healthy, Fulfilling and Active Lifestyles.
- 6.76 The proposed Submission Draft of the PPLP is largely in line with the approach put forward at Issues & Options stage.

7 Policy-off SA findings of development site alternatives

- 7.1 LUC appraised all preferred allocations and reasonable alternatives for development in the PPLP before the Council had drafted detailed preferred allocation policies for inclusion in the Preferred Options version of the PPLP published for consultation in October 2016. The sites tested in the SA are the sites tested through the Council's Strategic Housing Land Availability Assessment (SHLAA)¹²¹ which scored all promoted site options 'Green', 'Amber' and 'Red'. 'Green' and 'Amber' sites were taken forward for consideration for allocation in the Plan and have been appraised as options in the SA. Sites which scored 'Red' were not considered to be reasonable alternatives and were not taken forward for further consideration.
- 7.2 A policy-off approach to the appraisal was taken, i.e. the principle of housing development on each site was appraised without consideration of the measures that might be implemented at each site to mitigate adverse effects or enhance positive effects.¹²² The aim of these policy-off appraisals was to objectively assess the effects of the principle of development of each site on a consistent basis so that each could be given due consideration for allocation prior to consideration of policy measures and the identification of preferred allocations.
- 7.3 All sites were appraised to the same level of detail using the SA site assumptions outlined in **Appendix 1**. Where significant adverse effects were identified, appropriate recommendations were made on how these might be mitigated at each site. Individual appraisal matrices for each site can be found in **Appendix 7**.
- 7.4 The policy-off site appraisals were used by SDC to inform the selection and definition of the preferred site allocation policies published within the Preferred Options version of the PPLP and subsequently, following consultation in late 2016, to define the site allocation policies in the proposed Submission Draft version of the PPLP. The following SHLAA sites subjected to policy-off appraisal have been selected for allocation within the proposed Submission Draft version of the PPLP:
- SHLAA Site: 004 - Former Sands Motel, Land adjoining pumping station, Dymchurch Road, St Mary's Bay (Policy RM9)
 - SHLAA Site: 27B - Shepway Close, Folkestone (Policy UA6)
 - SHLAA Site: 045 - forms part of Rotunda and Marine Parade Car Parks, Lower Sandgate Road, Folkestone (Policy UA2)
 - SHLAA Site: 046 - Ingles Manor, Castle Hill Avenue, Folkestone (Policy UA5)
 - SHLAA Site: 103 - The Royal Victoria Hospital, Radnor Park Avenue, Folkestone (Policy UA3)
 - SHLAA Site: 113 - Encombe House, Sandgate (Policy UA12)
 - SHLAA Site: 137 - Smiths Medical Campus, Hythe (Policy UA13)
 - SHLAA Site: 142 - Hythe Swimming Pool, Hythe (Policy UA19)
 - SHLAA Site: 153 - Princes Parade, Hythe (Policy UA18)
 - SHLAA Site: 195 - forms part of Development at North Lydd (Policy RM8)
 - SHLAA Site: 209 - Former Lympe Airfield (Policy ND6)
 - SHLAA Site: 244 - Former Officers Mess, Aerodrome Road, Hawkinge (Policy ND1)

¹²¹ <https://www.shepway.gov.uk/planning-policy/local-plan/evidence-base>

¹²² Adopted Core Strategy Policies were taken in to consideration where appropriate, e.g. effects of affordable housing and Lifetime Homes policies were taken into account in appraising sites for effects in relation to SA5.

- SHLAA Site: 306A - Land South of Kitewell Lane, Lydd (Policy RM7)
- SHLAA Site: 313 - St Saviour's Hospital, Seabrook Road, Hythe (Policy UA16)
- SHLAA Site: 334 - Mill Lane to the rear of Mill Farm, Hawkinge (Policy ND2)
- SHLAA Site: 342 – forms part of Rotunda and Marine Parade Car Parks, Lower Sandgate Road, Folkestone (Policy UA2)
- SHLAA Site: 346 - Former Gas Works, Ship Street, Folkestone (Policy UA7)
- SHLAA Site: 379 - Land off Victoria Road West, Littlestone (Policy RM2)
- SHLAA Site: 382 - East Station Goods Yard, Folkestone (Policy UA1)
- SHLAA Site: 402 – forms part of Sellindge (Policy ND5)
- SHLAA Site: 403 - Land west of Ashford Road, New Romney (Policy RM4)
- SHLAA Site: 404 - Land adjacent to Kent Battle of Britain Museum, Aerodrome Road, Hawkinge (Policy ND3)
- SHLAA Site: 418 - Etchinghill Nursery, Etchinghill (Policy ND9)
- SHLAA Site: 419 - Land adjacent to the Golf Course, Etchinghill (Policy ND10)
- SHLAA Site: 425C - Affinity Water, Shearway Road, Cheriton (Policy UA11)
- SHLAA Site: 431 - The Old Slaughterhouse, 'Rosemary Corner', Brookland (Policy RM12)
- SHLAA Site: 436/230 - Land rear of the Old School House, Church Lane, New Romney (Policy RM3)
- SHLAA Site: 451b/306b - Kitewell Lane, rear of the Ambulance Station, Lydd (Policy RM6)
- SHLAA Site: 458 - Highview School, Moat Farm Road, Folkestone (Policy UA8)
- SHLAA Site: 462 - Land rear of Varne Boat Club, Coast Drive, Greatstone (Policy RM10)
- SHLAA Site: 605 - Land east of Broad Street, Lyminge (Policy ND4)
- SHLAA Site: 612 - Land adjacent to Moore Close, Brenzett (Policy RM14)
- SHLAA Site: 618 - forms part of Sellindge (Policy ND5)
- SHLAA Site: 621 - Land at Station Road, Hythe (Policy UA14)
- SHLAA Site: 622- Land at the Saltwood Care Centre, Hythe (Policy UA15)
- SHLAA Site: 625 - 3-5 Shorncliffe Road, Folkestone (Policy UA4)
- SHLAA Site: 635 - Camping and Caravan Site, Stelling Minnis (Policy ND7)
- SHLAA Site: 637 - Brockman Family Centre, Cheriton (Policy UA9)
- SHLAA Site: 638 – Land adjoining the Marsh Academy, Station Road, New Romney (Policy RM5)
- SHLAA Site: 656 - Silver Spring Site, Park Farm (Policy RL11)
- SHLAA Site: 687 - The Cherry Pickers Public House, Cheriton (Policy UA10)
- SHLAA Site: 1003/385 - Land adjoining 385 Canterbury Road, Densole (Policy ND8)
- SHLAA Site: 1005 - forms part of Sellindge (Policy ND5)
- SHLAA Site: 1007 - forms part of Sellindge (Policy ND5)
- SHLAA Site: 1013 - Car park, Coast Drive, Greatstone (Policy RM11)
- SHLAA Site: 1018 - Foxwood School, Seabrook Road, Hythe (Policy UA17)
- SHLAA Site: PO18 - Land between Hillside and Brandet House, Rhee Wall Road, Brenzett (Policy RM14)
- SHLAA Site: PO19 - Land adjacent to Framlea, Rye Road, Brookland (Policy RM13)

- SHLAA Site: PO20 - Cherry Gardens, New Romney (Policy RM1)
- SHLAA Site: PO30 - Land off Boarmans Road, Brookland (Policy RM13)

7.5 The following SHLAA sites subjected to policy-off appraisal have not been selected for allocation in the proposed Submission Draft version of the PPLP represent the reasonable alternatives:

- SHLAA Site: 155 - Rectory Field, Eversley Road, Hythe
- SHLAA Site: 158 - Vale Farm (The Piggeries) Horn Street, Folkestone
- SHAA Site: 204A - Folkestone Racecourse
- SHLAA Site: 261 - Limuru, Cowgate Lane
- SHLAA Site: 289A - Romney Marsh Potato Company, New Romney
- SHLAA Site: 303A - Land south of Little Densole Farm
- SHLAA Site: 316 - East Hawkinge Lands
- SHLAA Site: 328 - Sellindge East
- SHLAA Site: 329 - Pepperland Nurseries, Boarmans Lane, Brookland
- SHLAA Site: 335 - Fisher Field, Dungeness Road, Lydd
- SHLAA Site: 338 - Black Bull Allotments, Dolphins Road, Folkestone
- SHLAA Site: 373 - Land West of Cockreed Lane, New Romney
- SHLAA Site: 388 - Land west of Canterbury Road, Hawkinge
- SHLAA Site: 390 - forms part of Development at North Lydd
- SHLAA Site: 405 - Land East of Cooling Lane, Sandgate
- SHLAA Site: 407a & 609 - forms part of Lands north and south of Rye Road, Brookland
- SHLAA Site: 409 - Land at Cockreed Lane, New Romney
- SHLAA Site: 415/430 - Land east of Ashford Road, New Romney
- SHLAA Site: 416 (317 & 416) - Fisherman's Beach, Land off Range Road, Hythe
- SHLAA Site: 423b - Land east of former railway, Teddars Leas Road, Etchinghill
- SHLAA Site: 457 - Land opposite Rock Cottage, Botolph's Bridge Road, Hythe
- SHLAA Site: 602 - Land between Valebrook Close and Valestone Close, Horn Street, Folkestone
- SHLAA Site: 604 - Land east of Eastbridge Road, Dymchurch
- SHLAA Site: 606 - The Mount, Barrow Hill, Sellindge
- SHLAA Site: 610 - Grove House land, Main Road, Sellindge
- SHLAA Site: 613 - Land at Rear of Barnstormers, Stone Street, Stanford
- SHLAA Site: 617 - Black Horse Caravan Site, 385 Canterbury Road, Densole
- SHLAA Site: 620 - Land at Harden Road, Lydd
- SHLAA Site: 623 - South of Ashford Road, Taylor Wimpey lands, Sellindge
- SHLAA Site: 627 - forms part of Sellindge
- SHLAA Site: 636 - The Shepway Resource Centre, Military Road
- SHLAA Site: 639 - St Nicholas Playing Field, Rolfe Lane, New Romney
- SHLAA Site: 640 - Land adj. 43 Horn Street
- SHLAA Site: 674 - Digby Road, CT20 3NB
- SHLAA Site: 681 - Commercial Land, Station Approach, New Romney

- SHLAA Site: 686/1004 - Land at Duck Street, Elham
- SHLAA Site: 689 - Westbrook School Playing Field, Shorncliffe Road, Folkestone
- SHLAA Site: 1002 - Land at Spitfire Way, Hawkinge
- SHLAA Site: 1014 - Craythorne Farm
- SHLAA Site: 1015 - Brickyard Poultry Farm, New Romney
- SHLAA Site: 1020 - Land to the South of New Romney
- SHLAA Site: PO1a - Land at Sellindge West
- SHLAA Site: PO3 - East Hawkinge Lands, Hawkinge
- SHLAA Site: PO4 - Land South West of Canterbury Road
- SHLAA Site: PO5 - Red House Lane
- SHLAA Site: PO8 - Land at rear of Touchwood, Stone street, Stanford
- SHLAA Site: PO21 - Land behind Village Hall Car Park, Orgarswick Avenue, Dymchurch
- SHLAA Site: PO23 - Walland & Denge Marsh
- SHLAA Site: PO24 - Land at Harden Road, Lydd
- SHLAA Site: PO25 - Land adjacent to Josephs Way, New Romney
- SHLAA Site: PO26 - Former Cemex Yard, Station Approach, New Romney
- SHLAA Site: PO27 - Dymchurch Recreational Ground
- SHLAA Site: PO28 - Land at St Andrews Road, Littlestone Golf Club

7.6 The following SHLAA sites allocated in the Preferred Options version of the PPLP have not been allocated in the proposed Submission version of the PPLP:

- SHLAA Site: 204A - Folkestone Racecourse (Policy ND9)
- SHLAA Site: 390 - forms part of Development at North Lydd (Policy RM7)
- SHLAA Site: 405 - Land East of Cooling Lane, Sandgate (Policy UA18)
- SHLAA Site: 407a/609 – forms part of Lands North and South of Rye Road, Brookland (Policy RM12RM13)
- SHLAA Site: 613 - Land at rear of Barnstormers, Stone Street, Stanford (Policy ND8)
- SHLAA Site: 627 - forms part of Sellindge (Policy ND6)
- SHLAA Site: 636 - The Shepway Resource Centre, Military Road (Policy UA17)
- SHLAA Site: 686 - Land at Duck Street, Elham (Policy ND4)
- SHLAA Site: 1020 - Land to the South of New Romney (Policy RM5)

7.7 SHLAA site options PO1a to PO30 were appraised following the publication of the Preferred Options version of the PPLP. The following SHLAA sites not allocated in the Preferred Options version of the PPLP have now been included in the proposed Submission version of the PPLP:

- SHLAA Site: PO18 - Land between Hillside and Brandet House, Rhee Wall Road, Brenzett (Policy RM14)
- SHLAA Site: PO19 - Land adjacent to Framlea, Rye Road, Brookland (Policy RM13)
- SHLAA Site: PO20 - Cherry Gardens, New Romney (Policy RM1)
- SHLAA Site: PO30 - Land off Boarmans Road, Brookland (Policy RM13)

7.8 The reasons given by SDC for why these sites have been removed from and added to the PPLP are set out in Appendix 5 alongside the reasons for the selection and non-selection of the other site options.

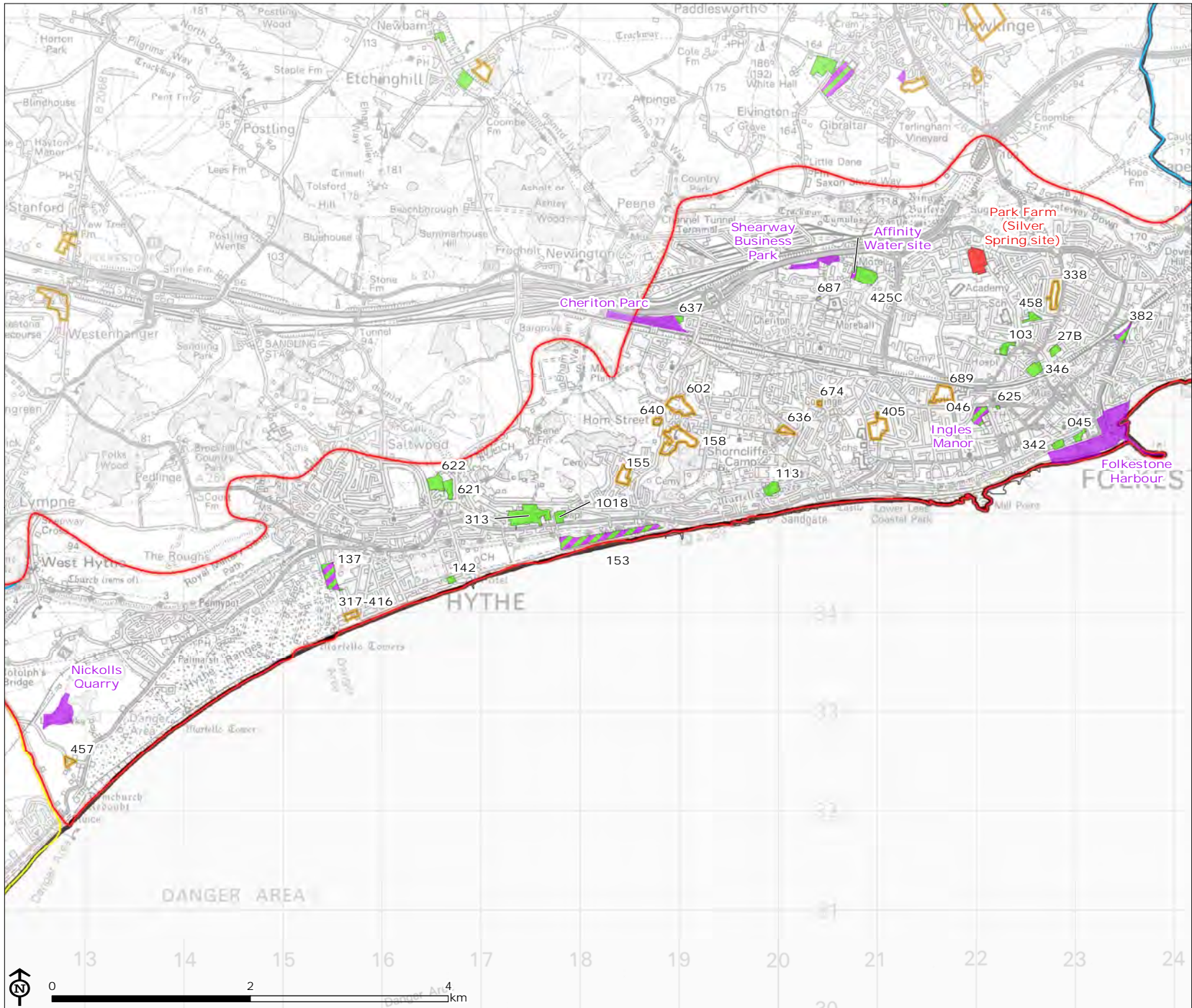
7.9 The policy-off SA scores for the above sites selected for allocation in the proposed Submission Draft version of the PPLP and the reasonable alternatives are shown in **Table 7.1** below. Some of

the SA objectives have been broken down into multiple sub objectives with separate scores to draw out variations in effects associated with different environmental constraints. The two far right hand columns of the table count the number of significant negative and positive effects scored by each site to help make it easier to compare the performance of the sites selected for allocation in the proposed Submission Draft PPLP and the sites that were not selected for allocation. These are a useful indication of which sites perform most positively against the SA objectives and criteria, but care should be applied in using them as they are heavily weighted towards environmental topics in terms of the number of objectives and criteria, as opposed to social and economic. **Figures 7.1, 7.2 and 7.3** illustrate the locations of all the sites across the District's three broad areas:

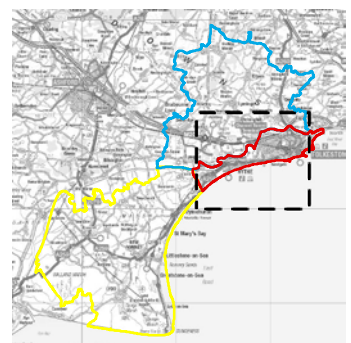
- Urban Area of Folkestone and Hythe
- Romney Marsh
- North Downs

Shepway Places and Policies Local Plan Sustainability Appraisal

Figure 7.1: Proposed Submission Allocations and Reasonable Alternatives



- Urban Area**
- Shepway District
 - District boundary
 - North Downs area
 - Romney Marsh area
 - Urban area
 - Employment Allocation
 - Housing Allocation
 - Mixed Use Housing/ Employment Allocation
 - Retail Employment Allocation
 - Reasonable alternatives











Source: OS, Shepway District Council,

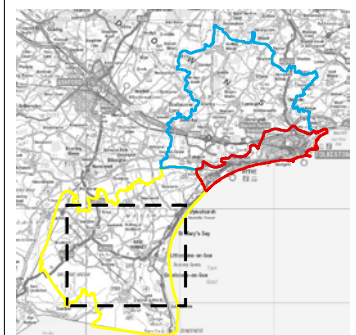
Map Scale @ A4: 1:55,000

Shepway Places and Policies Local Plan Sustainability Appraisal

Figure 7.2: Proposed Submission Allocations and Reasonable Alternatives

Romney Marsh Area

-  Shepway District
-  District boundary
-  North Downs area
-  Romney Marsh area
-  Urban Area
-  Employment Allocation
-  Housing Allocation
-  Mixed Use Housing/ Employment Allocation
-  Reasonable alternatives



Source: OS, Shepway District Council,

Map Scale @ A4: 1:58,000

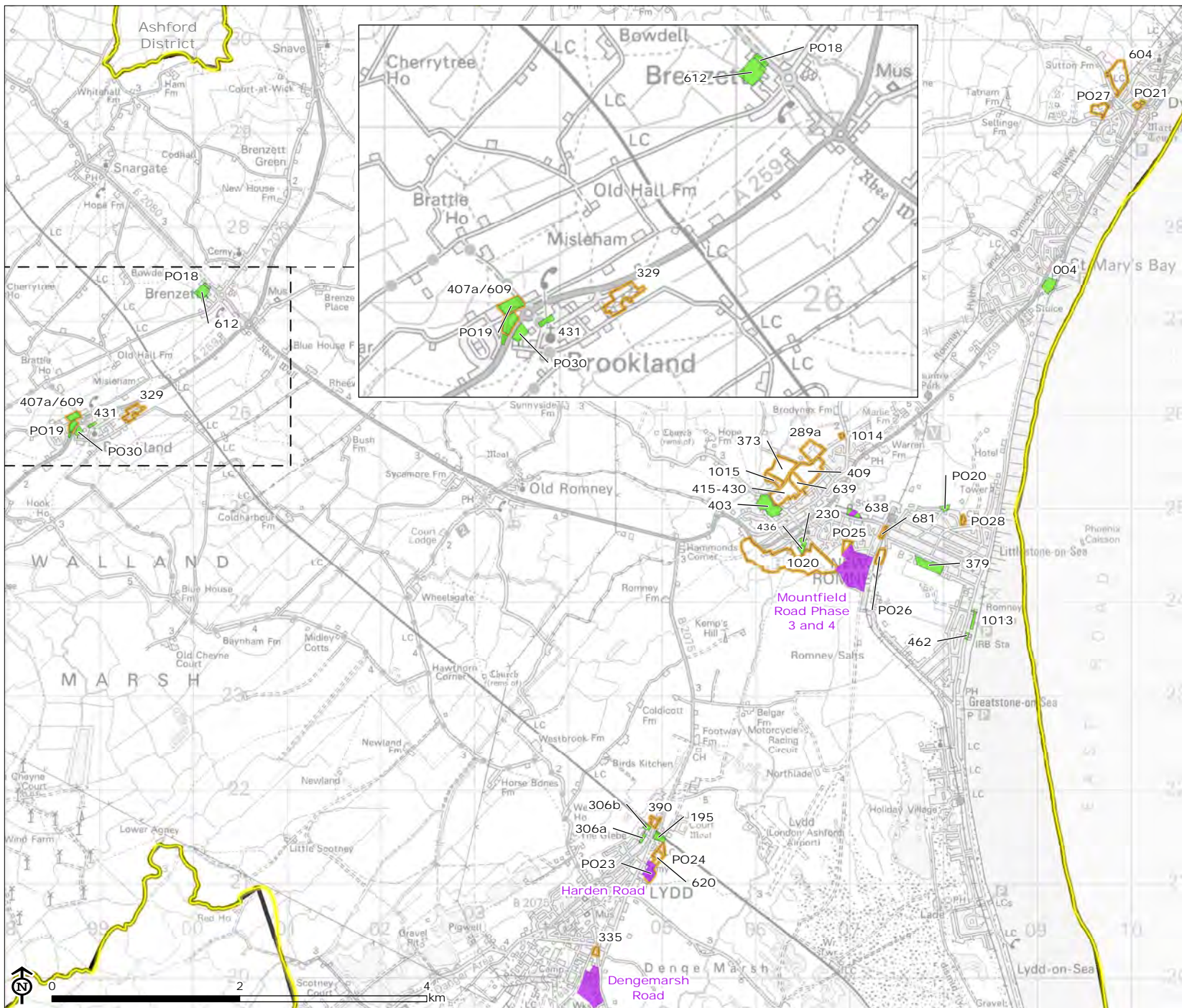
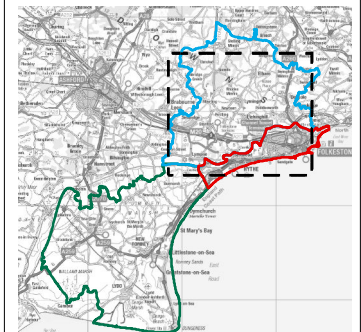


Figure 7.3: Proposed Submission Allocations and Reasonable Alternatives

North Downs Area

- Shepway District
- District boundary
- North Downs area
- Romney Marsh area
- Urban area
- Employment Allocation
- Housing Allocation
- Mixed Use Housing/
Employment Allocation
- Retail Employment Allocation
- Reasonable alternatives



Source: OS, Shepway District Council,

Map Scale @ A4: 1:70,000

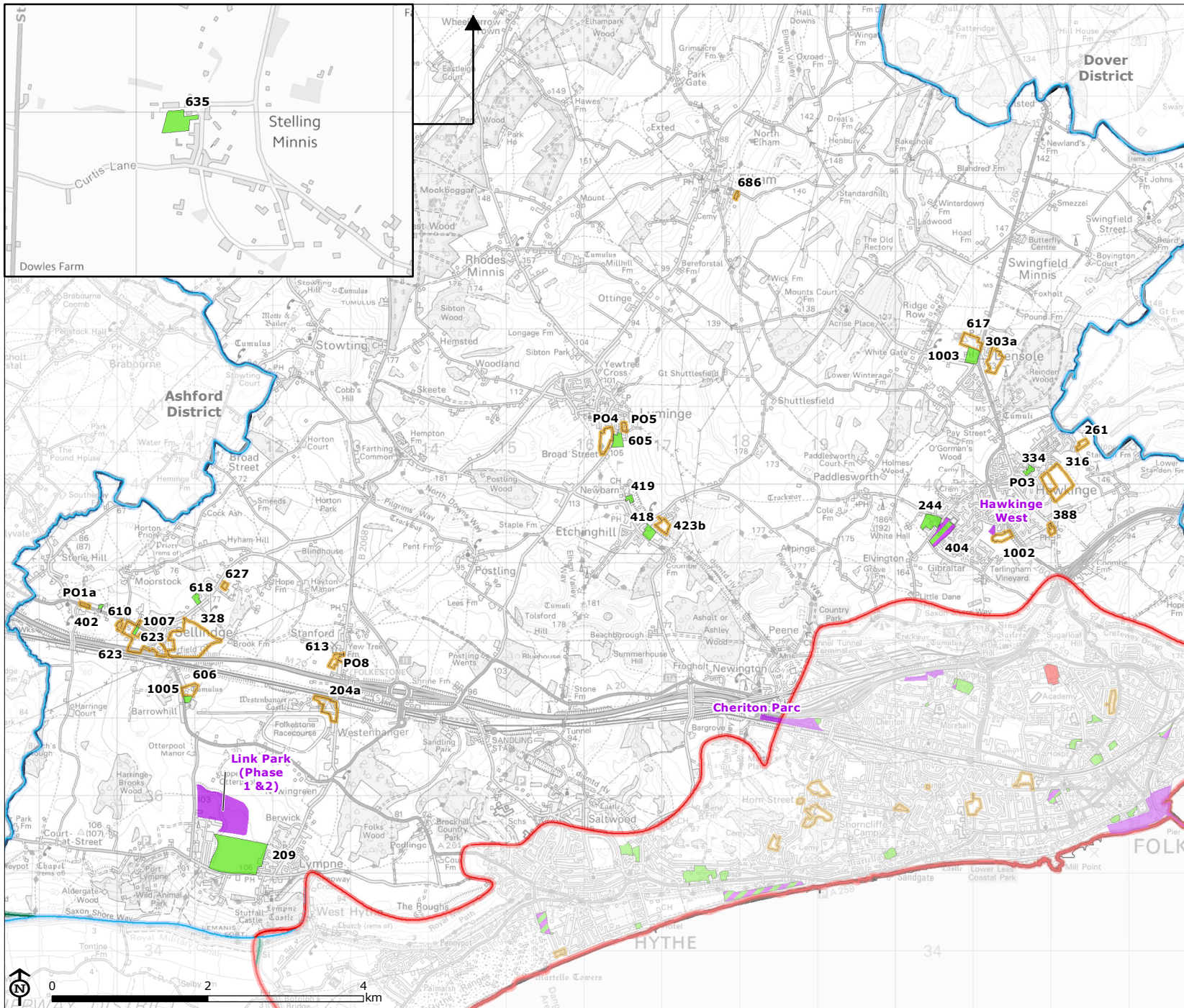


Table 7.1: Summary table illustrating policy-off SA scores of development site alternatives

Sites	SA 1: Flood Risk	SA 2: Climate Change Mitigation	SA 3: Community vibrancy, services and facilities	SA 4: Crime Reduction	SA 5(a) : Affordable Housing	SA 5(b) : Housing for Older People	SA 6: Employment Opportunities	SA 7: Historic Environment	SA 8(a) : Landscape Character	SA 8(b) : Settlement Coalescence	SA 8(c) : Townscape Regeneration	SA 9: Biodiversity	SA 10(a): Reduce the Need to Travel	SA 10(b) : Sustainable Transport Modes	SA 11(a): Efficient Use of Land	SA 11(b) : Soil Quality	SA 11(c) : Land Contamination	SA 11(d) : Minerals and Geology Safeguarding	SA 12: Water Quality	SA 13: Water Efficiency	SA 14: Open Space	No. of significant positive effects (++)	No. of significant negative effects (--)
	Proposed Submission Draft Allocation Sites ¹²³																						
004	--	0	0	0	++	++	0	-?	0	0	+++?	--	0	++	+	0	0	?	0	0	0	4	2
27B	0	0	++	0	++	++	++	-?	0	0	0	0	++	++	-	0	0	0	0	0	--?	6	1
045 ¹²⁴	0	0	++	0	++	++	++	--?	0	0	+++?	0	++	++	+	0	0	?	0	0	0	7	1
046	0	0	+	0	++	++	++	--?	0	0	+++?	0	++	++	+	0	0	0	0	0	0	6	1
103	-	0	+	0	++	++	++	0	0	0	+++?	--	++	++	+	0	++	0	0	0	0	7	1
113	0	0	0	0	++	++	++	-?	0	0	+++?	--	++	++	+	0	0	0	0	0	0	6	1
137	--	0	+	0	++	++	++	-?	0	0	+++?	-?	++	++	+	0	++	?	0	0	0	7	1
142	--	0	+	0	++	++	+	0	0	0	+++?	0	+	0	+	0	0	0	0	0	0	3	1
153	--	0	0	0	++	++	0	--?	-?	0	+++?	--	0	++	+	0	++	?	0	0	--?	5	4
195	0	0	0	0	++	++	++	--	0	0	+++?	-?	++	++	+	0	0	?	0	0	0	6	1
209	0	0	+	0	++	++	++	--?	-?	--?	0	-?	++	++	0	0	++	?	-?	0	0	6	2
244	0	0	0	0	++	++	0	-?	--?	0	+++?	0	0	++	+	-	0	?	-?	0	0	4	1
306a	0	0	0	0	+	++	++	-?	0	0	0	-?	++	++	-	0	0	0	0	0	0	4	0
313 ¹²⁵	0	0	0	0	++	++	+	-?	-?	0	0	--	+	++	+	0	0	?	0	0	0	3	1
334	0	0	+	0	++	++	0	-?	-?	0	0	0	0	++	-	-	0	0	-?	0	0	3	0

¹²³ This section lists the SHLAA sites selected for inclusion within site allocation policies within the proposed Submission Draft PPLP.

¹²⁴ SHLAA Sites 045 and 342 were merged into preferred site allocation UA7.

¹²⁵ SHLAA Sites 313 and 1018 were merged into preferred site allocation UA24

Sites	SA 1: Flood Risk	SA 2: Climate Change Mitigation	SA 3: Community vibrancy, services and facilities	SA 4: Crime Reduction	SA 5(a) : Affordable Housing	SA 5(b) : Housing for Older People	SA 6: Employment Opportunities	SA 7: Historic Environment	SA 8(a): Landscape Character	SA 8(b): Settlement Coalescence	SA 8(c) : Townscape Regeneration	SA 9: Biodiversity	SA 10(a): Reduce the Need to Travel	SA 10(b) : Sustainable Transport Modes	SA 11(a): Efficient Use of Land	SA 11(b): Soil Quality	SA 11(c): Land Contamination	SA 11(d): Minerals and Geology Safeguarding	SA 12: Water Quality	SA 13: Water Efficiency	SA 14: Open Space	No. of significant positive effects (++)	No. of significant negative effects (--)
342 126	0	0	++	0	++	++	++	--?	0	0	+++?	--	++	++	+	0	0	0	0	0	--?	7	3
346	-	0	++	0	++	++	++	-?	0	0	+++?	0	++	++	+	0	?	0	0	0	0	7	0
379 127	--	0	0	0	++	++	++	-?	0	0	0	-?	++	++	-	0	0	?	0	0	0	5	1
382	0	0	+	0	++	++	++	-?	0	0	+++?	0	++	++	+	0	++	0	0	0	0	7	0
402 128	0	0	0	0	+	0	0	-?	0	0	+++?	-?	0	++	+	--	0	?	0	0	0	2	1
403	--	0	+	0	++	++	+	-?	0	0	0	0	+	++	-	0	0	0	0	0	0	3	1
404	0	0	0	0	++	++	0	--?	--?	0	+++?	0	0	++	+	-	+++?	0	-?	0	0	5	2
418	0	0	0	0	++	++	0	-?	--?	0	0	-?	0	++	-	0	0	0	0	0	0	3	1
419	0	0	0	0	++	++	0	-?	-?	0	0	0	0	++	-	-	0	0	-?	0	0	3	0
425C	0	0	+	0	++	++	++	-?	0	0	+++?	0	++	++	+	-	0	0	-?	0	0	6	0
431	--	0	0	0	+	0	0	--?	0	0	+++?	0	0	++	+	--	0	0	0	0	0	2	3
436/2 30 ¹²⁹	0	0	+	0	+	++	++	-?	0	0	0	0	++	++	-	0	0	0	0	0	0	4	0
451b/ 306b	0	0	0	0	+	++	++	-?	0	0	0	-	++	++	-	0	0	0	0	0	0	4	0
458	0	0	+	0	++	++	++	-?	0	0	+++?	0	++	++	+	0	0	0	0	0	0	6	0
462	--	0	0	0	+	0	0	-?	0	0	0	--	0	++	-	0	0	0	0	0	0	1	2

¹²⁶ SHLAA Sites 045 and 342 were merged into preferred site allocation UA7.

¹²⁷ SHLAA Site 379 was reduced in size into preferred site allocation RM2.

¹²⁸ SHLAA Sites 402, 618, 627, 1005 and 1007 were merged into preferred site allocation ND6.

¹²⁹ SHLAA Site 436 was expanded to include SHLAA site 230 as preferred site allocation RM3.

Sites	SA 1: Flood Risk	SA 2: Climate Change Mitigation	SA 3: Community vibrancy, services and facilities	SA 4: Crime Reduction	SA 5(a) : Affordable Housing	SA 5(b) : Housing for Older People	SA 6: Employment Opportunities	SA 7: Historic Environment	SA 8(a) : Landscape Character	SA 8(b) : Settlement Coalescence	SA 8(c) : Townscape Regeneration	SA 9: Biodiversity	SA 10(a): Reduce the Need to Travel	SA 10(b) : Sustainable Transport Modes	SA 11(a): Efficient Use of Land	SA 11(b) : Soil Quality	SA 11(c): Land Contamination	SA 11(d): Minerals and Geology Safeguarding	SA 12: Water Quality	SA 13: Water Efficiency	SA 14: Open Space	No. of significant positive effects (++)	No. of significant negative effects (--)
605	0	0	+	0	++	++	0	??	??	??	0	0	0	++	-	-	0	0	??	0	0	3	2
612	--	0	+	0	++	++	0	??	0	0	0	0	0	++	-	--	0	0	0	0	0	3	2
618 130	0	0	0	0	++	++	0	??	0	0	0	0	0	++	-	--	0	0	0	0	0	3	1
621	0	0	+	0	++	++	+	??	0	0	0	0	+	++	-	0	0	0	0	0	0	3	0
622 131	0	0	+	0	++	++	+	??	??	0	0	--	+	++	-	0	0	?	0	0	0	3	1
625	0	0	+	0	++	++	++	??	0	0	+++?	0	++	++	+	0	0	0	0	0	0	6	0
635	0	0	0	0	+	0	0	??	--?	0	0	??	0	++	-	-	0	?	0	0	0	1	1
637	0	0	0	0	++	++	0	??	0	0	+++?	0	0	++	+	0	0	0	0	0	0	4	0
638	--	0	+	0	++	++	++	0	0	0	+++?	0	++	++	+	0	0	0	0	0	0	6	1
656	0	0	+	0	++	++	++	0	0	0	+++?	??	++	++	+	0	++	0	0	0	0	7	0
687	0	0	+	0	++	++	+	??	0	0	+++?	0	+	++	+	0	0	0	??	0	0	4	0
1003/ 385 132	0	0	0	0	++	++	0	??	--?	0	0	0	0	++	-	-	0	0	??	0	0	3	1
1005 133	0	0	0	0	++	++	0	??	0	0	0	0	0	++	-	--	0	?	0	0	0	3	1
1007 134	0	0	0	0	+	0	0	??	0	0	0	0	0	++	+	--	0	?	0	0	0	1	1
1013	--	0	0	0	++	++	0	??	0	0	+++?	--	0	++	+	0	0	?	0	0	0	4	2

¹³⁰ SHLAA Sites 402, 618, 627, 1005 and 1007 were merged into preferred site allocation ND6.

¹³¹ SHLAA Site 622 was expanded into preferred site allocation UA23.

¹³² SHLAA Site 1003 was reduced in size into preferred site allocation ND11.

¹³³ SHLAA Sites 402, 618, 627, 1005 and 1007 were merged into preferred site allocation ND6.

¹³⁴ SHLAA Sites 402, 618, 627, 1005 and 1007 were merged into preferred site allocation ND6.

Sites	SA 1: Flood Risk	SA 2: Climate Change Mitigation	SA 3: Community vibrancy, services and facilities	SA 4: Crime Reduction	SA 5(a) : Affordable Housing	SA 5(b) : Housing for Older People	SA 6: Employment Opportunities	SA 7: Historic Environment	SA 8(a): Landscape Character	SA 8(b): Settlement Coalescence	SA 8(c) : Townscape Regeneration	SA 9: Biodiversity	SA 10(a): Reduce the Need to Travel	SA 10(b): Sustainable Transport Modes	SA 11(a): Efficient Use of Land	SA 11(b): Soil Quality	SA 11(c): Land Contamination	SA 11(d): Minerals and Geology Safeguarding	SA 12: Water Quality	SA 13: Water Efficiency	SA 14: Open Space	No. of significant positive effects (++)	No. of significant negative effects (--)
1018 ¹³⁵	0	0	0	0	++	++	0	-?	0	0	+++?	-?	0	++	+	0	0	?	0	0	0	4	0
PO18	--	0	+	0	+	0	0	-?	0	0	0	0	0	++	-	--	0	0	0	0	0	1	2
PO19	--	0	0	0	++	++	0	-?	0	0	0	0	0	++	-	--	0	0	0	0	0	3	2
PO20	--	0	0	0	+	++	++	-?	0	0	0	-?	++	++	-	-	0	0	0	0	0	5	1
PO30	--	0	0	0	+	++	0	-?	0	0	0	0	0	++	-	--	0	0	0	0	0	2	2
Reasonable Alternative Sites¹³⁶																							
155	0	0	0	0	++	++	0	-?	0	0	0	-?	0	++	-	0	0	?	0	0	-?	3	0
158	-	0	0	0	++	++	0	-?	0	--?	0	--	0	++	-	0	++	?	0	0	0	4	2
204A	0	0	0	0	++	++	0	--?	-?	0	0	0	0	++	+	--	0	?	-?	0	0	3	2
261	0	0	0	0	+	0	0	-?	--?	0	0	0	0	++	-	-	0	0	-?	0	0	1	1
289A	--	0	+	0	++	++	+	-?	0	0	+++?	0	+	++	+	0	0	?	0	0	0	4	1
303A	0	0	0	0	++	++	0	-?	--?	0	0	-?	0	++	-	--	0	?	-?	0	0	3	2
316	0	0	+	0	++	++	0	-?	--?	0	0	-?	0	++	-	-	0	?	-?	0	0	3	1
328	0	0	0	0	++	++	0	--?	0	--?	0	-?	0	++	-	--	0	?	0	0	0	3	3
329	--	0	0	0	++	++	0	-?	0	0	0	0	0	++	+	--	++	0	0	0	0	4	2
335	--	0	+	0	+	0	++	-?	0	0	0	--	++	++	-	0	0	?	0	0	0	3	2
338	0	0	+	0	++	++	++	-?	0	0	0	0	++	++	-	0	0	0	0	0	--?	5	1
373	--	0	+	0	++	++	+	-?	0	0	0	0	+	0	-	--	0	0	0	0	0	2	2
388	0	0	+	0	++	++	0	-?	--?	0	0	-?	0	++	0	-	0	0	-?	0	0	3	1

¹³⁵ SHLAA Sites 313 and 1018 were merged into preferred site allocation UA24.

¹³⁶ This section lists the SHLAA sites not selected for inclusion within site allocation policies within the proposed Submission Draft PPLP.

Sites	SA 1: Flood Risk	SA 2: Climate Change Mitigation	SA 3: Community vibrancy, services and facilities	SA 4: Crime Reduction	SA 5(a) : Affordable Housing	SA 5(b) : Housing for Older People	SA 6: Employment Opportunities	SA 7: Historic Environment	SA 8(a) : Landscape Character	SA 8(b) : Settlement Coalescence	SA 8(c) : Townscape Regeneration	SA 9: Biodiversity	SA 10(a): Reduce the Need to Travel	SA 10(b) : Sustainable Transport Modes	SA 11(a): Efficient Use of Land	SA 11(b) : Soil Quality	SA 11(c) : Land Contamination	SA 11(d) : Minerals and Geology Safeguarding	SA 12: Water Quality	SA 13: Water Efficiency	SA 14: Open Space	No. of significant positive effects (++)	No. of significant negative effects (--)
390	-	0	0	0	+	++	++	-?	0	0	+++?	-?	++	++	+	0	++	?	0	0	0	6	0
405	0	0	+	0	++	++	++	-?	0	0	0	0	++	++	-	0	0	0	0	0	--?	5	1
407a/ 609 137	--	0	0	0	++	++	0	-?	0	0	0	0	0	++	-	--	0	0	0	0	0	3	2
409	--	0	+	0	++	++	++	--?	0	0	0	0	++	++	-	0	0	?	0	0	0	5	2
415/4 30	--	0	+	0	++	++	++	-?	0	0	0	0	++	++	-	0	0	0	0	0	0	5	1
416	0	0	+	0	++	++	++	--?	0	0	+++?	--	++	0	+	0	++	?	0	0	0	6	2
423b	0	0	0	0	++	++	0	-?	-?	0	0	-?	0	++	-	0	0	0	0	0	0	3	0
457	--	0	0	0	+	++	0	--?	0	-?	0	--	0	++	-	0	++	?	-?	0	0	3	3
602	0	0	0	0	++	++	0	-?	0	--?	0	-?	0	++	-	0	0	?	0	0	0	3	1
604	--	0	+	0	++	++	0	-?	0	0	0	-?	0	++	-	--	0	0	0	0	0	3	2
606	0	0	0	0	++	++	0	--?	0	0	0	0	0	++	-	--	0	?	0	0	0	3	2
610	0	0	0	0	++	++	0	-?	0	-?	0	0	0	++	-	--	0	?	0	0	0	3	1
613	0	0	0	0	++	0	0	-?	0	0	+++?	0	0	++	+	-	0	?	-?	0	0	3	0
617	0	0	0	0	++	++	0	-?	--?	0	0	0	0	++	-	-	0	0	-?	0	0	3	1
620	-	0	0	0	++	++	++	-?	0	0	0	-?	++	++	-	0	0	?	0	0	0	5	0
623	0	0	0	0	++	++	0	--?	0	--?	0	0	0	++	-	--	0	?	0	0	0	3	3
627 138	0	0	0	0	+	0	0	-?	-?	0	0	-?	0	++	-	--	0	?	0	0	0	1	1

¹³⁷ SHLAA Site 407a was expanded in size to include site 609 in preferred site allocation RM12.

¹³⁸ SHLAA Sites 402, 618, 627, 1005 and 1007 were merged into preferred site allocation ND6.

Sites	SA 1: Flood Risk	SA 2: Climate Change Mitigation	SA 3: Community vibrancy, services and facilities	SA 4: Crime Reduction	SA 5(a) : Affordable Housing	SA 5(b) : Housing for Older People	SA 6: Employment Opportunities	SA 7: Historic Environment	SA 8(a) : Landscape Character	SA 8(b) : Settlement Coalescence	SA 8(c) : Townscape Regeneration	SA 9: Biodiversity	SA 10(a): Reduce the Need to Travel	SA 10(b) : Sustainable Transport Modes	SA 11(a) : Efficient Use of Land	SA 11(b) : Soil Quality	SA 11(c) : Land Contamination	SA 11(d) : Minerals and Geology Safeguarding	SA 12: Water Quality	SA 13: Water Efficiency	SA 14: Open Space	No. of significant positive effects (++)	No. of significant negative effects (--)
636	0	0	+	0	++	++	++	--?	0	0	+++?	0	++	++	+	0	0	0	0	0	0	6	1
639	--	0	+	0	++	++	++	--?	0	0	0	0	++	++	-	0	0	?	0	0	0	5	1
640	0	0	+	0	+	0	0	-?	-?	0	0	--	0	++	-	0	0	?	0	0	0	1	1
674	0	0	+	0	+	0	++	0	0	0	0	0	++	++	+	0	0	0	0	0	0	3	0
681	-	0	+	0	+	0	++	-?	0	0	+++?	0	++	++	+	0	++	0	0	0	0	5	0
686/1004	0	0	+	0	+	0	0	-?	--?	0	0	0	0	++	-	-	0	?	-?	0	0	1	1
689	0	0	+	0	++	++	++	-?	0	0	0	0	++	++	-	0	0	0	0	0	0	5	0
1002	0	0	+	0	++	++	0	-?	--?	0	0	-?	0	++	-	-	++	0	-?	0	0	4	1
1014	--	0	0	0	0	0	0	-?	0	0	0	0	0	++	-	0	0	0	0	0	0	1	1
1015	--	0	+	0	++	++	+	-?	0	0	0	0	+	0	-	0	0	0	0	0	0	2	1
1020	--	0	+	0	++	++	++	--?	0	0	0	0	++	++	-	--	0	0	0	0	0	5	3
PO1a	0	0	0	0	+	++	0	-?	0	0	0	0	0	++	-	--	0	?	0	0	0	2	1
PO3	0	0	+	0	++	++	0	-?	--?	0	0	0	0	++	-	-	0	?	-?	0	0	3	1
PO4	0	0	+	0	++	++	0	--?	--?	-?	0	0	0	++	-	--	0	0	-?	0	0	3	3
PO5	0	0	+	0	+	0	0	--?	--?	0	0	0	0	++	-	-	?	0	-?	0	0	1	2
PO8	0	0	0	0	++	++	0	-?	0	0	0	0	0	++	+	-	0	?	-?	0	0	3	0
PO21	--	0	+	0	+	0	0	-?	0	0	+++?	0	0	++	+	0	0	0	0	0	0	2	1
PO23	-	0	+	0	++	++	++	-?	0	0	+++?	-?	++	++	+	0	?	?	0	0	0	6	0
PO24	-	0	0	0	++	++	++	-?	0	0	+++?	-?	++	++	+	0	0	?	0	0	0	6	0
PO25	--	0	+	0	++	++	++	-?	0	0	0	--	++	++	-	-	0	0	0	0	0	5	2

Sites	SA 1: Flood Risk	SA 2: Climate Change Mitigation	SA 3: Community vibrancy, services and facilities	SA 4: Crime Reduction	SA 5(a) : Affordable Housing	SA 5(b) : Housing for Older People	SA 6: Employment Opportunities	SA 7: Historic Environment	SA 8(a): Landscape Character	SA 8(b): Settlement Coalescence	SA 8(c) : Townscape Regeneration	SA 9: Biodiversity	SA 10(a): Reduce the Need to Travel	SA 10(b): Sustainable Transport Modes	SA 11(a): Efficient Use of Land	SA 11(b): Soil Quality	SA 11(c): Land Contamination	SA 11(d): Minerals and Geology Safeguarding	SA 12: Water Quality	SA 13: Water Efficiency	SA 14: Open Space	No. of significant positive effects (++)	No. of significant negative effects (--)
PO26	-	0	+	0	++	++	++	-?	0	0	+++?	-	++	++	+	-	?	0	0	0	0	6	2
PO27	-	0	+	0	+	++	0	-?	0	0	+++?	-?	++	++	-	0	0	0	0	0	--?	4	2
PO28	-	0	+	0	++	++	++	-?	0	0	+++?	-	++	++	+	0	0	?	0	0	0	6	1

Summary of SA findings

SA1: Reduce the risk of flooding, taking into account the effects of climate change

Proposed Submission Draft PPLP sites

- 7.10 Approximately 70% of sites scored a negligible effect. These are sites that have no land or a small proportion of land (<5%) within Flood Zones 3a or 3b or less than 25% of their land within an area of 'moderate' flood risk. Eleven of the sites scored a significant negative effect due to having a significant amount of land ($\geq 25\%$) within Flood Zones 3a or 3b or being located within an area of 'extreme' or 'significant' flood risk. The remaining sites scored a minor negative effect.

Reasonable alternative sites

- 7.11 Just over one third of the reasonable alternative sites scored a significant negative effect. These are sites that have a significant proportion of land ($\geq 25\%$) within Flood Zones 3a or 3b or less than 25% of their land within an area of 'moderate' flood risk.

SA2: Increase energy efficiency in the built environment, the proportion of energy use from renewable sources and resilience to a changing climate and extreme weather

- 7.12 All sites were considered to have a negligible effect on this objective. This is due to the fact that the location of housing sites will not have an effect on levels of domestic energy consumption and the potential for renewable energy use. These factors are influenced by design and construction methods encouraged through detailed development management policies.

SA3: Promote community vibrancy, provide opportunities to access services, facilities and environmental assets for all and avoid creating inequalities of opportunity for access

Proposed Submission Draft PPLP sites

- 7.13 Relatively few sites were considered to have significant effects on this objective. Preferred sites 27B, 045, 342 and 346 scored a significant positive effect for this objective due to the fact that they are located in one of the 20% most deprived areas on the Indices of Multiple Deprivation. Developments in these locations were considered to have greater potential to contribute to the regeneration and of existing and the creation of more vibrant communities. The remaining sites resulted in either a minor positive or negligible effects on this objective.

Reasonable alternative sites

- 7.14 There were no significant effects associated with the reasonable alternative sites in relation to this objective. Approximately half of the sites scored a minor positive effect and the other half scored a negligible effect.

SA4: Reduce crime and the fear of crime

- 7.15 All sites were considered to have a negligible effect on this objective. The effects of new developments on levels of crime and fear of crime depend on detailed design factors, such as the incorporation of green space or the use of appropriate lighting.

SA5: Improve the provision of homes, including affordable housing, having regard to the needs of all sections of society, including the elderly

5(a) Affordable housing

Proposed Submission Draft PPLP sites

- 7.16 The majority of sites were expected to have a significant positive effect on this objective due to the fact that the majority of sites are likely to be able to accommodate 15 or more dwellings or are on land with an area of 0.5 ha or more. Sites that meet these thresholds will be required to provide 30% affordable dwellings under Core Strategy Policy CSD1, with significant positive effects on this aspect of the SA objective.

Reasonable alternative sites

- 7.17 The majority of the reasonable alternative sites were also considered to have significant positive effects for the same reasons.

5(b) Dwellings for older people

Proposed Submission Draft PPLP sites

- 7.18 The majority of sites were expected to have a significant positive effect on this objective due to the fact that the majority of sites are likely to be able to accommodate 10 or more dwellings. Sites that met this threshold will be required to construct 20% of market dwellings to Lifetime Homes standards under Core Strategy Policy CSD2. Assuming a development density of 30 dwellings per hectare (dph) as above, this equates to sites of ≥ 0.33 ha. Allocated sites equal to or over this size were assessed as having a significant positive effect on this aspect of the SA objective.

Reasonable alternative sites

- 7.19 The majority of the reasonable alternative sites were also considered to have significant positive effects for the same reasons.

SA6: Support the creation of high quality and diverse employment opportunities

Proposed Submission Draft PPLP sites

- 7.20 Almost half of the sites scored a significant positive effect on this objective due to their close proximity (within convenient walking distance (800 m)) to a Major Employment Site. The remaining sites scored minor positive and negligible effects.

Reasonable alternative sites

- 7.21 The reasonable alternative sites performed similarly to the selected sites, with almost half of the sites expected to have a significant positive effect and the remaining sites minor and negligible effects.

SA7: Conserve and enhance the fabric and setting of historic assets

Proposed Submission Draft PPLP sites

- 7.22 Approximately three quarters of the sites scored a minor negative but uncertain effect due to their scoring a 3 or 4¹³⁹ in KCC's heritage assessment. A lot of these sites are located within areas of general archaeological potential. Approximately one quarter of the sites scored a significant negative but uncertain effect due to their scoring a 1 or 2¹⁴⁰ in KCC's heritage assessment. A negligible effect was expected for the remaining sites.

Reasonable alternative sites

- 7.23 The reasonable alternative sites performed similarly to the selected sites with approximately three quarters of the sites scoring a minor negative but uncertain effect.

SA8: Conserve, and where relevant enhance, the quality, character and local distinctiveness of the landscape and townscape

8(a) Landscape

Proposed Submission Draft PPLP sites

- 7.24 Six sites scored a potential significant negative uncertain effect on this portion of the objective. This was due to the sites being within the Kent Downs AONB which is designated for its landscape character and features. The remaining effects were minor negative, uncertain or negligible.

¹³⁹ Development of the proposed site is likely to have some impact on an asset or the setting of an asset which can be addressed through mitigation secured on any planning permission. And/or development of the proposed site is likely to have some minor impact on an asset or the setting of an asset which can be addressed through mitigation secured on any planning permission.

¹⁴⁰ Proposed site includes a significant asset and development is likely to have a major impact which should be avoided. And/or proposed site includes a significant asset and development is likely to have a significant impact or is very close to an asset and likely to significantly affect its setting – further more detailed assessment is needed prior to a decision.

Reasonable alternative sites

- 7.25 A similar number of the reasonable alternative sites sit within the AONB, and were assessed as having the potential for significant negative uncertain effects on the objective for the reasons stated above. The majority of sites were assessed as likely to have a negligible effect.

8(b) Settlement character: coalescence

Proposed Submission Draft PPLP sites

- 7.26 One site, ID number 209, scored a significant negative effect on this part of the objective. The site contains a significant proportion of the open land between the settlement of Lymgne to the east and the Lymgne Industrial Park. Development of the entire site would result in the perceived coalescence of Lymgne with the neighbouring Lymgne Industrial Park. Whilst not representing coalescence of separate settlements, this could nevertheless have a significant negative effect on the character of Lymgne. There is an element of uncertainty attached to this effect until such time as the detailed design, scale and landscaping of the site are known. Site 605 scores a minor negative uncertain effect. All other sites scored a negligible effect.

Reasonable alternative sites

- 7.27 Four reasonable alternative sites, sites 158, 328, 602 and 623, scored a significant negative effect on this objective. Like site 209, these sites represent over 50% of an existing strategic gap between settlements.

8(c) Townscape: regeneration

Proposed Submission Draft PPLP sites

- 7.28 Over half of the sites scored a significant positive uncertain effect on this portion of the SA objective due to the fact that a significant proportion of the sites sit within urban areas on brownfield land. Redevelopment of these sites was considered to have the potential to make a significant contribution to the regeneration of the wider townscapes within which they sit.

Reasonable alternative sites

- 7.29 Significantly fewer reasonable alternative sites were considered to have a significant positive uncertain effect. This was due to the fact that the majority of the reasonable alternative sites are on greenfield land where there is more limited potential for regeneration and therefore negligible effects on this part of the objective overall.

SA9: Conserve and enhance biodiversity

Proposed Submission Draft PPLP sites

- 7.30 Almost one quarter of the sites scored a significant negative effect as they are located entirely or partly within a national and/or local BAP Priority Habitat or Local Wildlife Site. The remaining effects were negligible with some minor negative and minor negative uncertain effects.

Reasonable alternative sites

- 7.31 A small proportion of sites scored a significant negative effect for the same reason as the selected sites. The remaining effects were negligible with some minor negative effects.

SA10: Reduce the need to travel; increase opportunities to choose sustainable transport modes and avoid development that will result in significant traffic congestion

10(a) Reduce the need to travel

Proposed Submission Draft PPLP sites

- 7.32 Almost half of the sites scored a significant positive effect as they are within convenient walking distance (800 m) of a Major Employment Site. Therefore, there would be greater opportunity for new residents to access employment opportunities more easily, minimising travel distances and times.

Reasonable alternative sites

- 7.33 Approximately half of the reasonable alternative sites scored a significant positive effect due to their being within convenient walking distance of Major Employment Sites.

10(b) Increase opportunities to choose sustainable transport modes

Proposed Submission Draft PPLP sites

- 7.34 All but one site scored a significant positive effect on this part of the objective due to the sites being within walking distance of a rail station (800 m) or bus stop (400 m). One site, ID number 142, scored a negligible effect due as it is not within a convenient walking distance of a railway station or bus stop.

Reasonable alternative sites

- 7.35 The reasonable alternatives performed similarly; however there were three sites which were considered to have a negligible effect. The remaining sites scored a significant positive effect as they are within walking distance of a rail station (800 m) or bus stop (400 m).

SA11: Use land efficiently and safeguard soils, geology and economic mineral reserves

11(a) Efficient use of land

Proposed Submission Draft PPLP sites

- 7.36 More than half of the sites are on previously developed land. This represents a more efficient use of land compared to developing on greenfield sites. Therefore, these sites were considered to have a minor positive effect on this part of the objective. All but one of the remaining sites scored a minor negative effect because they are not located on previously developed land. Site 209 scored a negligible effect - although on previously developed land, there are no longer significant buildings within the site and much of the hardstanding has become overgrown with vegetation.

Reasonable alternative sites

- 7.37 The vast majority of the reasonable alternative sites are on undeveloped greenfield land. Therefore, the majority of their effects were considered to be minor negative as opposed to minor positive.

11(b) Soil quality and quantity

Proposed Submission Draft PPLP sites

- 7.38 Approximately one quarter of the sites scored a significant negative effect on this SA objective due to the fact that they are on Grade 1 or 2 agricultural land. The majority of the sites scored a negligible effect with a small number of sites located on Grade 3 agricultural land scoring a minor negative effect.

Reasonable alternative sites

- 7.39 The reasonable alternative sites performed similarly to the selected sites with approximately one quarter of the sites scoring a significantly negative effect.

11(c) Land contamination

Proposed Submission Draft PPLP sites

- 7.40 A small number of sites scored significant positive effects in relation to this objective they are on contaminated land. Housing allocations located on contaminated land would be required to remediate the land during construction, with significant positive effects on this objective.

Reasonable alternative sites

- 7.41 The reasonable alternative sites performed similarly to the selected sites with a small number of sites scoring significant positive effects for the reasons stated above.

11(d) Minerals safeguarding

Proposed Submission Draft PPLP sites

- 7.42 Approximately one third of the sites were identified as being within a Mineral Safeguarding Area resulting in an uncertain effect on this objective. All other sites were assessed as likely to have a negligible effect.

Reasonable alternative sites

- 7.43 The reasonable alternative sites performed slightly less well than the selected sites with approximately half of the alternative sites being within a Mineral Safeguarding Area. All other sites were assessed as likely to have a negligible effect.

SA12: Maintain and improve the quality of groundwater, surface waters and coastal waters

Proposed Submission Draft PPLP sites

- 7.44 No significant effects were identified for this SA objective. The majority of sites resulted in a negligible effect. A small number of sites resulted in a minor negative uncertain effect due to the site being located in ward with acknowledged waste water capacity issues or being located in a Groundwater Source Protection Zone.

Reasonable alternative sites

- 7.45 The reasonable alternative sites performed similarly to the selected sites. The majority of sites resulted in a negligible effect with a small number resulting in a minor negative uncertain effect for the reasons outlined above.

SA13: Use water resources efficiently

- 7.46 All sites were considered to have a negligible effect on this objective. Development standards in relation to water efficiency are not related to a development site's location.

SA14: Protect and enhance open space and ensure that it meets local needs

Proposed Submission Draft PPLP sites

- 7.47 Selected sites 27B, 153 and 342 scored a significant negative effect due to the sites being located on land designated as open space. The effects were assessed as uncertain as it is not yet known the extent to which the development would contribute to alternative provision of open space that is lost to development. All other sites were expected to have a negligible effect.

Reasonable alternative sites

- 7.48 Three reasonable alternative sites (site 338, 405 and PO27) scored a significant negative effect. Despite not being formally designated as a public open space, site 338 is currently used as allotments, site PO27 is a recreation ground and site 405 is a playing field. All but one of the remaining sites were expected to have a negligible effect. One site, ID number 155, scored a minor negative uncertain effect. This was due to approximately 17% of the site being located on land designated as open space. It was recognised that this open space could be incorporated into the design of the development or alternative open space could be provided elsewhere to compensate for any loss.

Recommendations

- 7.49 Recommendations on how significant adverse effects and in some cases minor adverse effects against specific SA objectives could be mitigated on particular sites were included in the detailed appraisal matrices (see **Appendix 7**). These recommendations were reviewed by Shepway District Council and where appropriate were incorporated into the preferred site allocation policies before they were published for public comments and suggestions. The recommendations focussed on incorporating site-based measures for reducing flood risk protecting the setting of listed buildings, protecting the character of the AONB, preventing coalescence, or reducing the loss of open space and/or agricultural land. The majority of the recommendations were included

in the final draft of the policies, before the Preferred Options draft was consulted on in October-November 2016.

Reasons for selecting sites

- 7.50 The reasonable alternative sites generally performed less well against the SA objectives than the proposed Submission Draft PPLP sites. However, there were a number of exceptions, notably the following reasonable alternative sites, for which no significant negative effects were recorded:
- SHLAA Site: 155 - Rectory Field, Eversley Road, Hythe
 - SHLAA Site: 390 - forms part of Development at North Lydd
 - SHLAA Site: 423b - Land east of former railway, Teddars Leas Road, Etchinghill
 - SHLAA Site: 613 - Land at Rear of Barnstormers, Stone Street, Stanford
 - SHLAA Site: 620 - Land at Harden Road, Lydd
 - SHLAA Site: 674 - Digby Road, CT20 3NB
 - SHLAA Site: 681 - Commercial Land, Station Approach, New Romney
 - SHLAA Site: 689 - Westbrook School Playing Field, Shornclyffe Road, Folkestone
 - SHLAA Site: PO8 - Land at rear of Touchwood, Stone Street, Stanford
 - SHLAA Site: PO23 - Walland & Denge Marsh
 - SHLAA Site: PO24 – Land at Harden Road, Lydd
- 7.51 There were also some reasonable alternative sites that scored a high number of significant positive effects although they also had one or more significant negative effects recorded. In this respect they scored similarly to some of the sites that were selected for inclusion in the proposed Submission Draft PPLP.
- 7.52 While these reasonable alternative sites may have performed better than a number of the proposed Submission Draft PPLP sites, there were other planning considerations identified through the District's SHLAA assessment process which determined which options were taken forward. **Appendix 5** explains the reasoning behind the selection and non-selection of each site option appraised.

8 SA findings for the proposed Submission Draft Places and Policies Plan

- 8.1 LUC appraised all preferred policies set out in the Preferred Options version of the PPLP published for consultation in October 2016. The significant effects and recommendations identified through the appraisal of the preferred policies informed the development of the policies within the proposed Submission Draft of the PPLP. For example, the SA raises concern that in some site allocation policies, no site-based mitigation measures have been included to reduce the risk of flooding. Consequently, several of the site allocations within the proposed Submission Draft of the PPLP were modified to include additional flood resistant and resilient construction measures.
- 8.2 Like the Preferred Options policies appraised in 2016, the development management policies set out in the proposed Submission Draft have been appraised against each sustainability objective. Individual appraisal matrices for each proposed Submission Draft development management policy can be found in **Appendix 8** and the findings are summarised in **Table 8.2** below.
- 8.3 The proposed Submission Draft site allocation policies have been appraised using the SA site assumptions outlined in **Appendix 1**. **Figures 8.1, 8.2** and **8.3** illustrate the locations of the proposed Submission Draft site allocations across the District's three broad areas:
- Urban Area of Folkestone and Hythe
 - Romney Marsh
 - North Downs
- 8.4 The SA Report that supported the Preferred Options version of the PPLP published for consultation in October 2016 contained detailed appraisals in Appendix 7, which are summarised in Chapter 7 of that report. The 'policy-off' effects of these SHLAA sites have been reviewed by Shepway Council to inform the selection of proposed Submission Draft site allocations and the definition of proposed Submission Draft site allocation policies. The appraisals have now been updated to reflect the changes made to the most recent proposed Submission Draft version of the PPLP, and are presented in **Appendix 7** and **Chapter 8** of this SA Report. The effects of each proposed Submission Draft site allocation policy, including mitigation and enhancement measures outlined within each policy, have been appraised to assess the overall effects of development against each SA objective. These overall, 'policy-on', scores are summarised in **Table 8.1** below.
- 8.5 The proposed Submission version of the PPLP begins by setting out a series of general policy requirements for sites allocated in the PPLP, requiring that all development meets the requirements set out in the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG). The general requirements also draw attention to relevant policies in the adopted Core Strategy (2013) and Part 2 of the proposed Submission PPLP. The policies in the adopted Core Strategy were subject to appraisal in 2012 and 2013. The policies in Part 2 of the proposed Submission version of the PPLP have been subject to appraisal below.
- 8.6 The following policies within the proposed Submission Draft version of the PPLP were appraised:

Part One of the PPLP – Places

- Policy UA1 - East Station Goods Yard, Folkestone
- Policy UA2 - Rotunda and Marine Parade Car Parks, Lower Sandgate Road, Folkestone
- Policy UA3 - The Royal Victoria Hospital, Radnor Park Avenue, Folkestone
- Policy UA4 - 3-5 Shorncliffe Road, Folkestone

- Policy UA5 - Ingles Manor, Castle Hill Avenue, Folkestone
- Policy UA6 - Shepway Close, Folkestone
- Policy UA7 - Former Gas Works, Ship Street, Folkestone
- Policy UA8 - Highview School, Moat Farm Road, Folkestone
- Policy UA9 - Brockman Family Centre, Cheriton
- Policy UA10 - The Cherry Pickers Public House, Cheriton
- Policy UA11 - Affinity Water, Shearway Road, Cheriton
- Policy UA12 - Encombe House, Sandgate
- Policy UA13 - Smiths Medical Campus, Hythe
- Policy UA14 - Land at Station Road, Hythe
- Policy UA15 - Land at the Saltwood Care Centre, Hythe
- Policy UA16 - St Saviour's Hospital, Seabrook Road, Hythe
- Policy UA17 - Foxwood School, Seabrook Road, Hythe
- Policy UA18 - Princes Parade, Hythe
- Policy UA19 - Hythe Swimming Pool, Hythe
- Policy RM1 - Land off Cherry Gardens, Littlestone
- Policy RM2 - Land off Victoria Road West, Littlestone
- Policy RM3 - Land rear of the Old School House, Church Lane, New Romney
- Policy RM4 - Land west of Ashford Road, New Romney
- Policy RM5 - Land adjoining The Marsh Academy, Station Road, New Romney
- Policy RM6 - Kitewell Lane, rear of the Ambulance Station, Lydd
- Policy RM7 - Land South of Kitewell Lane, Lydd
- Policy RM8 - Station Yard, Station Road, Lydd
- Policy RM9 - Former Sands Motel, Land adjoining pumping station, Dymchurch Road, St Mary's Bay
- Policy RM10 - Land rear of Varne Boat Club, Coast Drive, Greatstone
- Policy RM11 - Car park, Coast Drive, Greatstone
- Policy RM12 - The Old Slaughterhouse, 'Rosemary Corner', Brookland
- Policy RM13 - Lands north and south of Rye Road, Brookland
- Policy RM14 - Land adjacent to Moore Close, Brenzett
- Policy ND1 - Former Officers' Mess, Aerodrome Road, Hawkinge
- Policy ND2 - Mill Lane to the rear of Mill Farm, Hawkinge
- Policy ND3 - Land adjacent to Kent Battle of Britain Museum, Aerodrome Road, Hawkinge
- Policy ND4 - Land east of Broad Street, Lyminge
- Policy ND5 - General Sellindge Policy
- Policy ND6 - Former Lympne Airfield
- Policy ND7 - Camping and Caravan Site, Stelling Minis
- Policy ND8 - Land adjoining 385 Canterbury Road, Densole
- Policy ND9 - Etchinghill Nursery, Etchinghill
- Policy ND10 - Land adjacent to the Golf Course, Etchinghill

Part Two of the PPLP – Development management policies

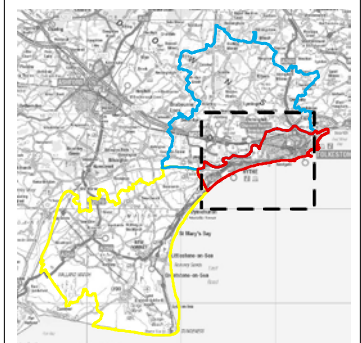
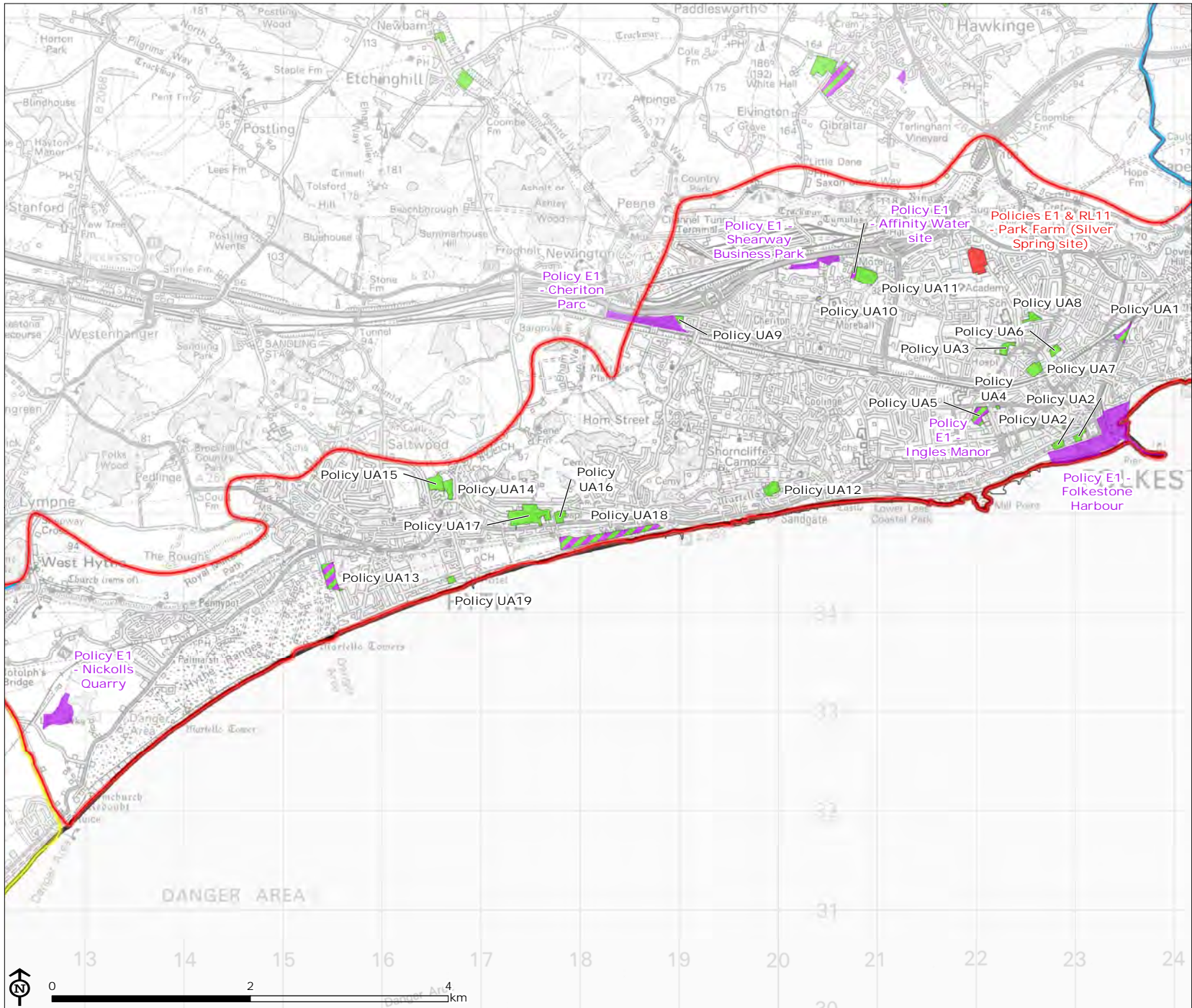
- Policy HB1 - Quality Places Through Design
- Policy HB2 - Cohesive Design
- Policy HB3 - Internal and External Space Standards
- Policy HB4 - Self-build and Custom Housebuilding Development
- Policy HB5 - Replacement Dwellings in the Countryside
- Policy HB6 - Local Housing Needs in Rural Areas
- Policy HB7 - Dwellings to Support a Rural-based Enterprise
- Policy HB8 - Alterations and Extensions to Residential Buildings
- Policy HB9 - Annexe Accommodations
- Policy HB10 - Development of Residential Gardens
- Policy HB11 - Loss of Residential Care Homes and Institutions
- Policy HB12 - Development of New or Extended Residential Institutions (C2 Use)
- Policy HB13 - Houses in Multiple Occupation (HMOs)
- Policy HB14 – Accommodation for Gypsies and Travellers
- Policy E1 - Allocated Employment Sites
- Policy E2 - Redevelopment of Existing Employment Sites
- Policy E3 - Tourism
- Policy E4 - Hotels and Guest Houses
- Policy E5 - Touring and Static Caravan, Chalet and Camping Sites
- Policy E6 - Farm Diversification
- Policy E7 - Reuse of Rural Buildings
- Policy E8 - Provision of Fibre to the Premises
- Policy RL1 - Retail Hierarchy
- Policy RL2 - Folkestone Major Town Centre
- Policy RL3 - Hythe Town Centre
- Policy RL4 - New Romney Town Centre
- Policy RL5 - Cheriton District Centre
- Policy RL6 - Sandgate Local Centre
- Policy RL7 - Other District and Local Centres
- Policy RL8 - Development Outside Town, District and Local Centres
- Policy RL9 - Design, Location and Illumination of Advertisements
- Policy RL10 - Shop Fronts, Blinds and Security Shutters
- Policy RL11 - Former Silver Spring Site, Park Farm
- Policy RL12 - Former Harbour Railway Line
- Policy C1 - Creating A Sense of Place
- Policy C2 - Safeguarding Community Facilities
- Policy C3 - Provision of Open Space
- Policy C4 - Children’s Play Space

- Policy T1 - Street Hierarchy and Site Layout
- Policy T2 - Parking Standards
- Policy T3 - Residential Garages
- Policy T4 - Parking for Heavy Goods Vehicles (HGVs)
- Policy T5 - Cycle Parking
- Policy NE1 - Enhancing and Managing Access to the Natural Environment
- Policy NE2 - Biodiversity
- Policy NE3 - Protecting the District's Landscapes and Countryside
- Policy NE4 - Equestrian Development
- Policy NE5 - Light Pollution and External Illumination
- Policy NE6 - Land Stability
- Policy NE7 - Contaminated Land
- Policy NE8 - Integrated Coastal Zone Management
- Policy NE9 - Development Around the Coast
- Policy CC1 - Reducing Carbon Emissions
- Policy CC2 - Sustainable Design and Construction
- Policy CC3 - Sustainable Drainage Systems (SuDS)
- Policy CC4 - Wind Turbine Development
- Policy CC5 - Small Scale Wind Turbines and Existing Development
- Policy CC6 - Solar Farms
- Policy HW1 - Promoting Healthier Food Environments
- Policy HW2 - Improving the Health and Wellbeing of the Local Population and Reducing Health Inequalities
- Policy HW3 - Development That Supports Healthy, Fulfilling and Active Lifestyles
- Policy HW4 - Promoting Active Travel
- Policy HE1 - Heritage Assets
- Policy HE2 - Archaeology
- Policy HE3 - Local List of Heritage Assets
- Policy HE4 - Folkestone's Historic Gardens

Shepway Places and Policies Local Plan Sustainability Appraisal

Figure 8.1: Preferred Allocation Policies

- Urban Area**
-  Shepway District
 -  District boundary
 -  North Downs area
 -  Romney Marsh area
 -  Urban area
 -  Employment Allocation
 -  Housing Allocation
 -  Mixed Use Housing/ Employment Allocation
 -  Retail Employment Allocation









Source: OS, Shepway District Council,

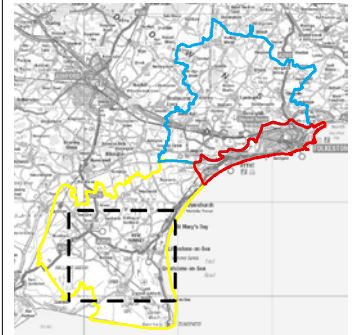
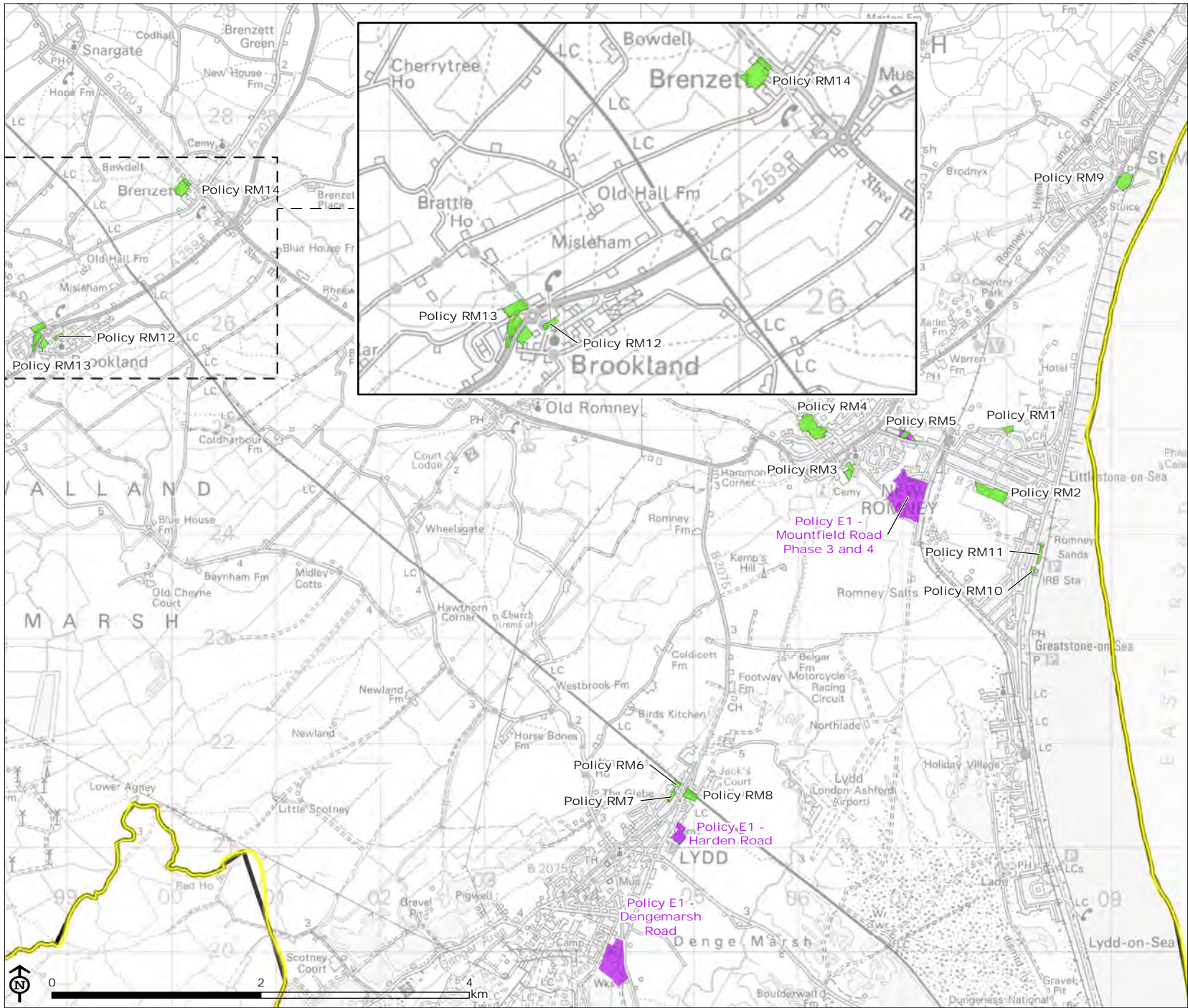
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Shepway Places and Policies Local Plan Sustainability Appraisal

Figure 8.2: Preferred Allocation Policies

- Romney Marsh Area
-  Shepway District
 -  District boundary
 -  Romney Marsh area
 -  Employment Allocation
 -  Housing Allocation
 -  Mixed Use Housing/ Employment Allocation



Source: OS, Shepway District Council,








Map Scale @ A4: 1:52,000

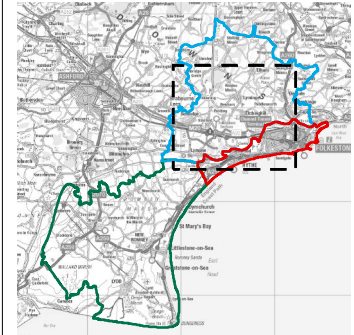
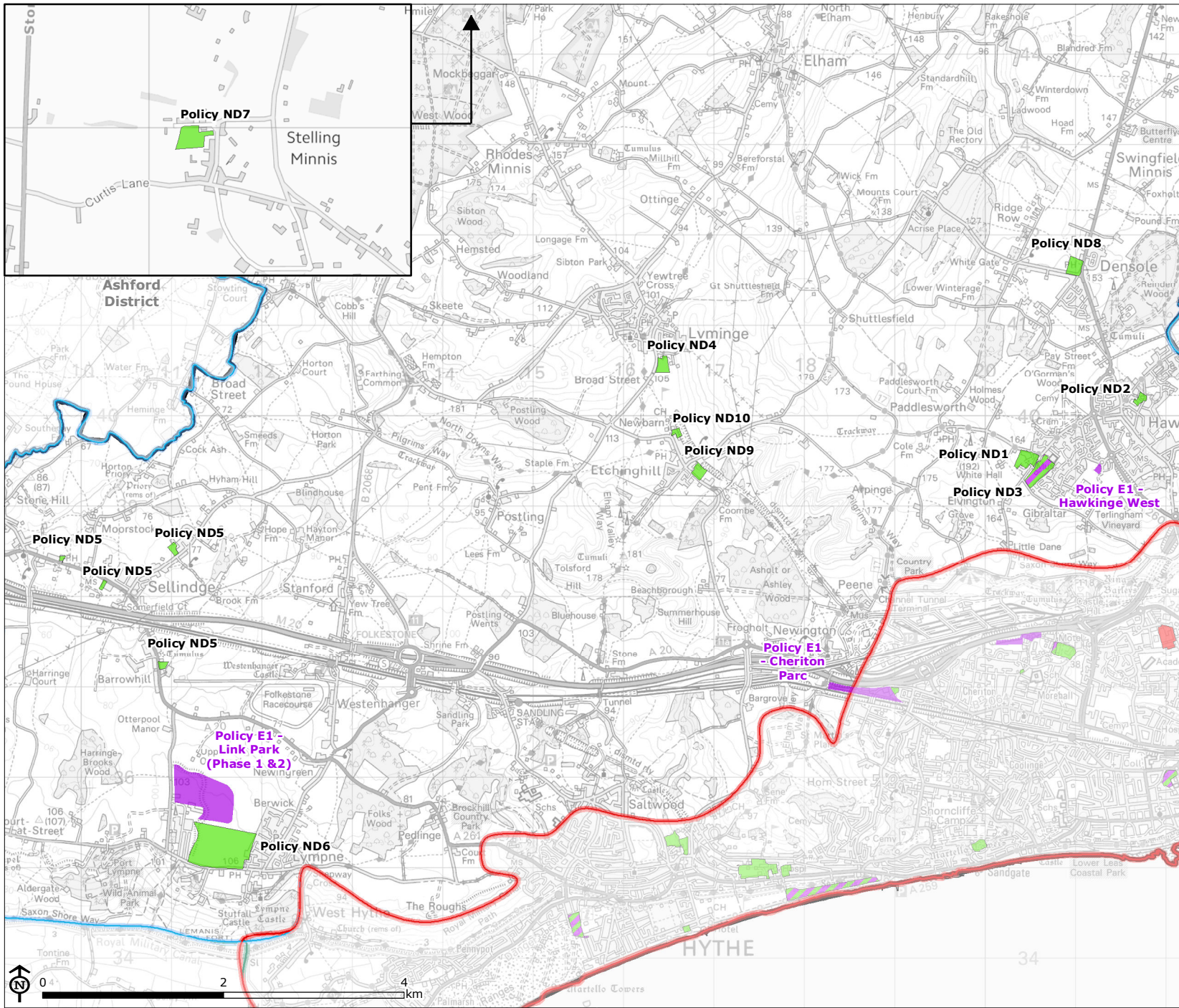


Shepway Places and Policies Local Plan Sustainability Appraisal

Figure 8.3: Preferred Allocation Policies

North Downs Area

-  Shepway District
-  District boundary
-  North Downs area
-  Romney Marsh area
-  Urban area
-  Employment Allocation
-  Housing Allocation
-  Mixed Use Housing/ Employment Allocation
-  Retail Employment Allocation



Source: OS, Shepway District Council,

Map Scale @ A4: 1:60,000

Table 8.1: Summary table illustrating SA scores of the proposed Submission Draft PPLP site allocation policies

Site Allocation Policies	SA 1: Flood Risk	SA 2: Climate Change Mitigation	SA 3: Community vibrancy, services and facilities	SA 4: Crime Reduction	SA 5(a) : Affordable Housing	SA 5(b) : Housing for Older People	SA 6: Employment Opportunities	SA 7: Historic Environment	SA 8(a) : Landscape Character	SA 8(b): Settlement Coalescence	SA 8(c) : Townscape Regeneration	SA 9: Biodiversity	SA 10(a) : Reduce the Need to Travel	SA 10(b): Sustainable Transport Modes	SA 11(a): Efficient Use of Land	SA 11(b): Soil Quality	SA 11(c): Land Contamination	SA 11(d): Minerals and Geology Safeguarding	SA 12: Water Quality	SA 13: Water Efficiency	SA 14: Open Space
Urban Area																					
Policy UA1	0	0	+	0	++	++	++	0	0	0	++	0	++	++	+	0	++	0	0	0	0
Policy UA2	0	0	++	0	++	++	++	-	0	0	++	-	++	++	+	0	+	?	0	0	--?
Policy UA3	-	0	+	0	++	++	++	+	+	0	++	-	++	++	+	0	++	0	0	0	+
Policy UA4	0	0	+	0	++	++	++	0	+	0	++	0	++	++	+	0	0	0	0	0	0
Policy UA5	0	0	+	0	++	++	++	-	+	0	++	0	++	++	+	0	0	0	0	0	0
Policy UA6	0	0	++	0	++	++	++	0	0	0	0	+	++	++	-	0	0	0	0	0	-
Policy UA7	0	0	++	0	++	++	++	0	+	0	++	+	++	++	+	0	+	0	0	0	+
Policy UA8	0	0	+	+	++	++	++	0	0	0	++	0	++	++	+	0	0	0	0	0	0
Policy UA9	0	0	0	0	++	++	0	0	0	0	++	+	0	++	+	0	0	0	0	0	+
Policy UA10	0	0	+	0	++	++	+	0	0	0	++	0	+	++	+	0	0	0	-?	0	+
Policy UA11	0	0	+	0	++	++	++	0	+	0	++	0	++	++	+	-	0	0	0	0	+
Policy UA12	0	0	0	0	++	++	++	0	+	0	++	+	++	++	+	0	0	0	0	0	0
Policy UA13	-	0	+	0	++	++	++	0	0	0	++	0	++	++	+	0	++	?	0	0	0
Policy UA14	0	0	+	0	++	++	+	0	+	0	0	+	+	++	-	0	0	0	0	0	0
Policy UA15	0	0	+	0	0	++	+	0	0	0	0	-	+	++	-	0	0	?	0	0	0
Policy UA16	0	0	0	0	++	++	+	0	0	0	+	0	+	++	+	0	0	?	0	0	+
Policy UA17	0	0	0	0	++	++	0	0	0	0	++	0	0	++	+	0	0	?	0	0	+
Policy UA18	--	0	+	0	++	++	+	-	-	0	++	-	0	++	+	0	++	?	0	0	-?
Policy UA19	--	0	+	0	++	++	+	0	0	0	++	0	+	0	+	0	0	0	0	0	+

Site Allocation Policies	SA 1: Flood Risk	SA 2: Climate Change Mitigation	SA 3: Community vibrancy, services and facilities	SA 4: Crime Reduction	SA 5(a) : Affordable Housing	SA 5(b) : Housing for Older People	SA 6: Employment Opportunities	SA 7: Historic Environment	SA 8(a) : Landscape Character	SA 8(b) : Settlement Coalescence	SA 8(c) : Townscape Regeneration	SA 9: Biodiversity	SA 10(a) : Reduce the Need to Travel	SA 10(b) : Sustainable Transport Modes	SA 11(a) : Efficient Use of Land	SA 11(b) : Soil Quality	SA 11(c) : Land Contamination	SA 11(d) : Minerals and Geology Safeguarding	SA 12: Water Quality	SA 13: Water Efficiency	SA 14: Open Space
Romney Marsh																					
Policy RM1	-	0	0	0	+	++	++	0	+	0	0	0	++	++	-	-	0	0	+	0	0
Policy RM2	-	0	+	0	++	++	++	0	0	0	0	+	++	++	-	0	0	0	+	0	+
Policy RM3	0	0	+	0	++	++	++	0	+	0	0	+	++	++	-	0	0	0	+	0	0
Policy RM4	-	0	+	0	++	++	+	0	+	0	0	+	+	++	-	0	0	0	+	0	+
Policy RM5	-	0	+	0	+?	+?	++	0	+	0	++	0	++	++	+	0	0	0	+	0	0
Policy RM6	0	0	0	0	+	0	++	0	0	0	0	0	++	++	-	0	+	0	+	0	0
Policy RM7	0	0	0	0	+	0	++	0	0	0	0	-	++	++	-	0	+	0	+	0	0
Policy RM8	0	0	+	0	++	++	++	-	0	0	++	0	++	++	+	0	0	?	+	0	0
Policy RM9	-	0	+	0	++	++	0	0	0	0	++	-	0	++	+	0	0	?	0	0	+
Policy RM10	-	0	0	0	+	0	0	0	0	0	0	-	0	++	-	0	0	0	0	0	0
Policy RM11	-	0	0	0	++	++	0	0	0	0	++	-	0	++	+	0	0	?	0	0	0
Policy RM12	--	0	0	0	+	0	0	0	0	0	++	+	0	++	+	--	0	0	0	0	0
Policy RM13	-	0	+	0	++	++	0	0	+	0	0	+	0	++	-	--	0	0	+	0	+
Policy RM14	-	0	+	0	++	++	0	0	0	0	0	+	0	++	-	--	0	0	+	0	0
North Downs																					
Policy ND1	0	0	0	0	++	++	0	0	-	0	++	0	0	++	+	-	0	?	0	0	+
Policy ND2	0	0	+	0	+	++	0	0	0	0	0	0	0	++	-	-	0	0	0	0	0
Policy ND3	0	0	+	0	++	++	++	0	-	0	++	0	0	++	+	-	++	0	0	0	+
Policy ND4	0	0	+	0	++	++	0	0	-	0	0	0	0	++	-	-	0	0	0	0	+
Policy ND5	0	0	0	0	++	++	0	0	+	0	++	0	0	++	-	--	++	?	0	0	0
Policy ND6	0	0	++	0	++	++	++	-	0	-	0	0	++	++	0	0	++	?	0	0	0

Site Allocation Policies	SA 1: Flood Risk	SA 2: Climate Change Mitigation	SA 3: Community vibrancy, services and facilities	SA 4: Crime Reduction	SA 5(a) : Affordable Housing	SA 5(b) : Housing for Older People	SA 6: Employment Opportunities	SA 7: Historic Environment	SA 8(a) : Landscape Character	SA 8(b): Settlement Coalescence	SA 8(c) : Townscape Regeneration	SA 9: Biodiversity	SA 10(a): Reduce the Need to Travel	SA 10(b): Sustainable Transport Modes	SA 11(a): Efficient Use of Land	SA 11(b) : Soil Quality	SA 11(c): Land Contamination	SA 11(d): Minerals and Geology Safeguarding	SA 12: Water Quality	SA 13: Water Efficiency	SA 14: Open Space
Policy ND7	0	0	0	0	+	++	0	0	-	0	0	+	0	++	-	-	0	?	0	0	+
Policy ND8	0	0	0	0	++	++	0	0	-	0	0	0	0	++	-	-	0	0	0	0	+
Policy ND9	0	0	+	0	++	++	0	0	-	0	0	0	0	++	-	0	0	0	0	0	+
Policy ND10	0	0	0	0	++	++	0	-	0	0	0	0	0	++	-	-	0	0	0	0	+
Retail Allocation Policy																					
Policy RL11	0	0	+	0	0	0	++	0	0	0	++	-	++	++	+	0	++	0	0	0	0

Table 8.2: Summary table illustrating SA scores of the proposed Submission Draft PPLP development management policies

Development Management Policies	SA 1: Flood Risk	SA 2: Climate Change Mitigation	SA 3: Community Vibrancy, Services and Facilities	SA 4: Crime Reduction	SA 5: Housing	SA 6: Employment Opportunities	SA 7: Historic Environment	SA 8: Landscapes and Townscapes	SA 9: Biodiversity	SA 10: Transport Infrastructure	SA 11: Efficient Use of Land and Resources	SA 12: Water Quality	SA 13: Water Efficiency	SA 14: Open Space
Housing and Built Environment														
Policy HB1	0	0	+	+	+/-	0	+	+	+	+	0	0	0	+
Policy HB2	0	0	+	0	+	0	0	++	0	+	0	0	0	0
Policy HB3	0	0	0	0	++	0	+	0	0	+	0	0	0	+
Policy HB4	0	0	0	0	++	0	0	0	0	0	0	0	0	0
Policy HB5	0	0	0	0	++	0	0	++	0	0	+	0	0	0
Policy HB6	0	0	0	0	++	0	0	+	0	0	0	0	0	0
Policy HB7	0	0	0	0	++	+	0	0	0	0	0	0	0	0
Policy HB8	0	0	0	0	0	0	+	++	0	0	0	0	0	0
Policy HB9	0	0	0	0	0	0	+	++	0	0	0	0	0	0
Policy HB10	0	0	0	0	0	0	0	++	+	0	0	0	0	0
Policy HB11	0	0	0	0	++	0	+	0	0	0	+	0	0	0
Policy HB12	0	+	+	0	++	0	0	0	0	0	0	0	0	+
Policy HB13	0	0	0	0	++	0	0	+	0	0	0	0	0	0
Policy HB14	0	0	+	0	++	0	+	+	+	0	0	0	0	0
Economy														
Policy E1	--	0	+	0	0	++	--	++/--	--	+/-	++/--/?	-?	0	0
Policy E2	0	0	0	0	+	0	0	0	0	0	+	0	0	0
Policy E3	0	0	0	0	0	++	+	+	+	+	0	0	0	0
Policy E4	0	0	0	0	0	++	0	0	0	0	+	0	0	0
Policy E5	0	0	0	0	+	++	0	+	0	0	+	0	0	0
Policy E6	0	0	0	0	0	++	0	++	0	0	+	0	0	0
Policy E7	0	0	0	0	+?	++	+	+	0	0	+	0	0	0

Development Management Policies	SA 1: Flood Risk	SA 2: Climate Change Mitigation	SA 3: Community Vibrancy, Services and Facilities	SA 4: Crime Reduction	SA 5: Housing	SA 6: Employment Opportunities	SA 7: Historic Environment	SA 8: Landscapes and Townscapes	SA 9: Biodiversity	SA 10: Transport Infrastructure	SA 11: Efficient Use of Land and Resources	SA 12: Water Quality	SA 13: Water Efficiency	SA 14: Open Space
Policy E8	0	0	++	0	0	++	0	0	0	0	0	0	0	0
Retail and Leisure														
Policy RL1	0	0	++	0	0	++	0	0	0	0	0	0	0	0
Policy RL2	0	0	++	+	++	++	0	+	0	0	0	0	0	0
Policy RL3	0	0	++	+	0	+	0	+	0	0	0	0	0	0
Policy RL4	0	0	++	+	0	+	0	+	0	0	0	0	0	0
Policy RL5	0	0	++	+	+	+	0	+	0	0	0	0	0	0
Policy RL6	0	0	++	+	+	+	0	+	0	0	0	0	0	0
Policy RL7	0	0	++	0	+	+	0	0	0	0	0	0	0	0
Policy RL8	0	0	++	0	0	0	0	+	0	+	0	0	0	0
Policy RL9	0	0	0	0	0	0	0	+	0	0	0	0	0	0
Policy RL10	0	0	0	0	0	0	++	+	0	0	0	0	0	0
Policy RL12	0	++	++	0	0	+	0	0	0	++	0	0	0	0
Community														
Policy C1	0	0	++	+	+	+	+	++	0	0	0	0	0	0
Policy C2	0	0	++	0	0	0	0	0	0	0	+	0	0	0
Policy C3	+	0	++	0	0	0	0	0	+	0	0	0	0	++
Policy C4	0	0	++	0	0	0	0	0	0	0	0	0	0	++
Transport														
Policy T1	0	0	+	++	0	+	0	0	0	++	0	0	0	0
Policy T2	0	+	0	0	0	0	0	+	0	+/-	0	0	0	0
Policy T3	0	0	0	0	0	0	0	+	0	+/-	0	0	0	0
Policy T4	0	0	0	0	0	0	0	+	0	+	0	0	0	0

Development Management Policies	SA 1: Flood Risk	SA 2: Climate Change Mitigation	SA 3: Community Vibrancy, Services and Facilities	SA 4: Crime Reduction	SA 5: Housing	SA 6: Employment Opportunities	SA 7: Historic Environment	SA 8: Landscapes and Townscapes	SA 9: Biodiversity	SA 10: Transport Infrastructure	SA 11: Efficient Use of Land and Resources	SA 12: Water Quality	SA 13: Water Efficiency	SA 14: Open Space
Policy T5	0	+	0	0	0	0	0	0	0	+	0	0	0	0
Natural Environment														
Policy NE1	0	0	++	0	0	0	0	0	++	0	0	0	0	++
Policy NE2	0	0	+	0	0	0	0	0	++	0	++	0	0	0
Policy NE3	0	0	0	0	0	0	0	++	0	0	0	0	0	0
Policy NE4	0	0	0	0	0	0	0	++	0	0	++	+	0	0
Policy NE5	0	0	0	0	0	0	0	+	+	0	0	0	0	+
Policy NE6	0	0	0	0	0	0	0	0	0	0	++	0	0	0
Policy NE7	0	0	0	0	0	0	+	0	0	0	++	+	0	0
Policy NE8	++	+	+	0	0	+	+	+	+	+	0	+	0	0
Policy NE9	+	0	+	0	0	0	+	+	+	+	+	+	0	0
Climate Change														
Policy CC1	0	++	0	0	+/-	0	0	0	0	0	0	0	0	0
Policy CC2	+	++	+	0	+/-	0	0	0	+	0	0	+?	+	+
Policy CC3	++	++	0	0	+	0	0	0	+?	0	0	+?	+	0
Policy CC4	0	++	0	0	0	0	0	0	0	0	0	0	0	0
Policy CC5	0	++	0	0	0	0	+	+	+	0	0	0	0	0
Policy CC6	0	++	0	0	0	0	+	+	+	0	+	0	0	0
Health and Wellbeing														
Policy HW1	0	0	++	0	0	-	+	0	0	0	0	0	0	0
Policy HW2	0	0	++	0	0	0	0	0	0	0	0	0	0	0
Policy HW3	0	0	++	0	0	0	0	0	+	0	+	0	0	+
Policy HW4	0	+	++	0	0	0	0	0	0	++	0	0	0	0

Development Management Policies	SA 1: Flood Risk	SA 2: Climate Change Mitigation	SA 3: Community Vibrancy, Services and Facilities	SA 4: Crime Reduction	SA 5: Housing	SA 6: Employment Opportunities	SA 7: Historic Environment	SA 8: Landscapes and Townscapes	SA 9: Biodiversity	SA 10: Transport Infrastructure	SA 11: Efficient Use of Land and Resources	SA 12: Water Quality	SA 13: Water Efficiency	SA 14: Open Space
Historic Environment														
Policy HE1	0	0	++	0	0	+	++	0	0	0	+	0	0	0
Policy HE2	0	0	0	0	0	0	++	++	0	0	0	0	0	0
Policy HE3	0	0	0	0	0	0	++	++	0	0	0	0	0	0
Policy HE4	0	0	+	0	0	0	++	++	0	0	0	0	0	0

Summary of SA findings

SA1: Reduce the risk of flooding, taking into account the effects of climate change

Development management policies

- 8.7 Policy NE8 and Policy CC3 were assessed as having significant positive effects on this SA objective, as both policies seek to reduce the risk of flooding. Policy E1 scored a significant negative effect on account of the policy allocating employment sites in areas at risk of flooding.

Site allocation policies

- 8.8 Policies UA18, UA19 and RM12 scored a significant negative effect. These policies make no reference to flood risk, despite the land within each site being wholly designated as Flood Zones 2 and 3. However, it should be noted that the General Policy Requirements section at the beginning of the proposed Submission PPLP states that proposals for development within zones at risk of flooding, or at risk of wave over-topping near to the coastline, will require a Site Specific Flood Risk Assessment, in accordance with national policy and guidance and Core Strategy Policy SS3: Place-Shaping and Sustainable Settlements Strategy. Local Plan Policies NE8: Integrated Coastal Zone Management and NE9: Development Around The Coast provide further guidance.

SA2: Increase energy efficiency in the built environment, the proportion of energy use from renewable sources and resilience to a changing climate and extreme weather

Development management policies

- 8.9 Policies CC1 to CC6 were assessed as having significant positive effects on this SA objective. These six policies make up chapter 15 of the PPLP, Climate Change, which is devoted to mitigating and adapting to the effects of climate change. Policy RL12 for the Former Harbour Railway Line is also expected to have a significant positive effect on this SA objective as the policy seeks to provide a cycle and pedestrian route to the harbour, which is likely to encourage the uptake of more sustainable means of transport and reduce the associated greenhouse gas emissions.

Site allocation policies

- 8.10 All site allocation policies scored a negligible effect on this SA objective. The policies make no reference to domestic energy consumption or the potential for renewable energy use. These factors are influenced by design and construction methods encouraged through detailed development management policies.

SA3: Promote community vibrancy, provide opportunities to access services, facilities and environmental assets for all and avoid creating inequalities of opportunity for access

Development management policies

- 8.11 Approximately one third of the development management policies scored a significant positive effect. These policies seek to provide opportunities to access services or promote the vitality and viability of areas in the District. These policies include retail and leisure policies, all policies within Chapter 12, Community, and Chapter 16, Health and Wellbeing. Individual policies in chapters 10 (Economy), 14 (Natural Environment) and 17 (Historic Environment) also scored significant positive effects.

Site allocation policies

- 8.12 Few sites resulted in significant effects for this objective. Policies UA2, UA6, UA7, RM5 and ND6 were considered to have significant positive effects on this objective. This is due to the fact that policies UA2, UA6 and UA7 sit within areas classified as being in the 20% most deprived areas on the Indices of Multiple Deprivation. Policies RM5 and ND6 are not, but will provide community facilities as well as being located within easy walking distance of a number of other facilities. Developments in these locations were considered to have greater potential to contribute to the regeneration and of existing and the creation of new vibrant communities. The remaining policies were assessed as having either a minor positive effect or negligible effect.

SA4: Reduce crime and the fear of crime

Development management policies

- 8.13 Policy T1 was the only development management policy to score a significant positive effect on this SA objective. The policy supports active frontages, for the purposes of natural surveillance and creating characterful places. Minor positive or negligible scores were predicted for all other development management policies.

Site allocations policies

- 8.14 All but one of the site allocations policies were considered to have a negligible effect on this objective because the effects of new developments on levels of crime and fear of crime depend on detailed design factors, such as the incorporation of green space or the use of appropriate lighting. Policy UA8 scored a minor positive effect for this objective because it seeks to provide links to the local footpath network which should benefit from natural surveillance in order to minimise opportunities for anti-social behaviour.

SA5: Improve the provision of homes, including affordable housing, having regard to the needs of all sections of society, including the elderly

Development management policies

- 8.15 Policies HB3 to HB7, HB11 to HB14 and RL2 all scored a significant positive effect on this objective due to each policy seeking to contribute to the variety of housing supply in the District. Policies HB1, CC1 and CC2 scored minor mixed effects due to the fact that each seeks to implement a high quality of design which may impact the affordability of housing as well as contributing positively to the quality of people's lives. The majority of policies were considered to have a negligible effect on this objective, with a few policies resulting in a minor positive effect.

5(a) Affordable housing

Site allocations policies

- 8.16 The majority of site allocations policies were assessed as having a significant positive effect on this objective as they are likely to be able to accommodate 15 or more dwellings or are on land with an area of 0.5 ha or more. Sites that meet these thresholds will be required to provide 30% affordable dwellings with significant positive effects on this aspect of the SA objective.

5(b) Dwellings for older people

Site allocations policies

- 8.17 The majority of sites were assessed as likely to have a significant positive effect on this objective as they are likely to be able to accommodate 10 or more dwellings. Sites that meet this threshold are required to construct 20% of market dwellings to Lifetime Homes standards. Assuming a development density of 30 dwellings per hectare (dph) as above, this equates to sites of ≥ 0.33 ha. Allocated sites equal to or over this size were assessed as having a significant positive effect on this aspect of the SA objective.

SA6: Support the creation of high quality and diverse employment opportunities

Development management policies

- 8.18 Policies E1, E3 to E8 and RL1 to RL2 all scored a significant positive effect on this objective as they each support the improvement and diversity of the District's economy. The majority of development management policies were considered to have a negligible effect on this objective, with a small number of policies resulting in a minor positive effect. One policy, HW1, scored a minor negative effect because it restricts the number of hot food takeaways in the District, resulting in possible adverse effects on employment numbers.

Site allocation policies

- 8.19 Approximately half of the site allocations policies scored a significant positive effect on this objective. Sites within convenient walking distance (800 m) of a Major Employment Site were assumed to have a significant positive effect on this SA objective by minimising travel distances and enabling easier access to employment opportunities. Furthermore, some allocations include

the provision of new retail and employment spaces facilitating new economic growth in the District.

SA7: Conserve and enhance the fabric and setting of historic assets

Development management policies

- 8.20 Policies HE1 to HE4 and RL10 all scored a significant positive effect on this objective as each seeks to protect and enhance the historic environment in the District. Policy E1 was assessed as having the potential for a significant negative effect on this objective due to the fact that the policy allocates the Ingles Manor and Folkestone Harbour sites, which both sit in the urban area of Folkestone and contain a number of listed buildings. Both sites also sit within the Folkestone Leas and Bayle Conservation Area. In addition there is potential for buried archaeological remains associated with the Ingles Manor complex as well as a background potential for earlier periods. The employment sites at Nickolls Quarry, Link Park, Shearway Business Park, Park Farm and Affinity Water are also within close proximity to various other heritage assets including Scheduled Monuments and a Listed Building.
- 8.21 The remaining policies were considered to have a negligible effect on this objective, with a small number of policies resulting in minor positive effects.

Site allocation policies

- 8.22 No significant effects were identified on this objective. The majority of the site allocations policies resulted in negligible uncertain effects. One site (UA3) scored a minor positive effect on this objective as the main building on the site, which is considered to be an undesignated heritage asset, is to be re-used and converted into residential apartments. The proposal will help preserve the character and setting of the Victorian element of the building. The remaining sites scored a minor negative or negligible effect.

SA8: Conserve, and where relevant enhance, the quality, character and local distinctiveness of the landscape and townscape

Development management policies

- 8.23 Approximately one quarter of the development management policies scored a significant positive effect on this objective on account of the policies seeking to protect and enhance the District's landscapes and townscapes. Policy E1 was assessed as having the potential for a mixed effect on this objective given that each employment site is entirely or partly located on previously developed land, the redevelopment of which has the potential to make a significant positive contribution to landscape/townscape character within and in the immediate vicinity of each site. However, a large number of the employment sites are located in the Kent Downs AONB or within the setting of the AONB, resulting in a significant adverse effect on the area's character. Development of Link Park would result in a significant risk of settlement coalescence in combination with site allocation Policy ND6 which sets out plans for a westward extension to the village of Lympne towards the Lympne Industrial Park and its Link Park extensions. The remaining policies were considered to have either a negligible or minor positive effect.

8(a) Landscape

Site allocation policies

- 8.24 No significant effects were identified on this part of the objective. A small number of sites are within the Kent Downs AONB and have the potential to have significant negative effects but each policy offers some protection through design and layout requirements so these effects were downgraded to minor negative. The majority of the sites scored a negligible effect, with a small number of minor positive effects.

8(b) Settlement character: coalescence

Site allocation policies

- 8.25 Almost all the site allocations policies scored a negligible effect against this part of the objective. There was one exception: Policy ND6 scored minor negative effects. Policy ND6 scored a minor negative effect because although it represents the vast majority of open land between the settlement of Lympne to the east and Lympne Industrial Park, text within the policy states that

parcel 2 of the site will remain undeveloped so as to retain separation between Lympe and Lympe Industrial Park.

8(c) Townscape: regeneration

Site allocation policies

- 8.26 Approximately half of the site allocation policies scored a significant positive effect on this part of the objective. This was because a significant proportion of the sites were on brownfield land, the redevelopment of which has the potential to make a significant contribution to urban regeneration.

SA9: Conserve and enhance biodiversity

Development management policies

- 8.27 Policy NE1 and NE2 scored a significant positive effect as the policies directly relate to protecting the natural environment and specifically biodiversity. Policy CC3 has the potential to have a minor positive effect on this objective given that the policy incorporates SuDS into its development, which can help provide a habitat for wildlife. The effect was recognised as uncertain as wildlife will only flourish for certain types of SuDS solutions. Policy E1, on the other hand, scored a significant negative effect on this objective, due to the fact that two of the allocated employment sites, Dengemarsch Road and Mountfield Road, contain BAP Priority Habitats. No provision is made within the policy for the conservation and enhancement of these protected habitats and species. The remaining development management policies were considered to have minor positive or negligible effects against this objective.

Site allocation policies

- 8.28 No significant effects were identified on this objective. The majority of the site allocations policies resulted in negligible effects. Approximately one third of the site allocations policies scored a minor positive effect, with the remaining policies scoring a minor negative effect. These minor negative effects reflected allocations which are in close proximity to sensitive biodiversity assets; however, provisions are made within the policies to help conserve and protect the species and habitats for which these assets have been designated. Furthermore, it should be noted that the General Policy Requirements section at the beginning of the proposed Submission PPLP states that proposals for development should be supported by a Phase 1 Habitat Survey to assess the presence of Protected Species on or near the sites, in accordance with Core Strategy Policy CSD4: Green Infrastructure of Natural Networks, Open Spaces and Recreation.

SA10: Reduce the need to travel; increase opportunities to choose sustainable transport modes and avoid development that will result in significant traffic congestion

Development management policies

- 8.29 Policies RL12, T1 and HW4 scored a significant positive effect on this objective on account of the policies encouraging people to walk, cycle and use public transport. Policies T2 and T3 scored a mixed effect. The policies support more sustainable means of transport and reducing congestion, however both policies make provision for parking encouraging the ongoing high ownership and use of private cars for commuting and accessing services which would have a negative effect on uptake of alternative sustainable modes of travel. Policy E1 was considered to have a mixed effect on this objective. Although a large proportion of the employment sites are located within convenient walking distance of existing residential areas and bus stops, the creation of new employment opportunities will increase the number of people travelling to and from these locations. The policy makes no provision for sustainable transport modes to encourage people to commute to these locations via sustainable alternatives the car. The majority of policies were considered to have a negligible effect on this objective, with a few policies resulting in a minor positive effect.

10(a) Reduce the need to travel

Site allocation policies

- 8.30 Approximately half of the site allocations policies scored a significant positive effect on this objective given that they are within convenient walking distance (800 m) of a Major Employment Site minimising travel distances and enabling easier access to employment opportunities.

10(b) Increase opportunities to choose sustainable transport modes

Site allocation policies

- 8.31 Almost all sites scored a significant positive effect on this part of the objective as almost all sites are within walking distance of a rail station (800 m) or bus stop (400 m). Site allocation UA19 was the only exception scoring a negligible effect against this portion of the objective.

SA11: Use land efficiently and safeguard soils, geology and economic mineral reserves

Development management policies

- 8.32 Policies NE2, NE4, NE6 and NE7 scored a significant positive effect on this SA objective. Policy NE2 seeks to conserve and enhance sites of geodiversity value. Policy NE4 seeks to prevent the loss of the best and most versatile agricultural land. Policy NE6 seeks to bring unstable land, wherever possible, back into productive use and Policy NE7 contributes to improving efficient use of land through the utilisation of previously contaminated land, following remediation.
- 8.33 Policy E1, on the other hand, scored a mixed significant positive/negative uncertain effect. The significant positive effect was due to the fact that all of the employment sites are entirely or partly located on previously developed land, which is considered to be a more efficient use of land compared to the development of greenfield sites. Additionally, five of the employment sites are entirely or partly located on contaminated land, which would require remediation but bring the land back into productive use. However, the employment sites allocated at Nickolls Quarry and Cheriton Parc contain a significant proportion of land recorded as Grade 2 agricultural land, which would be lost to development. This would result in a significant negative effect. An uncertain effect was given due to several of the allocated employment sites being within Minerals Safeguarding Areas.
- 8.34 The majority of the remaining policies were considered to have a negligible effect on this objective, with a few policies resulting in a minor positive effect.

11(a) Efficient use of land

Site allocation policies

- 8.35 No significant effects were identified on this objective. The policy text makes no reference to efficiency of land use so the scores are based on site location. More than half of the sites are on previously developed land and scored a minor positive effect. The remaining sites are located on greenfield land and have scored a minor negative effect. One site, site ND6, scored a negligible effect given that the site is located on the former Lympe airfield, which could be considered to be previously developed land (including hardstanding); however, there are no longer any significant buildings within this relatively large site, and much of the hardstanding has become overgrown with vegetation, giving this previously developed site a relatively rural and open character.

11(b) Soil quality and quantity

Site allocation policies

- 8.36 Policies RM12, RM13, RM14 and ND5 scored a significant negative effect on this SA objective. This was because these sites are located on Grade 1 or 2 agricultural land. The majority of sites scored a negligible effect with a small number of sites located on grade 3 agricultural land scoring a minor negative effect.
- 8.37 However, it should be noted that the General Policy requirements section at the beginning of the proposed Submission PPLP states that proposals for development that would result in the loss of the best and most versatile agricultural land (Grades 1, 2 and 3a) should provide allotments where there is evidence of demand.

11(c) Land contamination

Site allocation policies

- 8.38 Policies UA1, UA3, UA13, UA18, ND3, ND5, ND6 and RL11 scored significant positive effects in relation to this part of the objective. These allocations sit on areas of contaminated land and the policy text encourages the remediation of this land prior to construction works. The majority of policies resulted in a negligible effect.

11(d) Minerals safeguarding

Site allocation policies

- 8.39 Approximately one third of the site allocations policies were identified as being within a Mineral Safeguarding Area, resulting in an uncertain effect on this objective. All other sites were assessed as having a negligible effect. The policies make no provision for the safeguarding of minerals.

SA12: Maintain and improve the quality of groundwater, surface waters and coastal waters

Development management policies

- 8.40 No significant effects were identified for the development management policies in relation to this objective. Almost all of the policies were considered to have a negligible effect on this objective, with a few policies resulting in a minor positive effect. Policy E1 scored a minor negative uncertain effect due to one of the employment sites, Link Park, being located in an area with wastewater capacity issues. The uncertainty is related to the construction activities and mitigation that would be employed. Two policies resulted in a minor positive uncertain effect due to uncertainty surrounding the type of SuDS solution to be implemented.

Site allocation policies

- 8.41 No significant effects were identified on this objective. The majority of the site allocation policies resulted in a negligible effect, while a small number resulted in a minor positive effect. This was due to the policies supporting a surface water drainage strategy as part of the design concept for each site. One policy, UA10, scored a minor negative uncertain effect because the site falls within a Groundwater Source Protection Zone and no measures have been set out in the policy to mitigate this.

SA13: Use water resources efficiently

Development management policies

- 8.42 No significant effects were identified for the development management policies in relation to this objective. Almost all of the policies were considered to have a negligible effect on this objective, the exceptions being policies CC2 and CC3 which promote water efficiency and sustainable urban drainage systems (SuDS) respectively, having minor positive effects on this objective.

Site allocation policies

- 8.43 All site allocations policies were considered to have a negligible effect on this objective. Development standards in relation to water efficiency are not related to a development site's location. No provisions have been made within the policies.

SA14: Protect and enhance open space and ensure that it meets local needs

Development management policies

- 8.44 Policies C3, C4 and NE1 scored a significant positive effect on this objective due to the fact that they all seek to safeguard and increase the provision of and accessibility to local open and green spaces within the District. The majority of policies were expected to have a negligible effect with a few resulting in minor positive effects.

Site allocation policies

- 8.45 Policy UA2 scored a significant negative uncertain effect due to the site being located on land currently designated as open space. The policy text makes no reference to the provision of open space. A small number of sites scored a minor positive effect as the policy makes provision for open space. All other site allocation policies were expected to have a negligible or minor negative effect on the objective.
- 8.46 It should be noted that the General Policy requirements section at the beginning of the proposed Submission PPLP states that proposals for development should provide open spaces and children's play space in line with proposed Submission policies C3 and C4.

Cumulative effects

- 8.47 **Table 8.1** and **Table 8.2** above present a summary of the scores for all the site allocation policies and all the development management policies in the proposed Submission Draft version of the PPLP, including 44 site allocations and 65 development management policies. This enabled an assessment to be made of the likely significant effects of the proposed Submission PPLP as a whole in combination with the site allocation and development management policies set out in the adopted Core Strategy (2013) on each of the SA objectives, i.e. an assessment of cumulative effects as required by the SEA Regulations.

SA1: Reduce the risk of flooding, taking into account the effects of climate change

- 8.48 The allocation of large areas of greenfield land through the PPLP could reduce the extent of permeable surfaces available for infiltration and therefore increase flood risk, particularly because some of the site allocations include areas of higher flood risk. However, the proposed Submission PPLP encourages the use of SuDS (policy CC3) and the development of buildings that are sustainably constructed to reduce carbon emissions (policy CC1) in the District and adapt to the effects of climate change. Furthermore, development proposals must be supported by a Flood Risk Assessment that investigates the implication of poor flood defences and incorporates measures and design features to protect existing and future occupants from the risk of flooding. These policies are supported by Policy SS3 in the adopted Core Strategy which requires development proposals in areas of flood risk should be supported by detailed flood risk assessments. Together, the PPLP and the adopted Core Strategy direct most new development to areas of lower flood risk. Measures seeking to protect and enhance the green infrastructure network will also be of benefit to flood risk management.
- 8.49 Overall a cumulative **mixed (minor positive and minor negative) effect** is likely in relation to flooding.

SA2: Increase energy efficiency in the built environment, the proportion of energy use from renewable sources and resilience to a changing climate and extreme weather

- 8.50 The development proposed in the proposed Submission PPLP and the adopted Core Strategy will inevitably result in an increase in greenhouse gas emissions from buildings but this will depend to some extent on the design of development. Policies in the PPLP require new development to meet high standards of energy efficiency and encourage the incorporation of renewable energy generation (policies CC1, CC2, CC4, CC5 and CC6). Furthermore, the proposed Submission PPLP encourages the use of SuDs (policy CC3), which should help to respond to extreme rainfall events arising from climate change. These policies are supported by Policy SS3 in the adopted Core Strategy which requires development proposals to use sustainable construction measures that maximise water and energy efficiency and encourage renewable/low carbon energy generation.
- 8.51 Overall a cumulative **mixed (minor positive and minor negative) effect** is likely in relation to greenhouse gas emissions and climate change adaptation.

SA3: Promote community vibrancy, provide opportunities to access services, facilities and environmental assets for all and avoid creating inequalities of opportunity for access

- 8.52 The PPLP includes policies seeking to ensure that there are adequate community facilities available to support population growth, in particular by safeguarding existing community facilities and the provision of new open, green and formal play spaces (Policies C2 to C4). Co-locating new housing allocations near services and facilities will ensure that people have convenient access and the sustainable transport improvements proposed through the PPLP will also address accessibility. This will in turn help to address social deprivation and exclusion.
- 8.53 Most of the development proposed through both the proposed Submission PPLP and the adopted Core Strategy is to be located within the urban areas of Folkestone and Hythe where there is relatively good access to the concentration of existing services and facilities. However, there are also a number of allocations within and adjacent to rural villages in the Romney Marsh and North

Downs Areas, which will contribute to maintaining the viability of existing community services and facilities in the rural areas of the District.

- 8.54 The rural nature of Shepway District means that it is not realistic to expect that all residents will be within walking distance of a school of GP surgery; however the measures in the Plan relating to improvements to the sustainable transport network will help to ensure that more people are able to travel to such facilities and services by means other than car.
- 8.55 Residential development proposed through the proposed Submission PPLP and the adopted Core Strategy could result in increased pressure on existing services and facilities, such as education and health facilities. However, both documents make good provision for new school places, and GP surgeries to meet the needs of the District over the Plan period. Core Strategy policy SS3 requires all new development to address social and economic needs in the neighbourhood and not result in the loss of community, voluntary or social facilities. Core Strategy policy SS4 promotes active and vibrant community centres. Core Strategy policy SS5 sets out the framework for the District's Community Infrastructure Levy (CIL).
- 8.56 Overall a cumulative **minor positive effect** is likely in relation to this objective.

SA4: Reduce crime and the fear of crime

- 8.57 Most of the policies in both the proposed Submission PPLP and the adopted Core Strategy will not have a direct effect on this objective, although PPLP policy T1: Street Hierarchy and Site Layout makes reference to supporting the development of active frontages for the purposes of natural surveillance and creating characterful places. In general this SA objective will be affected by the design and layout of new development (e.g. the incorporation of lighting) which will not be detailed until the planning application stage.
- 8.58 Overall a cumulative **negligible effect** is likely in relation to crime and safety.

SA5: Improve the provision of homes, including affordable housing, having regard to the needs of all sections of society, including the elderly

- 8.59 The Core Strategy identifies a target of 8,000 dwellings over the plan period (minimum 7,000 dwellings). Core Strategy policy CSD1 requires that, subject to viability, development proposing 15 or more dwellings or land with an area of 0.5 ha or more should provide 30% affordable dwellings. Core Strategy policy CSD2 requires that, subject to viability and design restrictions, development proposing 10 or more dwellings should include 20% of market dwellings meeting Lifetime Homes standards. Therefore, all site allocations estimated to provide over 10-15 dwellings in both the adopted Core Strategy and the proposed Submission PPLP are likely to help to ensure that a mixture of housing types are developed and that housing is available to people on lower incomes and to address disparities between incomes and house prices.
- 8.60 While most new housing development will be focussed in Folkestone and Hythe, the spatial strategy does make provision for some housing at smaller settlements to meet local needs in these communities. All new housing will be delivered in accordance with the Local Plan policies relating to high quality design and construction, so it is assumed that the new housing will be high quality.
- 8.61 Overall, a cumulative **significant positive** effect is likely in relation to housing.

SA6: Support the creation of high quality and diverse employment opportunities

- 8.62 The adopted Core Strategy plans for the delivery of 20ha of employment development and 35,000sqm of retail space over the Plan Period to ensure that there are jobs available to meet the needs of the growing population. Most of this employment land allocated within the adopted Core Strategy and proposed Submission PPLP will be located within the urban areas of Folkestone and Hythe which should mean that the jobs created are accessible for most people and can be reached via public transport. The allocation of this employment land, and the measures in the Plan to safeguard existing sites, should encourage inward investment and result in the delivery of jobs to meet the needs of the growing population. Co-locating employment development with housing will help to ensure that people (including those without a car) have convenient access to jobs.

- 8.63 New employment sites will be developed in accordance with other plan policies relating to standards for design and construction, so it is assumed that they will be high quality, increasing their attractiveness to investors.
- 8.64 Overall a cumulative **significant positive effect** is likely in relation to the economy and employment.

SA7: Conserve and enhance the fabric and setting of historic assets

- 8.65 While the majority of the development proposed within the adopted Core Strategy and the proposed Submission Local Plan is located on previously developed land, there are some significant pockets of greenfield land proposed for development. The large scale housing and employment development proposed on greenfield land is more likely to adversely affect heritage assets and their settings. The majority of the site allocations are in close proximity to at least one heritage asset which has the potential to be adversely affected by new development. However, the vast majority of development proposed in these locations is generally not considered to generate adverse effects on such assets.
- 8.66 The PPLP makes provision for the protection and enhancement of cultural heritage assets through policy HE1: Heritage Assets and Policy HE2: Archaeology, and through specific consideration of heritage assets in site allocation policies. This could result in enhancements as well as mitigation. The strategic allocations set out in the adopted Core Strategy, specifically Policy SS6 and SS7 promote high quality design to preserve the setting of the key heritage assets and archaeological features.
- 8.67 Overall a cumulative **mixed (minor positive and minor negative) effect** is likely in relation to the historic environment.

SA8: Conserve, and where relevant enhance, the quality, character and local distinctiveness of the landscape and townscape

- 8.68 A significant proportion of the landscape of Shepway District is rural in nature and includes the North Downs AONB. Therefore the residential and employment development proposed through the adopted Core Strategy and the proposed Submission PPLP could have negative effects. Roughly one fifth of the site allocations in the proposed Submission PPLP are on greenfield land within the AONB and therefore have the potential to have adverse effects on its landscape character. These sites are relatively small and disparate within the AONB helping to minimise their cumulative effect on the special qualities of the designation. Collectively, these sites represent a much smaller proportion of the total amount of development (residential and employment) allocated within the proposed Submission PPLP, and an even smaller proportion when combined with the strategic scale development allocated within the adopted Core Strategy.
- 8.69 PPLP Site allocation ND6 contains the vast majority of the open land between the settlement of Lympne to the east and the Lympne Industrial Park. Whilst the industrial park is not a standalone settlement, in landscape terms it does represent an isolated and defined urban area. Therefore, policy ND6 states that parcel 2 of the site will remain undeveloped, so as to retain separation between Lympne and Lympne Industrial Park. A significant proportion of the development sites are located on previously developed land. Development in these locations has the potential to regenerate the visual appearance on the area within the immediate vicinity with positive effects.
- 8.70 The PPLP makes provision for mitigating the potential landscape-related impacts of new development, in particular through policy NE3: Protecting the District's Landscapes and Countryside. Other measures in the Plan, such as policies seeking to enhance green infrastructure, will help to improve the overall setting of new development within the landscape.
- 8.71 The strategic allocations set out in the adopted Core Strategy, specifically Policy SS6 and SS7 promote high quality design that is sympathetic to the landscape and coastal character of the areas.
- 8.72 Overall, the effects of the policies set out in both the adopted Core Strategy and the proposed Submission PPLP on the landscape are to some extent uncertain until detailed proposals for particular sites come forward at the planning application stage. However, a cumulative **mixed**

(significant positive and minor negative) effect is identified in relation to the landscapes and townscapes of the District.

SA9: Conserve and enhance biodiversity, taking into account the effects of climate change

- 8.73 The large scale development proposed through the adopted core Strategy and the proposed Submission PPLP could affect biodiversity and geodiversity, particularly in and around the sites located on greenfield land (although it is recognised that brownfield sites can still harbour valuable biodiversity). The loss of areas of greenfield land could result in the loss of valuable habitat and disturbance to species, particularly during the construction phase. Nine of the site allocations within the proposed Submission PPLP have the potential to have adverse effects on biodiversity assets within close proximity to them. However, the proposed Submission PPLP makes good provision for the protection and enhancement of biodiversity and geodiversity, particularly through policy NE1: Enhancing and Managing Access to the Natural Environment and NE2: Biodiversity which safeguard sensitive areas from new development.
- 8.74 The adopted Core Strategy's strategic allocation policy SS7 requires that the development include a management strategy to enhance the biodiversity of the land under development. Furthermore, Policy CSD4 sets out strategic-scale plans for the expansion and enhancement of the District's green infrastructure network, including open recreation spaces.

Habitat Regulations Assessment Findings

- 8.75 It should also be noted that the HRA Report of the proposed Submission Draft PPLP and the adopted Core Strategy concluded that the PPLP does not significantly influence local and regional effects on the integrity of European sites, either alone or in-combination with other plans or projects. The HRA made a number of recommendations to ensure that the PPLP protects the integrity of the Folkestone to Etchinghill Escarpment SAC and Dungeness, Romney Marsh and Rye Bay SPA, SAC and Ramsar (see paragraphs 1.21 and 1.22 above).
- 8.76 Overall a cumulative **mixed (minor positive and minor negative) effect** is likely in relation to biodiversity and geodiversity.

SA10: Reduce the need to travel; increase opportunities to choose sustainable transport modes and avoid development that will result in significant traffic congestion

- 8.77 The proposed Submission PPLP makes good provision for improvements to the sustainable transport network, most notably cycling through Policy T5. In addition Policy RL12 allocates the former harbour railway line for a linear park, promoting active travel by providing a cycle and pedestrian route to the harbour area.
- 8.78 Many policies in the adopted Core Strategy (SS3- SS7, CSD2, CSD3, CSD6 and CSD7) promote a design-led and sustainable access approach to ensure that new developments and priority centres of activity are suitably located, have appropriate and safe highways infrastructure and are readily accessible on foot and by bicycle.
- 8.79 Furthermore, the fact that most new housing and employment development allocated within the adopted Core Strategy and proposed Submission PPLP will be focussed within Folkestone and Hythe should mean that most people have shorter journeys to access jobs, services and facilities, and they may be more easily able to walk and cycle day to day, reducing emissions from car use and traffic congestion on the road network. Provisions in the Plan relating to private car and lorry parking provisions could facilitate ongoing car use but overall the Local Plan makes good provision to mitigate these effects.
- 8.80 Overall a cumulative **significant positive effect** is likely in relation to sustainable transport and reducing the need to travel.

SA11: Use land efficiently and safeguard soils, geology and economic mineral reserves

- 8.81 Policy SS2 of the adopted Core Strategy sets a target for at least 65% of dwellings to be provided on previously developed/brownfield land by the end of 2030/2031. However both the proposed Submission PPLP and adopted Core Strategy propose development on a significant area of

greenfield land, resulting in the loss of undeveloped land, some of which is located on land of good to moderate quality agricultural land or safeguarded minerals.

- 8.82 The majority of the development sites are located on previously developed land. Prioritising the development of previously developed (brownfield) land can help to ensure that greenfield land is protected from unnecessary development. Furthermore, some of these previously developed areas are also considered to be contaminated land which will be remediated.
- 8.83 Overall a cumulative **mixed (significant positive and significant negative) effect** is likely in relation to the efficient use of land and minerals.

SA12: Maintain and improve the quality of groundwater, surface waters and coastal waters and the hydromorphological (physical) quality of rivers and coastal waters

- 8.84 Adopted Core Strategy Policy CSD5 promotes sustainable resource management across the District.
- 8.85 The allocation of new development sites will increase the local population and result in significant levels of construction activity and traffic all of which has the potential to increase levels of localised ground, water and air pollution. Site allocation policies located on top of Source Protection Zones include requirements for measures to avoid pollution of ground water. Furthermore, policies NE7: Contaminated Land and CC2: Sustainable Design and Construction require new development to prevent contamination of any watercourse, water body or aquifer.
- 8.86 In relation to the capacity of the foul and combined sewer network to accommodate additional development, the Water Cycle Study identifies a potential capacity issue in the strategic wastewater link between the Westenhanger and Lympe area and Sellindge WwTW. Development in these areas could therefore increase the risk of wastewater overflows, with adverse effects on water quality, but the risk is judged minor due to the regulatory requirement for the water undertaker to provide a connection to wastewater treatment facilities at some point.
- 8.87 The policies that seek to manage flood risk (as described above under SA objective 1) will also indirectly benefit water quality by reducing the likelihood of water pollution resulting from flood events.
- 8.88 Overall a cumulative **mixed (minor positive and minor negative) effect** is likely in relation to water quality.

SA13: Use water resources efficiently

- 8.89 Adopted Core Strategy Policy SS3 requires development proposals to use sustainable construction measures that maximise water and energy efficiency.
- 8.90 The development of new homes and employment land through the adopted Core Strategy and proposed Submission PPLP will inevitably result in an increase in demand for water abstraction and treatment; however levels of per capita water consumption will not be affected. Together, both documents encourage the efficient use of water resources through policy CC2: Sustainable Design and Construction.
- 8.91 Overall a cumulative **minor positive effect** is likely in relation to the efficient use of water resources.

SA14: Protect and enhance open space and ensure that it meets local needs

- 8.92 While the population growth that will result from the residential development proposed through the adopted Core Strategy and proposed Submission PPLP could put pressure on the existing network of open space, both the adopted Core Strategy and the proposed Submission PPLP contain a number of policies which protect and enhance the District's green infrastructure network, including public open spaces and local green spaces.
- 8.93 The adopted Core Strategy aims to protect and enhance the District's green infrastructure network through the provision of green infrastructure in strategic allocation SS7 and policy CSD4 which aims to improve green infrastructure, open spaces and recreational facilities across the district.

- 8.94 The proposed Submission PPLP policies include:
- Policy C3: Provision of Open Space
 - Policy C4: Children's Play Space
 - Policy NE1: Enhancing and Managing Access to the Natural Environment
- 8.95 The provision of improved green infrastructure, open space and sports facilities through these policies will contribute to increasing biodiversity in the District and encourage and enable people to engage in active recreation.
- 8.96 One site allocation policy UA2 earmarks an existing open space for development without requirements to replace any net loss of open space. This development has the potential to result in a significant adverse effect against this objective. However, overall a cumulative **significant positive effect** is likely in relation to the protection and enhancement of green infrastructure.

Cross-boundary Cumulative Effects

- 8.97 Shepway District is bordered by four neighbouring Districts each with their own spatial strategies for development:
- Ashford District (Kent County)
 - Canterbury District (Kent County)
 - Dover District (Kent County)
 - Rother District (East Sussex County)
- 8.98 Developments within these neighbouring Districts close to the administrative boundary of Shepway have the potential to generate cumulative **significant negative effects** through increased urbanisation, particularly in relation to SA objectives:
- SA1: Reduce the risk of flooding, taking into account the effects of climate change.
 - SA8: Conserve, and where relevant enhance, the quality, character and local distinctiveness of the landscape and townscape.
 - SA9: Conserve and enhance biodiversity, taking into account the effects of climate change.
 - SA11: Use land efficiently and safeguard soils, geology and economic mineral reserves.
- 8.99 Furthermore, strategic employment and retail allocations along the region's main transport links could attract Shepway residents which has the potential to generate significant adverse effects of the viability of Shepway District's employment sites and town centres, with the potential for **significant negative effects** in relation to SA objectives:
- SA3: Promote community vibrancy, provide opportunities to access services, facilities and environmental assets for all and avoid creating inequalities of opportunity for access.
 - SA6: Support the creation of high quality and diverse employment opportunities.
- 8.100 There is also the potential for synergistic **significant positive effects** on SA objectives 3 and 6 associated with the combined effects of multiple employment and retail allocations in the region helping East Kent to achieve a critical mass to attract and retain growth industries and higher skilled employees.
- 8.101 The proposed Submission Draft PPLP is likely to generate **significant positive effects** on SA objective 10 (Reduce the need to travel; increase opportunities to choose sustainable transport modes and avoid development that will result in significant traffic congestion). However, it is acknowledged that general growth in the District and in neighbouring authorities will result in an increase in the number of vehicles on the roads and an increased risk of traffic congestion. Work is currently being undertaken by Shepway District Council and neighbouring authorities to determine what the existing and projected future capacity of the highway networks in the area is and is likely to be.

8.102 Shepway District Council is working with its neighbouring authorities to mitigate the potential for such cumulative adverse effects and maximise the opportunities for cumulative benefits for the region.

Recommendations

Recommendations made following the appraisal of the Preferred Options version of the PPLP

8.103 LUC appraised all preferred policies set out in the Preferred Options version of the PPLP alongside reasonable alternatives before they were published for public comments and suggestions in October 2016. The significant effects and recommendations identified through the appraisal of the preferred policies informed the development of the policies within the proposed Submission Draft of the PPLP. The following published preferred site allocation policies had the potential to have significant negative effects:

- Policy UA7 - Rotunda and Marine Parade Car Parks, Lower Sandgate Road
- Policy UA25 - Princes Parade, Hythe
- Policy RM5 - Land to the South of New Romney
- Policy RM12 - Lands North and South of Rye Road, Brookland
- Policy RM13 - Land Adjacent to Moore Close, Brenzett
- Policy ND6 - Sellindge
- Policy ND7 - Former Lympne Airfield
- Policy ND9 - Land at Folkestone Racecourse
- Policy ND13 - Land adjacent to Golf Course, Etchinghill

8.104 **Table 8.3** below outlines the additional site-based measures that were recommended for the Preferred Options version of the PPLP published in October 2016. These recommendations were reviewed by Shepway District Council and where the Council considered it to be appropriate, they were incorporated into the proposed Submission Plan.

Table 8.3: Site-based mitigation recommendations for the Preferred Options version of the PPLP

Policy Ref.	Significant Negative Effects	Recommended Mitigation Measures
Policy UA7	SA Objective 14 – Open Space	43% of the site is covered by an area of open space, a significant proportion of which is likely to be lost when the site is developed. The loss of this open space could be mitigated through requirements for the provision of open space within the preferred policy elsewhere within the immediate vicinity.
Policy UA25	SA Objective 1 – Flood Risk	The land within the site is wholly designated as Flood Zones 2 and 3 but is not identified in the District’s SFRA (2015) as at risk of ‘extreme’, ‘significant’ or ‘moderate’ coastal flooding. Despite this, the preferred policy makes no provisions to mitigate this flood risk. A site-based policy requirement for adequate flood protection measures to be incorporated within the design of the site would help mitigate this effect.
Policy RM5	SA Objective 11 – Efficient Use of Land	Approximately 37% of the land within the site is classified as being of Grade 2 agricultural quality, and 42% is classed as Grade 3 agricultural quality. The loss of some of the best and most versatile agricultural land in the District is not readily mitigated. In deciding whether to allocate the site for development, the significant negative effect on SA

Policy Ref.	Significant Negative Effects	Recommended Mitigation Measures
		Objective 11 will have to be weighed against other considerations, such as the availability of alternative, less environmentally sensitive sites and the benefits of development.
Policy RM12	SA Objective 11 – Efficient Use of Land	The site is wholly on Grade 1 agricultural land. The loss of some of the best and most versatile agricultural land in the District is not readily mitigated. In deciding whether to allocate the site for development, the significant negative effect on SA Objective 11 will have to be weighed against other considerations, such as the availability of alternative, less environmentally sensitive sites and the benefits of development.
Policy RM13	SA Objective 11 – Efficient Use of Land	Approximately 73% of the land within the site sits on Grade 2 agricultural land and 27% sits on Grade 1 agricultural land. The loss of some of the best and most versatile agricultural land in the District is not readily mitigated. In deciding whether to allocate the site for development, the significant negative effect on SA Objective 11 will have to be weighed against other considerations, such as the availability of alternative, less environmentally sensitive sites and the benefits of development.
Policy ND6	SA Objective 11 – Efficient Use of Land	The site is wholly within an area of Grade 1 and 2 agricultural land. The loss of some of the best and most versatile agricultural land in the District is not readily mitigated. In deciding whether to allocate the site for development, the significant negative effect on SA Objective 11 will have to be weighed against other considerations, such as the availability of alternative, less environmentally sensitive sites and the benefits of development.
Policy ND7	SA Objective 8 – Landscape	The site contains the vast majority of the open land between the settlement of Lympne to the east and the Lympne Industrial Park. Whilst the industrial park is not a standalone settlement, in landscape terms it does represent an isolate and defined urban area. Development of the entire site would result in the perceived coalescence of Lympne with the neighbouring Lympne Industrial Park, with a significant adverse effect on this part of the objective. While the policy outlines requirements for the design, layout and landscaping to reduce adverse effects on the character of the AONB, no mention is made for the need to mitigate the appearance of settlement coalescence. The addition of such a requirement through appropriate landscaping and layout of the development would help to mitigate the effects on this part of the objective.
Policy ND9	SA Objective 11 – Efficient Use of Land	The site is wholly within an area of Grade 1 and 2 agricultural land. The loss of some of the best and most versatile agricultural land in the District is not readily mitigated. In deciding whether to allocate the site for development, the significant negative effect on SA Objective 11 will have to be weighed against other considerations, such as the availability of alternative, less environmentally sensitive sites and the benefits of development.
Policy ND13	SA Objective 7 – Cultural Heritage	The site is close proximity to a number of heritage assets but the preferred policy makes no provision to protect the setting of these heritage assets. Provision in the policy that the design of the development should seek to minimise effects on the setting of the nearby heritage assets would help to mitigate the significance of this

Policy Ref.	Significant Negative Effects	Recommended Mitigation Measures
		effect.

Recommendations made following the appraisal of the proposed Submission Draft version of the PPLP

8.105 The following proposed Submission Draft policies have the potential to have significant negative effects:

- Policy UA2 - Rotunda and Marine Parade Car Parks, Lower Sandgate Road, Folkestone
- Policy UA18 - Princes Parade, Hythe
- Policy UA19 - Hythe Swimming Pool, Hythe
- Policy RM12 - The Old Slaughterhouse, 'Rosemary Corner', Brookland
- Policy RM13 - Lands north and south of Rye Road, Brookland
- Policy RM14 - Land adjacent to Moore Close, Brenzett
- Policy ND5 - General Sellindge Policy
- Policy E1 – Employment Sites

8.106 Some of these are recommendations carried forward from the SA of the Preferred Options version of the PPLP that have not been clearly addressed in the proposed Submission draft of the PPLP. For many of the potential negative effects identified in relation to the PPLP, mitigation will be provided through the implementation of other policies in the adopted Core Strategy and Places and Policies Local Plan. **Table 10.1** identifies the proposed Submission Draft PPLP policies that are expected to provide mitigation for the potential significant negative effects of other proposed Submission Draft PPLP policies.

8.107 In addition, **Table 8.4** below outlines some additional site-based measures for the proposed Submission Draft site allocation policies which may help to mitigate some of the potential significant adverse effects identified.

Table 8.4: Site-based mitigation recommendations

Policy Ref.	Significant Negative Effects	Recommended Mitigation Measures
Policy UA2	SA Objective 14 - Open Space	43% of the site is covered by an area of open space, a significant proportion of which is likely to be lost when the site is developed. The loss of this open space could be mitigated through requirements for the provision of open space within the policy elsewhere within the immediate vicinity.
Policy UA18	SA Objective 1 - Flood Risk	The land within the site is not identified in the District's SFRA (2015) as at risk of 'extreme', 'significant' or 'moderate' coastal flooding but is wholly designated as Flood Zones 2 and 3. The policy makes no provisions to mitigate this flood risk. A site-based policy requirement for adequate flood protection measures to be incorporated within the design of the site would help mitigate this effect.
Policy UA19	SA Objective 1 - Flood Risk	The land within the site is not identified in the District's SFRA (2015) as at risk of 'extreme', 'significant' or 'moderate' coastal flooding but is wholly designated as Flood Zones 2 and 3. The policy makes no provisions to mitigate this flood risk. A site-based policy requirement for adequate flood protection measures to be incorporated within the design of the site would help mitigate this effect.

Policy Ref.	Significant Negative Effects	Recommended Mitigation Measures
Policy RM12	SA Objective 1 - Flood Risk SA Objective 11 - Efficient Use of Land	SA Objective 1: The land within the site is not identified in the District's SFRA (2015) as at risk of 'extreme', 'significant' or 'moderate' coastal flooding but is wholly designated as Flood Zones 2 and 3. The policy makes no provisions to mitigate this flood risk. A site-based policy requirement for adequate flood protection measures to be incorporated within the design of the site would help mitigate this effect. SA Objective 11: Additionally, the site is wholly on Grade 1 agricultural land. The loss of some of the best and most versatile agricultural land in the District is not readily mitigated.
Policy RM13	SA Objective 11 - Efficient Use of Land	The site is wholly on Grade 1 agricultural land. The loss of some of the best and most versatile agricultural land in the District is not readily mitigated.
Policy RM14	SA Objective 11 - Efficient Use of Land	Approximately 80% of the land within the site sits on Grade 2 agricultural land while the remainder sits on Grade 1 agricultural land. The loss of some of the best and most versatile agricultural land in the District is not readily mitigated.
Policy ND5	SA Objective 11 - Efficient Use of Land	The site is wholly within an area of Grade 1 and 2 agricultural land. The loss of some of the best and most versatile agricultural land in the District is not readily mitigated.
Policy E1	SA Objective 1 - Flood Risk SA Objective 7 - Cultural Heritage SA Objective 8 - Landscape SA Objective 9 - Biodiversity SA Objective 11 - Efficient Use of Land	SA Objective 1: A significant proportion of the land (>=25%) within three of the allocated employment sites (Folkestone Harbour, Nickolls Quarry and Mountfield Road), is within Flood Zones 2 and 3. Additionally, parts of two of these sites were identified in the District's SFRA (2015) as at risk of 'extreme' flooding. The policy makes no provision to mitigate this flood risk. A site-based policy requirement for adequate flood protection measures to be incorporated within the design of the site would help mitigate this effect. SA Objective 7: Two of the allocated employment sites (Ingles Manor and Folkestone Harbour) contain heritage assets, while five are in close proximity to heritage assets. Yet the policy makes no provision to protect the setting of these heritage assets. Provision in the policy that the design of the development at these sites should seek to minimise effects on the setting of the nearby heritage assets would help to mitigate the significance of this effect. SA Objective 8: One of the allocated employment sites, Link Park, contains open land between the settlement of Lympne to the east and the Lympne Industrial Park. While the industrial park is not a standalone settlement, in landscape terms it does represent an isolated and defined urban area. Development of the entire site would result in the perceived coalescence of Lympne with the neighbouring Lympne Industrial Park in combination with Policy ND6 which allocates almost half of the open land between Lympne and the Lympne Industrial Park for residential development. The policy does not mention the need to mitigate the appearance of settlement coalescence. The addition of such a requirement through appropriate landscaping and layout of the development would help to mitigate the effects on this part of the objective. SA Objective 9: Two of the allocated employment sites (Dengemarsh Road and Mountfield Road) contain National BAP Priority Habitats.

Policy Ref.	Significant Negative Effects	Recommended Mitigation Measures
		<p>Dengemarsh Road also contains a Local BAP Priority Habitat, as well as another employment site, Folkestone Harbour. Despite this, the policy makes no provision for the conservation and enhancement of these protected habitats and species. The addition of such a requirement would help to mitigate the effects on this objective.</p> <p>SA Objective 11: Two of the allocated employment sites (Nickolls Quarry and Cheriton Parc) contain a significant proportion of land (=>25%) recorded as Grade 2 agricultural land. The loss of some of the best and most versatile agricultural land in the District is not readily mitigated.</p>

9 Monitoring

Regulation 17 of the SEA Regulations states that:

- (1) "the responsible authority shall 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"; and*
- (2) "the responsible authority's monitoring arrangements may comprise or include arrangements established otherwise than for the express purpose of complying with paragraph (1)"*

Schedule 2(9) of the SEA Regulations requires the Environmental Report to include:

"a description of the measures envisaged concerning monitoring"

- 9.1 The Planning Advisory Service guidance on SA states that it is not necessary to monitor everything. Instead, monitoring should be focused on the significant sustainability effects that may give rise to irreversible damage (with a view to identifying trends before such damage is caused) and the significant effects where there is uncertainty in the SA and where monitoring would enable preventative or mitigation measures to be taken. Therefore, monitoring measures have been proposed in this SA Report in relation to all of the SA objectives in the SA framework for which likely (or uncertain) significant positive or negative effects have been identified from the proposed Submission Draft version of the PPLP. This was the case for all of the SA objectives apart from 12: water quality and 13: water use efficiency.
- 9.2 **Table 9.1** sets out a number of suggested indicators for monitoring the potential significant effects of implementing the Local Plan.
- 9.3 The data used for monitoring in many cases will be provided by outside bodies. Information collected by other organisations (e.g. the Environment Agency) can also be used as a source of indicators. It is therefore recommended that the Council continues the dialogue with statutory environmental consultees and other stakeholders that has already been commenced, and works with them to agree the relevant sustainability effects to be monitored and to obtain information that is appropriate, up to date and reliable.

Table 9.1: Proposed Monitoring Framework for the Shepway Places and Policies Local Plan

Ref.		Proposed monitoring indicators
SA1	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
SA2	Increase energy efficiency in the built environment, the proportion of energy use from renewable sources and resilience to a changing climate and extreme weather.	<ul style="list-style-type: none"> • Number of new developments incorporating low carbon technologies • Installed renewable energy capacity • Number of Air Quality Management Areas declared
SA3	Promote community vibrancy, provide opportunities to access services, facilities and environmental assets for all and avoid creating inequalities of opportunity for access.	<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 • Affordable home completions
SA4	Reduce crime and the fear of crime.	<ul style="list-style-type: none"> • Number of crimes committed
SA5	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
SA6	Support the creation of high quality and diverse employment opportunities.	<ul style="list-style-type: none"> • Amount of new employment land delivered • Extent of employment land lost to residential development • Number of people claiming Jobseekers' Allowance • Qualifications of the working age population • Extent and speed of broadband coverage
SA7	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
SA8	Conserve, and where relevant enhance, the quality, character and local distinctiveness of the landscape and townscape.	<ul style="list-style-type: none"> • Percentage of new development taking place on brownfield/previously developed land • Number of new proposals in the AONB and other 'sensitive landscape areas'

Ref.		Proposed monitoring indicators
SA9	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.
SA10	Reduce the need to travel; increase opportunities to choose sustainable transport modes and avoid development that will result in significant traffic congestion.	<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
SA11	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 • Amount of development that takes place on best and most versatile agricultural land • Proportion of household waste recycled • Proportion of commercial waste recycled • Proportion of waste sent to landfill
SA12	Maintain and improve the quality of groundwater, surface waters and coastal waters and the hydromorphological (physical) quality of rivers and coastal waters.	<i>No likely significant effects identified through the SA.</i>
SA13	Use water resources efficiently.	<i>No likely significant effects identified through the SA.</i>
SA14	Protect and enhance green infrastructure and ensure that it meets local needs.	<ul style="list-style-type: none"> • Extent of new or loss of new Local Green Spaces • Amount of development that takes place on Local Green Spaces • Extent of new and loss of open space and sport and recreation facilities

10 Conclusions

- 10.1 The Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) process has informed every iteration of the PPLP. A Scoping Report was published for consultation in April 2014, followed by three SA Reports. One for each published iteration of the PPLP:
- Issues and Options published in 2014.
 - Preferred Options in 2016.
 - Proposed Submission Draft PPLP in 2017.
- 10.2 For each iteration of the PPLP, the SA/SEA process has tested the significant effects of a range of site allocation and development management policy options. Informed by the SA/SEA, preferred options were defined and consulted upon in the Preferred Options version of the PPLP published in October 2016. Following the consultation in October 2016, these options were revised and reappraised alongside new alternatives to inform the latest set of site allocations and development management policies set out in the proposed Submission Draft version of the PPLP published alongside this SA Report.
- 10.3 In general, the policy approaches and site options that have been taken forward in the Local Plan are those that perform more positively or at least as well against the SA objectives than the rejected options, although in a small number of cases other planning considerations have determined that other options should be taken forward. As described in this SA report, the PPLP includes a number of policies that should help to mitigate the potential negative effects of proposals within the PPLP.
- 10.4 The proposed Submission Draft version of the PPLP proposes housing and employment development and the allocation of other uses across Shepway to meet the future needs of the District; therefore the SA has identified the potential for significant negative effects on many of the environmental objectives including cultural heritage, landscape and the safeguarding of the best and most versatile agricultural land. However, the PPLP also includes a wide range of development management style policies that aim to protect and enhance the economic, social and environmental conditions of the District. These should go a long way towards mitigating the potential negative effects of the overall scale of development proposed, although some significant effects are likely to remain where mitigation is not possible or difficult, such as the loss of best and most versatile agricultural land.
- 10.5 The fact that the adopted Core Strategy and the proposed Submission Draft PPLP direct most new development to the urban areas of Folkestone and Hythe will have a range of mainly social and economic benefits since these urban areas have the greatest range of jobs and service provision in the District and are in need of regeneration. In addition, the PPLP allocates a range of sites in the rural areas of the District which will help to maintain the vibrancy of rural communities. The PPLP's support for the District's sustainable transport network will enable more people to access local jobs, services and facilities whilst minimising environmental harm.

Mitigation

- 10.6 It is a requirement of the SEA Regulations that consideration is given to "*the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme*". For many of the potential negative effects identified in relation to the PPLP, mitigation will be provided through the implementation of other policies in the adopted Core Strategy and the proposed Submission Draft PPLP itself.
- 10.7 **Table 10.1** below identifies the strategic policies set out in the adopted Core Strategy (2013) and the development management policies in the proposed Submission Draft PPLP that are expected to provide mitigation for the potential significant negative effects of other proposed Submission

Draft PPLP policies. Note that only those SA objectives for which potential significant negative effects were identified have been included in the table. Five out of the 14 SA objectives are unlikely to be significantly negatively affected by the preferred policies or site allocations in the PPLP.

Table 10.1: Mitigation for potential significant negative effects identified

SA objectives for which potential significant negative effects have been identified	Other Local Plan policies providing possible mitigation	
	Core Strategy	PPLP
SA1. Reduce the risk of flooding, taking into account the effects of climate change	SS3: Place-Shaping and Sustainable Settlements Strategy , clause C, seeks to prevent development in areas at risk of flooding.	CC3: Sustainable Drainage Systems (SuDS) promotes the use of SuDS in new development which will help to mitigate the potential effects of development on greenfield land in relation to reduced infiltration. NE1: Enhancing and Managing Access to the Natural Environment , NE2: Biodiversity and CC2: Sustainable Design and Construction directly and indirectly promote improvements to the District's green infrastructure network, which will help to reduce flood risk and alleviate the effects of climate change.
SA7. Conserve and enhance the fabric and setting of historic assets	SS3: Place-Shaping and Sustainable Settlements Strategy , clause e, seeks to respect and enhance key historic features of conservation interest in the District.	HE1: Heritage Assets , HE2: Archaeology , HE3: Local List of Heritage Assets and HE4: Folkestone's Historic Gardens seek to protect and enhance heritage assets in the Borough and will apply to all new development including at the allocated sites.
SA8. Conserve, and where relevant enhance, the quality, character and local distinctiveness of the landscape and townscape.	SS1: District Spatial Strategy identifies three character areas and the development considered appropriate to each. CSD3: Rural and Tourism Development of Shepway states that building scan only be converted if they will contribute to the character of their location.	NE3: Protecting the District's Landscapes and Countryside seeks to ensure that the quality and character of Shepway's landscapes are protected and enhanced and will apply to all new development including at the allocated sites. NE1: Enhancing and Managing Access to the Natural Environment , NE2: Biodiversity and CC2: Sustainable Design and Construction Spaces directly and indirectly promote improvements to the District's green infrastructure network, which will help to maintain the green spaces and gaps which form an important part of the setting of the District's towns and villages. CC2: Sustainable Design and Construction also includes specific criteria relating to ensuring that the design and layout of new development is appropriate for the surroundings.

SA objectives for which potential significant negative effects have been identified	Other Local Plan policies providing possible mitigation	
	Core Strategy	PPLP
SA9. Conserve and enhance biodiversity.	CDS4: Green Infrastructure of Natural Networks, Open Spaces and Recreation seeks to achieve net gains in biodiversity, at the same time as safeguarding designated biodiversity sites from harm.	NE1: Enhancing and Managing Access to the Natural Environment and NE2: Biodiversity seek to conserve and enhance biodiversity in the District. NE2: Biodiversity includes specific criteria relating to ensuring that access to protected sites is improved, but also managed in sensitive areas.
SA11. Use land efficiently and safeguard soils, geology and economic mineral reserves.	SS2: Housing and the Economy Growth Strategy sets a target for at least 65% of dwellings to be provided on previously developed land by the end of 2030/31.	NE4: Equestrian Development, CC6: Solar Farms and HW3: Development that supports healthy, fulfilling and active lifestyles require proposals to avoid the loss of high quality agricultural land where possible.
SA14. Protect and enhance green infrastructure and ensure that it meets local needs.	SS1: District Spatial Strategy seeks to secure new accessible public green space. CSD4: Green Infrastructure of Natural Networks, Open Spaces and Recreation directly and indirectly promotes improvements to the District's green infrastructure, as well as the amount of space available. This will help to safeguard, maintain and expand access to local green spaces.	NE1: Enhancing and Managing access to the Natural Environment, NE2: Biodiversity, CC2: Sustainable Construction and C5: Local Green Spaces directly and indirectly promote improvements to the District's green infrastructure network, which will help to safeguard, maintain and expand access to local green spaces. C2: Safeguarding Community Facilitates and C3: Provision of Open Space promotes the safeguarding and new provision of open spaces in the District. HW4: Protecting and Enhancing Rights of Way maintains access to the countryside and connects open and green spaces in the District.

Next steps

- 10.8 This SA Report will be available for consultation alongside the proposed Submission Draft version of the PPLP in January 2018. When the consultation has finished, the Council will submit the PPLP to the Planning Inspectorate, who will arrange an 'examination in public'. This is likely to be later in 2018. All the comments received during the forthcoming Submission consultation will be on the proposed Submission of the PPLP and this SA Report will be considered by an independent Planning Inspector during the examination.

LUC

January 2018