



Town Planning

Submitted to
Shepway District Council

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Shepway Growth Options Study

Phase Two Report

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Final Report

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1 Introduction

1.1 Project context

In October 2016, AECOM was commissioned by Shepway District Council (SDC) to develop a Strategic Growth Options Study for Shepway District to identify land suitable for strategic scale development across multiple plan periods.

The Strategic Growth Options Study is an evidence base document intended to inform the Local Plan process. The context for the Growth Options Study comprised a new calculation of Shepway's emerging Objectively Assessed Housing Need (OAHN) as part of a Strategic Housing Market Assessment (SHMA) carried out jointly with Dover District Council.

The SHMA, which was published in spring 2017, suggests that significantly more homes are needed across Shepway in coming years than planned for within the adopted Core Strategy¹. In order to constitute sustainable development, these homes will require appropriate supporting infrastructure, including new employment opportunities.

As such, a partial review of the Core Strategy is taking place. The partial review will help ensure that the uplift in housing numbers can be accommodated within Shepway and that the jobs and infrastructure that the new homes will need can also be successfully delivered.

The Strategic Growth Options Study is therefore a crucial element of the evidence base for the Core Strategy partial review. It is being carried out in parallel with the Sustainability Appraisal (SA) process for the partial review, and there will be various points at which these parallel processes inform one another.

The Strategic Growth Options Study comprises three elements: a High Level Options Report, a Phase Two Report and a High Level Landscape Appraisal that informs both the High Level Options Report and the Phase Two Report.

This document is the Phase Two Report and thus builds on the evidence presented within the High Level Options report to set out the final conclusions of the Strategic Growth Options Study.

1.2 Project objectives and structure

This Phase Two Report takes as its starting point the conclusions of the High Level Options Report and aims to add sufficient detail and site-specific evidence to them in order to determine the boundaries of land considered suitable for strategic-scale development and the extent of land considered unsuitable for such development.

¹ Available online at <https://www.shepway.gov.uk/planning/planning-policy/local-plan/core-strategy-review-2016>

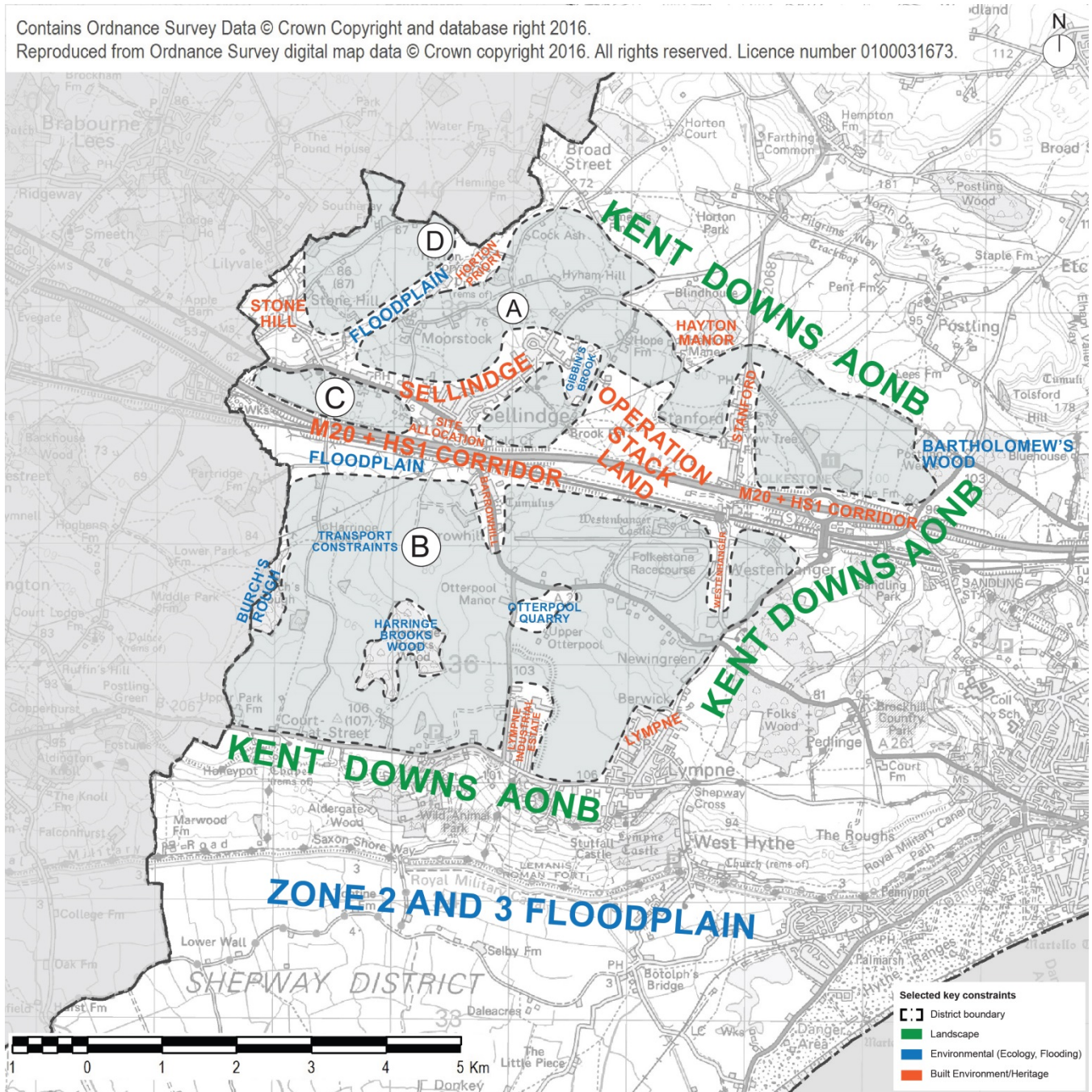
Investigation of options is thorough and exhaustive to ensure all potential areas for development are identified. The report concludes with a map showing all boundaries defining land considered suitable for development. As with the High Level Options report, the Phase Two report considers only land within Shepway District.

The location of the boundaries were determined through a detailed review of the evidence base, taking forward evidence from the High Level Options report but also adding new, more site-specific evidence gathered for this stage of assessment. This comprises data and evidence, including photographs, taken as part of detailed on-site assessment which took place during January 2017. The site visits gathered information based not only on features within and adjoining study area land, but also based on long views from vantage points close to the study area, both within and outside the Kent Downs Area of Outstanding Natural Beauty (AONB).

The High Level Options Report concluded by identifying (Figure 14, page 5-101) four parcels of land, lettered A to D, that the evidence suggested had the potential to be suitable for development. This illustration, replicated below as Figure 1, can be thought of as the starting point for this report. It should, however, be noted that the land boundaries and constraints shown in Figure 1 are indicative only; not every constraint has been illustrated and there may be small parcels of land that are found to be suitable adjacent to but not within the A-D boundaries- this report will address both of these issues.

The focus of this Phase Two report is therefore to determine whether some or all of the land within, between or adjacent to the areas of search in Figure 1 may be suitable for development when assessed in more detail.

Figure 1: Areas A-D, comprising the starting point for this Phase Two report



The remainder of this report takes Areas A, B, C and D in turn. In a similar way as for the strategic level assessment, each area is tested for its performance against eight criteria, with AECOM specialists inputting evidence to each as appropriate. These criteria have been selected with the objective of achieving a sustainable form of development, and reflect in all cases the approach of the National Planning Policy Framework (NPPF). The better a location performs on a range of criteria, the more sustainable development in that location is likely to be.

It is important to remember that this report is focussed on the suitability of land for development more than the precise form or layout of that development (though of course the former will have implications for the latter).

However, it is therefore important that those seeking to implement the recommendations of this study do not lose this focus on sustainability at this more detailed level. This means, for example, ensuring that new development minimises the need to travel by providing employment, facilities and services for local residents rather than functioning as a dormitory suburb. It also entails minimising the environmental impact of new development through such interventions as use of renewable energy, sustainable urban drainage and so on.

The criteria used at this Phase Two stage complement but do not replicate those used in the High Level Options process and are as follows:

- Agricultural land quality (seeking to minimise impacts on Grades 1, 2 and 3a land², which comprise for planning purposes 'Best and Most Valuable' agricultural land);
- Transport and accessibility (seeking locations that can connect well to and are accessible from other settlements, by public transport and other means);
- Landscape (seeking to avoid visually prominent locations, including but not limited to minimising impact on the AONB, and seeking locations with the potential for landscape mitigation);
- Infrastructure (seeking locations able to be serviced by existing and, where appropriate, new infrastructure);
- Heritage (seeking to avoid adverse impacts on any designated heritage assets³ and their settings, taking into account local landscapes and views);

² Nationally-available agricultural land mapping provided by Natural England has been used for the purposes of this report, but it does not divide the Grade 3 land shown into Grade 3a (comprising Best and Most Valuable land) and 3b (which does not). We have allowed for this constraint throughout this report simply by regarding Grade 3 land as more suitable than Grades 1 and 2 land, but less suitable than Grades 4, 5 or non-agricultural land.

³ As defined by the NPPF; specifically World Heritage Sites, Scheduled Monuments, listed buildings, protected wreck sites, Registered Parks and Gardens, Registered Battlefields and conservation areas.

- Regeneration potential (aiming to maximise regeneration opportunities);
- Economic development potential (aiming to maximise opportunities for economic development); and
- Spatial opportunities and constraints (seeking to maximise use of existing defensible boundaries to development and create new defensible boundaries; to avoid less sustainable development patterns, such as ribbon development along roads; also taking account of existing development, planning proposals and/or policy support for development)

For each of the four areas, a final Conclusions section brings together and seeks to balance the findings of each criterion based assessment. This permits an overall judgement to be made on the basis of the evidence gathered and AECOM's own professional knowledge and experience of similar studies. The overall judgement informs the boundaries and extent of land considered suitable for strategic development.

Assessing each area using the same methodology, the same criteria and with those criteria in the same order helps ensure consistency of assessment across all locations.

The High Level Options report set out a range of spatial planning principles based on the NPPF that underpin the Shepway Growth Options Study. These principles, provided for reference in Table 1 below, have been carried forward into this Phase Two report. Just as within the High Level Options report, the conclusions for all areas should be aligned with, and avoid conflict with, these spatial planning principles. The conclusions section of each of the four areas assessed sets out those spatial planning principles considered particularly relevant in each case.

As a caveat to Table 1, it should be noted that many principles from the strategic planning context, in particular those from the NPPF, appear in some cases to relate more specifically to plans rather than to evidence base documents informing plans. Although the Growth Options Study is an evidence base document rather than a plan itself, it is considered nonetheless desirable for the principles of the study to be as closely aligned as possible to the principles of the planning process that it will inform.

Table 1: Translation of NPPF into spatial planning principles

Dimension of sustainable development	NPPF Core Planning Principles and Shepway Core Strategy policies informed by each dimension ⁴	Emerging spatial planning principle for Growth Options Study
NPPF economic dimension	NPPF Core Planning Principle 3: proactively drive and support sustainable economic development to deliver homes, business and industrial units, infrastructure and thriving local places	1. The criteria for assessing suitability of land should facilitate the delivery of new homes, employment and related infrastructure
	NPPF Core Planning Principle 3: take account of market signals, such as land prices and housing affordability, taking account of the needs of the residential and business communities	2. Shepway-specific market signals and the needs of District residents and businesses should inform criteria for assessing suitability of land for development
NPPF environmental dimension	NPPF Core Planning Principle 5: take account of the different roles and character of different areas, promoting the vitality of urban areas, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it	3. Criteria for assessing suitability of land for development should recognise and respect the character of the countryside and the need to support rural communities

⁴ Only NPPF text relevant for the purposes of the Strategic Growth Options Study has been quoted

Dimension of sustainable development	NPPF Core Planning Principles and Shepway Core Strategy policies informed by each dimension ⁴	Emerging spatial planning principle for Growth Options Study
	<p>NPPF Core Planning Principle 6: support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change</p>	<p>4. Criteria for assessing suitability of land for development should build in opportunities for decarbonisation of development, and seek to avoid areas of flood risk and coastal change</p>
	<p>NPPF Core Planning Principle 7: contribute to conserving and enhancing the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser environmental value</p>	<p>5. Criteria for assessing suitability of land for development should seek to direct development to land of lesser environmental value, and identify opportunities for conserving and enhancing the natural environment, including reducing pollution.</p>
	<p>NPPF Core Planning Principle 8: encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value</p>	<p>6. Criteria for assessing suitability of land for development should seek to maximise brownfield/previously developed land opportunities, provided that land is not of high environmental value</p>
	<p>NPPF Core Planning Principle 9: promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas</p>	<p>7. Criteria for assessing suitability of land for development should seek to identify opportunities for mixed-use development and multiple uses of land</p>

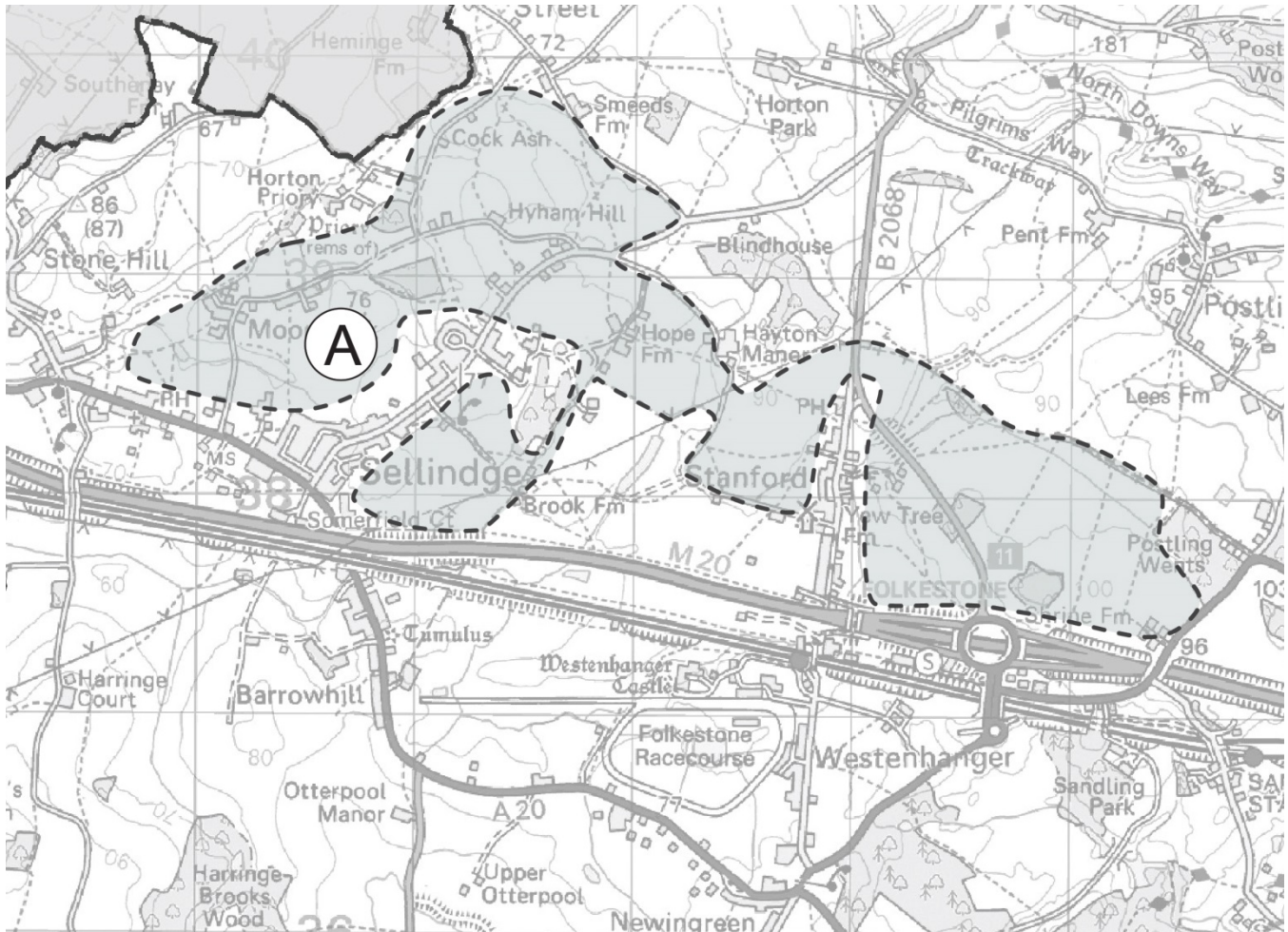
Dimension of sustainable development	NPPF Core Planning Principles and Shepway Core Strategy policies informed by each dimension ⁴	Emerging spatial planning principle for Growth Options Study
	NPPF Core Planning Principle 10: conserve heritage assets in a manner appropriate to their significance	8. Criteria for assessing suitability of land for development should seek to conserve and if possible enhance heritage assets
	NPPF Core Planning Principle 11: Actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable	9. Criteria for assessing suitability of land for development should seek to maximise opportunities for public transport, walking and cycling as transport modes, as part of a wider approach towards creating sustainable settlements
NPPF social dimension	NPPF Core Planning Principle 4: seek to secure a good standard of amenity for all existing and future occupants of land and buildings	10. Criteria for assessing suitability of land for development should maximise amenity for existing and future residents
	NPPF Core Planning Principle 12: take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs	11. Criteria for assessing suitability of land for development should take account of opportunities to improve health, culture and well-being, including through appropriate consideration of community facilities, recreation and open space

Dimension of sustainable development	NPPF Core Planning Principles and Shepway Core Strategy policies informed by each dimension ⁴	Emerging spatial planning principle for Growth Options Study
<p>Overarching/all dimensions</p>	<p>NPPF Core Planning Principle 1: set out a positive vision for the future of an area; Core Planning Principle 2: planning should be a creative exercise in finding ways to enhance and improve places</p>	<p>12. The study should focus on opportunities as well as constraints. It should seek to apply creative solutions to the planning process.</p>
	<p>NPPF Core Planning Principle 1: joint working/co-operation to address larger than local issues;</p>	<p>13. The study should seek to maximise involvement, co-operation and joint working with neighbouring and County authorities</p>
	<p>NPPF Core Planning Principle 1: provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency</p>	<p>14. The study conclusions should be unambiguous and easy to interpret; there should be a focus on informing the planning process throughout.</p>

2 Assessment of specific locations

2.1 Area A: North and East of Sellindge

Figure 2: Area A before Phase Two assessment



Agricultural land quality

Almost all of Area A, including Sellindge and the hamlet⁵ of Moorstock, consists of Grade 2 agricultural land. The only Grade 3 land lies at the edges of the area and is much smaller in extent. At the eastern end of Area A, there is a small amount of Grade 3 land along the B2068 north of M20 Junction 11 and along the southern edge of the AONB in the vicinity of Bartholomew's Wood. To the west, the hamlet of Stone Hill and its immediate surroundings lie on Grade 3 land and there is also a much smaller 'tongue'

⁵ For consistency, a settlement is defined as a 'hamlet' for the purposes of this report if it comprises a small settlement lacking a parish of its own. Settlements like Lymgne, Sellindge and Stanford that have their own parishes are referred to instead as 'villages'.

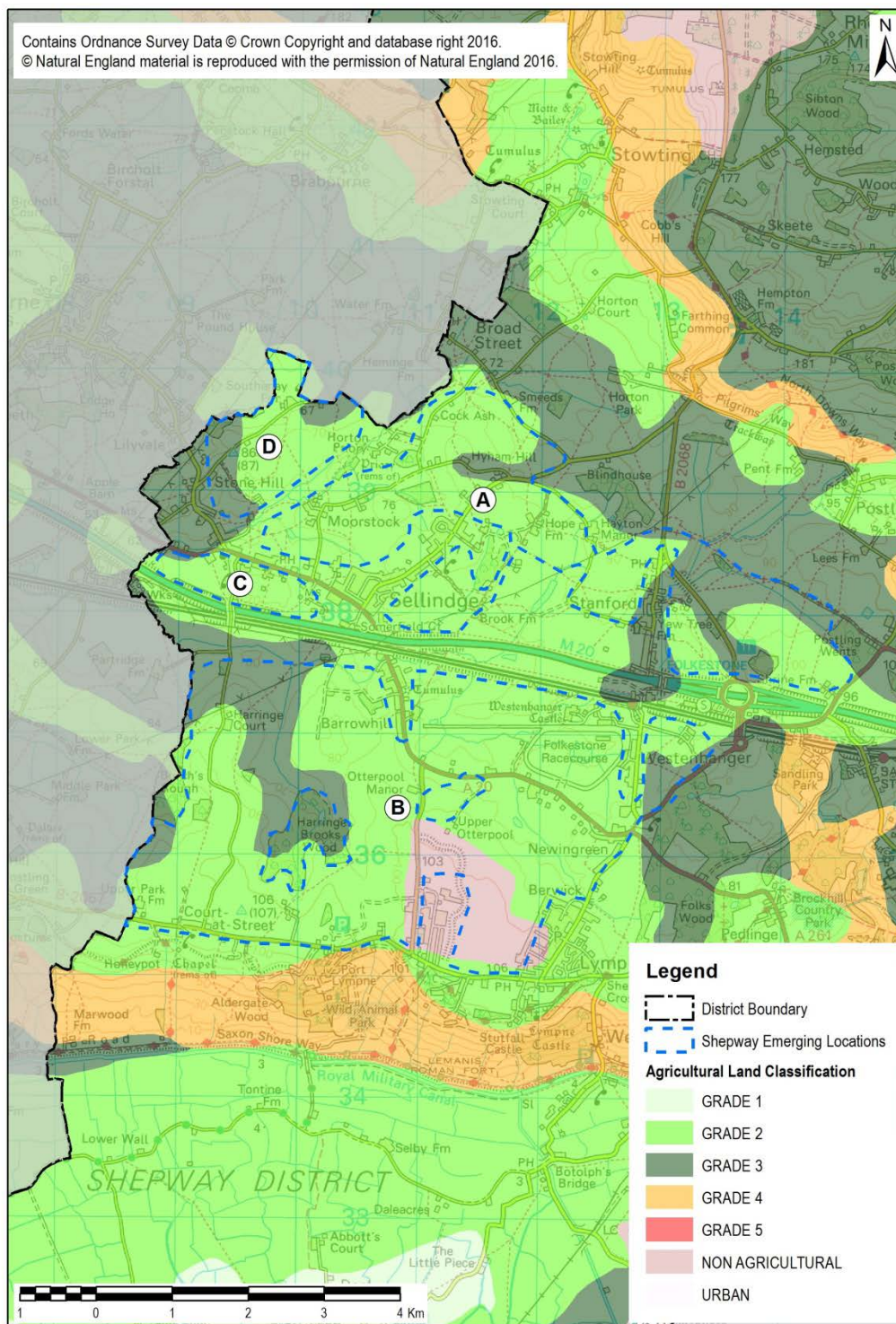
of Grade 3 land at Hyham Hill. On this criterion, therefore, almost all of Area A has a lower absolute suitability for development, though, relative to Areas B, C and D its relative performance is stronger, given the large extent of Grade 2 land across all four areas. This criterion is illustrated across all four areas for clarity in Figure 3 below.

Figure 3 is based on Natural England's regional-scale agricultural land quality mapping for London and the South East⁶, and as such should not be considered sufficiently accurate for use in assessment of individual fields or sites; any enlargement, such as Figure 3, could be misleading, and as such full and detailed site-specific survey would be needed to support any site allocation or planning application.

The map shows Grades 1-5, but Grade 3 is not subdivided into Grade 3a (comprising, alongside Grades 1 and 2, Best and Most Valuable (BMV) agricultural land) and Grade 3b (which does not comprise BMV land).

⁶ Available online at <http://publications.naturalengland.org.uk/publication/141047?category=5954148537204736>

Figure 3: Agricultural land quality across Areas A, B, C and D



Transport and accessibility

Area A is located to the north of the M20, around the villages of Sellindge and Stanford. In the eastern part of the area the B2068 provides access to the M20 at Junction 11. Swan Lane provides a connection to the A20 at Sellindge, joining with Blindhouse Lane and Stone Street to the north. There are a number of other rural roads throughout the area, serving individual properties and hamlets.

As set out in the Phase 1 assessment, the impact of growth here on M20 Junction 11 and on the routes to the M20, i.e. the B2068 and A20 should be considered as part of development proposals and the policy formation process.

No bus services currently operate directly through the area. The closest bus services to this area are the number 10/10A service which runs through Sellindge along the A20 Ashford Road, to the south of the western portion of the site, and the number 18 service, which operates along Ashford Road at the eastern boundary of the site, providing a service to Canterbury to the north and Hythe to the south. There are no cycle routes within the area; however there are numerous public footpaths which run through the more rural parts.

The western part of the area benefits from proximity to Sellindge and access to local facilities. The eastern portion of the area benefits from proximity to Junction 11 of the M20 as well as a walking route over the M20 via Stone Street towards Westenhanger station.

Many of the smaller roads and rural lanes in Area A are constrained and capacity upgrades would be likely unfeasible in many locations. This consideration applies particularly to lanes north of Sellindge including Moorstock Lane, Hyham Hill and Blindhouse Lane. Even Swan Lane, though able to accommodate a higher level of traffic than currently uses it, is not entirely unconstrained.

Landscape

The assessment of the landscape criterion across all four areas was informed by a range of considerations, including relationship of land to the Kent Downs AONB and its setting, and how visually prominent development on that land would be. Both of these considerations were partly informed by mapping of terrain height the study area, illustrated in Figure 4 below. In general terms, development on higher land is more visible across a wider area and on lower land less so, meaning lower land tends to be more suitable for development, though with exceptions applied on a case by case basis.

It is important to note that this approach is appropriate for landscape assessments in general, irrespective of whether or not the area being assessed is within the setting of an AONB, though of course those areas within an AONB setting, as at Shepway, should be considered relatively more sensitive to development, having regard to the Government's Planning Practice Guidance⁷, the Kent Downs AONB Management Plan, and the examples presented in Appendix C of this report.

⁷ PPG paragraph 003 reference ID: 8-003-20140306, available at <https://www.gov.uk/guidance/natural-environment>

The setting of an AONB is not formally defined, either in Government policy or by AONB Management Plans. Rather, the extent to which the AONB setting is relevant for planning purposes depends on the development proposed.

The most relevant description of the setting of the Kent Downs AONB for the purposes of this study is that provided by the AONB Management Unit at the Maidstone Local Plan inquiry, which was as follows:

'In some cases the setting area [of the AONB] will be compact and close to the AONB boundary, perhaps because of natural or human made barriers or because of the nature of the proposed change. However, the setting area may be substantial for example where there is a contrast in topography between higher and lower ground.

Scale, height, siting, use, materials and design are factors that will determine whether a development affects the setting of the AONB. Incompatibility with surroundings, movement, reflectivity and colour are also likely to affect impact. In most cases, the further away a development is from the AONB boundary, the more the impact is likely to be reduced, however a very large or high development may have an impact even if some considerable distance from the AONB boundary.

Locations where development and changes to the landscape where the setting of the Kent Downs AONB may be more keenly felt include views to and from the scarp of the North Downs to the Vale of Holmesdale [i.e. the A20/M20 corridor].

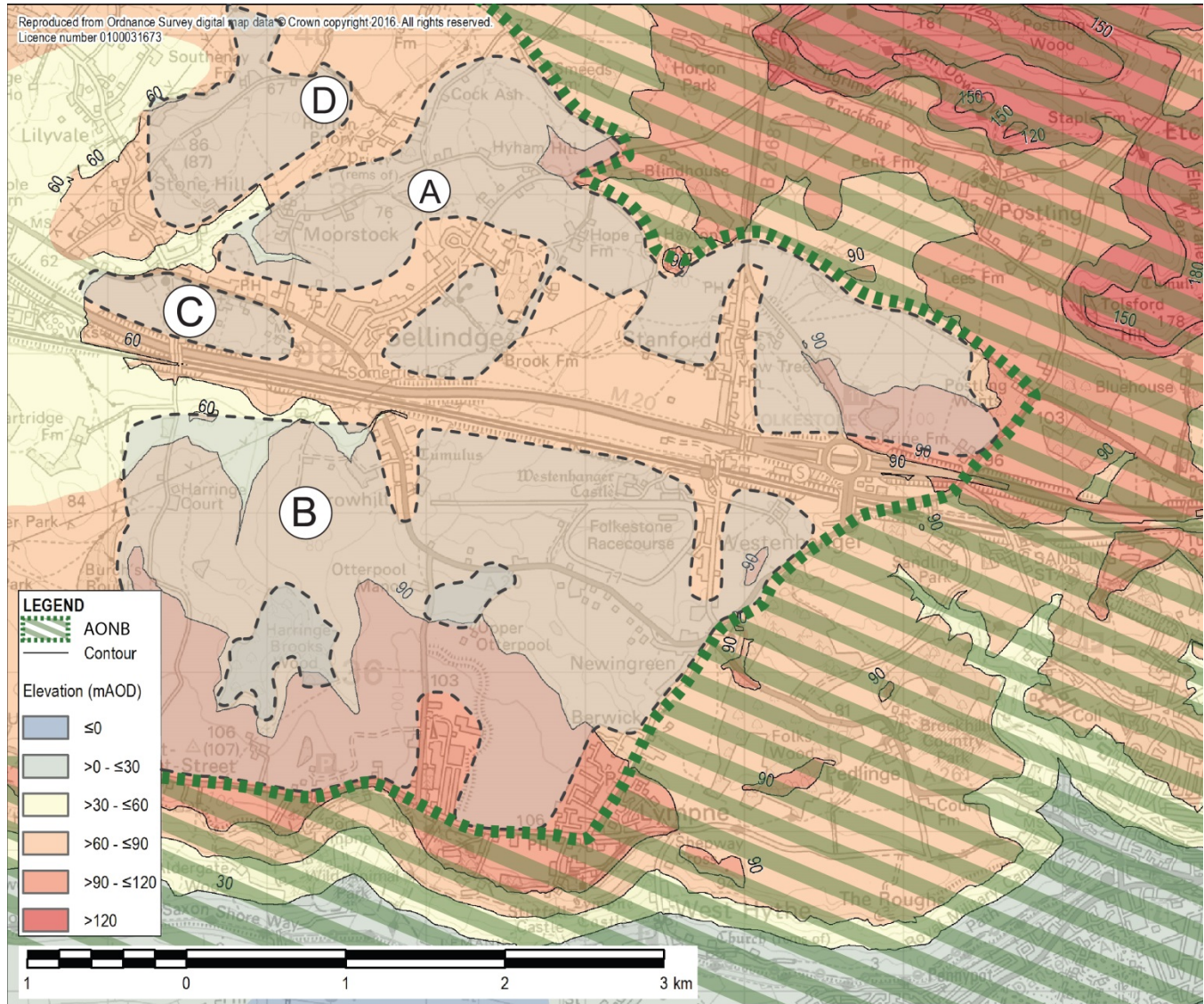
A development may avoid direct physical effects, but introduce other impacts, such as a greater level of traffic, noise and the characteristics of built development or be located outside of the AONB but increase urban fringe pressures on land in the AONB, potentially affecting land management and the Public Rights of Way (PRoW) network. Examples of adverse impacts on the setting of the Kent Downs AONB include:

- *development which would have a significant impact on views in or out of the AONB;*
- *loss of tranquillity through the introduction or increase of lighting, noise, or traffic movement or other environmental impact including dust, vibration and reduction in air quality;*
- *introduction of abrupt change of landscape character;*
- *loss or harm to biodiversity, heritage assets and natural landscape, particularly if these are contiguous with the AONB; and*
- *development giving rise to significantly increased traffic flows to and from the AONB, resulting in erosion of the character of rural roads and lanes.*

Taking these factors into consideration, it is not considered possible to provide an absolute definition for setting of the AONB; rather proposals would have to be assessed on a case by case basis taking into account both location and the characteristics of the development under consideration.'

This helpful summary of the context and relevant planning considerations in respect of the AONB setting informs the approach of this entire report, not just that of Area A.

Figure 4: Terrain height across Areas A, B, C and D



Area A has a gently rolling landform and forms a part of a broader area of foothills to the North Downs Ridge to its north. The area predominantly comprises arable farmland, with occasional interspersed areas of woodland. Fields in the area are mostly large-scale and divided by tracks, fence lines or roads, with occasional hedgerows. There is partial tree cover around the settlement of Sellindge and along its surrounding roads, which provides a degree of enclosure to the west of the area. The north, centre and east of the area have sparser tree cover and consequently a more open character.

The area includes land close to the settlements of Sellindge and Stanford. Stanford is a village and well-contained linear settlement north of the M20. Sellindge is a more dispersed settlement, with development spread along many of the roads into and out of the village. There are intermittent attractive views towards the North Downs Ridge from across the area. There are also intermittent views

of traffic along the M20 to the south, which detracts from the appearance and setting of parts of the area. Tranquility across the southern part of Area A is reduced by traffic on the M20.

AECOM was commissioned as part of the Shepway Growth Options Study to provide a High Level Landscape Appraisal (HLLA), which now comprises part of the Shepway evidence base on landscape.

The HLLA was a high-level study of often quite broad character areas within Shepway District. Its conclusions were intended to help identify which parts of the District were likely to be more suitable for development. As such, assessment of sensitivity, or suitability, was not undertaken on a site-by-site basis, but on the evident landscape characteristics of wider character areas across the District, known as Landscape Character Areas (LCAs).

Within those LCAs assessed as High in terms of landscape sensitivity, it is likely that there is very limited or no potential for strategic-scale development. For LCAs assessed as Medium, there are likely to be parcels of land that, when assessed at a more site-specific level, are considered either to have higher than or less than Medium sensitivity to development, but the location and detailed characteristics of these land parcels was not assessed until this more fine-grained Phase 2 analysis. Area A is covered by parts of the LCAs 05: Postling Vale, 06: Stanford, and 09: Sellindge.

LCA 05: Postling Vale is identified in the HLLA as being of High landscape sensitivity and therefore far less suitable for strategic scale development in terms of likely impact on landscape character and visual amenity. LCA 06: Stanford and LCA 09: Sellindge are each identified as being of Medium landscape sensitivity, where impact on landscape character and visual impact is considered not necessarily to be an obstacle to strategic scale development, and where suitability is likely to be determined by other sustainability or strategic environmental considerations.

Land within Area A is in the middle ground of views south from the North Downs Way National Trail and the North Downs Ridge, which are within the Kent Downs AONB. Consequently, a large proportion of the land within Area A, notably around Stanford and in the north and east of the area, is perceived to form a part of the setting of the AONB (this is illustrated in Figure 5, which shows the eastern part of Area A prominent in the foreground in views from the AONB, and Figure 6, illustrating the same for the land in the north). Development on this open and generally undeveloped land is relatively more likely to give rise to significant adverse visual effects on the setting of the AONB, as a result of its proximity and prominence from along the ridgeline. These areas are therefore considered to be unsuitable for strategic scale development.

Figure 5: View from public access land within the AONB at Tolsford Hill, showing flat, open and highly visible land in the east of Area A within the AONB setting (arrowed)



Figure 6: View from Farthing Common within the AONB, showing flat, open and highly visible land within the AONB setting (arrowed) in the north of Area A



However, there are discrete areas of land to the north and east of Sellindge which are largely concealed in views from the AONB by a combination of the intervening rolling landform, increased tree and woodland cover around Sellindge, and their distance from viewpoints within the AONB. These areas of land therefore have fewer constraints in terms of potential landscape or visual effects on the AONB (as illustrated in Figure 8 below). Additionally, there are a number of other more localised detracting factors, including the land's proximity to the existing settlement of Sellindge, its relatively contained zone of visual influence, extensive agricultural development around Elm Tree Farm, power lines east of the village (illustrated in Figure 7), and the M20 to the south.

Figure 7: Visually enclosed land east of Sellindge and north of the M20 considered more suitable on the landscape criterion. Note the dominance of the power lines in this location, with Operation Stack land in the distance at the right



Figure 9 is similar to Figure 8 in showing a view of the village of Brabourne Lees from the AONB ridgeline. Although Brabourne Lees is in Ashford rather than Shepway, the picture is included to demonstrate that not just Sellindge, but much other development within the valley, blends in effectively to trees in the middle distance of wider views from the AONB. The same effect could apply in the case of new development if it were designed appropriately, softened by significant planting, and nestled within the lower parts of the valley floor.

Whilst strategic scale development on land adjacent to Sellindge may give nevertheless give rise to some adverse landscape and visual effects, these effects are limited because they could be more readily mitigated through the siting, type and design of development to assimilate it into the landscape. These areas are therefore considered to be suitable for strategic scale development.

Figure 8: Sellindge and surrounding land (arrowed) from Farthing Common within the AONB. Due to extensive tree cover and landform, Sellindge is very difficult to see despite being a large village for the area, and forms only a minor feature in the middle distance of a much wider vista



Figure 9: The nearby village of Brabourne Lees (arrowed) in Ashford, like Sellindge, has a minimal visual impact on the AONB setting, set as it is among trees in the middle distance of a wider vista. Any new development in Area A should seek to reflect this approach



Land north and west of Moorstock Lane within Area A is considered to be unsuitable for strategic scale development as a result of the potential for adverse landscape effects that may not be readily mitigated. These areas of land are small-scale pastoral fields divided by belts of mature and veteran trees. The effect of strategic scale development on this land could significantly alter its strongly rural and remote landscape characteristics.

Infrastructure

The southern portion of Area A benefits from proximity to Sellindge village which has a wide range of facilities and services including a GP surgery (The Surgery, Sellindge), primary school (Sellindge Primary School), village shop with integrated Post Office, village hall, residents' association, sports and social club, farm shop and a public house. The provision of infrastructure in Sellindge may be enhanced by development of the Sellindge broad development zone identified through Core Strategy Policy CSD9. This identifies the site as suitable for the development of up to 250 new dwellings with associated social infrastructure improvements and provision. New development in this location may therefore provide an opportunity to increase the range of social infrastructure, including education and open space provision, in proximity to the southern portion of Area A.

It is important to note, however, that whilst Sellindge benefits from a range of facilities, SDC advises that many of these are at capacity. The forthcoming development of up to 250 dwellings referenced above requires the expansion of the doctors' surgery and the expansion of the primary school from 0.5 forms equivalent (FE) to 1 FE, using land in the control of the applicant. As of early 2017, there is no spare capacity for further development at either the doctor's surgery or school, and land with potential for the future expansion of the school is in separate ownership.

As such, any proposals would have to be able to either expand the school from 1FE to 2FE or provide for a new primary school. Additionally, new or expanded health care would be required.

The remainder of Area A does not perform as well with regards to access to existing or potential for future infrastructure. The eastern and western parts generally lack access to services and facilities, with the only exception being the public house at Stanford. Access to green infrastructure across Area A is, however, reasonable, and includes recreation grounds within Sellindge, Gibbin's Brook (SSSI), Great Priory Wood, Hayton Wood, Perry Wood, Bartholomew's Wood and Butcher Wood.

Heritage

The primary heritage constraint to development in Area A is the setting of the Grade I listed Monks Horton Priory (now a private house) and scheduled Horton Priory which includes an area of gardens around the Priory. The asset's setting takes in a broad swathe of the agricultural land north of Moorstock Lane from a point to the west of Swan Lane westwards to the corner where the setting is shared with the Grade II listed Moorstock House. For much of its length Monks Horton Priory is screened from the land to the south of Moorstock Lane by a thick hedge incorporating mature standard trees. The one appreciable gap in the hedge is approximately 280m south-west of the junction of Moorstock Lane and the lane north to Cock Ash, which allows views of the asset from the road and the land to the south of the road.

Land to the south of Moorstock Lane and the west of Great Priory Wood slopes gently south towards the village of Sellindge. Development in this location would be screened from Horton Priory and Monks Horton Priory by a double line of hedges north of Moorstock Lane, by the row of houses to the south of Moorstock Lane and by the sloping topography. As such, it would be more suitable for development provided that the north facing slope of the hillock to the south-west of Great Priory Wood is avoided, given that it comprises higher ground within the setting of the assets.

However, towards the south-west corner of this piece of land is the Grade II listed Elm Tree Farm House and associated barn. The farmhouse has a late 18th or early 19th century façade over an earlier building and the barn dates to the 16th century. The assets are, though, effectively screened from much of the area by hedges around the garden to the west and by modern farm buildings to the north and east. The farmhouse is, however, visible from Ashford Road to the south and development between it and the road would be within its setting, making this location less suitable for development.

The Grade II listed Lees Cottages lie on the northern edge of Sellindge at the northern end of Downs Way. The assets are screened to the south by the buildings at the northern end of the road and to the east and west and to an extent to the north by the hedge and the mature trees that surround the garden. However, the hedge to the north is sparser than those to the east and west allowing views out to the field to the north which forms part of the asset's setting. It is not considered that development within the asset's setting would cause substantial harm but it is suggested that any development should be at some remove from its boundary.

On the western side of Moorstock Lane where it meets Ashford Road the Grade II listed Guinea Hall is well screened on all sides, to the east, west and south by mature trees and to the north and north-west by outbuildings. Development at a reasonable distance as far north as Moorstock Wood would not affect the asset's setting but moving further north onto the footpath from Moorstock Farm to the Church of St Mary the land becomes part of the setting of the church and as such is considered unsuitable for development on this criterion (Figure 10).

Figure 10: St Mary's Church, Sellindge from the north-east, showing that land north of Ashford Road here would be unsuitable for development on the heritage criterion



In addition, land in this area has suffered very little from the grubbing up of hedges and the landscape is readable on 19th century historic maps with woods and the water management system associated with Hoddiford Mill still in place (Figure 11).

Figure 11: Historic landscape around Hoddiford Mill (centre-right)



The Grade II listed Lower Cock Ash to the north-east of Monks Horton Priory is screened from land to the south by a belt of trees to the immediate south of the asset. To the north-east and east however the asset enjoys an open setting and development would need to be a considerable distance away in order not to interfere with the setting. The situation is different for the Grade II* listed Kite Manor to the west of the junction of Southenay Lane, Broad Street and Church Lane. Here, the asset's setting comprises its grounds, which are heavily screened from land to the west by mature trees, and for a short distance along the road to the north and south. Further south along Broad Street on the eastern side is the Grade II listed Smeeds Farm. The asset is set back from the road but the rising land to the west towards Holly Wood forms part of its setting. Similarly, the Grade II listed Hyham Hill Farmhouse on Swan Lane enjoys an open setting to the rear with views over a field bounded to the north by the belt of trees and scrub land to the south of Lower Cock Ash.

The land around Hope Farm bordered by Swan Lane to the north-west and Hayton Road to the north-east is not within the setting of any designated heritage asset. The Grade II listed Hayton Manor Farm and associated barn have enclosed settings which do not extend much further than the road. In contrast, although backed by Gibbin's Brook wood to the west, Gibbins Brook Farm has an extensive setting over the fields to the east earmarked for Operation Stack extending as far as Kennet Lane. The

screening provided by Gibbin's Brook wood makes the land to the south-east of Swan Lane at this point more suitable for development from a heritage standpoint. Of the three designated assets in the area Holly Cottage (Grade II) is screened by the houses on the south-east side of Swan Lane, and Rhodes House and Little Rhodes on Ashford Road (both Grade II) are heavily screened by mature trees within and surrounding their grounds (Figure 12).

Figure 12: Land to rear of listed Rhodes House and Little Rhodes, showing screening



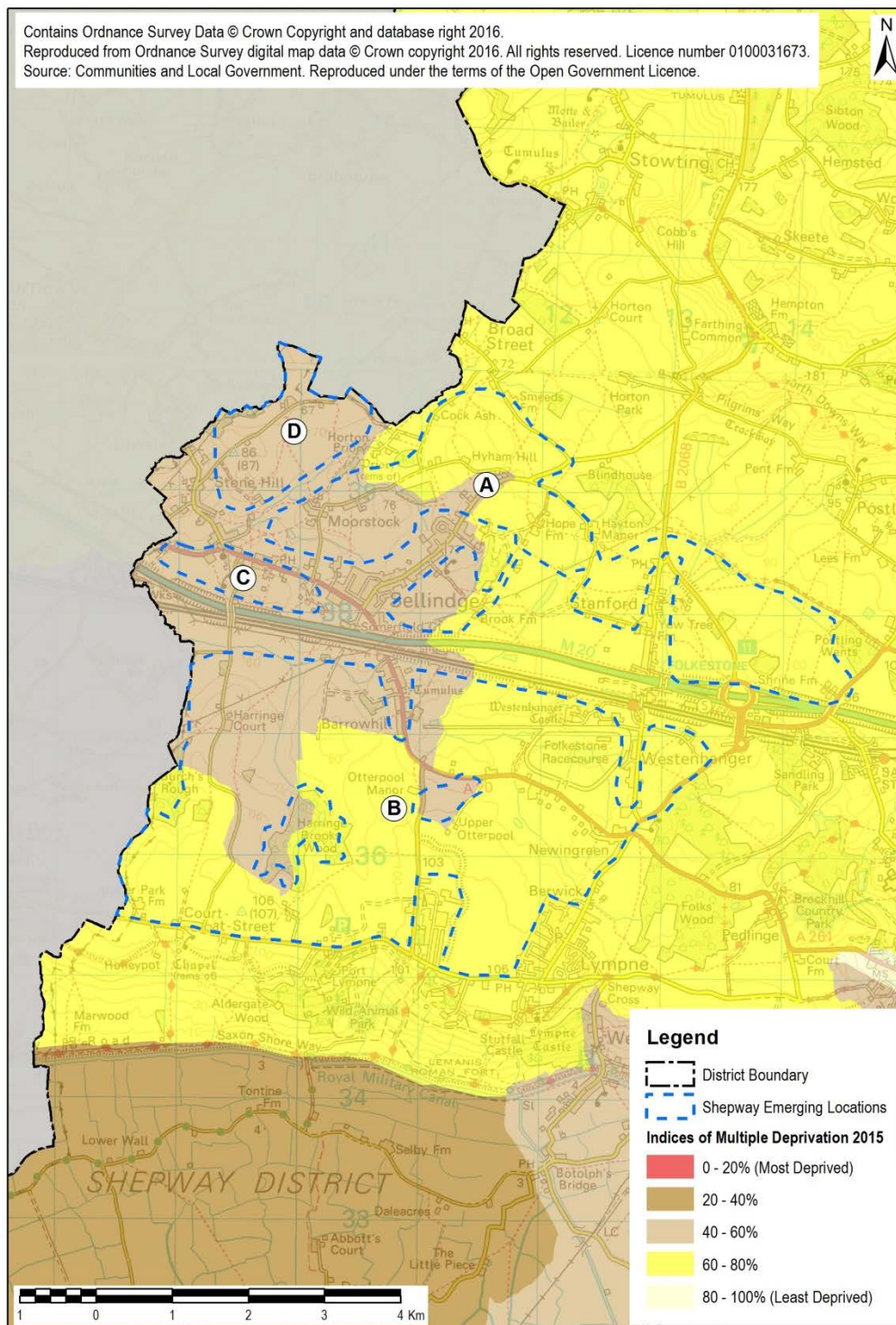
The only designated built heritage asset in Stanford is the Grade II* listed Stanford Windmill. The windmill is a tall building with a wide setting extending to the fields surrounding it to the north-west, south-west and east and as far south as the A20. As is often the case with tall buildings one can venture quite close and not see it and there may be parcels of land quite close to the asset, including the triangle described by Stone Street, the B2068 and the East Stour River, that are not within its setting.

The easternmost extent of Area A bounded by Stanford to the west, the Kent Downs AONB to the north, Ashford Road to the east and the M20 Motorway to the south does not contain and is not within the setting of any designated heritage asset.

Regeneration potential

Area A is divided between a slightly more deprived western half, around Sellindge, and a relatively less deprived eastern half around Stanford. However, as no part of the area is significantly deprived, development in any location would likely have limited impacts on this criterion. Nevertheless, this criterion would support to some extent development around Sellindge rather than further east. The indices of multiple deprivation across all four areas, which comprises the key indicator informing the regeneration criterion, are illustrated in Figure 13 below.

Figure 13: Indices of Multiple Deprivation across Areas A, B, C and D



Economic development potential

In principle, the eastern portion of Area A is highly suitable for employment led development given its proximity to Junction 11 of the M20, Westenhanger railway station and Folkestone service station which already includes employment and retail uses. Employment led development to the east of the B2068, particularly in close proximity to the M20, could offer direct access to the strategic road network, offer the potential for 24-hour working and accommodate a wide range of employment use classes. In addition, commercial development in this broad location would have a lesser impact on the nearby village of Stanford. However, balanced against this are the key constraints of B2068 capacity in this location, as the road is not suitable for heavy goods vehicles, and furthermore large-scale employment uses within these areas would be out of keeping with the rural character and intensity of existing land uses.

Small scale employment uses could be appropriate, however, in the southern portion of Area A, adjacent to Sellindge and its broad development zone (Policy CSD9) which is identified as suitable for the development of up to 250 dwellings, employment uses and associated social infrastructure.

Spatial opportunities and constraints

Area A is spatially large and complex. The main constraints include the existing hamlet of Moorstock in the western part of the area and scattered farmsteads in the centre, of which the largest is Hope Farm. There are fewer spatial constraints in the far east of the area. In the centre of the area, coalescence of housing between Sellindge and Stanford should be avoided so that both settlements retain their historic role as separate villages.

The network of roads across the area provides spatial opportunities as well as constraints. In the centre and far east, the M20 provides a clear southern limit to development, as do Hayton Road, Broad Street and the road past Cock Ash on the northern edge. In the west, Moorstock Lane may have potential as a defensible boundary for development adjacent to Sellindge, and likewise in the east, either the B2068 or the footpath between Postling Wents and Hayton Manor Farm could be effective boundaries to development adjacent to Stanford.

Field boundaries/hedgerows across Area A offer potential as defensible boundaries to development, though the countryside is more open east of Stanford and such opportunities are therefore more limited in this location.

Like other areas, Area A includes within its boundaries Impact Risk Zones (IRZs) for a number of Sites of Special Scientific Interest. IRZs are designated to assess the potential risks to SSSIs posed by development proposals. They comprise an area surrounding each SSSI which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts.

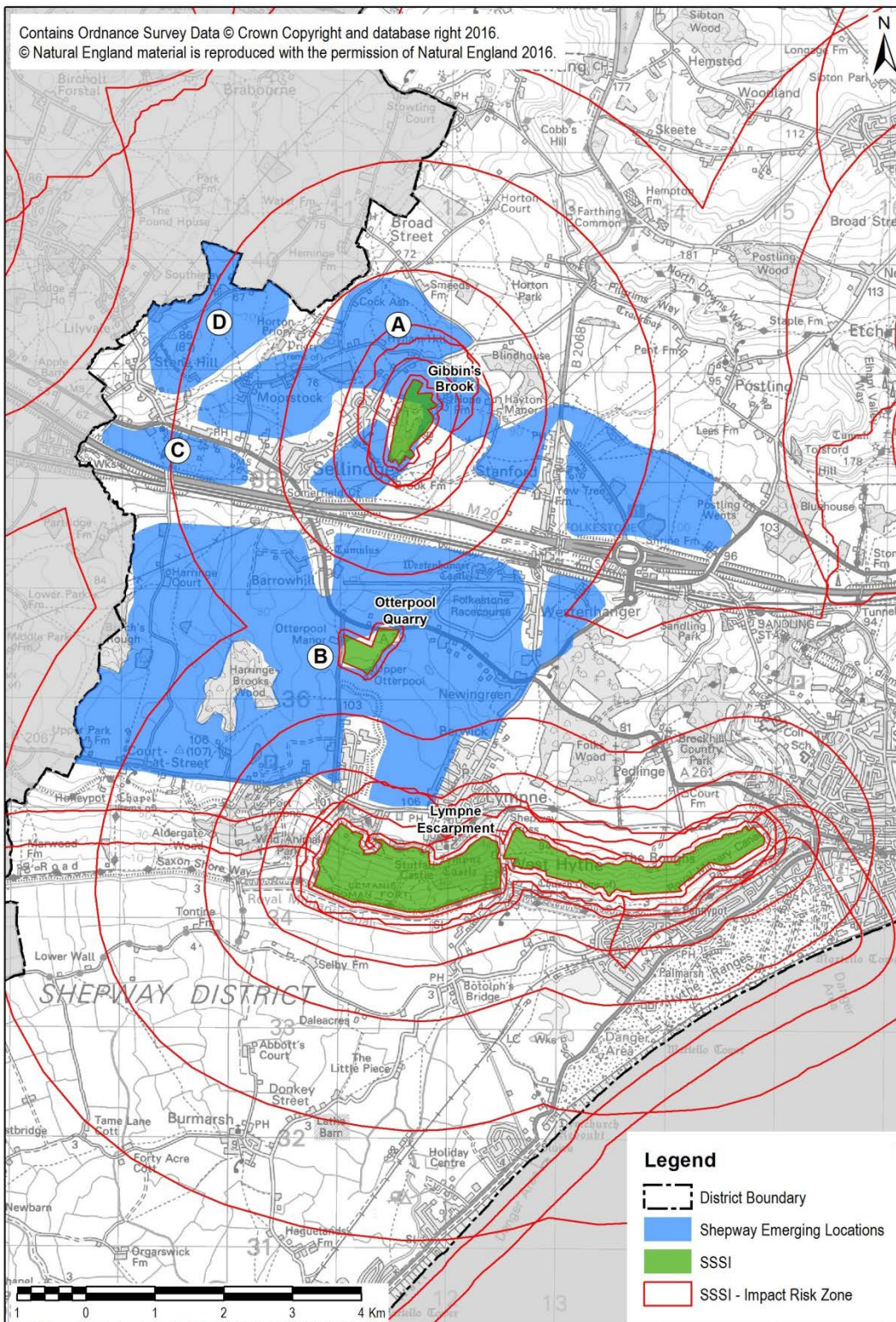
Local planning authorities have a duty to consult Natural England before granting planning permission on any development that is likely to affect a SSSI. In this way, the IRZs can be used to consider

whether a proposed development is likely to affect a SSSI and whether harm might be avoided or mitigated.

IRZs differ significantly in extent depending on the SSSI they relate to, as illustrated in Figure 14. There is no definitive statement from Natural England on the type or quantity of development that would be permitted within each IRZ.

However, the varying extents of relevant SSSIs across the study area is clear from Figure 14, which shows that the whole of Area A is within the IRZ for Gibbin's Brook.

Figure 14: SSSI Impact Risk Zones across Areas A, B, C and D



Due to the lack of a definitive statement on the type or quantity of development acceptable within each SSSI IRZ, we carried out targeted consultation with Natural England on the IRZs within the study area, and have incorporated their advice into our conclusions.

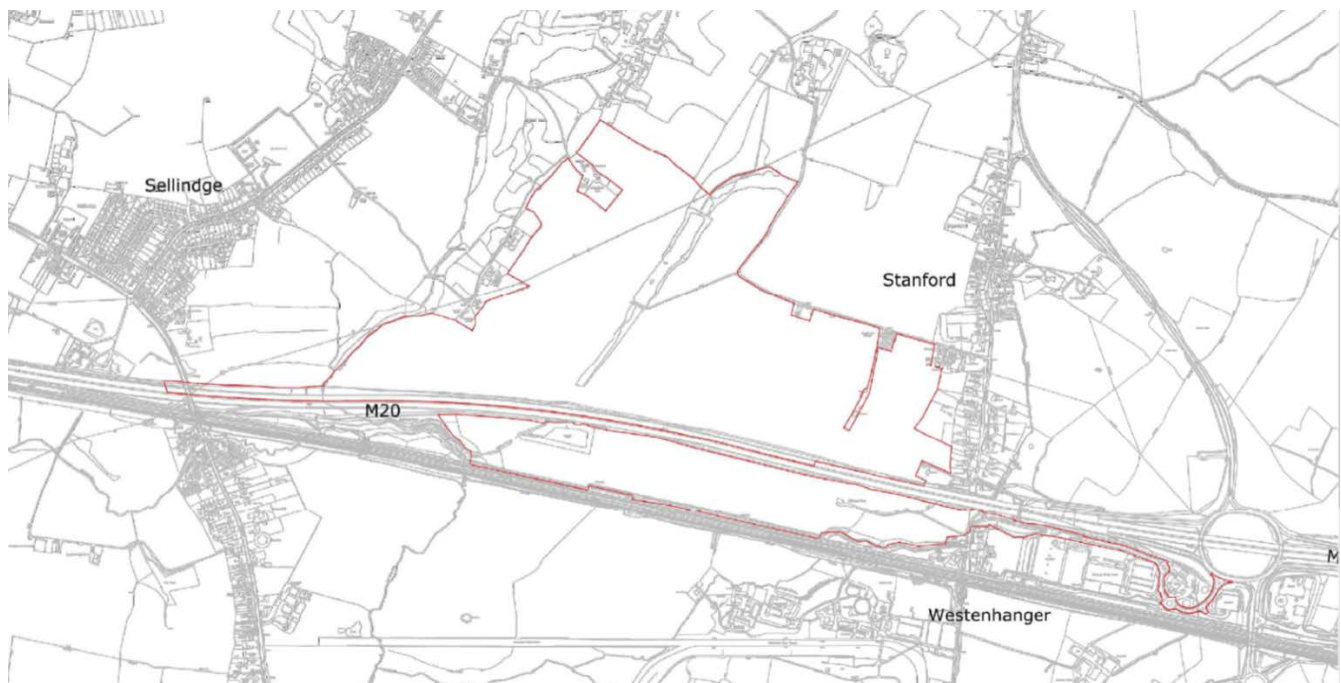
For Area A, Natural England advises that the key issue for the Gibbins Brook SSSI IRZ would be pollution of watercourses running into the SSSI. The surrounding topography, whereby water flows from north to south in the vicinity of the SSSI, thus suggests that development would be less suitable on the marshy land to the immediate north of Gibbins Brook. However, the watercourse at the southern end of the SSSI that flows into the East Stour river north of Barrowhill is flowing away from the SSSI, making development to the south of Gibbins Brook less of a problem on this criterion.

Natural England also advised that for development in all areas, account should be taken at site allocation and/or planning application stage of the possible impacts of more journeys and visitors to the natural assets at Dungeness, which, though outside the study area, are likely to be impacted by journeys from new development within it.

Specifically for Area A, as Gibbins Brook SSSI is common access land, site allocations and planning applications should have regard to the potential impacts of a higher level of visitors to the SSSI, considering where appropriate options for mitigation.

The outer boundary of the land earmarked for Operation Stack (illustrated in Figure 15 below) is a clear and defensible edge for development in the centre of the area between Gibbin's Brook wood and Stanford.

Figure 15: Boundaries of land required for Operation Stack



Source: Highways Agency

At the time of writing (January 2017) a planning application has been submitted to the east of Sellindge within the red-line boundary illustrated in Figure 16 below. The proposal, which has Shepway reference number Y16/1122/SH, is described as:

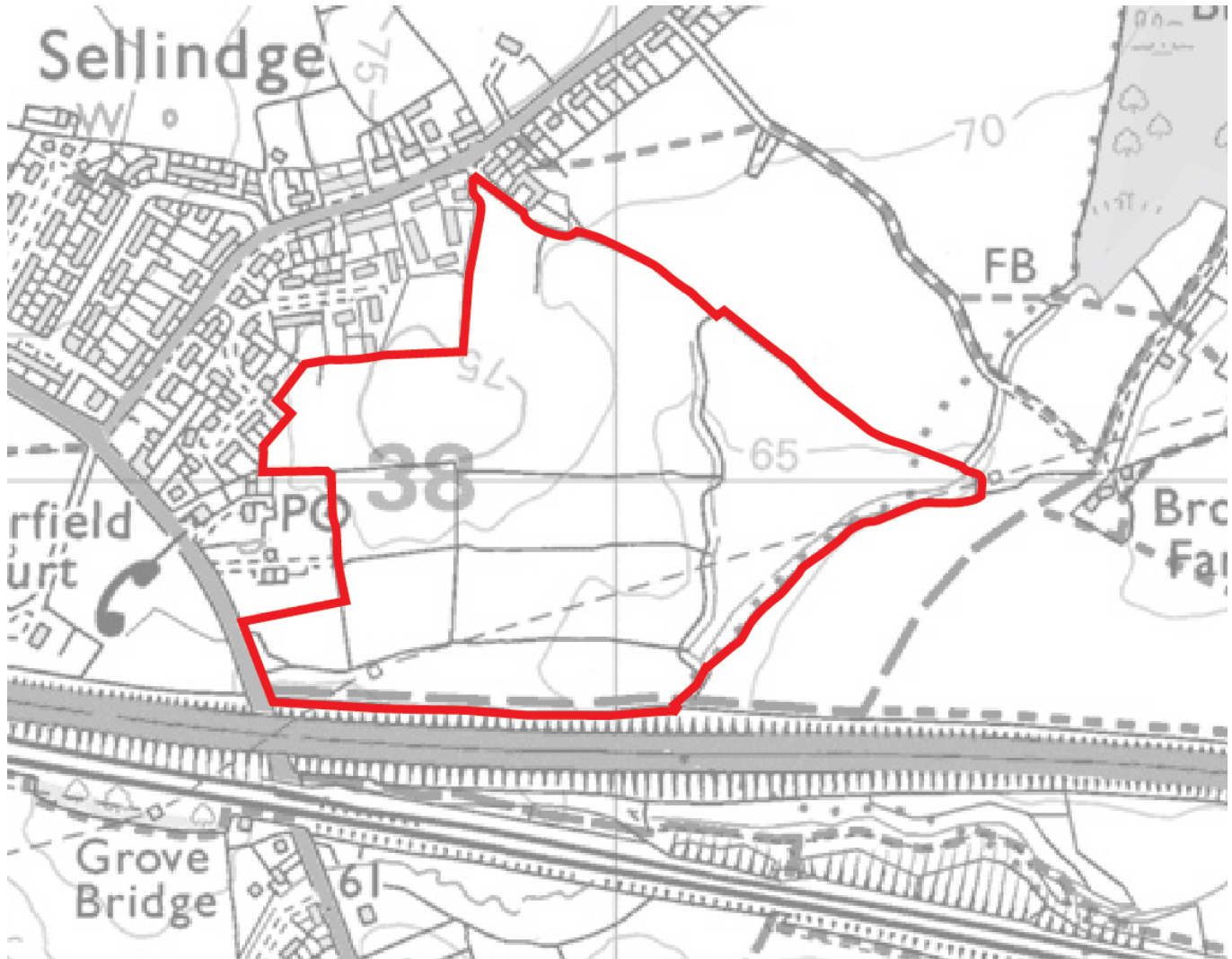
'Outline planning application for a neighbourhood extension for the creation of up to 162 houses including affordable, self-build and retirement housing, up to 929 square metres Class B1 business floorspace, allotments, recreational ground and multi-use games area, nature reserve and associated access, parking, amenity space and landscaping'.

As the application has not yet been determined, it has not for the purposes of this study been treated as a spatial opportunity or a constraint; it is nevertheless covered here as a relevant consideration.

One important spatial constraint in this location, also relevant for the planning application outlined above, is the electricity line and its supporting pylons extending across the site and illustrated previously in Figure 7. National Grid guidance does not provide a specific buffer zone between pylons and residential development, but AECOM's experience in other locations suggests that a buffer of 15-30 metres on each side would be appropriate.

However, even with such a buffer, it is likely that the perceived quality of residential development in this location would be lower than if the pylons were not in place. Though there is the potential for the electricity cable to be buried, and this could be explored by developers, the cost of doing so would likely be prohibitive.

Figure 16: Boundary of planning application for up to 162 dwellings east of Sellindge



Source: Shepway District Council

2.2 Area A Conclusions

Integrating assessment criteria

Though almost all of Area A comprises Grade 2 agricultural land, it is not unusual in this regard relative to the other three areas being assessed. Much of the Grade 3 land that does exist, which is preferable on this criterion, is already occupied by the village of Stanford or lies very close to the southern boundary of the AONB, meaning that it is in any case less suitable on the spatial opportunities and constraints criterion and the landscape criterion respectively. As such, the pattern of agricultural land grading within Area A does not provide a strong guide in terms of which locations would be relatively more suitable.

In transport terms, it appears that land in the south-west of the area around Sellindge is more suitable as it benefits from access to the A20 road, but land in the south-east is also considered suitable thanks to the B2068's connection with the M20 at Junction 11- though this land is less suitable on the landscape criterion. However, the previously-referenced capacity constraints on the lanes within and around Moorstock act to constraint development north of Sellindge, despite the good performance of the land here on a range of other criteria. Implicitly, the less developed north of the area, which has only smaller rural roads and footpaths, is less suitable on the transport criterion, but this is consistent with its lesser suitability on the landscape criterion in terms of proximity to the AONB.

On the landscape criterion, it is generally the case that the southern half of Area A performs much better than the north, due to a range of factors. Firstly and most obviously, it is the furthest part of the area from the Kent Downs AONB to the north, meaning development here would have a much lesser visual impact on its setting. This effect is increased further by the generally lower nature of the land around Sellindge in the south of the area, making it less visually prominent. This is partly why the settlement of Sellindge, despite its size, is relatively difficult to pick out from vantage points along the North Downs Way along the ridgeline within the AONB, forming a very small element within the middle distance of a much more extensive vista towards the coast, Greensand Ridge and Romney Marshes. The tree cover also significantly reduces the visual impact of land in the south-west of Area A from these vantage points.

By contrast, the north, centre and east of Area A have sparser tree cover and a more open character, and hence are much more clearly within the visual setting of the AONB, particularly from vantage points including Tolsford Hill to the east. The final reason why the south of the area performs relatively better in relation to the AONB is that its tranquility has already been compromised to a significant extent by the noise from the M20 and, to a lesser extent, from HS1 and the A20.

It is for this reason that the south of the area was considered to have only a Medium sensitivity to development in the HLLA.

In particular, land north and east of Sellindge benefits from fewer constraints in terms of potential landscape or visual effects on the AONB. This is as a result of the land's proximity to existing development, its relatively contained zone of visual influence, and other localised detracting features. Whilst strategic scale development on these areas of land would be likely to give rise to some adverse landscape and visual effects, these effects are limited because they could be more readily mitigated through the siting, type and design of development in order to assimilate the potential development into the landscape.

The landscape characteristics of land north and west of Moorstock Lane is considered to make it unsuitable on the landscape criterion, specifically its strongly rural and remote character and its small-scale fields, mature and veteran trees.

The infrastructure criterion focusses mainly on the multiple services and facilities within Sellindge making the south-western part of Area A most suitable on this criterion. This is consistent with the transport and landscape criteria. However, as SDC advises that many of the existing services and

facilities in the village are already at capacity, new development would have to provide additional services and facilities of its own for use by both existing and new residents.

The heritage criterion indicates that land within the setting of Monks Horton Priory and Horton Priory is not suitable for development. This comprises part of the north-west of Area A. Elsewhere, there are more limited constraints close to Lees Cottages and Elm Tree Farm, and few constraints in relation to Guinea Hall (all assets in Sellindge- but the setting of Guinea Hall is part of the land west of Moorstock Lane considered unsuitable on the landscape criterion). Land north of Ashford Road to the north-east of St Mary's Church, Sellindge, is part of the church setting and the historic landscape around Hoddiford Mill, and as such, is considered unsuitable for development, but was less suitable in landscape terms in any case. Also around Sellindge, the screening around the three designated heritage assets to the east of the village (south of Swan Lane and west of Gibbin's Brook) means that this land, previously considered suitable on other criteria, is also more suitable on the heritage criterion.

There are a range of heritage assets in the northern and eastern parts of the area (Lower Cock Ash, Kite Manor, Smeeds Farm and Hyham Hill in the north and Stanford Windmill, Hayton Manor Farm and Gibbins Brook Farm in the east), but their settings are all within the land already considered less suitable in terms of the transport, landscape, and infrastructure criteria. Though the easternmost part of Area A is relatively free from heritage constraints, it is less suitable in landscape terms.

On the regeneration criterion, it is not considered that development anywhere in Area A would offer significant regeneration benefits as this location is not particularly deprived. However, unlike some of the other criteria assessed, this does not form an absolute constraint to development and given that deprivation is also low across Areas B, C and D, Area A does not perform relatively poorly on this criterion.

Turning to the economic development potential criterion, again it is the south of the area that performs relatively better, due to its proximity to the M20 and thanks to Sellindge and proposed new employment there. As previously noted, the land to the north of Junction 11 is considered unsuitable in landscape terms, but the land considered suitable on other criteria in the vicinity of Sellindge could benefit from employment alongside housing development.

Finally, on the spatial opportunities and constraints criterion, the key opportunities identified that have relevance in terms of the other criteria assessed include the land for Operation Stack, particularly its western edge. This would form a defensible boundary for the land identified as suitable on a range of other criteria east of Stanford. That boundary should be heavily landscaped in this location, with acoustic barriers and planting provided to avoid amenity impacts on new residents in this part of Sellindge, as well as helping to avoid any perception of coalescence between Sellindge and Stanford. Gibbins Brook forms another clear spatial boundary on the eastern edge of this land, but as a SSSI, development should seek to minimise impacts on it.

The negative impact of the electricity line and pylons was referenced in this location as a spatial constraint: however, this is considered an issue with the potential to be mitigated through site-specific design. It is not considered a constraint severe enough to render the land unsuitable for development.

To the north of Sellindge, the land identified as suitable on a range of other criteria is not suitable on the transport criterion. This is because only Swan Lane would be suitable as an access. The key bottleneck is the feasibility of upgrading Moorstock Lane for additional traffic, along the whole of its length but in particular at its southern end, given that it joins the A20 between narrow hedgerows screening two listed heritage assets- Guinea Hall to the west and Elm Tree Farm to the east. Therefore, the land suitable on other criteria north of the village could only benefit from a single highway access, most likely to the east on Swan Lane north of existing development. As such it would be relatively separated from services and facilities in the village centre.

AECOM transport specialists advise that this single access would render this location suitable only for a maximum of fifty dwellings, which therefore would render it non-strategic development for the purposes of this report and as such, out of its scope. However, given the fact that this land is close to Sellindge Primary School, there could be the potential for development in this location to be linked to the school expansion that would be likely required if major new development were to come forward at Sellindge. Taking into account again the limited potential of Swan Lane to accommodate additional traffic, AECOM transport specialists advise that to the east of Sellindge, although two points of access would be feasible (one on Swan Lane and one to the A20 just north of the M20 and HS1 bridges), the capacity of this land would nevertheless be limited to no more than 600 dwellings. As such, this provides the opportunity for development in this location to perform better on the spatial opportunities and constraints criterion by minimising impacts on Gibbins Brook SSSI, as illustrated in Figure 18.

Summary of land considered suitable

Having considered the interaction between all criteria, it is considered that there is one parcel of land within Area A suitable for strategic-scale development. It seems suitable on the transport, landscape, infrastructure, heritage, economic development potential and spatial opportunities and constraints criteria. This parcel of land is located to the east of Sellindge and would comprise an expansion of the existing settlement. However, it is of a small enough scale to maintain the identity and character of Sellindge as a free-standing village, through avoiding, for example, coalescence with other settlements.

Additionally, this land is no less suitable on the regeneration criterion than any other part of Area A or indeed most other parts of Areas B, C and D. Though there are small and scattered parts of Area A more suitable on the criterion of agricultural land, these are limited in extent and less suitable on a range of other criteria. As such, the limited suitability of the land east of Sellindge on the grounds of agricultural quality is considered to be outweighed by its suitability on a range of other criteria.

The overall conclusions for Area A are considered consistent with the NPPF when taken as a whole and are made with particular reference to spatial planning principles 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12 and 14.

Figure 17: Selected key spatial constraints and opportunities informing Phase Two assessment of Area A

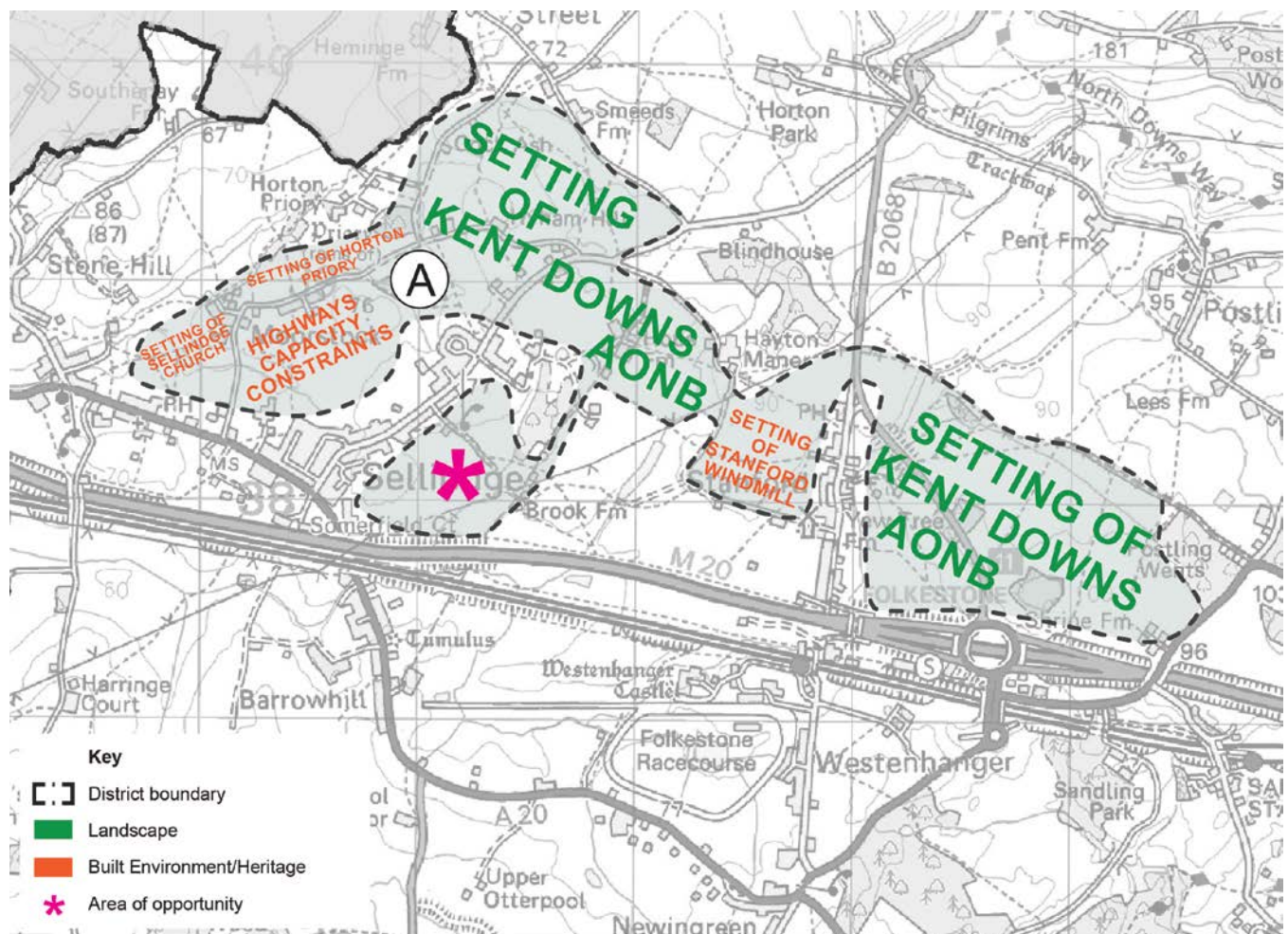
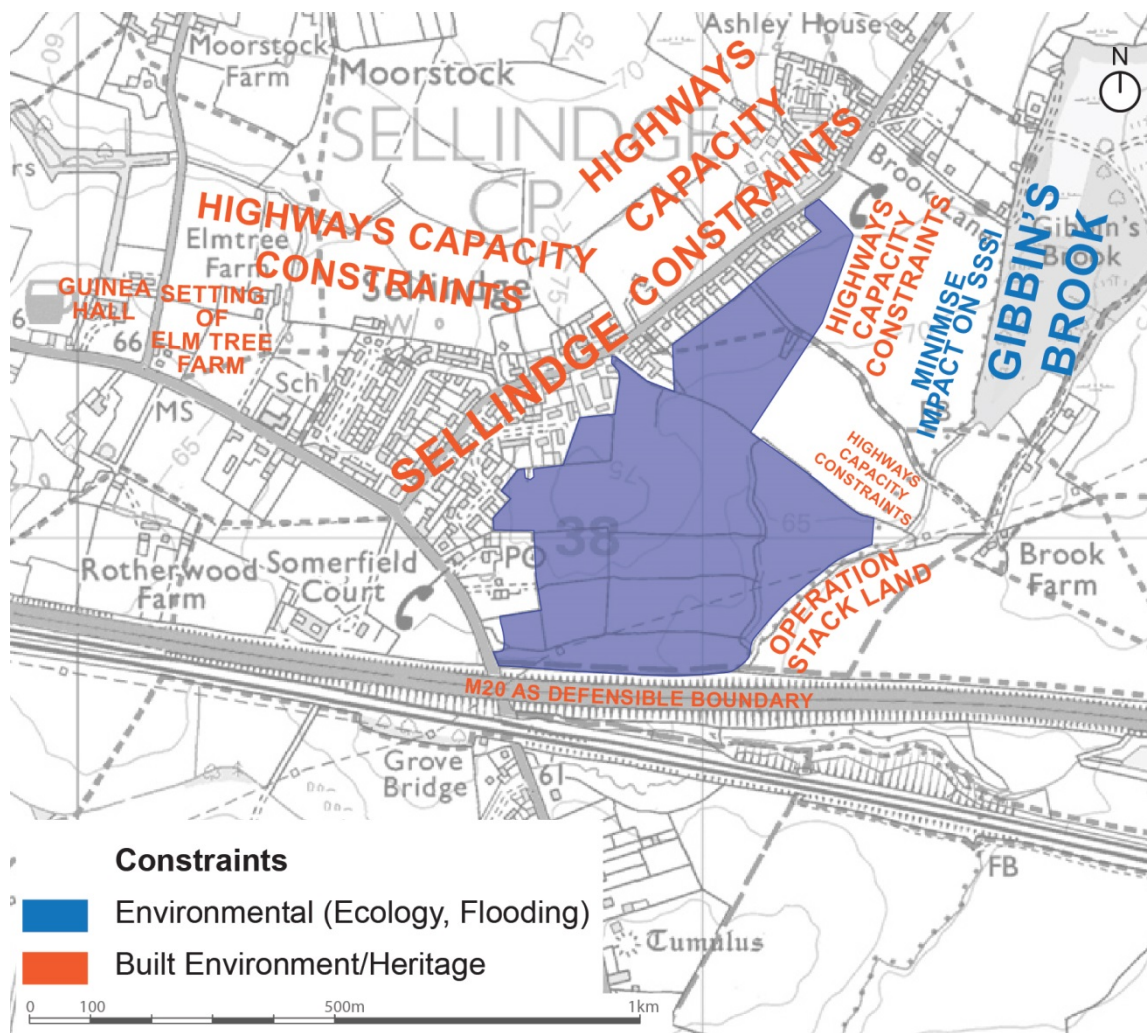
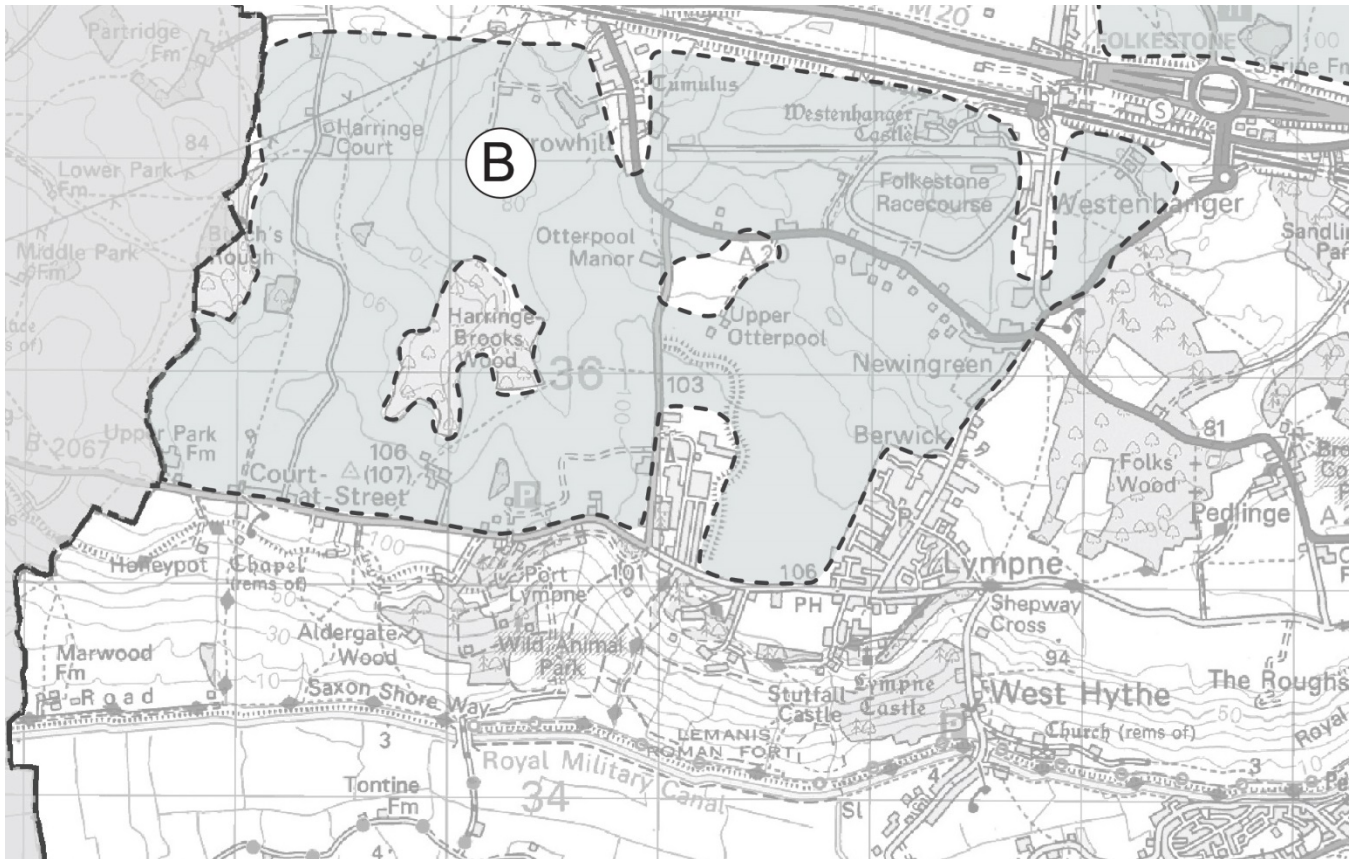


Figure 18: Area A after Phase Two assessment



2.3 Area B: South of M20

Figure 19: Area B before Phase Two assessment



Agricultural land quality

As previously illustrated in Figure 3, like Area A, most of Area B comprises Grade 2 agricultural land. However, there is a relatively large finger of Grade 3 land extending into the west of the area south of the HS1 line, north of Harringe Court and into Harringe Brooks Wood, making this part of the area more suitable on this criterion. There is also a smaller amount within Burch's Rough and immediately to the south, with the same effect on suitability. In the east of the area, there is also a similarly more suitable patch of Grade 3 land in the southern half of the triangle of roads immediately east of Westenhanger.

Finally, the land in the south-east of Area B is classified as non-agricultural, presumably a legacy of its former use as the airfield at RAF Lympe. In this regard, the classification may be regarded as outdated as the land has now returned to agricultural use. However, it remains the case that in purely technical terms, this south-eastern part of Area B remains the most suitable on this criterion.

Transport and accessibility

There are a number of routes through this area. The A20 Ashford Road runs from M20 Junction 11 to Newingreen along the eastern edge of the area before turning north-west into the area towards Barrowhill, connecting to Sellindge by passing underneath HS1 and the M20. In the east of the area, Stone Street runs north-south from Westenhanger to Newingreen and further south to Lympne, also forming the eastern edge of the site. The ancient road connection to Stanford was, however, closed with the construction of the M20, and there is now just a footpath over the motorway linking Stanford to Area B.

Within the centre of the area, the B2067 Otterpool Lane provides a north-south connection between the A20 Ashford Road and Aldington Road. To the west of the area, Harringe Lane connects the B2067 at Court-at-Street in the south to the A20 in the north, crossing HS1 and the M20 to do so. As the only major road and the only one providing access to the M20, the A20 provides the main transport connection to/from the area and the main spine within the area. A local cycle route runs from Lympne along Stone Street to Newingreen, continuing on the A20 towards Sandling. There are a number of public footpaths which run through the rural areas of the site, though the density of paths across most of the area is much lower than in Areas A, C and D.

Area B is served by bus route 10/10A which operates along Aldington Road, Otterpool Lane, A20 Ashford Road and Stone Street. This service provides connections to Ashford, Sellindge, Hythe and Folkestone. The area is accessible by rail from Westenhanger station, which is located off Stone Street to the northeast of the area and adjacent to Folkestone Racecourse. This is the only one of the four areas with such close access to a railway station. However, the station is at the far north-eastern corner of Area B and if significant land were found to be suitable within Area B for development, there could be the option of moving the station one or more kilometres to the west so that it is more central to development.

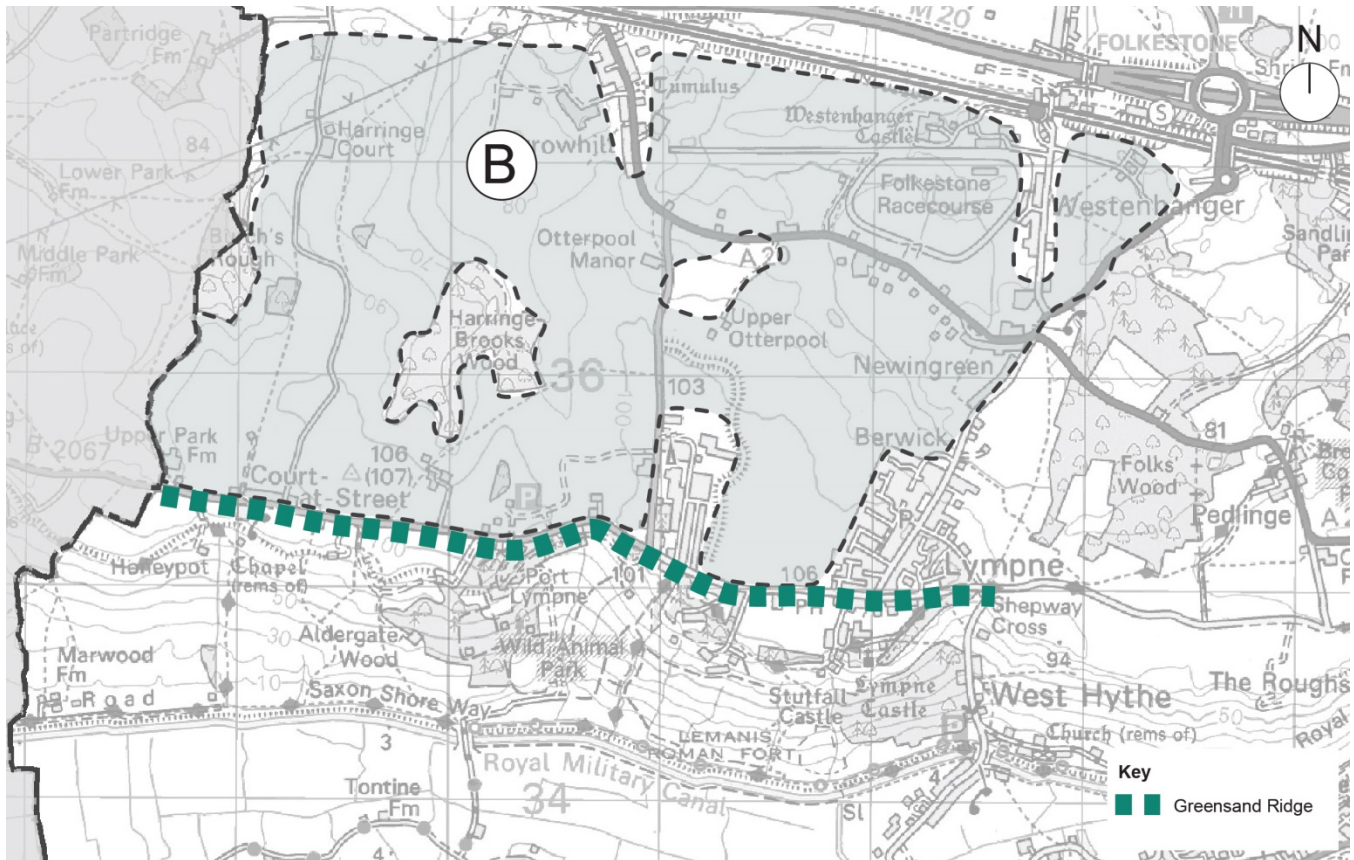
Future development in this area would benefit from direct access to Westenhanger station, as well as access to the village of Lympne and the Lympne Industrial Estate. The combination of Westenhanger station and the direct access to the M20 makes this area by some way the most suitable of the four on the transport and access criterion, even allowing for the poorer performance of the south and west of the area in this regard. However, were significant development to be proposed, connectivity would need to be significantly enhanced from the existing baseline. It is likely that greater highway capacity would be needed to M20 Junction 11, as well as additional highway, walking and cycling connectivity to Westenhanger station.

Landscape

Area B encompasses part of a wider dip-slope landform that gently undulates between a high point of over 100 metres above Ordnance Datum (AOD) along the Greensand Ridge, which forms the southern edge of the area (as illustrated in Figure 20), and a low point along the HS1 railway corridor in the north (dropping to 55 metres AOD in the north-western part of Area B). The area predominantly comprises

open medium- to large-scale arable farmland, interspersed with intermittent blocks of woodland. Fields are bounded by a mixture of fence lines, hedgerows and tree belts.

Figure 20: The Greensand Ridge, a prominent ridgeline along the southern edge of Area B



Settlement around the area includes the village of Lympne, the hamlets of Westenhanger and Barrowhill, and other small-scale settlement and farmsteads predominantly located along the A20 and the Greensand Ridge. Lympne Industrial Park is located to the west of Lympne in the south of the area and is largely enclosed by tree belts that provide visual screening from the surrounding landscape. However, these belts are considered relatively poor in quality- they comprise non-native planting and do not fully screen the largest buildings on the estate, which remain prominent in some views from the AONB.

In the north of the area, the former Folkestone Racecourse is a notable land use, forming a large open area of grassland adjacent to Westenhanger Railway Station and Westenhanger Castle. The stands of the former racecourse are clearly visible in views from the south, including from the A20, and there are significant trees in and around the former parade ring immediately north of the stands. The M20 and HS1 railway line are generally screened from views by a combination of landform, acoustic fencing, and vegetation. The North Downs Ridge, within the Kent Downs AONB, is a notable feature in views to the north.

Area B is within LCA 11: Lympne as defined in the High Level Landscape Appraisal. LCA 11: Lympne is identified in the HLLA as being of Medium landscape sensitivity, where impact on landscape character and visual impact will not necessarily be an obstacle to strategic scale development, and where suitability is likely to be determined by other sustainability or strategic environmental considerations.

Other relevant factors on the landscape criterion are the planning permission, site allocation and SPD in place at Lympne Industrial Estate and the draft site allocation within the emerging Places and Policies Local Plan at Lympne Airfield to its east for 125 dwellings. Though the Industrial Estate is beyond the southern edge of Area B, it is nonetheless relevant as it comprises substantial development within the setting of the AONB, including some buildings proposed at the industrial estate up to 14 metres in height. More detail on the draft site allocation at Lympne Airfield appears under the Spatial Opportunities and Constraints criterion.

Broadly, land to the south and west of the A20 within Area B appears within the distant background of views from the North Downs Ridge, which includes views from the North Downs Way National Trail. Land to the west of Port Lympne in the south of Area B is also in the foreground of views north from the B2067, which is on the boundary of the Kent Downs AONB to the south. Views north from this part of the B2067 are across the open agricultural landscape in the foreground with the North Downs Ridge in the distance. Generally, this land to the west of Port Lympne (south and west of Harringe Brooks Wood) close to the B2067 is considered to be less suitable for development as a result of its strongly open and undeveloped characteristics in views from the AONB along the B2067, and from the North Downs Ridge. Strategic scale development on this land could to an extent be mitigated, but would still be likely to result in significant landscape and visual effects as a result of its relative prominence in the setting of the Kent Downs AONB.

Within the land to the south and west of the A20, there are two categories of land that have some potential for development. The first category is those locations that are less apparent in views from the AONB, and consequently are considered to be less sensitive with regards to potential for giving rise to significant visual effects. The second category comprises locations that, while on rising land more visible from the AONB, are considered distant enough from vantage points within it (over five kilometres) for even strategic-scale development to have an acceptable impact if mitigated appropriately through landscaping and planting. Areas in the first category comprise a small area of lower-lying, south-facing land adjacent to the west of Barrowhill (see Figure 21); and a slightly larger area of land between a watercourse and the A20 to the north of Lympne and west of Newingreen. These areas are considered more suitable for strategic scale development with less potential for significant landscape and visual effects as a result of their limited visibility in the landscape.

Land south of the A20 either side of Otterpool Lane, as well as within the triangle to the east of Westenhanger, falls into the second category. This land is intervisible with the AONB, but remains suitable for development if that development is mitigated appropriately.

Development at the triangle east of Westenhanger could bring with it the opportunity to reduce the impact of M20 Junction 11 on the AONB, as suggested by the AONB Management Unit in their 2009 publication 'Rural Streets and Lanes: A Design Handbook'.⁸ This states that the junction is:

'very insensitively conceived in terms of impact on the environment. A myriad of intrusive signing, lighting poles, poor quality surface materials pervade. The result is not appropriate for a sensitive location in an AONB. The Kent Downs can be seen to the north, yet views are interrupted by traffic paraphernalia.'

The Design Handbook continues by seeking redesign such that *'the road junction and CTRL are more effectively integrated into the rural environment. Soft and hard landscaping materials are used which are more appropriate to the setting. Signage is rationalised and made smaller in scale. Higher quality lighting columns are used and the view through to the Kent Downs is enhanced.'*

Figure 21: Land west of Barrowhill considered suitable for development, looking south from the HS1 line, with Somerfield Court Farm on the right. Development on the higher land in the distance would be suitable only with appropriate mitigation



Land north of the A20 between Barrowhill and Westenhanger is largely concealed visually from the AONB as a result of its lower-lying position in the surrounding undulating landform, as well as intervening trees and woodland alongside the M20 and HS1 railway corridors and around Stanford, Sellindge, and Westenhanger. The M20 and HS1 also form intervening visual barriers in this location. This area is less constrained in its potential to give rise to significant visual effects on the AONB, and its current land use and location between existing major roads and dispersed settlement reduce its rural characteristics and the potential for significant landscape or visual effects. Whilst strategic scale development on this area of land would be likely to give rise to some adverse landscape and visual effects, these effects would be localised and therefore more limited. As such, these areas would be more suitable for higher density development.

⁸ Available at http://www.kentdowns.org.uk/uploads/documents/Rural_Streets_and_Lanes.pdf

The land either side of Otterpool Lane referred to above comprises the land between Harringe Brooks Wood, Lympne, Barrowhill and the A20. It is visible in distant views from the North Downs Ridge to the north, and from localised visual receptors. This land has an undulating and open character and is seen in the context of existing dispersed blocks of woodland and tree belts, as well as existing development including Sellindge, Lympne and Lympne Industrial Park. This land is suitable for strategic-scale development subject to detailed, site-specific landscape and visual impact assessment and appropriate consideration of landscape and visual mitigation. Examples of landscape and visual mitigation that would potentially be appropriate here can be found in the Link Park Industrial Estate SPD (Shepway District Council, 2006)⁹. However, the examples in the SPD should not be considered either exhaustive or necessarily appropriate for strategic scale residential development without site-specific adaptation through design, layout, scale and landscaping.

Land between Stone Street and the A20 to the east of Westenhanger is just outside the boundary of the AONB (which lies along the A20 on its eastern edge). The land is visible in the distance amongst its wooded surroundings (Figure 20) in a small number of views from within the AONB. There are also intermittent views across the land from along the A20 and Stone Street. Whilst strategic scale development on this area of land would be likely to give rise to some adverse landscape and visual effects, these effects would be localised and therefore more limited.

⁹ Available online at http://www.shepway.gov.uk/media/3115/Link-Park-SPD/pdf/Link_Park_SPD.pdf

Figure 22: Land between Stone Street and the A20 to the east of Westenhanger (arrowed) as viewed from public access land within the Kent Downs AONB at Tolsford Hill



In conclusion, the land within Area B considered to be more suitable for strategic-scale development on the landscape criterion and not needing extensive mitigation is located west of Barrowhill, between Barrowhill and Westenhanger on the site of the former racecourse, and within a triangle of flatter land south of the A20 as it passes the racecourse site. Whilst strategic scale development on these areas of land would not avoid adverse landscape and visual effects entirely, these effects could be more readily mitigated through the siting, type, layout and design of development to assimilate it into the landscape, and limit potential wider landscape and visual effects, allowing for a higher density of development.

Land within Area B suitable for strategic-scale development subject to appropriate mitigation comprises the rising land either side of Otterpool Lane between Harringe Brooks Wood, Barrowhill, Lympne and the A20, and the land within the triangle east of Westenhanger. Detailed masterplanning work in support of policy formation will need to demonstrate suitability in landscape terms.

Infrastructure

The south eastern portion of Area B lies in close proximity to the village of Lympne, which contains a few services including a village shop with integrated Post Office, primary school (Lympne Church of England Primary School), village hall and public house.

The north-western portion of Area B also lies in close proximity to Sellindge which provides access to social infrastructure (including a primary school and a GP surgery) and facilities and services (including a Co-Operative village shop, a village hall, a farm shop, sports hall and a village hall).

It is recognised, however, that the potential scale of new development relative to the existing settlements of Lympne and Sellindge makes this criterion less about new development using existing services and facilities in the villages and more about itself providing new services, facilities and supporting infrastructure alongside housing for use by existing as well as new residents.

The remainder of Area B lacks existing access to services and facilities given the distance from nearby settlements. Overall, therefore, it is those portions of Area B closest to the settlements of Sellindge and Lympne that perform better with regards to access to infrastructure. Access to green infrastructure across Area B is, however, considered to be good and includes Harringe Brooks Wood, Burch's Wood, Park Wood, Rabbits Wood and Lympne Escarpment, as well as wider access to the Kent Downs AONB to the south and east.

Heritage

Area B contains a number of built heritage assets either just within or just outside its boundaries but only two, Otterpool Manor and Upper Otterpool (both listed Grade II) close to its centre.

Just south of the M20 and HS1 corridor and south of the northern border of the area is the scheduled monument of Westenhanger Castle, standing in 15 acres of parkland. The site has a long history and included, until the 16th century, a medieval church and cemetery as well as a moated enclosure, hall, gatehouse and curtain walls. The manor was altered in the early 16th century with the addition of a cross wing containing a chapel. Later in the century the kitchens were rebuilt and a west range, now partly surviving as ruins, a walled garden and a pond were created.

Within the area designated as scheduled, Westenhanger Manor (Grade I listed) is a fortified castle or fortified house of the 14th, 16th 18th and 19th centuries and now partly ruined. The curtain walls and mural towers date to the 14th century, with the north-eastern tower having been converted into a dovecote in the mid-19th century. The curtain wall extends to the north, east and west of the site with the manor house incorporating the eastern wall as its east elevation. Beyond the western wall stand conjoined 16th century barns, one incorporating a stable, which are also listed Grade I. The house and curtain wall are in an enclosed setting, with trees screening the assets even from close views (as illustrated in Figure 23).

Figure 23: Westenhanger Castle from the south-west with listed barns on left and grandstand of former racecourse to the right, with the Castle itself effectively screened by trees



This is especially true to the south where the screening is very dense. Better views are afforded of the barns from a footpath running along the west bank of the East Stour River, and of the house from the same footpath to the north (Figure 24).

Figure 24: View of Westenhanger Manor from the north



For simplicity, the scheduled Westenhanger Castle and the Grade I listed Westenhanger Manor and barns are treated as a single asset within this assessment. Views from the south-west are negatively impacted by the presence of stable buildings associated with Folkestone Racecourse and other modern agricultural buildings (Figure 25). The racecourse, which opened in 1908 and closed in 2012, is located to the south of the monument. The racecourse was used for aviation prior to the First World War, and as a dummy airfield and later as an operational airfield during the Second World War.

The legacy buildings from the racecourse include a substantial brick-built grandstand and other ancillary buildings and structures. Historic England state that, in their opinion, the development of the racecourse paid no attention to the significance of the castle, and that the proximity of the buildings to the heritage asset is harmful, necessitating the planting of trees to provide screening. These now restrict the views to and from the castle that would have been appropriate to a site of its high social status. Removing the modern grandstand, other buildings relating to the former racecourse use and inappropriate planting would help improve the wider setting and views to and from the castle.

Historic maps show the approach to the castle to have been from the south-west, along a drive commencing at approximately National Grid Reference 611921, 136622 on the A20 Ashford Road.

Construction of the racecourse has obliterated the drive where the track has been laid but the central section within the track is still visible in the landscape. It is not known if any other features of the 16th-century deer park survived the construction of the racecourse but they are not present in the landscape today. However, the rectangular enclosure shown to the immediate south of the castle on the 1st edition Ordnance Survey map may have been the location of the castle's formal gardens, which are referenced in documentary sources. It is understood that Historic England intends to undertake intrusive archaeological work to try to ascertain the context of these gardens with a view to extending the scheduled area to the south of the asset.

Figure 25: Westenhanger Castle in the background, also showing listed barns to the left with modern farm buildings to the right



As a scheduled monument with two Grade I listed buildings within it, Westenhanger Castle is of the highest significance and any development within its setting should be extremely sensitively treated.

Rather than employ a buffer zone, it is Historic England's view that Otterpool Park Garden Town offers an opportunity not only to preserve but also to enhance Westenhanger Castle's significance. In this aim, appropriate mitigation in terms of the use, scale and design of development within the setting of the castle will be essential in order to preserve its significance. Opportunities for enhancement include removal of the screening close to the asset on its south side, removal of the racecourse's stable buildings and modern agricultural buildings to the south-west of the asset, and the restoration of the driveway from the A20 as the castle's principal means of access.

In consultation, Historic England has made it clear that any masterplan for development within the asset's setting will need to be informed by a thorough understanding of the historic environment that is beyond the scope of this assessment. Until this work has been carried out, any boundary between land considered suitable for development and land considered not suitable should be treated as indicative only. Once further work on the historic landscape surrounding the assets is complete, here is the

potential for sensitively-designed new development, including appropriate landscaping and planting, to enhance the existing setting.

The triangle of land to the east of Area B bordered by Stone Street to the west, the M20 and HS1 Corridor to the north and the A20 Ashford Road to the south-west is adjacent to the Grade II listed Sandling Park registered park and garden which lies on the other side of the A20. The present house replaced an earlier house of 1949 which in turn replaced another which was destroyed by enemy bombing in 1942. The building platform of the earlier houses remains, as does the terrace to the south-east, lawns and a yew avenue to the south-west and a kitchen garden and rose garden to the north-west. To the west and south-west of the formal gardens the woodland gardens are planted with a variety of species trees and shrubs while to the south of the house and garden group are two tree fringed lakes. All these assets are screened from Area B by House Wood. Development of the triangle east of Westenhanger would be within the setting of the registered park and garden but the impact would be mainly upon the western boundary of House Wood, the agricultural land between House Wood and Kiln Wood and the northern boundary of Kiln Wood itself. Care should be taken in respect of the boundary treatment of any development along the A20 adjacent to the park. A height restriction and/or appropriate landscaping may need to be applied in the eastern part of the triangle to minimise visual impact from viewpoints within the Registered Park and Garden, for example from the slopes of Black Hill to the south-east.

Two built heritage assets stand in the centre of Area B, Otterpool Manor and Upper Otterpool, both listed Grade II. Both are isolated farmhouses of the 17th century or earlier and it has been agreed in consultation with Historic England that proposed new development needs to be sufficiently distant from both assets to preserve their visual connection to the surrounding landscape. This will help ensure that their historic roles as medieval centres of agrarian production can continue to be demonstrated and understood. Historic England advises that the extent of land around both listed manor houses and their associated buildings should be sufficiently wide for this to be credible as sustaining a viable agricultural use, or alternative uses which deliver the desired outcome of open green space.

Otterpool Manor, a farmhouse of the 17th century or earlier with a late 18th century façade, is on the western side of the B2067 (Figure 26). Its setting to the north, south and east is open farmland although to the west it is screened by modern agricultural buildings and a small copse. The setting extends as far as the A20 to the north and some way to the north-west but development to the south of Somerfield Court Farm and Park Wood would not cause substantial harm to the setting. To the south, development to a line continuing the southern boundary of the woods to the east of Otterpool Lane would be within the setting of the asset but with sensitive treatment to the boundary and height restriction on the highest ground, would cause less than substantial harm to the setting.

Upper Otterpool, of similar date to Otterpool Manor, has a more enclosed setting, being ringed by trees on all sides except the north and north-east. The screening to the west side is not, however, complete and development between the asset and the B2067 would be within its setting and that of Otterpool Manor. Such development would therefore be less suitable on the heritage criterion. Upper Otterpool's setting continues to the north between the approach road and the screening of the quarry and this area

is also less suitable from a heritage standpoint. The setting is not so extensive to the north-east and development to the south of the Ashford Road, allowing for a buffer and soft edge, could be carried out without causing substantial harm to the asset's setting.

Figure 26: Otterpool Manor from the north-west

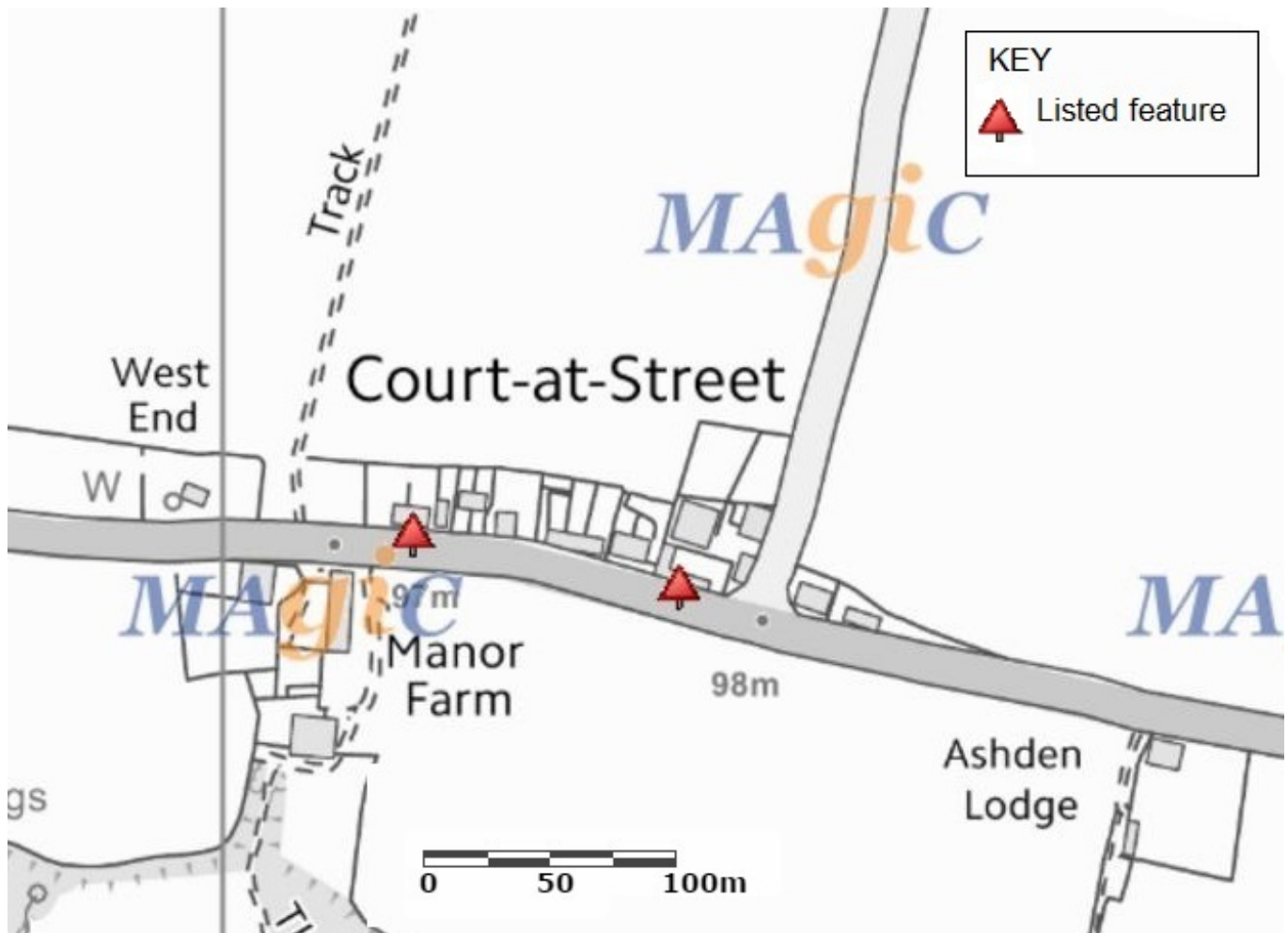


Two further assets, Berwick House and Little Berwick, stand on the eastern side of Stone Street, just to the north of Lypne. Both assets face the road and the open farmland beyond. Development extending as far east as Stone Street in this location would therefore lie within the setting of both assets. If development was given a soft edge, including, for example, open space, at an appropriate buffer distance west of both assets, then they would not suffer from substantial harm. Development between Lypne and Lypne Industrial Estate would not be within the setting of any designated heritage asset.

Further west along the B2067, land to the north of the Grade II* Port Lypne registered park and garden is screened from it by planting along the northern side of the road. However, this screening is absent to the north-west of the asset and development to the north of the B2067 would be within the asset's setting, and therefore is considered unsuitable on the heritage criterion.

Of the two assets in Court-at-Street, Forge Cottage and two cottages adjoining to right, and Manor Farm Cottages (both listed Grade II) both take their settings from the open farmland to the south and are screened from the north, the former by modern buildings and the latter by trees (See Figure 27).

Figure 27: Extract from the Government's Magic Map, showing listed buildings in Court-at-Street- Manor Farm Cottages to the west, Forge Cottage and two cottages adjoining to right to the east¹⁰



However, land to the north of the B2067 and to the west of Harringe Lane would be within the setting of the Grade II listed Upper Park Farm, further to the west, and the scheduled Romano-British building south of Burch's Rough to the north-west. Moving further north on Harringe Lane, however, the land in the north-west quadrant of Area B is not within the setting of any designated heritage asset.

¹⁰ Available at www.magic.gov.uk. (c) Crown Copyright and database rights 2017. Ordnance Survey 100022861

Regeneration potential

As illustrated in Figure 13 previously, Area B is divided between a slightly more deprived north-west, closer to Sellindge and at Barrowhill, and a relatively less deprived eastern and southern part around Lympe, Newingreen and Westenhanger. However, as no part of the area is significantly deprived, development in any location would likely have limited impacts on this criterion. Nevertheless, this criterion would support to some extent development west and east of Barrowhill.

Economic development potential

Adjacent to the southern boundary of Area B is Lympe Industrial Estate. The Estate is one of nine sites identified as protected for business uses under classes B1, B2 and B8 within Shepway. Additionally, the site benefits from existing permission for expansion onto currently greenfield land to its north (illustrated in Figure 31 below).

However, Shepway District Council advises that their emerging Employment Land Review 2017 indicates that there is far greater demand for new B use class employment in Folkestone, where there is a shortage of such units, than in more rural locations such as Lympe. As such, it is not certain that the existing permission will be implemented as demand for new units here may not be strong enough. This is a factor for Shepway to consider as they test options for development within the Core Strategy Review process.

A further area considered suitable for employment-led development lies in the north east part of Area B to the south of Folkestone Services. This location would be broadly appropriate for employment uses given its close proximity to Junction 11 of the M20, Westenhanger railway station and Folkestone Service Station, which already comprises employment and retail uses. If this land were to be allocated for new employment, it strengthens the case for reallocating the land earmarked for employment expansion at Lympe for alternative uses, likely residential. The extent of this land is illustrated in the Spatial Opportunities and Constraints sub-section below.

Spatial opportunities and constraints

Area B is the most extensive of the four locations being assessed. The features offering most potential for defensible boundaries for development, as with most of the more rural locations, are hedgerows/field boundaries and roads. Compared with other areas of search, the number of roads, and hence the number of potential defensible boundaries to development, is limited, particularly in the more remote west of the area. The B2067 forms the southern boundary and the railway lines the northern boundary in the centre of the area.

The north-east of the area performs best on this criterion. The former racecourse site in particular benefits from clear, defensible boundaries on all sides, as does the triangle of land east of Westenhanger and west of the A20. Any development in the more open landscape south of Ashford Road and north of Lympe could use either field boundaries or the watercourse separating Newingreen from Lympe as a defensible boundary. However, it will be important to maintain the integrity of Lympe as a free-standing hilltop village.

East of Harringe Lane, there could be potential to use the line of electric pylons as a defensible boundary to development. Across the rest of the area west of Otterpool Lane and the A20 at Barrowhill, there are opportunities to use either field boundaries, watercourses or farm drives as boundaries, though there are relatively fewer footpaths across this land. Having said this, the footpath in the south of the area between Otterpool Lane and Coldharbour Cottage could offer some potential to enclose development north of Port Lympne.

Existing development forming spatial constraints within the area includes the hamlets of Court-at-Street and Newingreen as well as scattered farms and houses including Harringe Court, Otterpool Manor, Coldharbour Cottage and numerous properties along Ashford Road.

Area B lies within the Impact Risk Zones of three SSSIs. The first of these covers the north of the area and relates to Gibbin's Brook, woodland on the north side of the M20/HS1 corridor. The second of these relates to Otterpool Quarry, but compared with the IRZs for other SSSIs, this is very limited, covering only the 50 metres around the edge of the quarry site. Finally, the south of Area B lies within the IRZ of Lympne Escarpment SSSI, which lies south of the area on the other side of the B2067.

Due to the lack of a definitive statement on the type or quantity of development acceptable within each SSSI IRZ, we carried out targeted consultation with Natural England on the IRZs within the study area, and have incorporated their advice into our conclusions.

For Area B, Natural England advise that the Otterpool Quarry SSSI IRZ should not be considered a significant constraint to development. The quarry has been designated for its geological interest and is not accessible to the public. As such, development in its vicinity is not considered to be significantly constrained. This has positive implications for development at the former works site close to the quarry, which also scores well in terms of spatial opportunities and constraints because it constitutes previously-developed land.

For the Lympne Escarpment SSSI IRZ, Natural England advises that site allocations and planning applications in the southern part of Area B in particular should consider carefully options to mitigate extra car journeys on surrounding roads, as air quality is a particularly important consideration for this SSSI.

Natural England advises further that in line with standard practice, a buffer of fifteen metres should apply between ancient woodland and new development to minimise impacts on this important habitat. Within Area B, this has implications for Harringe Brooks Wood and is an important consideration for the detailed site allocation and/or masterplanning stages.

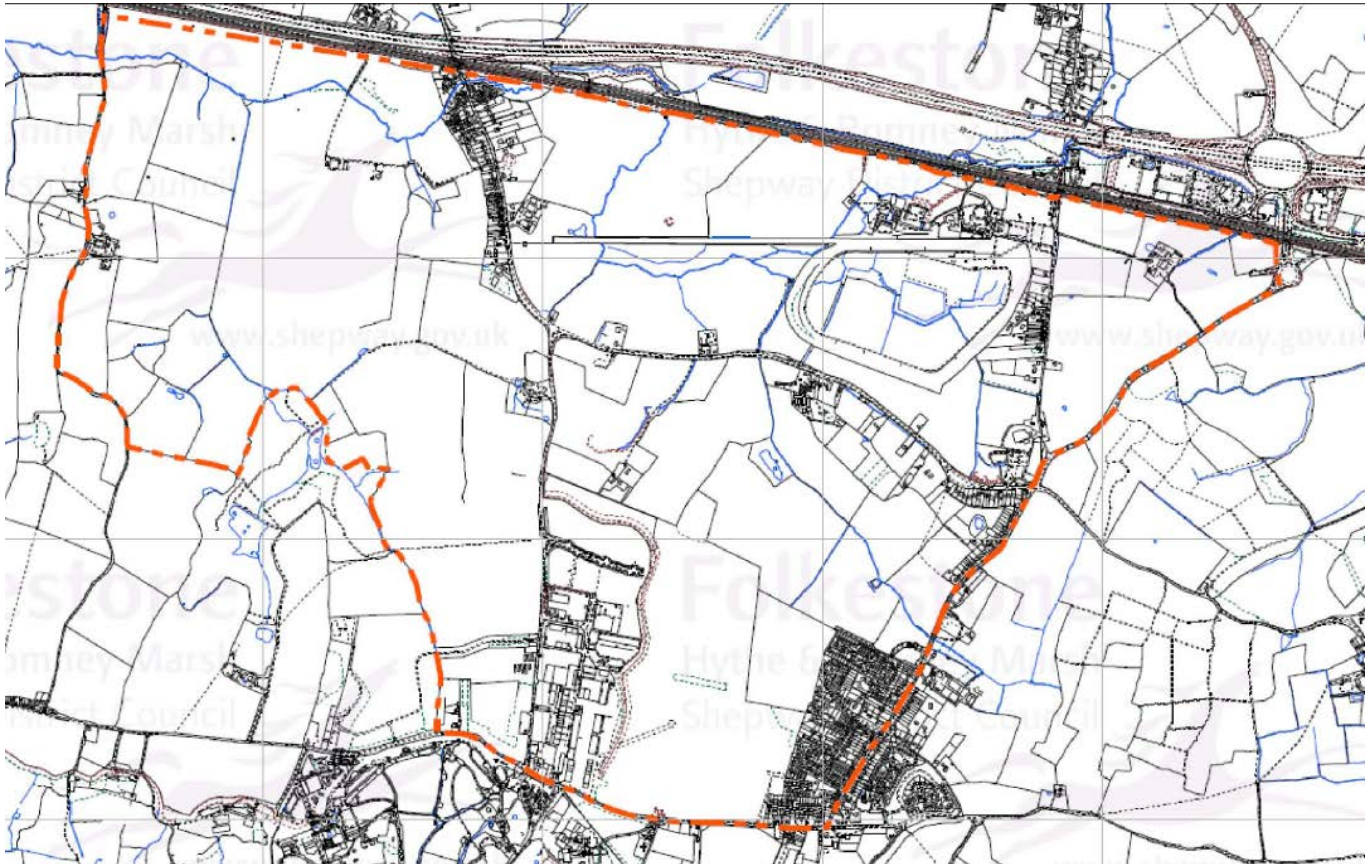
Natural England have also advised that for development in all areas, account should be taken at site allocation and/or planning application stage of the possible impacts of more journeys and visitors to the natural assets at Dungeness, which, though outside the study area, are likely to be impacted by journeys from new development within it.

By far the largest spatial opportunity in the area is the proposed Otterpool Park Garden Town. Though the precise boundaries of the Garden Town have not been defined, and indeed will be influenced by the

conclusions of this Growth Options Study, Figure 28 illustrates the boundaries of the Otterpool Park area of search.

At the time of writing, it is considered that national housing and planning policy supports the development of up to 12,000 homes within this red-line boundary. It is the role of this study to determine the performance of this policy aspiration in relation to how the area of search performs on the other criteria being assessed, and based on this, conclude how much capacity exists within the area of search. Strategic scale development could provide for significant employment and housing opportunities that do not currently exist within the district, whilst supporting the wider economy of existing towns and villages.

Figure 28: Area of search for up to 12,000 dwellings at proposed new Otterpool Park Garden Town, Shepway



Source: Otterpool Park: A Garden Town of the Future (Shepway District Council, 2016)

In terms of government policy, there are no spatial restrictions on where new housing and supporting infrastructure could be placed within the area of search. The requirement for garden villages (of under 10,000 dwellings) to be new free-standing settlements does not apply to garden towns (over 10,000 dwellings), which the Government states may be either 'on a new site away from existing settlements, or take the form of transformational development, both in nature or in scale to an existing settlement'.¹¹ This study considers that in the case of Otterpool Park, the former approach is more appropriate, and this supports an approach seeking to identify key strategic gaps and buffers between new town-scale development and existing towns and villages.

Such an approach reflects paragraph 58 of the NPPF, which requires planning policies and decisions to 'respond to local character and history, and reflect the identity of local surroundings'. This suggests that maintaining the historic character of Lympe as a free-standing hilltop village, originally established in

¹¹ Locally-led Garden Villages, Towns and Cities, DCLG, 2016, available at <https://www.gov.uk/government/publications/locally-led-garden-villages-towns-and-cities>

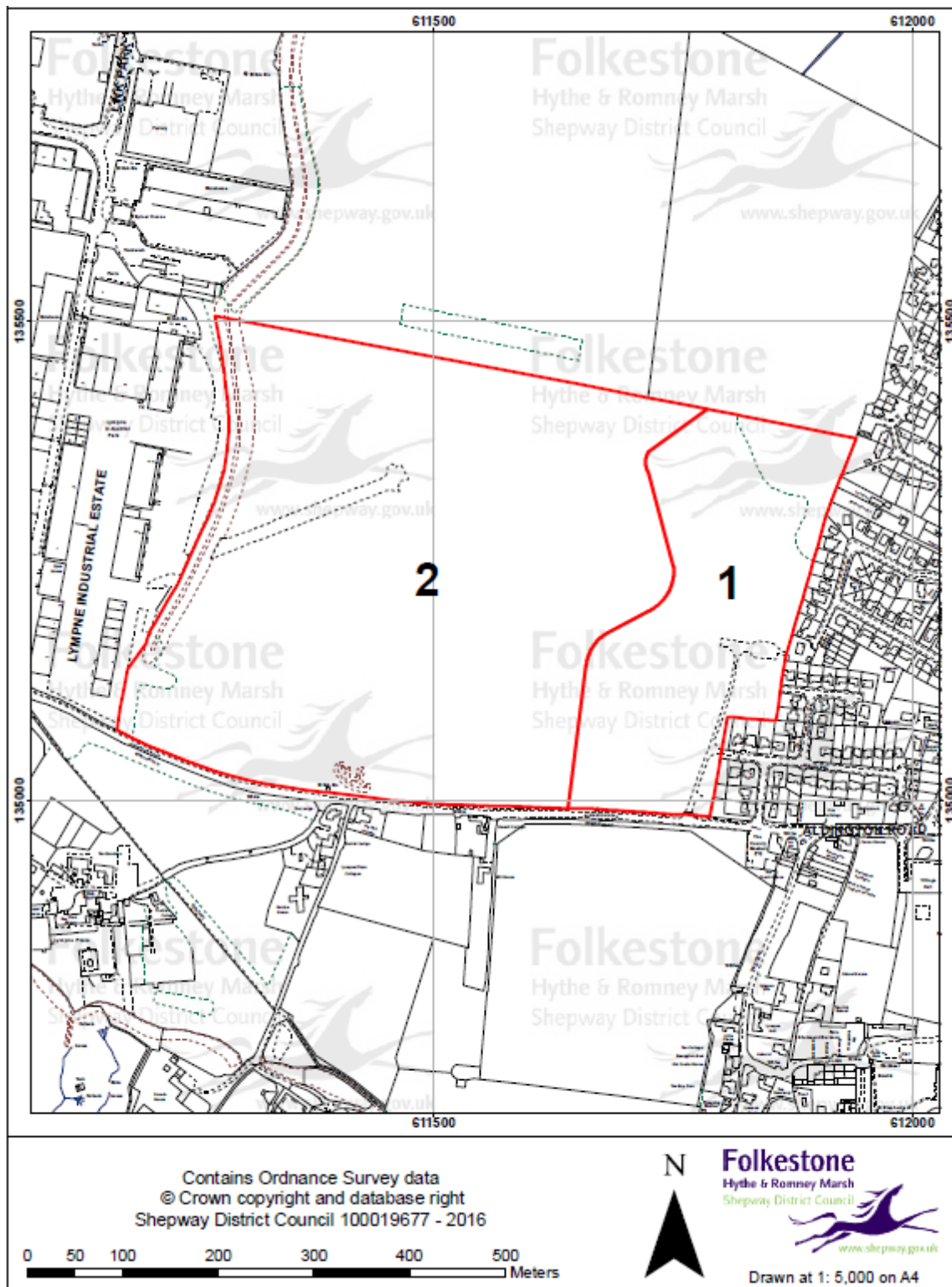
Roman times, is an important consideration. Other relevant paragraphs of the NPPF that would support a strategic gap between Otterpool Park and Lymgne include 7 (which states that the planning system should protect the historic environment) and 126 (which notes the desirability of new development making a positive contribution to local character and distinctiveness). As such, a strategic gap, justifiable in terms of national policy, should be left between any new development and the edge of Lymgne to maintain the current identity of Lymgne as a free-standing settlement.

Such an approach is consistent with the proposals set out within the Places and Policies Local Plan DPD for the former Lymgne Airfield between the industrial estate and the village (Policy ND7), which also provides for a landscape buffer, in this case to avoid coalescence between 125 new dwellings on the edge of Lymgne and the employment units at Lymgne Industrial Estate.¹²

This draft site allocation, which lies within the area of search for Otterpool Park Garden Town and is therefore considered within this study (despite its genesis in a separate, Shepway-led, planning process) is illustrated in Figure 29 below. In Figure 29, the land designated as site '1' comprises a residential development of 125 dwellings with the opportunity for some self and custom build plots, whereas site '2' is to remain undeveloped in order to avoid settlement coalescence, but with the addition of a suitable footpath.

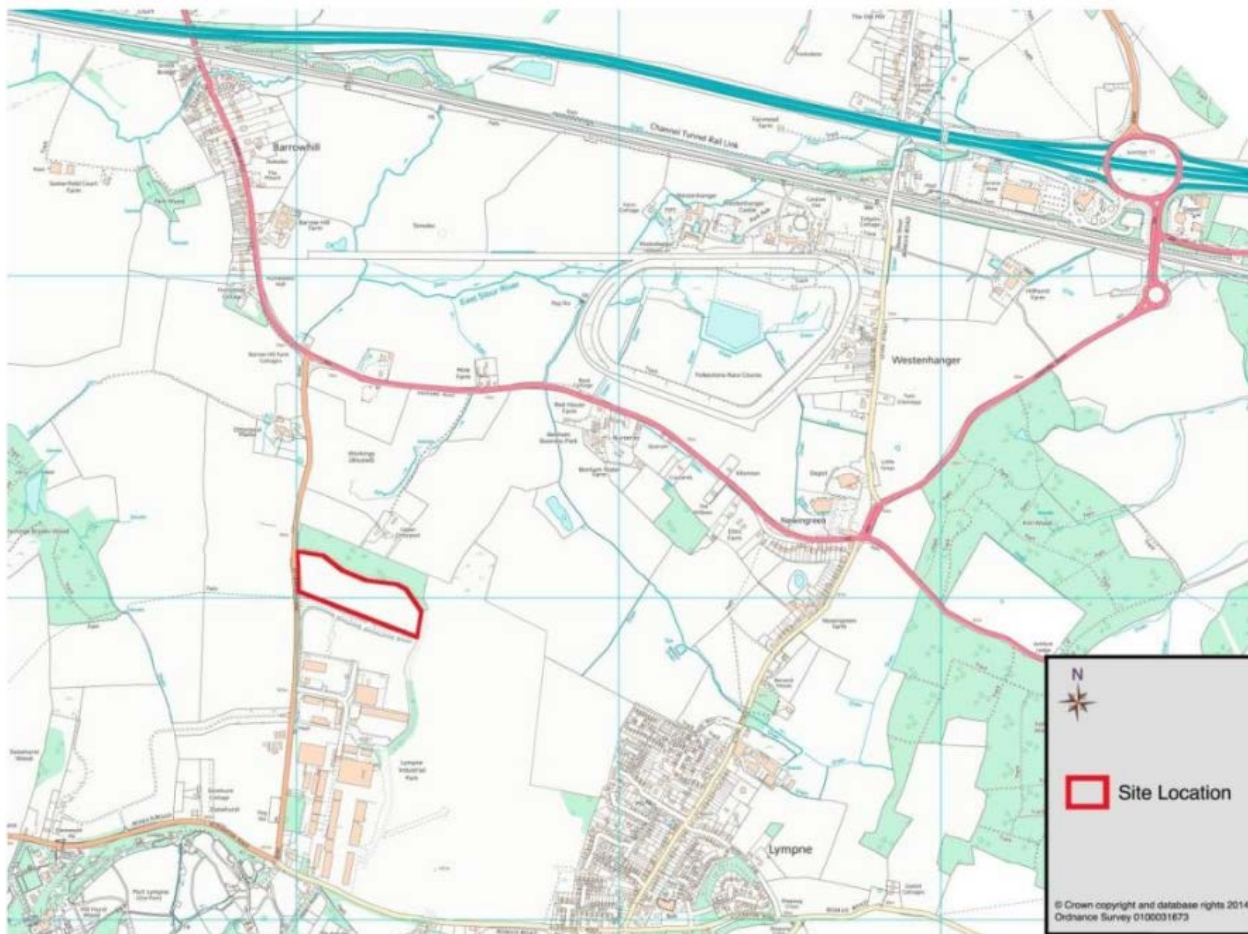
¹² As set out in the Places and Policies Local Plan, Preferred Options Consultation

Figure 29: Draft site allocation for 125 new dwellings at former Lymgne Airfield within Shepway's emerging Places and Policies Local Plan DPD



A planning application for a new biomass power plant (Shepway reference number: Y15/0751/SH) had been submitted within Area B but, as of April 2017, has been withdrawn. The proposed power plant was to have been located to the north of Lympe Industrial Estate (the application boundary is illustrated in Figure 30). Were the application to be resubmitted, this would have the potential to be a spatial constraint, not only due to its physical footprint, but also due to the need to maintain an appropriate buffer around it, a power plant being generally considered a 'bad neighbour' use for housing. However, following the withdrawal of the application, it has been considered for the purposes of this report not to form a spatial constraint, though is covered for the sake of completeness.

Figure 30: Application boundary for proposed biomass power plant at Lympe Industrial Park (application now withdrawn).

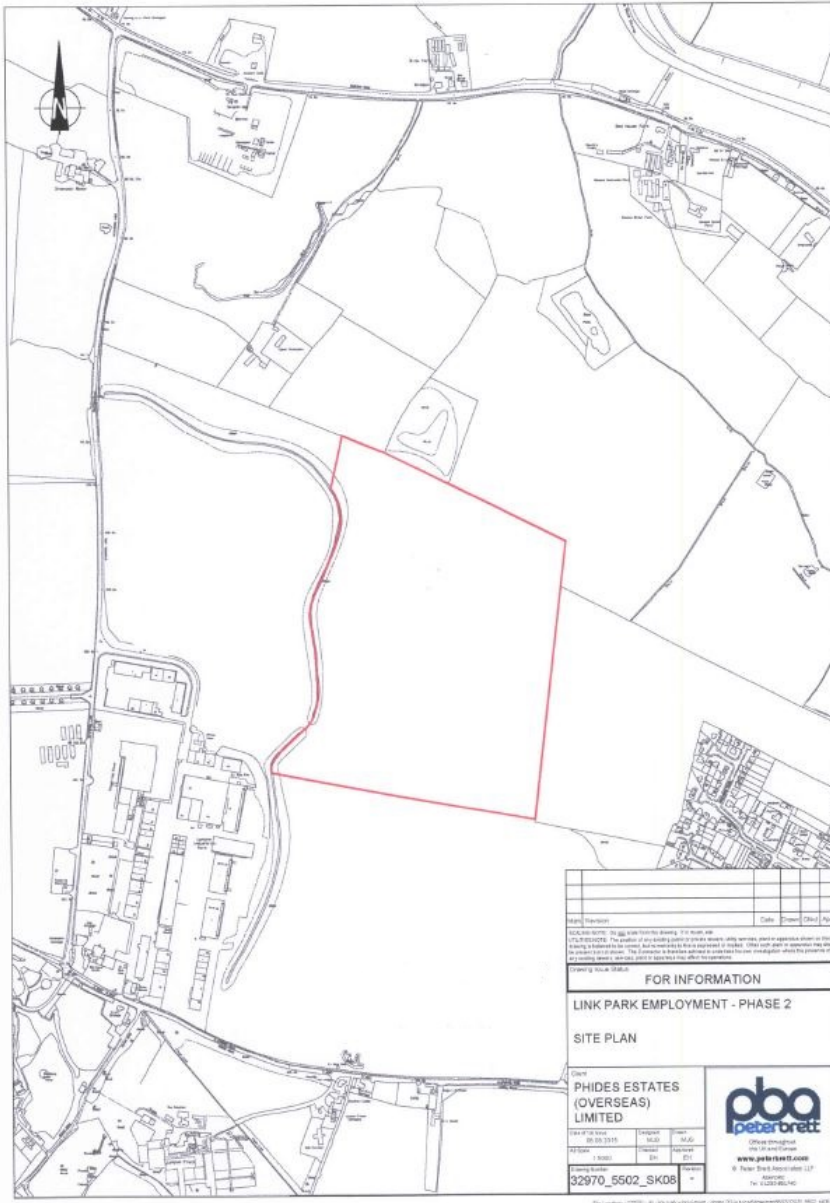


Source: Application planning statement (Iceni Energy 2, 2015)

Planning permission Y15/0880/SH¹³ covers land required for the Phase 2 expansion of Lympe Industrial Estate. If the permission, which is for employment space, were to be implemented, it would form a further spatial constraint for residential development. It is illustrated in Figure 31 below.

¹³ Available to view at <https://searchplanapps.shepway.gov.uk/online-applications/>

Figure 31: Permission boundary for consented Lymgne Industrial Estate Phase 2 Expansion



Source: Planning application (PBA, 2015)

2.4 Area B Conclusions

Integrating assessment criteria

Like Area A, most of Area B comprises Grade 2 agricultural land. The smaller extent of Grade 3 land that does exist, which is preferable on this criterion, occupies the north-west and to a lesser extent the

east of the area, and non-agricultural land occupies the south-east edge of the area. However, the Grade 3 land to the north-west performs poorly on transport and landscape criteria.

On the transport criterion, the most critically important features of Area B lie in its north-east, with the significant benefits of access to Westenhanger railway station and Junction 11 of the M20. This makes the north-east of Area B likely the most suitable land on this criterion across all of the four areas, though as previously noted, if significant development were proposed here, upgrade of the existing highway network to M20 J11 would be likely required, as well as enhanced highway, cycle and walking access to Westenhanger Station. The north-east also performs strongly on the landscape criterion, and most of it performs well on the heritage criterion as well.

Suitability in terms of transport and access gradually diminishes to the south and particularly to the west and south-west of the area, which are more rural and remote, making them difficult to access by means other than the private car - even the density of footpaths is lower here. The far west of the area performs poorly on the landscape criterion in any case. Though Harringe Lane connects to Sellindge by crossing HS1 and the M20 via Harringe Bridge, it is a narrow rural lane and upgrade of the bridge would be complex and costly, making land nearby less suitable on the transport criterion than it would at first appear based on spatial location. AECOM transport specialists advise that without upgrade of the HS1/M20 bridge, there would be capacity in this location for no more than fifty dwellings, and even these would likely need to have their traffic access controlled via 'shuttle' traffic lights over the bridge.

These transport constraints, as well as landscape considerations dealt with below, provide a logical western limit to land west of Barrowhill otherwise suitable for strategic-scale development on a range of other criteria.

Due to the primacy and capacity of the A20 as a transport spine, it is considered that the centre-east of the area also performs well on the transport criterion.

On the landscape criterion, Area B generally slopes downhill from south to north. This slope faces a number of vantage points from the Kent Downs AONB to the north, meaning it is within its setting, albeit with the effect mitigated by distance to some extent- the most prominent land is almost six kilometres from key viewpoints within the AONB. As such, although it is true that the higher land to the south of the area is visible from the AONB, the effect of distance lessens its impact, certainly compared to Area A, which comprises extensive flat land close to the AONB boundary and forming the foreground of views from it. Nevertheless, the more distant land in Area B remains visible from the AONB and as such, would only be suitable for strategic-scale development with appropriate mitigation, including a lower, more suburban, density of development, use of suitable local building materials, and extensive landscape softening through tree planting.

An assessment that this land is suitable subject to suitable mitigation (compared with the lower-lying land to the north of Area B, which was given a less qualified assessment of suitability on the landscape criterion) is consistent with the general approach of landscape assessment to seek to minimise the visual impact of development on prominent higher land.

The land considered suitable subject to appropriate mitigation, having regard to the definition of the setting of the Kent Downs AONB quoted previously in this report, is illustrated in Figures 32, 37 and 38 below.

Figure 32: View towards Area B from the North Downs Ridge near Brabourne. Land between Harringe Brooks Wood, Lympne, Barrowhill and the A20 is approximately between the two arrows. Appropriate mitigation could help integrate future development into the landscape, just as has happened at Sellindge (centre right)



The land to the south and west of the A20 is therefore considered suitable on the landscape criterion subject to appropriate softening of visual impact through landscaping. Such softening of visual impact through landscaping could bring with it an opportunity to strengthen further the existing planting to the north of Lympne Industrial Estate that helps soften its landscape and visual impact and replace existing non-native screening in this location with appropriate, and potentially more effective, native species.

There are two parts of the land south and west of the A20 where there is less of a requirement for softening due to the lack of intervisibility from AONB viewpoints. The first of these is land immediately west of Barrowhill, where a small, enclosed valley is less visually prominent and is screened effectively to the north by the elevated HS1 and M20.

The second exception is an area of flat, low-lying land north of Lympne and west of Newingreen that slopes gently down to its northern edge along the A20, and is bounded by a watercourse to the south. Development here would be less visually prominent than on the higher land to its south and the land is therefore considered suitable on this criterion. The same conclusion applies to the works site at the junction of Otterpool Lane and the A20, which forms part of the same visual envelope.

Though land immediately south of the M20 in the north-west of Area B is also low-lying, it is considered that this performs more poorly on the landscape criterion as intact hedgerows around smaller fields in the vicinity of Harringe Court and Springfield Wood provide a more attractive, historic and rural sense of place. The rural character is intensified further due to the more limited intervisibility between this land

and existing residential development or settlements. As previously noted, this land also performs poorly in transport terms.

The land north of the A20 and west of Stone Street is considered to be the best-performing part of Area B in landscape terms. This is as a result of four factors, namely:

- its lower-lying position, which significantly limits its visibility from the AONB;
- intervening trees and woodland alongside the M20 and HS1 railway corridors and around Stanford, Sellindge, and Westenhanger (with the M20 and HS1 themselves forming intervening visual barriers in this location);
- its current land use and location between existing major roads and dispersed settlement, which reduce its rural characteristics and the potential for significant landscape or visual effects that could not be mitigated through design; and
- the potential to demolish and not replace the existing racecourse stands, which comprise the most visually-prominent development in this location at present.

The triangle of land north of the A20 and east of Westenhanger is also visible in views from the AONB to the north. However, it is relatively low-lying and appears in the middle distance, beyond Folkestone motorway service area (more than two kilometres from the AONB viewpoint on Tolsford Hill). Though intervisible from the AONB, the land performs very well on the transport, spatial opportunities and constraints and employment criteria due to the proximity of M20 Junction 11, Westenhanger Station and the A20. Added to this, there is the possibility of effectively softening development in landscape terms to minimise visual impact on the AONB, as well as the opportunity to mitigate the existing landscape impact of Junction 11 along the lines proposed by the AONB Unit. Finally, it has been assessed that, with mitigation, heritage impacts in this location on the registered park and garden at Sandling Park would be minimised appropriately. As such, this land is considered suitable for development subject to appropriate mitigation in landscape and heritage terms.

It is important to note that strategic scale development on those areas of land considered more suitable in landscape terms would not avoid adverse landscape and visual effects entirely. These effects could be more readily mitigated through the siting, type and design of development to assimilate it into the landscape, and limit the potential wider landscape and visual effects on the Kent Downs AONB.

On the infrastructure criterion, the south and west of the area are generally considered less suitable due to their rural, undeveloped character far from existing services and facilities. One exception is the land to the north-west which could link to existing and/or new facilities at Sellindge, but as noted previously, this location is less suitable on transport and landscape grounds. In any case, facilities in Sellindge are concentrated generally in the eastern end of the settlement and are already at capacity. Therefore, this conclusion has some relevance for the land west of Barrowhill considered more suitable on other criteria because it is within walking distance of services and facilities in the eastern part of Sellindge via the A20 under the HS1 and M20 bridges, though it would also offer potential for new services and facilities of its own. The same potential for new infrastructure also makes land north of the A20 and east of Barrowhill more suitable on this criterion.

Though land in the vicinity of Lymgne is considered more suitable in terms of access to existing infrastructure, it performs more poorly on other criteria, most notably spatial opportunities and constraints and transport. Nevertheless, this has some relevance for the land south of the A20 and north of Lymgne found to perform well in terms of spatial opportunities and constraints, landscape and transport criteria.

Turning to heritage, the key constraint for land in Area B considered otherwise suitable on a range of other criteria is Westenhanger Castle. As a scheduled monument with two Grade I listed buildings within it, Westenhanger Castle is an asset of the highest significance and any development within its setting should be extremely sensitively treated. However, there are opportunities to both preserve and enhance the asset's setting and significance. The racecourse replaced the open landscape of the estate's 16th century deer park when it opened in 1908 and the land use to the south of the asset will need to maintain a largely open aspect. In addition to enhancing the asset's setting through appropriate use of land to the south there are opportunities for improvements, such as the removal of the racecourse stables, removal of the screening to the immediate south of the asset, and restoration of the original approach to the castle from the south-west, all of which will have a positive effect on the asset's significance. This would also bring place-making benefits to Otterpool Park New Town through the creation of new green infrastructure. Other than Westenhanger Castle, there are not considered to be any heritage constraints north of the A20 and west of Westenhanger/Stone Street.

The heritage constraints on the land east of Westenhanger within the setting of a Registered Park and Garden at Sandling Park have already been addressed above- with appropriate mitigation, it is considered that the impacts would be minimal. Within the land to the south and west of the A20, the settings of Otterpool Manor and Upper Otterpool are heritage constraints in the centre of Area B and as such their settings should be the subject of detailed consideration within future policy formation and masterplanning. However, due to intervening planting/screening at both assets and at the site itself, it is considered that the works site at the junction of the A20 and Otterpool Lane is likely suitable for development as it does not lie within the setting of either heritage asset. The land north of Somerford Court Farm considered suitable in terms of landscape, transport, regeneration and infrastructure also appears suitable in terms of heritage, being away from the settings of any heritage assets.

The need to protect the setting of Berwick House and Little Berwick means a buffer would be required west of Stone Street and north of the small watercourse, as this land is much less suitable on the heritage criterion even though it performed well on the landscape criterion. As an important parallel consideration, such a buffer would help avoid coalescence between extensive new development and Lymgne. The NPPF would (paragraph 58) seek to protect the visual integrity of Lymgne as a free-standing historic village with its own distinct identity and character, and hence this objective is justified in terms of the spatial opportunities and constraints criterion.¹⁴

¹⁴ The same consideration of maintaining the character and identity of free-standing historic villages also informed the approach taken within this report in respect of both Sellindge and Stanford.

Other land in the south of Area B is considered unsuitable on the heritage criterion as it lies within the setting of assets at Port Lymgne and Court-at-Street. However, this land is considered less suitable on the landscape, transport and infrastructure criteria in any case.

On the employment criterion, the locations considered more suitable, namely close to Lymgne Industrial Estate and on the triangle of land east of Westenhanger, are also considered suitable (with appropriate visual mitigation) on the landscape and heritage criteria. Additionally, on the basis of the emerging Employment Land Review 2017, it is considered that the land currently with permission for Phase 2 expansion of Lymgne Industrial Park may be more suitable for housing instead. Though a final decision on which use is more suitable in this location is a matter for the landowner and for the Council to test through the Core Strategy Review, it is AECOM's recommendation that it should be considered for alternative use as part of the policy formation process for the Core Strategy Review, providing alternative provision is made elsewhere in accordance with evidence requirements.

Finally, turning to the spatial opportunities and constraints criterion, the best-performing part of Area B is considered to be the north-east of the area, including the former racecourse, due to its strong defensible boundaries on all sides; this land is also considered to perform well on a range of other criteria, allowing for the need to protect the setting of Westenhanger Castle. Other features defining the boundaries of land considered suitable in this location comprise existing dwellings and their curtilages, and the limited employment land in the south-east corner at Newingreen.

The triangle east of Westenhanger performs well on the spatial opportunities and constraints criterion due to being surrounded by roads on all sides.

The former works site at the junction of Otterpool Lane and the A20 performs well in terms of spatial opportunities and constraints as it comprises previously-developed land. Additionally, the land between Lymgne and the Industrial Estate is also considered to perform well on this criterion given that it is the subject of a draft site allocation that has been consulted on through the statutory Local Plan process.

Locations in the far west and south-west of Area B have fewer features such as roads or footpaths that could form obvious boundaries to development, and in any case also perform less well to varying extents on the landscape, heritage, employment, transport, infrastructure and regeneration criteria.

The land within the centre of Area B (i.e. south of the A20, either side of Otterpool Lane) performs well on the spatial opportunities and constraints criterion in the sense that it forms the core of the area of search for Otterpool Park Garden Town, which has Government policy support, forming a material consideration in the planning balance. However, one constraint to this area of suitability is the potential for a strategic gap to be left between new development and the western edge of Lymgne in line with NPPF advice to respond to local character and history and reflect the identity of local surroundings. The potential for this gap to provide new or enhanced green infrastructure should be considered through subsequent stages of policy formation and master planning.

Based on this consideration, there are hedgerows in the centre of Area B that have the potential to act as defensible boundaries to development, and these should be retained.

The parcels of land in the centre of Area B considered suitable subject to landscape mitigation lie respectively west and east of Otterpool Lane. The land west of Otterpool Lane is considered suitable subject to mitigation as far south as the B2067, which not only forms a defensible barrier but is also the AONB boundary. To the west, hedgerows south of Harringe Brooks Wood, as well as the wood itself, act as defensible boundaries and protect the area of historic landscape with intact hedgerows and smaller fields further to the west.

North of Harringe Brooks Wood, there is a field to the north of Grade II-listed Otterpool Manor, which should be left undeveloped to respect the setting of this heritage asset. Otherwise, the large open field south of Somerfield Court Farm and a smaller field south-west of Barrowhill are not distinguished in landscape terms and are far enough west and north of Otterpool Manor to have a minimal impact on its setting, though the eastern and southern edges of development should be designed sensitively with soft landscaping. To the east, there are no constraints in development extending along the frontage with Otterpool Lane south of Otterpool Manor to the junction with the B2067.

To the east of Otterpool Lane, the main spatial constraints to the land that would be suitable subject to mitigation are the setting of the Grade II-listed Upper Otterpool, which extends into the fields to the north and east of the asset itself, and the approach of maintaining a buffer between new development and the existing (and proposed) edge of Lympne itself, as previously explained under the spatial opportunities and constraints criterion.

Finally, the triangle of land east of Westenhanger between Stone Street, the railway line and the A20 Ashford Road is considered suitable for development subject to appropriate mitigation, not only in terms of visual impact from AONB viewpoints but also as a result of needing to respect the setting of Sandling Park as a Registered Park and Garden. Employment uses would be particularly suitable within this location.

Also south of the A20, there is a need to protect the setting of the heritage assets of Berwick House and Little Berwick. As such, the most appropriate eastern boundary for development, though not defined by any feature on the ground, would appear to be a straight line between the south-west corner of the last house in Newingreen and the watercourse forming the boundary between the flatter land to its north and the rising land to its south. The best place for that straight line to meet the watercourse would be where that watercourse meets the easternmost hedgerow extending south to the edge of Lympne (see Figure 36). An important parallel effect of this pattern of development is the avoidance of coalescence between extensive new development and Lympne, and hence this approach also performs well on the spatial opportunities and constraints criterion, as it would keep development further from the northern edge of Lympne.

Figure 33: Land north of Lympne, looking west, with the foreground forming the setting of Berwick House and Little Berwick. Future development masterplans or policies should allow for a buffer between the viewpoint and the tree at the corner of the hedge (arrowed)- this would also help maintain a buffer between extensive new development and Lympne



The remainder of this parcel of suitable land is defined clearly by Newingreen to the east, the A20 and properties along it to the north, and the watercourse to the west and south.

To the west of Barrowhill, the land considered suitable on a range of other criteria is also considered to perform well on the spatial opportunities and constraints criterion given the opportunities presented by a number of logical boundaries to development in this location dividing the less visually prominent land to its north from the rising land to its south.

Summary of land considered suitable

Having considered the interaction between all criteria, five parcels of land within Area B are considered suitable for strategic-scale development without the need for extensive mitigation. Three further parcels are considered suitable subject to appropriate landscape and visual mitigation, and a final parcel comprises the draft site allocation forming an extension to Lympne. These nine parcels are considered suitable to a greater or lesser extent on agricultural land quality, transport, landscape, infrastructure, heritage, economic development potential and spatial opportunities and constraints criteria. The parcels of land considered suitable without the need for extensive mitigation are located to the west of Barrowhill, two parcels either side of a new approach to Westenhanger Castle at the former Folkestone Racecourse (illustrated in Figure 36), south of the A20 close to Newingreen, and the former works site also south of the A20. These sites would comprise the northern core of a new settlement around the hamlets of Barrowhill, Westenhanger and Newingreen, which has the potential to be served either by a relocated Westenhanger station further west than the existing station or by enhanced bus, cycle and pedestrian connectivity to the existing station.

Figure 34: Land at the former Folkestone Racecourse considered suitable for development



The land west of Barrowhill performs better on the regeneration criteria than the other two parcels, and there is other land within Area B that performs better on the agricultural land criterion, though these are limited in extent and less suitable on a range of other criteria. As such, the more limited suitability of the three parcels of land on the grounds of regeneration and agricultural quality is considered to be significantly outweighed by their strong suitability on a range of other criteria.

The three parcels of land considered suitable subject to landscape mitigation lie respectively west of Otterpool Lane, east of Otterpool Lane, and in the triangle east of Westenhanger. The two parcels either side of Otterpool Lane could act as more suburban, lower-density complements to any town centre functions north of the A20, with extensive planting and landscaping not only softening visual impact but also reflecting a 'garden town' model of development as per the policy support for development in this location.

Meanwhile, the triangle east of Westenhanger would be particularly suitable for employment development, thus forming an edge of centre employment area.

The conclusions on the land suitable for development and suitable with appropriate mitigation result in the emergence of a number of large areas of land with the potential to be retained as strategic open space within future development. This is due to the need to protect the settings of Westenhanger Castle, Otterpool Manor, and Upper Otterpool, as well as the need to avoid development at Otterpool Quarry SSSI. Though the precise extent of the settings of the heritage assets, together with mitigation required, can only be established through more detailed assessment and masterplanning, this study identifies the indicative area likely to comprise their settings for further consideration once the characteristics of the development proposed are clearer.

There are important opportunities to enhance all of the land to be retained as strategic open space within and surrounding Otterpool Park Garden Town through, for example, restoration of damaged habitats, hedgerow improvements, and enhanced public right of way or bridleway access.

Though such interventions would need to be developed further through subsequent master planning and/or the development of an integrated green infrastructure strategy, there appears to be the potential for all locations considered appropriate for strategic open space to form attractive country parks, urban farmland or similar assets as attractive and historically justifiable features within and surrounding the new Garden Town, as illustrated on Figure 38 below.

The integrated green infrastructure strategy for the new Garden Town should set out a range of principles uniting the approach to all new strategic open space (for example, increasing accessibility, enhancing biodiversity, removal of non-native planting and so on) alongside appropriate site-specific interventions needed based on the differing functions of the open space in different locations.

For example, the strategic open space in the south-eastern corner of Area B separating Lympne from the new town is likely to be less suitable for agriculture and more suitable as a country park or similar recreation use, whereas the land to the west (north and south of Harringe Brooks Wood) would be more suitable for retaining as farmed land, but with appropriate conservation and enhancement of historic features such as hedgerows.

The overall conclusions for Area B are considered consistent with the NPPF when taken as a whole and are made with particular reference to spatial planning principles 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12 and 14.

Figure 35: Selected key spatial constraints and opportunities informing Phase Two assessment of Area B

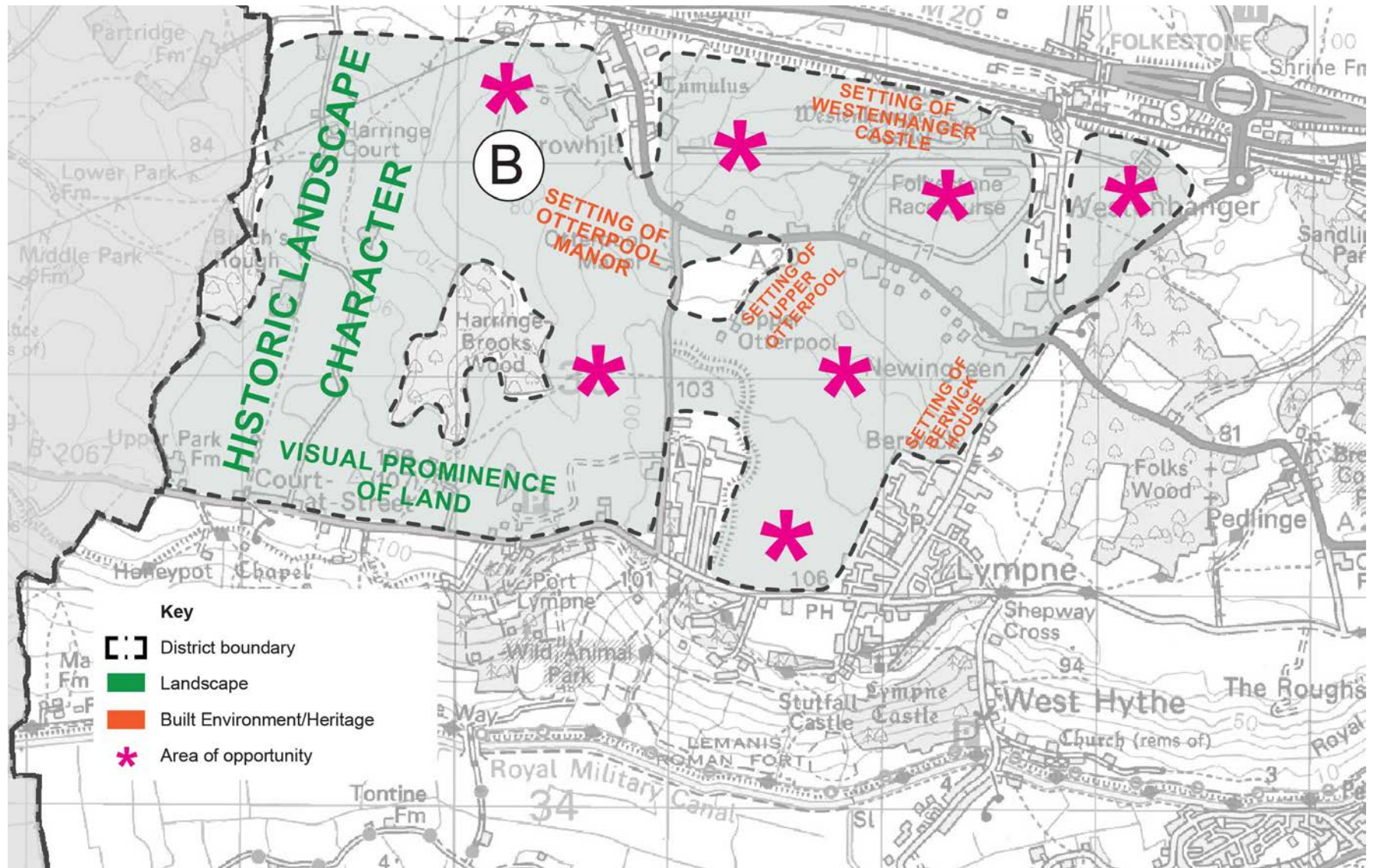


Figure 36: Suitable land within Area B after Phase Two assessment

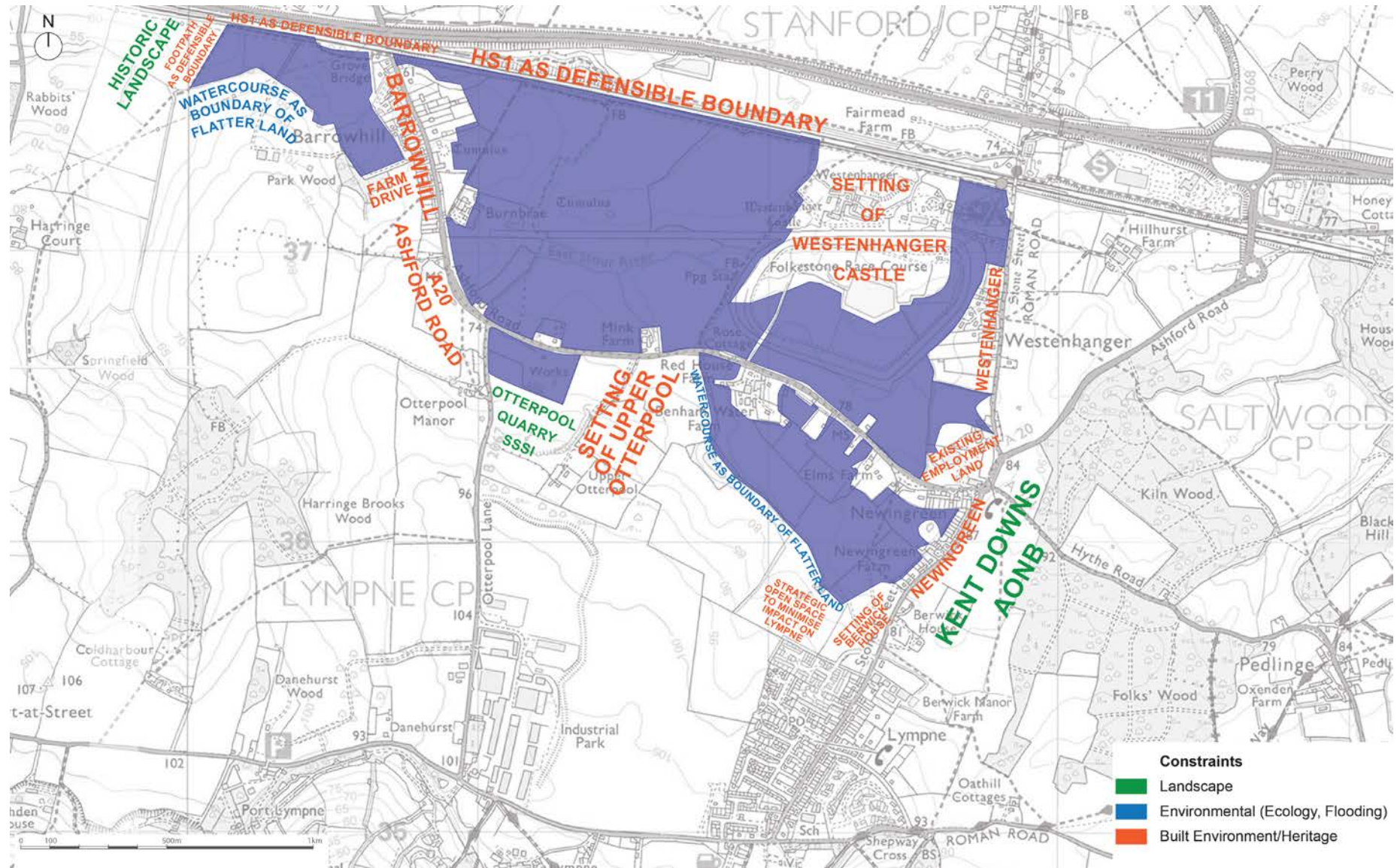


Figure 37: Land suitable subject to appropriate mitigation within Area B after Phase Two Assessment

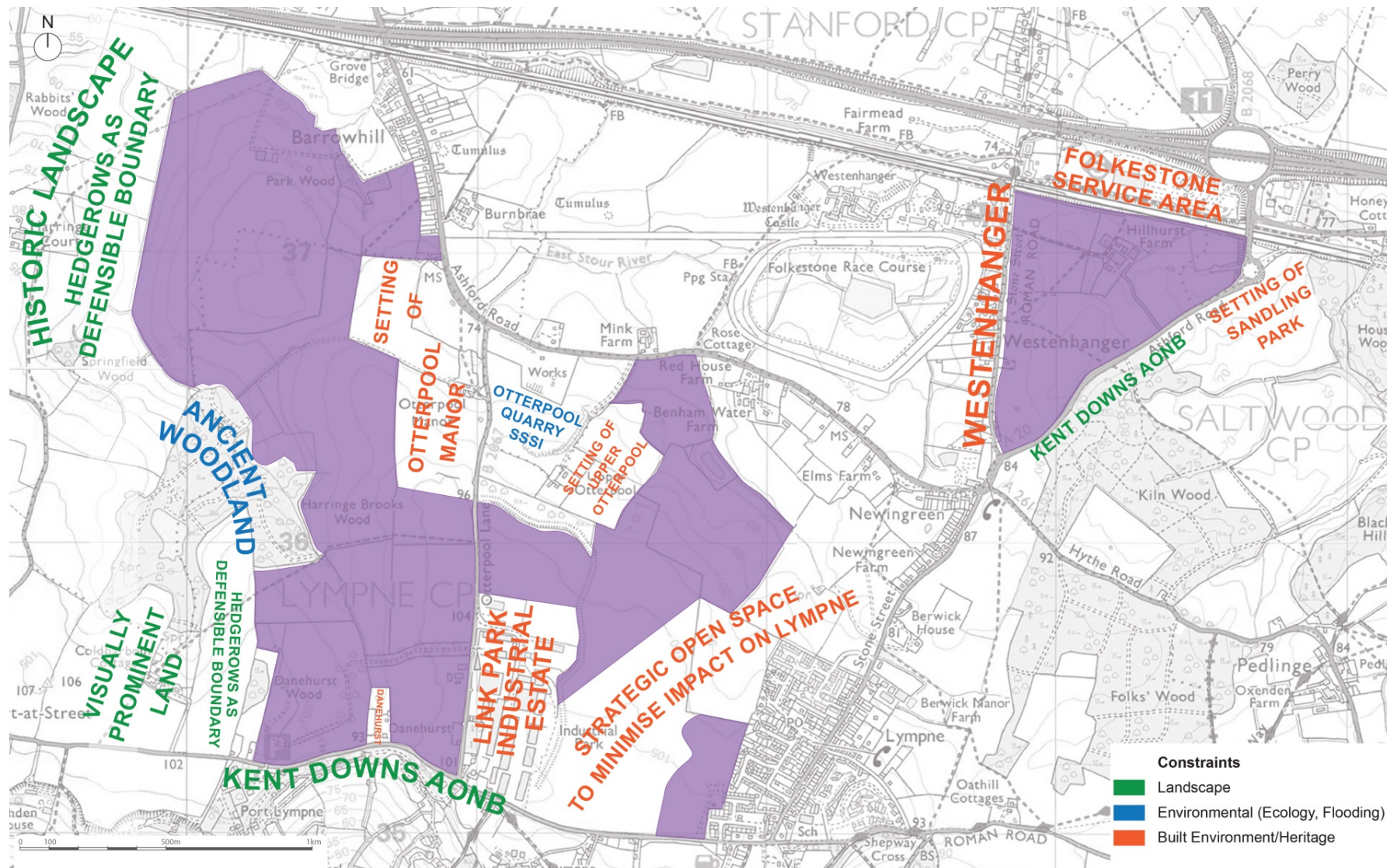
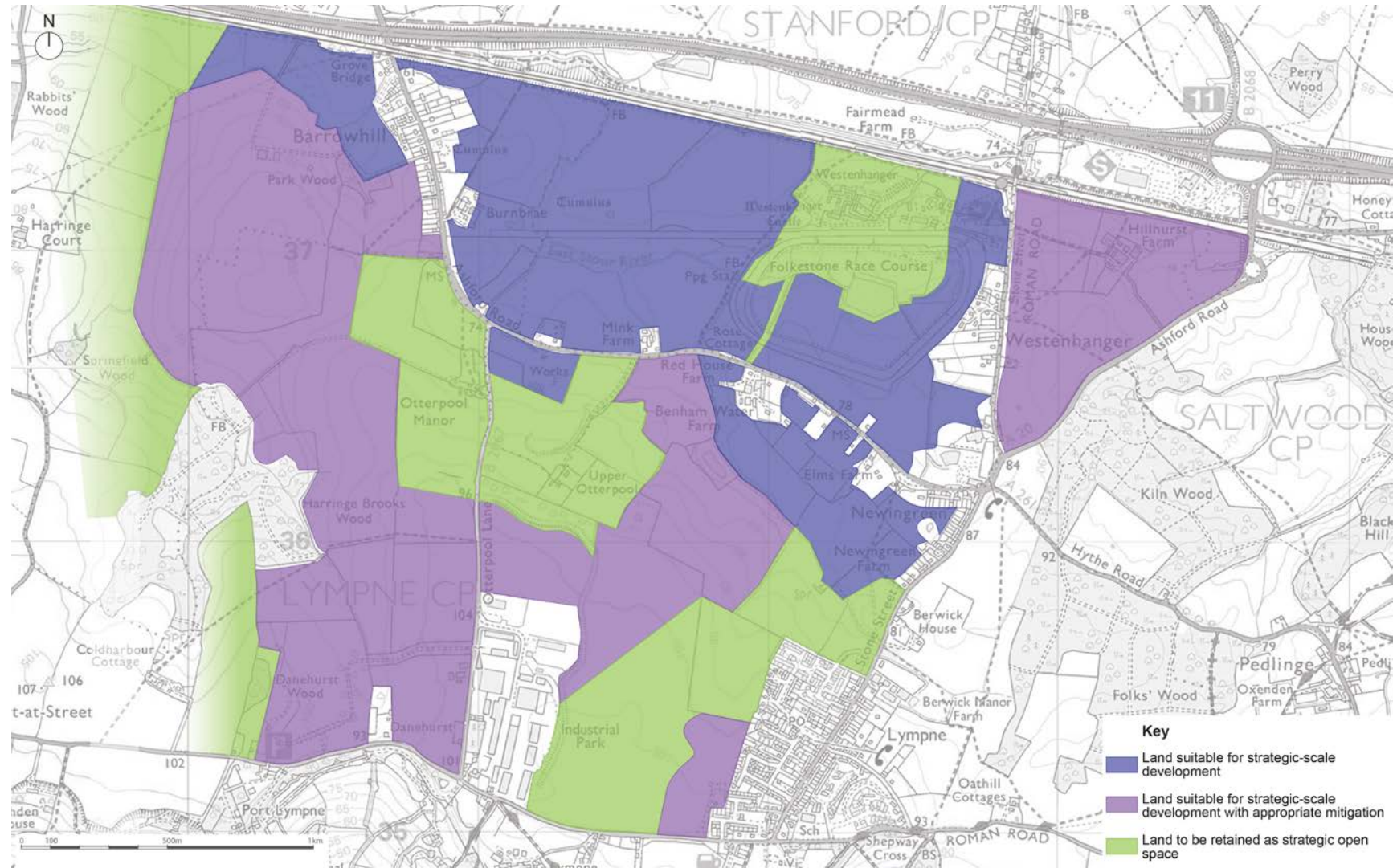
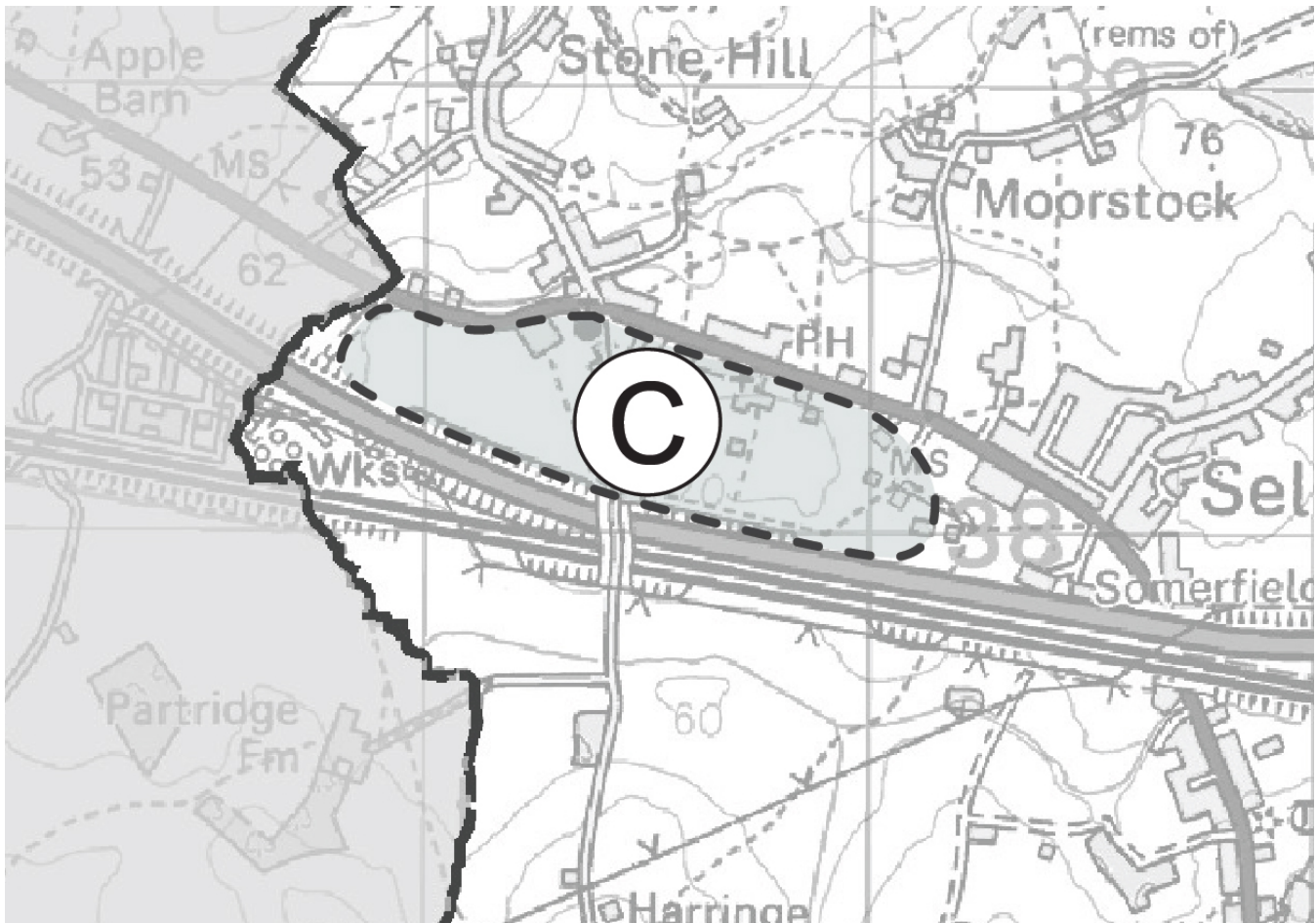


Figure 38: Both types of suitable land, with strategic open space, within Area B after Phase Two Assessment



2.5 Area C: South and West of Sellindge

Figure 39: Area C before Phase Two assessment



Agricultural land quality

With the exception of a very small part at its far north-western edge, the whole of Area C is located on Grade 2 agricultural land. As a result, on this criterion, Area C performs slightly worse than Areas A, B and D, though Grade 2 land is in fact extensive across the whole of the study area.

Transport and accessibility

Area C is bound to the south by the M20 and to the north by the A20. Harringe Lane is the only road through the area and this runs north-south through the centre, providing a connection to the A20 Ashford Road to the north and continuing south towards the B2067 at Court-at-Street to the south across the M20 and HS1 railway line. Harringe Lane is a minor road, forming a narrow country lane.

There are existing access points from the A20 onto the land along the northern edge of the area. Development in the east of Area C area would benefit from being within walking and cycling distance of

Sellindge village centre and local facilities. The A20 benefits from pedestrian pavements in this location to facilitate this.

However, development to the west of Harringe Lane would be more distant from Sellindge. To avoid ribbon development and walking along the side of the A20 a comprehensive and clear network of off-road paths and cycle ways would be needed to access services and facilities in the village centre by means other than the private car.

The 10/10A bus service operates along the A20 Ashford Road and there are a number of bus stops along the A20 north of the area. There are no cycle routes within the area, though it is crossed by numerous footpaths, most dense in the centre and east of the area and more limited to the west.

Taking all considerations into account, the northern edge of the area and its centre around Harringe Lane perform best on this criterion. However, as Area C is the smallest of the four areas and lying along a road corridor, no part of it is more than 400 metres away from the A20.

Landscape

Area C has a flat to slightly undulating landform, located at the base of a broad dip slope that rises to the Greensand Ridge to the south, and at the southern edge of a broader area of rolling foothills to the North Downs Ridge to the north. The area predominantly comprises farmland, the majority of which is currently in pastoral use, with fields of a small- to medium-scale divided by disrupted hedgerows with many gaps, and occasional evidence of remnant historic enclosure such as mature trees in fields. The western end of the area is strongly enclosed to its north, west and south by generally dense belts of trees.

Settlement within Area C includes several farms and houses generally dispersed close to and alongside the A20. Sellindge parish church is located centrally within a small cluster of houses amongst this settlement. Woodland and trees around settlement limit its visual influence over the area. The only road through the area is Harringe Lane, a minor single track lane that bridges over the M20 and railway line to the south, leading north through the centre of the area to a junction with the A20 close to the Church of St Mary. The M20 is in a cutting along the southern edge, with a timber acoustic fence and a belt of trees and scrub along its northern side. The noise of traffic along the M20 reduces tranquility within the area, although the visual influence of the motorway is limited.

Area C is covered by LCA 09: Sellindge as defined in the HLLA. LCA 09: Sellindge is identified in the HLLA as being of Medium landscape sensitivity where impact on landscape character and visual impact will not necessarily be an obstacle to strategic scale development, and where suitability is likely to be determined by other sustainability or strategic environmental considerations.

Land within Area C is well-concealed in views from the Kent Downs AONB by a combination of undulating surrounding landform, intervening development at Sellindge, and woodland or tree belts on its northern, eastern and southern edges. The land within Area C is thus considered to be less constrained in its potential to give rise to significant landscape or visual effects. This is also as a result of the land's proximity to existing dispersed settlement, relatively contained zone of visual influence,

and other localised detracting features including the M20 and power lines parallel to it. Whilst strategic scale development on these areas of land would be likely to give rise to some adverse landscape and visual effects, these effects are limited because they could be more readily mitigated through the siting, type and design of development to assimilate it into the landscape.

Infrastructure

The eastern portion of Area C lies in close proximity to the village of Sellindge and has access to social infrastructure (including a primary school and a GP surgery) and facilities and services (including a Co-Operative village shop, a village hall, a farm shop, sports hall and a village hall) located within the village. The eastern portion of Area C is also located adjacent to the Sellindge broad development zone identified through Core Strategy Policy CSD9. New development in this location therefore has the potential to improve and increase the range of social infrastructure, including education and open space provision, available at Sellindge, likely through providing new services and facilities as a westward expansion of the existing village centre (east of Harringe Lane).

As previously stated for Area A, it is important to note that whilst Sellindge benefits from a range of facilities, SDC advises that many of these are at capacity. The forthcoming development within the broad development zone referenced above requires the expansion of the doctors' surgery and the expansion of the primary school from 0.5 forms equivalent (FE) to 1 FE, using land in the control of the applicant. As of early 2017, there is no spare capacity for further development at either the doctor's surgery or school, and land with potential for the future expansion of the school is in separate ownership.

As such, any new development in the eastern half of Area C would have to be able to either expand the school from 1FE to 2FE or provide for a new primary school. Additionally, new health care would be required.

By contrast the western portion of Area C, west of Harringe Lane is further from existing infrastructure with access into Sellindge Village via the A20. Access to green infrastructure across the entirety of Area C is considered to be poor. However, again, there could be opportunities to provide new infrastructure, services and facilities west of Harringe Lane if this land is considered suitable for development on other criteria.

Heritage

The single designated built heritage asset within Area C is the Grade I listed Church of St Mary, Sellindge's parish church. Dating from the late 11th, 12th and 13th centuries, the church was restored in the mid-to-late 19th century. The church's west tower and pyramidal spire is visible in long views from the footpath from Sellindge, as was noted in the Area A analysis above. Apart from these long views to the east, the church's setting is limited in extent, the building only being visible amongst the trees in its churchyard along a short stretch of the A20 Ashford Road (as illustrated in Figure 40).

The churchyard is heavily wooded, as is the garden of the vicarage to the south. The tree screening is so dense that even in winter views of the church are almost non-existent from the field to its south. Only

at the northern boundary of the field is there a still heavily-screened view of the tower through the trees (as illustrated in Figure 41). As such, a small buffer zone should be employed in this area. The rest of Area C is not within the setting of any designated heritage asset.

Figure 40: St Mary's church, Sellindge, from the A20 to the north



Figure 41: St Mary's Church screened to a significant extent by trees to the south. The effect would be even stronger in summer



Regeneration potential

The whole of Area C is located within the 50% least deprived neighbourhoods in England. As such, it and Area D perform better on the regeneration criterion than do Areas A or B. Nevertheless, development within this area would therefore likely have limited regeneration impacts, and no part of the area is any more or less suitable on this criterion than any other.

Economic development potential

Area C is considered to be relatively suitable for employment uses given the strategic road access offered by the A20 and to the M20 beyond. However, being further from M20 Junction 11, it is less suitable for large-scale employment uses than land in Area B further east, as lorries associated with large-scale employment would have to pass through the village centre of Sellindge.

The area contains a commercial site which includes a garden centre and nursery. These are complementary to the residential uses which are focused along the A20, and it is this type of small-scale roadside retail uses considered more suitable for employment in this location. However,

expansion of this specific commercial site to accommodate further employment uses would not be considered appropriate given the limited road access. There are likely to be, however, limited opportunities to introduce employment generating uses in the form of local amenities and services, such as local shops and schools, to future residential development both within Area C and related to the Sellindge broad development zone at its eastern end that is designated under Core Strategy Policy CSD9.

Spatial opportunities and constraints

Spatially, Area C is not complex. It consists of a rough semi-circle of land crossed by one road (Harringe Lane) and bounded by the A20 as it passes through Sellindge to the north. Though there are no free-standing villages or other settlements within the area, it includes a number of properties to be avoided on the southern edge of Sellindge and the A20, including Court Lodge Farm, Rotherwood Farm and Potten Farm.

The eastern half of Area C is located within the Impact Risk Zone (IRZ) of Gibbin's Brook SSSI, which is the woodland located east of Sellindge. The western half of Area C does not fall within this IRZ. Though the far outer boundaries of some other IRZs cut across it, in general it is far enough from any SSSI for this not to be considered a constraint to development.

Natural England advise that for development in all areas, account should be taken at site allocation and/or planning application stage of the possible impacts of more journeys and visitors to the natural assets at Dungeness, which, though outside the study area, are likely to be impacted by journeys from new development within it.

As Gibbins Brook SSSI is common access land, site allocations and planning applications within Area C should have regard to the potential impacts of a higher level of visitors to the SSSI, considering where appropriate options for mitigation.

The area is crossed by numerous footpaths, particularly in its east and centre, which have the potential to form defensible boundaries to development, as does the western edge of the existing Core Strategy allocation south of Sellindge. Otherwise, the M20 is a very strong boundary to the south, with Harringe Lane also offering potential as a boundary. In the far west of the area, there are fewer footpaths and the land is flatter and more open, but the generally dense belts of trees to the north, west and south provide excellent visual and defensible boundaries to development.

In particular, the District boundary at the western end of Area C is very clear where it runs along a small watercourse marked by a line of dense trees. However, if development were to extend this far west, care must be taken to avoid the perception of buildings forming 'ribbon' development along the A20. This highlights the importance of sensitive design in north-western part of the area to avoid the perception of a hard edge to development.

2.6 Area C Conclusions

Integrating assessment criteria

Like other areas, but to a much greater extent, Area C mainly comprises Grade 2 agricultural land. The Grade 3 land that does exist is very limited and is at the north-west edge, which performs poorly on the infrastructure criterion due to its relative remoteness from Sellindge. As such, the agricultural land criterion within Area C does not provide a strong guide in terms of which parts would be relatively more suitable when criteria are assessed in the round.

On the transport criterion, the A20 along the northern edge of the area and Harringe Lane through the centre mean that these locations perform best. However, as Area C is the smallest of the four areas assessed and lies along a road corridor, no part of it is further than 400 metres away from the A20 and thus no part of the area is particularly unsuitable on this criterion.

In terms of landscape, Area C is the best-performing of the four areas assessed. While no part of the area is considered any more or less suitable than any other on this criterion, a number of factors combine here to make the area generally more suitable on this criterion. These comprise the loss of tranquility due to noise from the M20, the lack of intervisibility from viewpoints in the Kent Downs AONB due to intervening landforms, development and vegetation, a relatively contained zone of visual influence, and localised detracting features including the M20 and power lines. As in other locations, strategic scale development in Area C would be likely to give rise to some adverse landscape and visual effects, but these effects would be limited because they could be readily mitigated through the siting, type and design of development to assimilate it into the landscape.

In terms of infrastructure, the eastern half of the area performs better than the western half (i.e. west of Harringe Lane) due to its proximity to services and facilities at Sellindge.

However, as SDC advises that many of the existing services and facilities in the village are already at capacity, new development would have to provide additional services and facilities of its own for use by both existing and new residents.

Despite this requirement, the infrastructure criterion is not an absolute constraint given that new infrastructure, including new green infrastructure, should be developed alongside new housing in this location, both east and west of Harringe Lane. As such, and given the strong performance of the land west of Harringe Lane on other criteria including landscape, heritage, transport, regeneration and spatial opportunities and constraints, the relative lesser suitability of the land west of Harringe Lane on this criterion is considered less significant.

The only designated heritage asset within or having an impact on Area C is St Mary's Church in Sellindge. Though visible from the A20 to the north, dense trees screen most views of the church from the field to its south. However, as glimpses of the church are visible in one location in the centre north, a small buffer zone is justified in this location to ensure that any new development does not have a negative impact on its setting.

In terms of regeneration, no part of the area is any more or less suitable than any other, and in terms of employment, though the area is much less suitable for large-scale opportunities on the scale associated with M20 Junction 11 further east, there may nonetheless be more limited opportunities for small-scale roadside employment uses such as shops or schools.

The area performs well on the spatial opportunities and constraints criterion, with the A20 and properties along it forming a clear northern edge, the M20 doing the same along the south, and a strong landscape boundary of trees and a watercourse along the District boundary in the far west. To the east, visible boundaries on the ground are less apparent, but the western boundary of the Core Strategy allocation south of Sellindge (along hedgerows between the A20 and M20 passing east of Rotherfield Farm) has potential as an eastern limit.

Summary of land considered suitable

It is clear that, when assessed in the round, Area C performs well on every criterion except for that of agricultural land quality, as it comprises almost entirely Grade 2 land. However, as noted, it is not unusual in this regard among all the areas being assessed.

Its performance on the whole range of other criteria, including transport, landscape, heritage, infrastructure, regeneration, economic development potential and spatial opportunities and constraints is strong. Though the western half of the area (illustrated in Figure 42) performs more poorly on the infrastructure criterion, its strong performance on the others means that this lower suitability could easily be mitigated through new infrastructure provision.

Figure 42: Western half of Area C, looking west from Harringe Lane towards the District boundary



Given the area's good performance on most assessment criteria, it is considered that land on both sides of Harringe Lane is suitable for development. West of Harringe Lane, there are no significant constraints as far as the District boundary, but any development close to the road frontage on the north-western edge should be carefully designed and softened to provide a gentler urban edge. This will help

avoid the perception of ribbon development along the A20, given that the land on both sides of Harringe Lane would effectively comprise a westward expansion of Sellindge.

On the eastern side of Harringe Lane, there are again strong boundaries to the north, west and south that encompass flat farmland with very few identified constraints (illustrated in Figure 43). To the east, the western edge of the Core Strategy Site Allocation south of Sellindge would be an appropriate limit to development. Figure 44 shows that no specific constraints were identified within Area C.

Figure 43: Farmland in Area C east of Harringe Lane, offering few constraints to development



The overall conclusions for Area C are considered consistent with the NPPF when taken as a whole and are made with particular reference to spatial planning principles 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12 and 14.

Figure 44: Selected key spatial constraints and opportunities informing Phase Two assessment of Area C

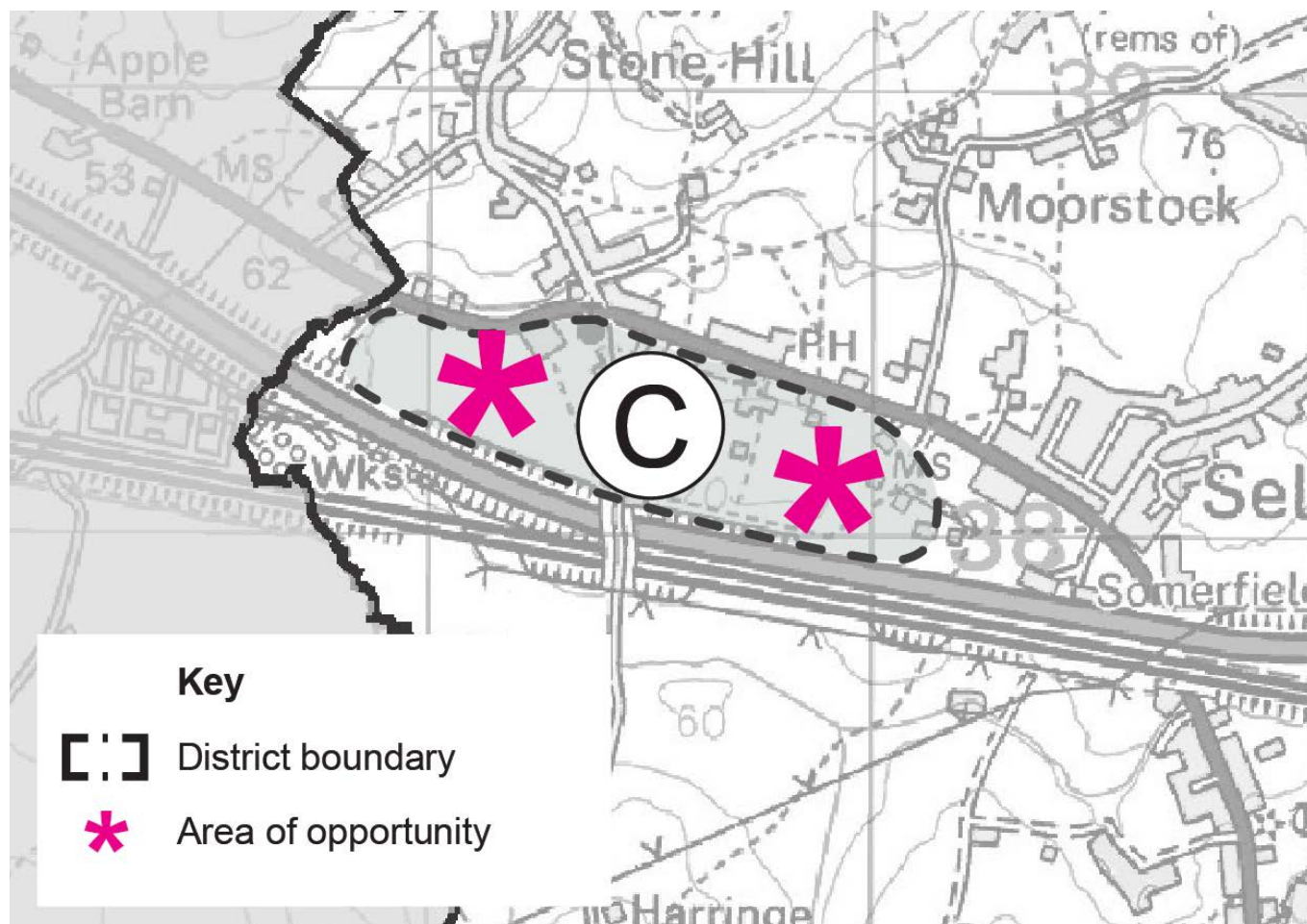
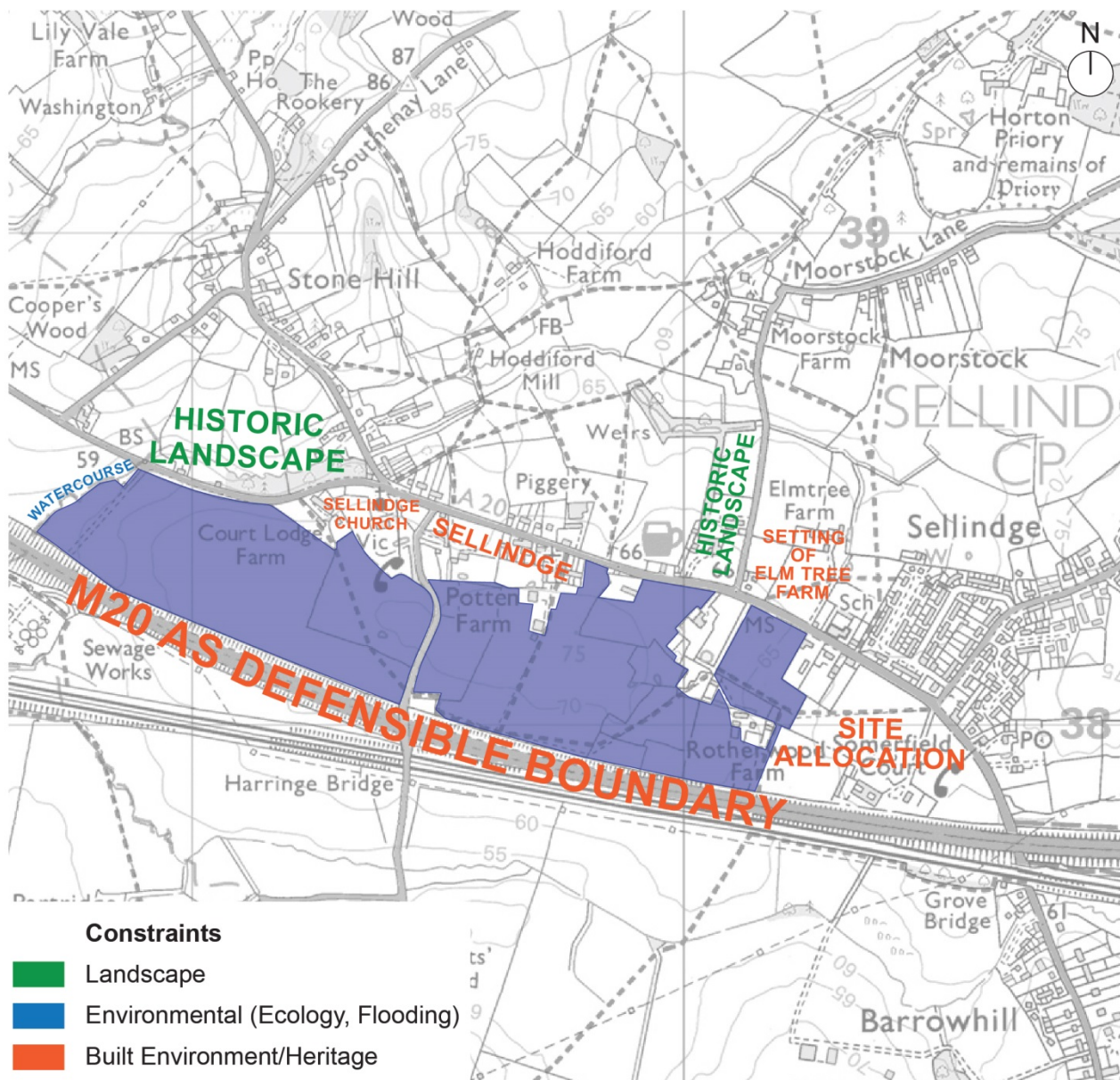
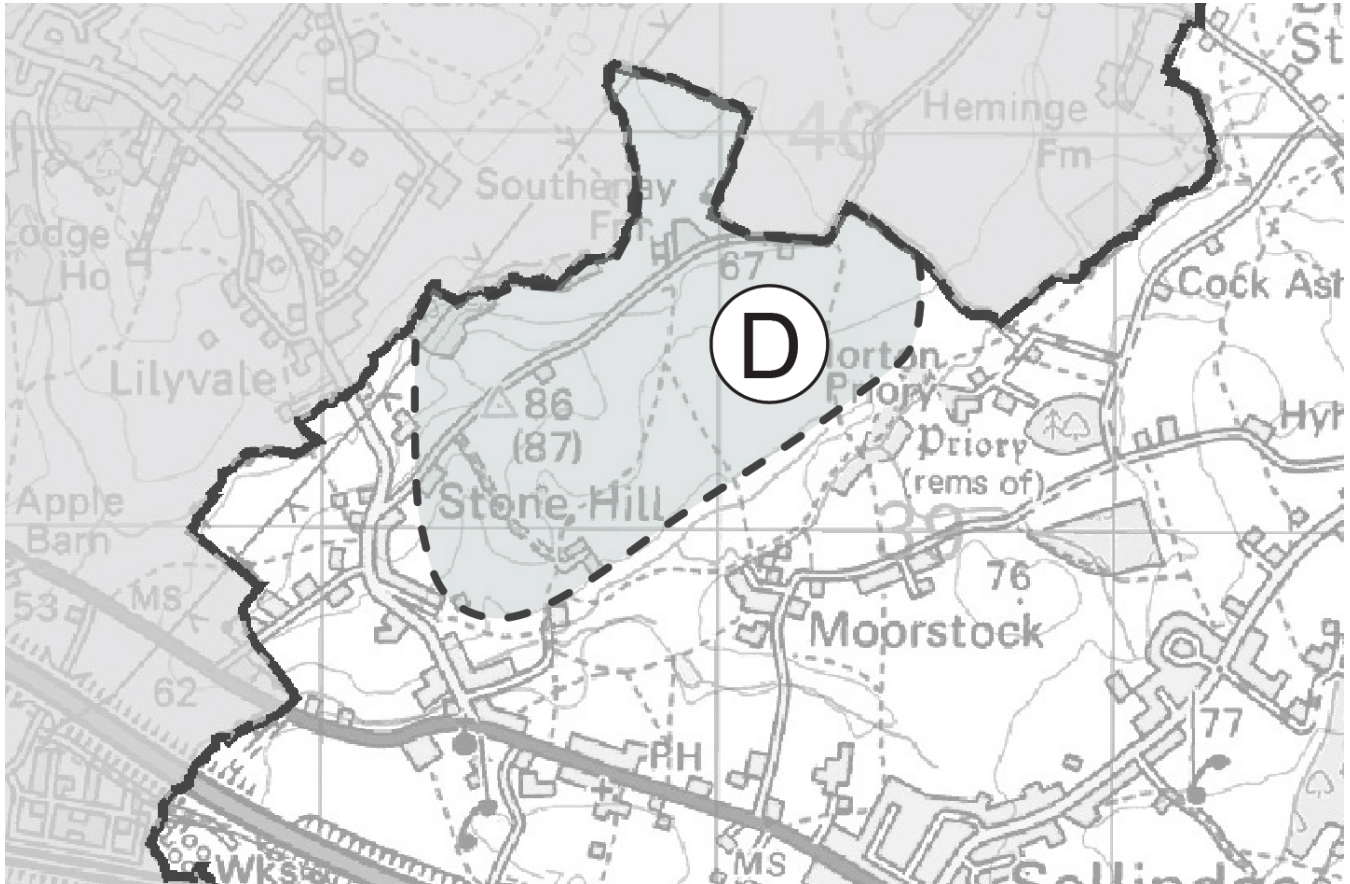


Figure 45: Area C after Phase Two assessment



2.7 Area D: East of Stone Hill

Figure 46: Area D before Phase Two assessment



Agricultural land quality

Like other areas, most of Area D comprises Grade 2 agricultural land, but there are smaller extents of Grade 3 land at the edges of the area, particularly to the east of Stone Hill and around Southernay Cottage. As such, the northern and southern edges of the area are more suitable than the centre on this criterion.

Transport and accessibility

This area is predominantly farmland with Southernay Lane, a single track road, forming the only road through the site. Southernay Lane connects with the hamlet of Stone Hill to the south and to the north continues towards Monks Horton. The area is relatively isolated and the local roads are narrow rural routes without pavements, and thus not conducive to walking towards Sellindge, which is the closest village.

Due to the rural nature of the area there are limited transport options. There are no cycle routes within the area. Bus number 10/10A operates along Plain Road and Stone Hill and provides services to Ashford, Sellindge, Hythe and Folkestone.

Development at this location would require significant improvements to Southenay Lane. Even then, the remote, rural location would suffer limited transport options, favouring the use of the private car.

The combination of these factors means that the entire area performs poorly on the transport criterion relative to Areas A, B and C, but within the area the north is relatively less suitable than the south, given the latter's greater proximity to the A20 corridor.

Landscape

Area D has a strongly undulating, generally raised, landform between floodplains to its north-west and south-east. The area is part of a broader area of rolling foothills to the North Downs Ridge to the north, predominantly comprising farmland, with pastoral farmland in the south-west and arable farmland in the north-east. It includes the roads of Stone Hill, Cooper's Lane and Southenay Lane. Settlement is limited to houses primarily located along Stone Hill. There is a strong sense of enclosure in the south-west of the area resulting from the undulating landform and mature vegetation along field boundaries and around settlement. This sense of enclosure and the cover by mature trees give it a rural character. The north-east of the area is more open, with large-scale arable fields and limited tree cover, reducing the sense of enclosure and creating a visual connection with the North Downs Ridge to the north.

Area D is covered by LCA 09: Sellindge as defined in the HLLA. LCA 09: Sellindge is identified in the HLLA as being of Medium landscape sensitivity where impact on landscape character and visual impact will not necessarily be an obstacle to strategic scale development, and where suitability is likely to be determined by other sustainability or strategic environmental considerations.

However, as explained under the Landscape sub-section of Area B, in some cases there is land within an area assessed as having Medium sensitivity at an LCA level which is less suitable (i.e. having higher sensitivity) at a site-specific level, and this appears to be the case for the whole of Area D, for the following reasons.

The north, east and centre of Area D are prominent in the middle ground of views south from the North Downs Way National Trail which is within the Kent Downs AONB (see Figure 47). Consequently, they are perceived to form an important element of the setting of the AONB. Development on this open and generally undeveloped land could potentially give rise to significant adverse visual effects on the setting of the AONB, as a result of its proximity and prominence from along the ridgeline. The north, east and centre of the area are therefore considered to be unsuitable for strategic scale development.

Figure 47: The visual prominence of the northern and eastern parts of Area D from Farthing Common viewpoint within the AONB



The south of Area D (illustrated in Figure 48) has distinct high quality rural characteristics including small-scale pastoral fields divided by mature and veteran trees. The effect of strategic scale development on this land could significantly alter its rural and remote landscape characteristics, and would be difficult to mitigate through the design or layout of any development. The south of the area is therefore also considered to be unsuitable for strategic scale development. Though slightly outside the indicative boundary of Area D, the triangle of land between Cooper's Lane and Stone Hill is considered to share the same characteristics as the southern part of Area D, and is also considered unsuitable for strategic scale development for this reason.

Figure 48: View into the south of Area D showing the driveway to Hoddiford Mill in the foreground and rising land beyond



Infrastructure

Area D predominantly contains agricultural land and the nearby hamlet of Stone Hill offers no facilities or services. However, Area D lies within relatively close proximity to Sellindge and therefore has more distant access to social infrastructure (including a primary school and a GP surgery). Therefore, access to facilities and services (including a Co-Operative village shop, a village hall, a farm shop, sports hall and a village hall) is considered to be reasonable, but as also noted on the transport criterion, the infrastructure, services and facilities located at Sellindge would only be accessible via car or cycle given the lack of pedestrian routes along Stone Hill Road.

Overall Area D scores moderately well in terms of access to services and facilities given its proximity to Sellindge, subject to the accessibility caveat noted above. However, access to green infrastructure across the entirety of Area D is considered to be poor.

Heritage

Designated heritage assets in Area D are all at its periphery. In the west of the area, those assets along Stone Hill Road, namely Glebe Farm House, Ashdown Cottages, Old Mill House, Stone Hill Cottage, Old Forge Cottage and Belle Vue (all Grade II) are screened from the majority of the area to the east either by buildings or hedges with trees and shrubs beyond. On Southenay Lane to the north of the area, Southenay Cottage (Grade II) has a large garden surrounded on all sides by mature trees. Its setting does, however, extend to the field north of Southenay Lane which is also within the setting of the Grade II listed Barn about 50 metres north-east of Southenay Farm House.

The farmhouse itself is Grade II listed and has a more restricted setting, being screened to the north but looking out across the higher land to the south. The fields to the south of these assets have had their hedges grubbed up and now exist as large expanses of open agricultural land. However, further south still the fields are intact and readable from historic maps as are other features such as woods and the water management systems around and to the east of Hoddiford Mill. As such, they contribute to a historic landscape important in heritage terms and therefore the south of the area is less suitable in heritage terms than those parts of the north outside the settings of heritage assets.

Though the north and east of Area D are close to the designated assets at Horton Priory, the land does not appear to lie within its visual setting.

Regeneration potential

The whole of Area D is located within the 50% least deprived neighbourhoods in England. As such, it and Area C perform better on the regeneration criterion than do Areas A or B. Nevertheless, development within this area would therefore likely have limited regeneration impacts, and no part of the area is any more or less suitable on this criterion than any other.

Economic development potential

This location is considered to be unsuitable for locating employment uses given its predominantly rural character and generally poor access to the strategic road network. The majority of the roads within this area are minor roads and are therefore not suited to increased volumes of traffic and goods vehicles. In addition, public transport accessibility to this area is poor. Should this area be considered suitable for residential development then there may, however, be very limited opportunities to introduce employment generating uses in the form of local amenities and services (i.e. local shops).

Spatial opportunities and constraints

Area D's main spatial features that have the potential to be used as defensible boundaries to development comprise Southenay Lane, which extends south-west to north-east across the area, numerous footpaths extending down the hill south-east from the lane, and the watercourses that flow into the larger stream and floodplain marking the southern edge of the area. There seems generally more potential for physical features to be used as boundaries for development in the west of the area (such as Stone Hill Road) than in the east, where there are fewer obvious physical boundaries between Area D and Horton Priory.

The area is generally open and rural, particularly in its northern half. There are a number of properties along Southenay Lane that any development should avoid, as well as properties along Plain Road south of Stone Hill itself that start to merge into Sellindge. This also applies to the more isolated buildings at Hoddiford Farm and Hoddiford Mill.

To the north of Southenay Lane, there are fewer obvious features that could be used as boundaries to development other than the row of electric pylons, or, beyond that, the District boundary itself along the

watercourse on the valley floor. As such, this part of Area D performs worse on the spatial opportunities and constraints criterion than does the south.

Finally, the eastern half of Area D is located within the Impact Risk Zone (IRZ) of Gibbin's Brook SSSI, which is the woodland located east of Sellindge. However, the western half of Area D does not fall within this IRZ. Though the far outer boundaries of some other IRZs cut across it, in general it is far enough from any SSSI for this not to be considered a constraint to development within it.

Natural England advise that for development in all areas, account should be taken at site allocation and/or planning application stage of the possible impacts of more journeys and visitors to the natural assets at Dungeness, which, though outside the study area, are likely to be impacted by journeys from new development within it.

As Gibbins Brook SSSI is common access land, site allocations and planning applications within Area D should have regard to the potential impacts of a higher level of visitors to the SSSI, considering where appropriate options for mitigation.

2.8 Area D Conclusions

Integrating assessment criteria

Area D, being mainly Grade 2 land, performs in a similar way to other areas on the agricultural land criterion. Only the northern and southern edges perform better on this criterion.

In terms of transport, the area suffers from its generally rural, remote character, and it performs worse on this criterion than any other area. Though the south is relatively more suitable in terms of transport, being closer to the A20 corridor, this land performs poorly on other criteria, including landscape.

In landscape terms, the area was given a Medium assessment in the High Level Landscape Assessment as part of the Sellindge Landscape Character Area. However, at this more fine-grained level of assessment, Area D is considered much less suitable in landscape terms than Areas A and C that also formed part of the same Landscape Character Area. The relative lack of suitability on this criterion is based on two different factors- firstly, the high quality rural landscape on the south-east slope of the raised land forming the centre of Area D and the prominence, proximity and intervisibility of the centre and north-west of the area from vantage points within the AONB to its north, meaning that this part of Area D is firmly within the AONB setting. As such, the whole area performs poorly on the landscape criterion.

In terms of infrastructure, Area D performs moderately well due to the proximity of services and facilities at Sellindge but these would only be accessible by car and cycle rather than walking. There are no services and facilities closer by at Stone Hill, and access to green infrastructure is poor.

Though those parts of the north of the area outside the setting of heritage assets are more suitable on the heritage criterion than the historic landscape in the south, this land is the most rural and remote and the most distant from Sellindge, as well as lacking defensible boundaries. As such, it performs poorly

on landscape, transport, infrastructure, economic development potential and spatial opportunities and constraints criteria.

The regeneration criterion indicates that no part of Area D is any more or less suitable on regeneration grounds, but the whole of the area performs poorly on the economic development potential criterion.

In terms of spatial opportunities and constraints, the south of the area generally performs better than the north as there are more features including hedgerows and footpaths that could be used as defensible boundaries to development compared to the more open land north of Southenay Lane. For the same reasons, the west performs better than the east of the area.

Summary of land considered suitable

Area D is considered to be the only one of the four areas of land assessed that has no land suitable for development. It is Area D's generally remote, rural location, its historic landscape and its prominence in views from the AONB to the north that are the key factors in this assessment, with the area performing generally poorly in both absolute and relative terms on the transport, landscape, economic development potential and spatial opportunities and constraints criterion. Though its performance on heritage is more mixed, there are still extensive parts of the area, particularly the historic landscape south of Southenay Lane, considered unsuitable on this criterion. It performs moderately well on infrastructure due to the proximity of Sellindge, but the transport criterion in particular would cancel this out due to the difficulty of access by means other than car or cycle. The area also performs poorly in absolute terms on the agricultural land quality criterion, but in relative terms, its suitability on these grounds does not differ significantly from that of Areas A, B or C. Figure 49 illustrates the fact that no land considered suitable for development was identified within Area D.

The overall conclusions for Area D are considered consistent with the NPPF when taken as a whole and are made with particular reference to spatial planning principles 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12 and 14.

Figure 49: Selected key spatial constraints and opportunities informing Phase Two assessment of Area D

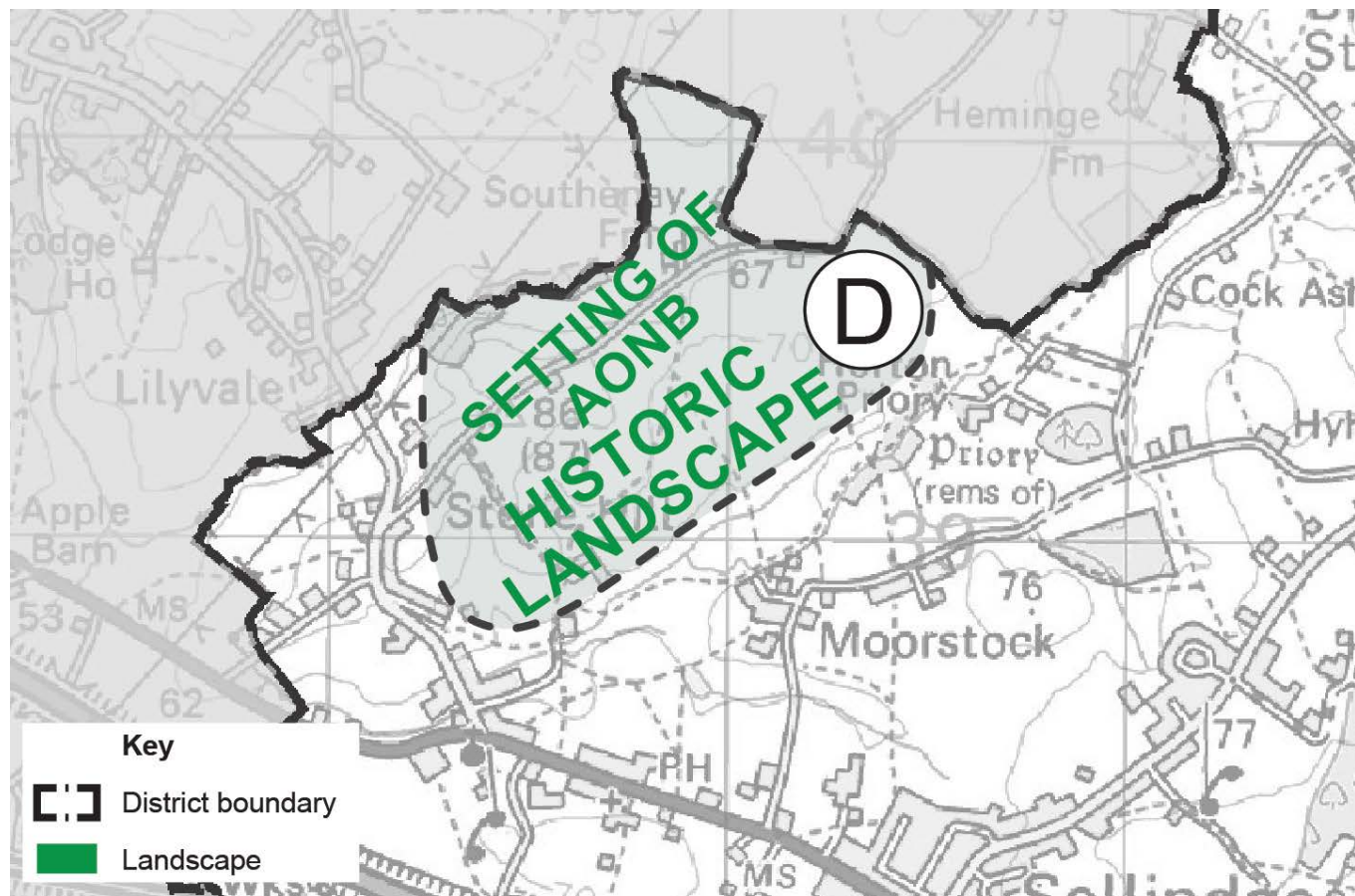
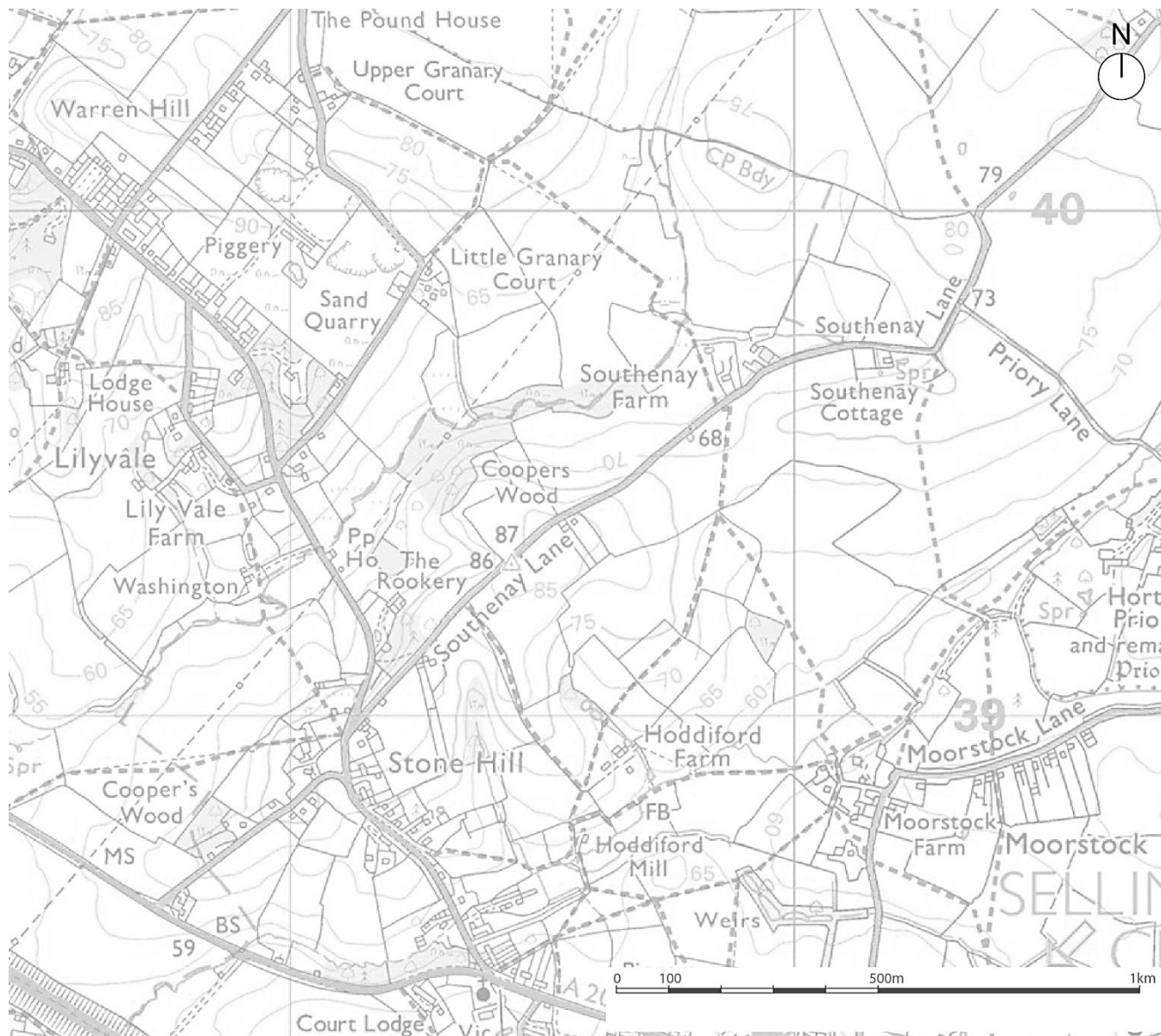


Figure 50: Area D after Phase Two assessment



3 Conclusions

3.1 Land considered suitable for strategic-scale development

This report has sought to identify land within Shepway District that, in AECOM's independent and professional judgement, is considered to have potential for development, based on relative rather than absolute suitability. The report assessed the suitability of land from a technical perspective, using a range of criteria based on spatial planning principles derived from the National Planning Policy Framework. This will ensure that implementing the recommendations of the Strategic Growth Options Study can maximise economic, social and environmental benefit while minimising environmental harm.

The report does not recommend definitively that the land identified be allocated for future development; it sets out how Shepway could grow, not necessarily where it should grow, and comprises evidence to inform policy rather than policy itself. It does not take into account the demand for housing or employment land, which are further key factors that should be used to establish the quantity of development land needed. It also does not take into account the relative suitability or otherwise of land within neighbouring authorities that may have the potential to meet Shepway's need should it exceed the capacity available within the District.

There are further important considerations for Shepway to take into account following this assessment of which land is considered technically suitable for development. As SDC considers the findings of this report and investigates options for allocating land based on it, those options should build in the necessity of achieving sustainability through concentrating development into a critical mass. This would help minimise the risk of fragmented development dispersed across a wider area or a 'suburban' model of development lacking appropriate supporting facilities and services alongside housing.

Providing development as a critical mass will conversely provide more scope and opportunity to attract employment uses of a meaningful size and to provide strategic-scale open space, playing fields, schools and the other relatively large-scale land uses and infrastructure that any community needs to promote social cohesion and sustainability.

More details on relevant infrastructure 'triggers' for strategic-scale development are provided in section 3.4 below.

This report identifies that, in addition to sites with planning permission and existing site allocations, there are around 234.6 hectares of land considered suitable for residential development and appropriate supporting uses, and a further 257.8 hectares of land considered suitable for the same purpose subject to appropriate mitigation. This gives a total of 492.4 hectares of land that has been identified as having some kind of potential for new residential and supporting land uses. The land identified could be suitable for development across multiple plan periods, subject to further testing through the planning process.

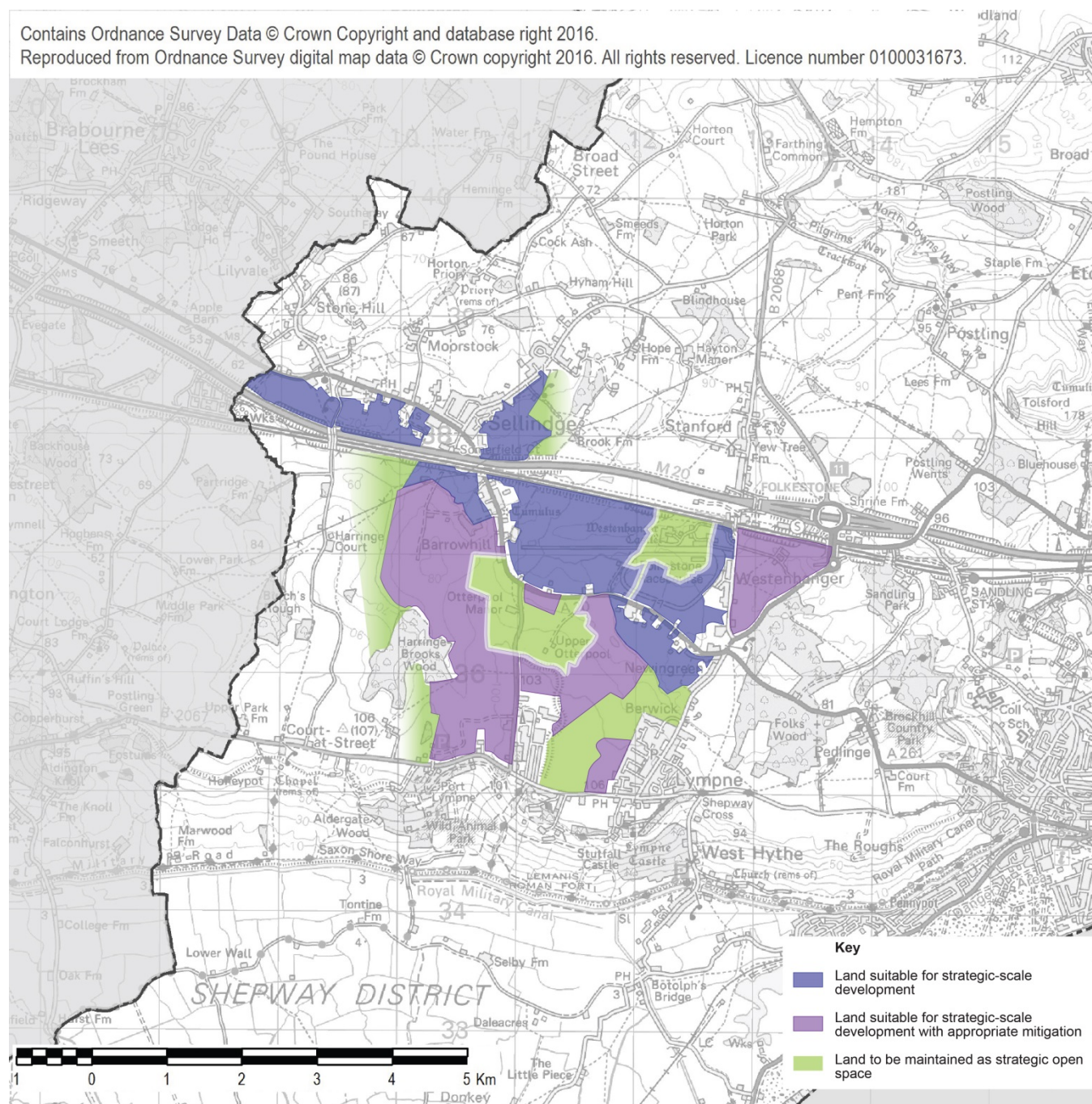
The conclusions for Area B highlighted the potential for significant areas of strategic open space to be provided within and surrounding new development, with a green infrastructure strategy exploring and defining the various important roles that such strategic green space would play in various locations.

Figure 51 below presents all locations considered suitable for strategic-scale development. It also demonstrates the potential to extend strategic green space beyond that presented in the Area B conclusions to a much wider area, which has been calculated as approximately 220 hectares.¹⁵ This ensures that, in addition to its role preserving the setting of heritage assets, open space can also play an important role as a 'buffer' at the urban fringe.

Such an open space buffer would not only separate and protect open countryside from new development, but also provide enhanced access and leisure opportunities, appropriate for a new landscape-led garden town. The areas of individual strategic open spaces illustrated in Figure 51 are provided in Table 6 below.

¹⁵ As the outer boundaries of the open space at the urban fringe of the proposed new development have not been defined precisely at this strategic level of analysis, this figure of 220 hectares can only be approximate for the time being. It is at the detailed masterplanning and/or site allocation phase that precise boundaries and extent can be defined.

Figure 51: All land considered suitable for strategic-scale development and strategic open space¹⁶



¹⁶ Comprising a total of 235 hectares of land suitable for development, 258 hectares of land suitable for development with appropriate mitigation, and 220 hectares of strategic open space (all figures approximate/rounded).

3.2 Indicative dwelling capacity

The indicative dwelling capacity of all eight sites considered suitable and four sites considered suitable with appropriate mitigation has been calculated based on appropriate density figures for sustainable residential development. It should be noted that these density calculations are indicative and that actual densities will depend on how (or whether) each site is developed. However, these indicative densities nevertheless provide a useful guideline for the Council and other relevant stakeholders.

The indicative densities are gross rather than net, as is appropriate for strategic-scale residential development. They are based on previous AECOM research into optimum residential densities across England, set out in more detail in Appendix D. The gross density calculation takes account of space needed for uses supporting housing, including streets, open space, schools, local shopping centres, community facilities and so on. The density calculations shown in Tables 2, 3, 4 and 5 include the land defined as 'suitable for development' and 'suitable for development subject to appropriate mitigation', as identified in Figure 51, but not the land to be maintained as strategic open space shown in the same Figure.

Dwelling capacity differs depending on the density selected for each site, which can only be established through detailed, site-specific masterplan work. As such, it is appropriate to provide a range of dwelling densities rather than a single density for each site. However, it is clear from this study that some sites are less suitable for lower-density development and some less suitable for higher-density development, depending on their context, constraints and opportunities. Tables 2-5 below set out assessed dwelling capacity by area (Tables 2-4) and in total (Table 5). The most appropriate density to apply in each case should be tested via detailed masterplanning and policy formation and will need to consider an appropriate range of property types to meet housing need, demand, policy requirements and market viability.

Table 2: Indicative dwelling capacity of land within Area A

Category	Site	Size (ha)	10 dph	15 dph	20 dph	25 dph
Suitable	East of Sellindge	24	240	360	480	600
	TOTAL	24	240	360	480	600

Table 3: Indicative dwelling capacity of land within Area B

Category	Site	Size (ha)	10 dph	15 dph	20 dph	25 dph
Suitable	West of Barrowhill	14.3	143	215	286	358
Suitable	Former racecourse west of Westenhanger Castle	91.4	914	1370	1827	2284
Suitable	Former racecourse east of Westenhanger Castle	33.6	336	505	673	841
Suitable	South-west of Newingreen	26.4	264	396	528	660
Suitable	Works site south of A20	4.4	44	65	87	109
Suitable subject to mitigation	West of Otterpool Lane	156.2	1562	2343	3124	3905
Suitable subject to mitigation	East of Otterpool Lane	52.2	522	783	1044	1305
Suitable subject to mitigation	East of Westenhanger	41.5	415	623	830	1038
Suitable subject to mitigation	West of Lympne (draft site allocation)	7.9	79	119	158	198
	TOTALS	427.9	4,279	6,419	8,557	10,698

Table 4: Indicative dwelling capacity of land within Area C

Category	Site	Size (ha)	10 dph	15 dph	20 dph	25 dph
Suitable	West of Harringe Lane	18.5	185	278	370	463
Suitable	East of Harringe Lane	22	220	330	440	550
	TOTALS	40.5	405	608	810	1013

Table 5: Total indicative dwelling capacity on all land within the study area

Category	Site	Size (ha)	10 dph	15 dph	20 dph	25 dph
Suitable	West of Harringe Lane	18.5	185	278	370	463
Suitable	East of Harringe Lane	22	220	330	440	550
Suitable	East of Sellindge	24	240	360	480	600
Suitable	West of Barrowhill	14.3	143	215	286	358
Suitable	Former racecourse west of Westenhanger Castle	91.4	913.6	1370	1827	2284
Suitable	Former racecourse east of Westenhanger Castle	33.6	336.4	505	673	841
Suitable	South-west of Newingreen	26.4	264	396	528	660
Suitable	Works site south of A20	4.4	43.6	65	87	109
Suitable subject to mitigation	West of Otterpool Lane	156.2	1562	2343	3124	3905
Suitable subject to mitigation	East of Otterpool Lane	52.2	522	783	1044	1305
Suitable subject to mitigation	East of Westenhanger	41.5	415	623	830	1038
Suitable subject to mitigation	West of Lympne (draft site allocation)	7.9	79	119	158	198
	TOTALS	492.4	4,9.	7,387	9,847	12,311

Table 6: Areas of strategic open space accompanying new development

Location	Primary role/function(s)	Indicative size (ha)
East of Sellindge	Buffer to development	21
North of Harringe Brooks Wood	Buffer to development	52
South of Harringe Brooks Wood	Buffer to development	19
Otterpool Manor and Upper Otterpool	Preserve and enhance SSSI and setting of heritage assets	53
Westenhanger Castle	Preserve and enhance setting of heritage assets	27
West of Lympne	Maintain historic identity and character of Lympne	49
TOTAL		221

3.3 Criteria-based assessment across the study area

This report has tested the suitability of land for development against eight planning policy criteria, with no single criterion prioritised over any other.

However, in practice, though every criterion has the potential to be mitigated, some are more easily mitigated than others. How easy criteria are to mitigate depends not only on physical conditions, features and characteristics within the study area, but also on the constraints and opportunities allowed within national and local planning policy.

As a general rule, though with exceptions, the criteria with the most limited potential for mitigation relate to existing physical features (both natural and man-made), namely agricultural land quality, landscape, heritage and spatial opportunities and constraints, and planning policy tends to reflect this.

The criteria with greater potential for mitigation, again with the occasional exception, tend to fall into two categories. Firstly, there are criteria such as transport, economic development potential and infrastructure that relate to development that, even if thin on the ground at the time of assessment, could be provided in future alongside new housing.

Secondly, there are criteria applying to intangible factors. Of all the criteria, these are least severe in their constraining impact. In the case of this study, the regeneration criterion falls into this category, whereby even if a location performs poorly, it need not block development altogether. Rather, this criterion is more useful in terms of signaling opportunities for rather than constraints to development.

Given that the criteria relating to existing physical features tend to be most absolute in their impacts, an assessment of suitability of land for development in most locations tends to be defined spatially most in terms of landscape, heritage and spatial opportunities and constraints.

Obviously, different locations differ in the extent to which each of these criteria constrain development. However, across all locations, the criteria have been applied so as to ensure the assessment undertaken meets with the requirements of the National Planning Policy Framework.

The Kent Downs AONB surrounds the study area on three sides, with the impact of development on its setting a key consideration in national and local policy. Additionally, heritage assets within the study area are relatively scattered and limited in number. With the exception of the M20 and HS1 corridor already defining the boundaries of Areas A, B, C and D, there are few other large-scale spatial constraints to development. Although Government policy support for Otterpool Park Garden Town also carries weight as an opportunity for development, this applies only within Area B and is difficult to qualify in planning terms.

These various constraints and opportunities were balanced as appropriate to lead to our conclusions on suitability or otherwise of land. The approach taken was that simple intervisibility of land from viewpoints within the AONB did not automatically preclude development; rather, suitability was determined based on relative impact of development on AONB setting, opportunities for landscape and visual mitigation, and balanced against the performance of the land on all other assessment criteria. Any master planning of land identified as suitable within this study, and in particular of land identified as suitable subject to appropriate mitigation, should be truly landscape-led and explore the potential, where necessary, for off-site as well as on-site mitigation.

As illustrated in Figures 8 and 9, the visual impacts of development on the AONB can be mitigated to a significant extent through appropriate planting and through intervening distance.

Impacts on the AONB also need to be considered in the context of scale of the entire designation. The Kent Downs AONB stretches 94 kilometres from the Surrey border near Westerham to the South Foreland, east of Dover, and is up to 17 kilometres wide. Any visual impacts from development within the study area would be confined to footpaths and other public access land in a part of the AONB about seven kilometres long and two kilometres into its southern boundary.

When taken as a whole, therefore, the impacts on the AONB would be very limited, particularly in the context of the much larger valley floor settlements elsewhere visible from, and to an extent defining the character of, the same scarp including Folkestone, Ashford, Maidstone and Aylesford.

3.4 Infrastructure

This study has emphasised the importance of providing supporting infrastructure, services, facilities and other appropriate land uses alongside new housing to ensure the sustainability of development and to avoid the risk of developing 'dormitory' suburbs where homes are separated from jobs, shops and schools and hence travel by private car is implicitly encouraged.

In order to minimise the risk of this pattern of development, it is helpful to understand the types and quanta of infrastructure required to ensure the sustainability of strategic-scale development. This is, of course, only a high-level assessment; the precise locations, type and quanta of infrastructure required is a matter to be addressed in more detail at the site allocation and/or master planning stage and then through planning applications submitted in response.

Nevertheless, presentation of this data, even as high-level analysis, provides a starting point so that the Council, developers and other relevant stakeholders can begin to understand the scale of investment that may be required. Close co-ordination with infrastructure providers will be necessary to ensure that sufficient funding is in place and that new development benefits from clear, coordinated phasing. Each service provider will in turn be preparing their own capital investment proposals for their own forward planning purposes, and these must be properly informed by the wider development aspirations for the study area.

AECOM has developed an infrastructure model that indicates likely infrastructure requirements for strategic-scale development within an English local authority. Simplified outputs from the infrastructure model are set out in Table 7 below. Table 7 assumes a development of 10,000 net new dwellings and is based on relevant planning benchmarks, which include national and County standards alongside assumptions based on AECOM's own experience and knowledge of infrastructure planning. As such, Table 7 is at this stage an indicative estimate only. Precise requirements for Shepway will be identified through joint working between the District Council and relevant stakeholders.

The assessment of infrastructure does not cover demand for or supply of employment land. This is, of course, an important element of any sustainable pattern of development, but its type and quanta must be determined through an authority-specific Employment Land Review or similar process; Shepway's next Employment Land Review was published in Spring 2017.

It is also important to note that it would not be practicable for all infrastructure requirements, such as for example, the hospital space needed, to be provided within the new development itself. As such, Table

7 indicates the requirements arising not only within but within the catchment area of the new development, and the size of that catchment area differs depending on the facility or service in question.

On the basis of this report, it appears that land within Area B in particular has the potential to form a sustainable settlement of the scale needed to require this kind of strategic infrastructure provision, subject to detailed masterplanning, density assumptions and the mix of development to be provided.

Table 7: AECOM assessment of supporting infrastructure requirements for a new settlement of 10,000 dwellings in England

Infrastructure category	Infrastructure item	Measurement unit	Requirement based on 10,000 new dwellings
Education facilities	Nurseries (assuming 50 places) ¹⁷	Square metres (sq. m)	1,838¹⁸
	Primary School Form Entries (assuming 210 children per form) ¹⁹²⁰	Form entries	11.9
	Secondary School Form Entries (assuming 150 children per form) ²¹²²	Form entries	9.2
	Sixth Form ²³²⁴	Colleges	1²⁵

¹⁷ % of 0-4 year olds in informal nursery provision based on Kent County Council Childcare Sufficiency Assessment April 2014

¹⁸ Square metres per child based on previous AECOM project experience (East Hampshire, Exeter, Fareham, Huntingdonshire, Milton Keynes, Swindon)

¹⁹ Places per dwelling based on Leeds City Council Infrastructure Background Draft Paper 2015, and builds in AECOM assumption of 5% of children to private rather than state primary education

²⁰ Department for Education guidelines on form size

²¹ Places per dwelling based on Leeds City Council Infrastructure Background Draft Paper 2015, and builds in AECOM assumption of 5% of children to private rather than state primary education

²² Department for Education guidelines on form size

²³ Places per dwelling based on Leeds City Council Infrastructure Background Draft Paper 2015

²⁴ Proportion of 16-17 year olds in sixth form based on previous AECOM project experience (West Sussex)

Infrastructure category	Infrastructure item	Measurement unit	Requirement based on 10,000 new dwellings
Health and social care facilities	Primary care facility (GP and Dentist) ²⁶	Sq. m	2,927 ²⁷
	Hospital space	Sq. m	7,644 ²⁸
	Mental healthcare space	Sq. m	836 ²⁹
	Nursing home facilities	Sq. m	4,425 ³⁰
	Residential Care facilities	Sq. m	6,392 ³¹
	Extra Care facilities	Sq. m	3,912 ³²

²⁵ Pupils per college assumed from Hampshire County Council Education department data

²⁶ Patients per GP is a standard planning benchmark used by NHS Clinical Commissioning Groups. People per dentist based on ratio of dentists to population across England 2015 (General Dental Council)

²⁷ Square metres per GP based on NHS Healthy Urban Development Model. Square metres per dentist based on comparable AECOM project work.

²⁸ NHS England data on hospital beds to population across England, 2015; sq. m per bed based on data from AECOM cost consultancy project experience

²⁹ NHS England data on mental health hospital beds to population across England, 2015; sq. m per bed based on data from AECOM cost consultancy project experience

³⁰ Demand levels based on prevalence rates from 'More Choice, Greater Voice - a toolkit for producing a strategy for accommodation with care for older people (Housing Learning and Improvement Network). Square metres per bed based on Kent and Medway Social Care Research - Estuary View Medical Centre Plans for Expansion

³¹ As footnote 30

³² Demand levels based on prevalence rates from 'More Choice, Greater Voice - a toolkit for producing a strategy for accommodation with care for older people (Housing Learning and Improvement Network). Square metres per bed based on AECOM cost consultancy project experience

Infrastructure category	Infrastructure item	Measurement unit	Requirement based on 10,000 new dwellings
Community and Civic	Multi use community facility (including library and art gallery)	Sq. m	3,413³³
	Police station	Sq. m	454³⁴
	Fire station	Sq. m	665³⁵
	Ambulance station	Sq. m	116³⁶
Indoor Sports	Swimming pools	Sq. m	190³⁷
	Sports halls	Sq. m	366³⁸
Open Space and Recreation	Outdoor sports	Hectares (ha)	45.10³⁹
	Natural green space	Ha	48.75⁴⁰
	Parks and gardens	Ha	24.38⁴¹
	Amenity green space	Ha	10.97⁴²

³³ Library and art gallery floor space based on South East Museums, Libraries and Archives Council's 'Paying for Growth' report. Community facility floorspace based on previous AECOM project experience (East Hampshire, Exeter, Fareham, Huntingdonshire, Milton Keynes, Swindon)

³⁴ Based on previous AECOM project experience in West Yorkshire

³⁵ As footnote 34

³⁶ As footnote 34

³⁷ Leeds City Council Open Space Sport and Recreation Assessment

³⁸ As footnote 37

³⁹ As footnote 37

⁴⁰ As footnote 37

⁴¹ As footnote 37

⁴² As footnote 37

Infrastructure category	Infrastructure item	Measurement unit	Requirement based on 10,000 new dwellings
	Allotments	Ha	5.85 ⁴³
	Childrens' informal play space	Ha	13.41 ⁴⁴
	Childrens' formal play space	Ha	6.09 ⁴⁵

3.5 Suitability of land beyond Shepway District

Alignment with Spatial Planning Principle 13

Each of the conclusions for Areas A, B, C and D was considered to align with 1-12 and 14 of the spatial planning principles guiding the Shepway Growth Options Study.

Spatial Planning Principle 13 (that the study should seek to maximise involvement, co-operation and joint working with neighbouring and County authorities) is missing from this list because it was not considered relevant for the purposes of area-based assessment. However, it needs to be addressed here so that the Growth Options Study aligns with all fourteen spatial planning principles and can therefore be considered a more robust assessment for the purposes of planning policy.

SDC now needs to consider whether the potential dwelling capacity identified within this report and from other sources across the District is sufficient to meet its emerging Objectively Assessed Housing Need (OAHN) for the coming Local Plan period, and future growth beyond that period. As previously stated, this study, quite rightly, was not constrained by an upper or lower limit to capacity or target for growth. The final dwelling capacity assessed is based purely on the technical suitability or otherwise of land within the District.

If SDC considers that there is insufficient capacity to meet its OAHN within its own borders, then under the Duty to Co-Operate, introduced by the 2011 Localism Act, then Shepway must work with its neighbouring authorities (Ashford, Canterbury, Dover and Rother), and relevant County authorities (East Sussex and Kent County Councils) in order to identify land outside Shepway but within the same Housing Market Area that could contribute to meeting Shepway's need.

⁴³ As footnote 37

⁴⁴ National Playing Field Association (Fields In Trust) standards

⁴⁵ As footnote 44

Potential for more suitable land elsewhere

There would also be potential in planning terms to meet Shepway's housing need outside its boundaries if it was considered that land within neighbouring authorities performed better on the eight technical criteria used by AECOM than the land identified in Shepway within this report.

Some areas of search performed better on the eight technical criteria than others. In general terms, there was only one criterion where the performance of all four areas of search was universally poor, and that was agricultural land quality. This is due to the quantity and extent of Grade 2 agricultural land within the study area, which for planning purposes comprises Best and Most Valuable (BMV) land, alongside Grades 1 and 3a.

It is theoretically possible, therefore, that there exists undeveloped land within Shepway's neighbouring authorities that performs as well as or better than the land identified in this report but also avoids BMV land. As such, it can be assumed that if there is more suitable land in the neighbouring authorities, then it needs to be a) outside the Kent Downs AONB, b) not already urban and c) either Grade 3, Grade 4, Grade 5 or non-agricultural land. As noted previously, Natural England's agricultural land quality mapping does not divide Grade 3 land into the BMV grade of 3a and the non-BMV grade of 3b, though of course development on Grade 3a land would still be logically preferable to development on Grade 2 land.

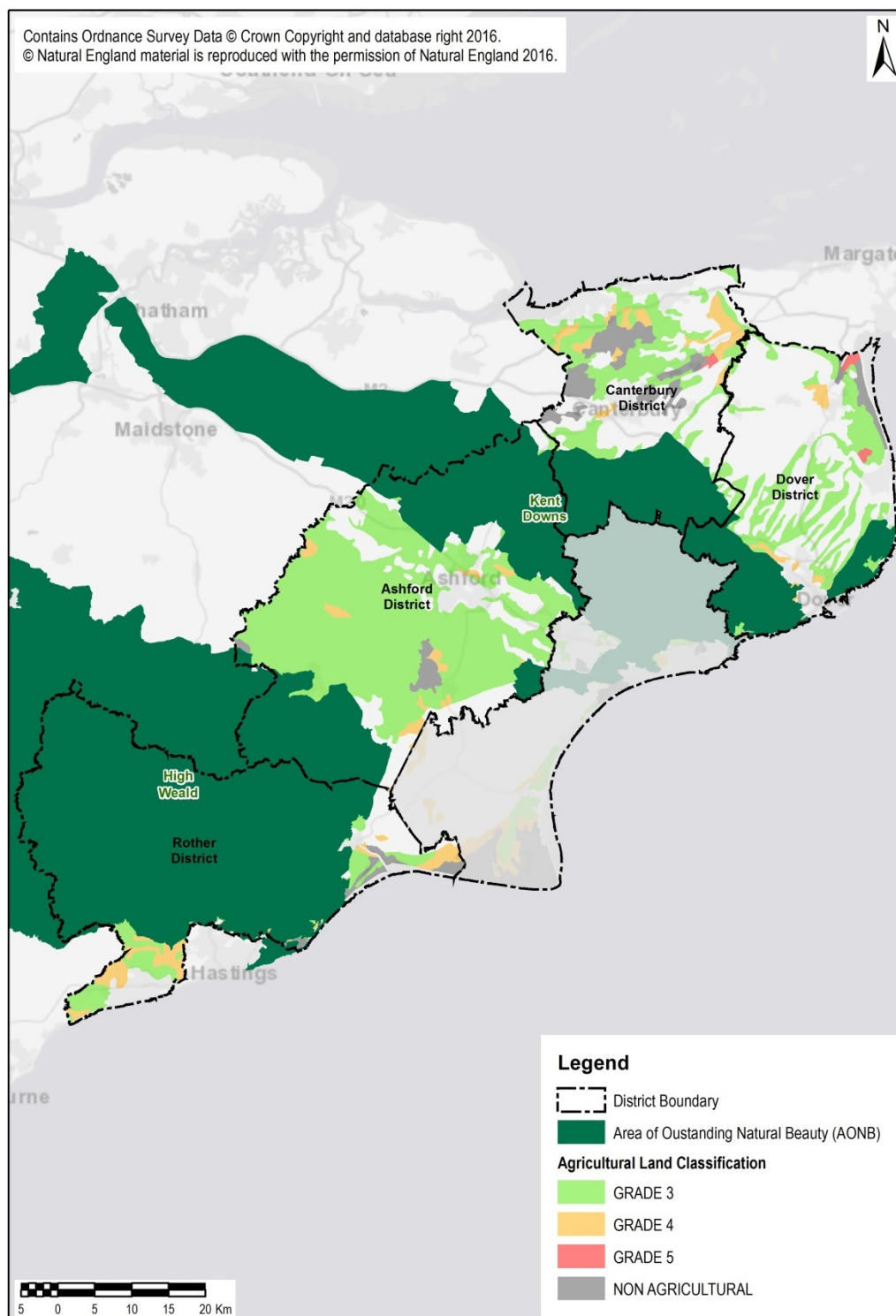
Figure 42 below identifies the location and extent of all land within Shepway's neighbouring authorities that fulfils a), b) and c) above. Though a detailed assessment of potential outside Shepway's borders is outside the scope of this study, it seems that the poorest quality agricultural land (Grades 4 and 5) is severely constrained by environmental designations. For example, the extensive Grade 4 and 5 land in Canterbury, which comprises heathland and woodland to the north of the city itself, is almost entirely comprised of either ancient woodland, National Nature Reserves, Sites of Special Scientific Interest (SSSI) or Special Areas of Conservation.⁴⁶ The poorer-quality agricultural land south of Ashford also largely comprises an SSSI or ancient woodland. Likewise, the land in Rother that is poorer agricultural quality is part of the same Zone 3 floodplain as most of Dungeness and Romney Marsh.

This suggests that development of Grade 3 land would be the only realistic alternative to developing the Grade 2 land within Shepway's borders. As such, Ashford would appear to offer by far the greatest extent of Grade 3 land, with potential much more limited in Rother, Canterbury and Dover.

However, it is recognised that Ashford Borough Council has its own, significant, housing need to accommodate and that agricultural land quality is just one criterion of the many that must be balanced for the purposes of sustainable planning.

⁴⁶ As illustrated by Defra's Magic Map at <http://magic.defra.gov.uk/MagicMap.aspx>

Figure 52: Location and extent of undeveloped poorer-quality agricultural land or non-agricultural land outside Kent Downs AONB in local authorities neighbouring Shepway District



If considered appropriate, a more detailed assessment of the potential of Grade 3 and other lower-quality agricultural land outside the boundaries of Shepway, subject to developing appropriate arrangements for joint working, would help ensure consistency with NPPF paragraphs 17 and 112, which state respectively that:

'Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies'; and

'local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.'

3.6 Other material considerations

Housing need

The Shepway Strategic Growth Options Study was carried out without an upper limit of growth or capacity. This was an appropriate limitation to ensure a consistent, District-wide assessment based only on the technical suitability of land. However, this means that other factors considered material considerations for the purposes of planning nevertheless need to be taken into account by SDC when considering which land to allocate. Most obviously, and as previously mentioned, housing need can form a powerful consideration that, in certain circumstances, demands the development even of more sensitive land. For example, in example 8, Appendix C, an Inspector permitted development on the grounds of social and economic need despite acknowledging it would have a 'significant adverse effect' on the setting of an AONB.

Likewise, and with perhaps more relevance for Shepway as it was made at a Local Plan examination rather than an appeal, the Inspector for the Bath and North East Somerset Core Strategy concluded that a development of three hundred dwellings in Bath was appropriate despite causing localised harm to the AONB itself (not just its setting) because the city's housing need is so high.⁴⁷

Examples like this need, however, to be heavily caveated in the case of the Shepway study area, for two main reasons. Firstly, development potentially harming an AONB or its setting always needs to be considered on a case-by-case basis (and that, as illustrated by Appendix C, permitting development causing harm tends to be the exception rather than the rule). The weight that should be attached to housing need when considering the pros and cons of development within the study area will depend not only on Shepway's own need but also whether neighbouring authorities are able to meet their own need within their own boundaries.

In recent appeal decisions, Inspectors have increasingly been concluding that housing need carries enough weight for a development to be permitted even where a local authority can demonstrate a five-year supply of housing land, as required by paragraph 49 of the NPPF, a factor which had on previous occasions been used as a reason for refusal. Within these appeal decisions, the housing need cited in

⁴⁷ See Inspector's Report into Bath Core Strategy 2014, available at http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/cs_pins_final_report.pdf

support of development is normally need within the relevant housing market area; for example, on this basis, 75 homes were permitted in 2015 at Burnham-on-Crouch, Essex⁴⁸ and 180 at Northwich in Cheshire in 2016⁴⁹. Additionally, in February 2017, the Secretary of State permitted 750 new homes at Lichfield in Staffordshire by overturning the previous conclusion of an Inspector that the District had a five-year housing land supply.⁵⁰

Examples where national housing need rather than that of the local housing market area has been cited as a reason for approval are rarer but nevertheless exist. For example, in February 2016, the Secretary of State upheld the conclusions of an Inspector who allowed 605 homes at Ashby-de-la-Zouch in Leicestershire. North West Leicestershire was able to demonstrate a five-year supply of housing land, but the Secretary of State noted that his decision was supported by the fact that '*local planning authorities must also plan for housing supply beyond the five year period, [and] that there is also a current national imperative to boost the supply of housing*'

Government planning guidance, in the PPG⁵¹, supports the approach employed by the Shepway Strategic Growth Options Study; namely an approach that deliberately keeps separate the assessment of housing demand from that of housing supply. While this study has informed the supply side, the demand side, comprising an assessment of housing need across Shepway's wider housing market area is covered by the Shepway SHMA, published in Spring 2017.

Cumulative impacts

This report has not considered in detail the impact that Operation Stack will cause to the AONB or its setting, but the potential cumulative impact of this large-scale project alongside and separate from new housing development need to be taken into account by relevant parties. The potential cumulative impacts would suggest that a cautious approach to the issue of AONB setting is justifiable, particularly to the north of the M20/HS1 corridor. Such an assessment must also recognise however, that south of the M20/HS1 corridor, local and national policy support for Otterpool Park Garden Town also carries weight for the purposes of our assessment.

Viability

Alongside housing need and cumulative impacts, viability can be a further important consideration that in certain circumstances weighs in favour of a higher level of development, to ensure that housing is deliverable. For example, new housing development will require extensive supporting new and improved infrastructure, not just schools, shops and other services but also potentially larger-ticket items such as the previously mentioned option of moving Westenhanger station further west, or a capacity upgrade and/or redesign for Junction 11 of the M20.

⁴⁸ Appeal decision available online at <http://www.richboroughestates.co.uk/live/appeals/886a.pdf>

⁴⁹ Appeal decision available online at <http://www.richboroughestates.co.uk/live/appeals/1134a.pdf>

⁵⁰ See decision letter online at https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/590918/17-02-13_DL_IR_Watery_Lane_Lichfield_2224354.pdf

⁵¹ PPG Paragraph 004 Reference ID: 2a-004-20140306, available at <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments#methodology-assessing-housing-need>

However, such large-scale infrastructure interventions need to be funded by developers or via Government intervention, and if it can be demonstrated convincingly that more housing is needed to render such interventions viable, then the planning case for development on relatively less suitable land grows stronger. To ensure that their assessment of viability is accurate and robust, developers should be required to present evidence by means of an 'open book' approach to the issue.⁵²

Regeneration benefits

The regeneration benefits offered by strategic-scale new development form a material consideration for the purposes of planning, and can extend well beyond the immediate development itself. This report has identified extensive land suitable for strategic-scale development in a location close to parts of Shepway experiencing a higher relative level of deprivation, including Folkestone, Hythe and Romney Marsh. Development in the M20/HS1 corridor could change the demographic make-up of Shepway as a whole, and likely increase its labour force, its local spend, and its number and range of employers and employees.

Measuring the likely economic uplift for the purposes of regeneration would require a detailed study of the baseline situation and then a range of development scenarios to be tested, likely based on the ongoing master planning work being progressed for Otterpool Park and that will be informed by the findings of this report. This would help ensure that the aim of maximising regeneration benefits across the wider area informs preferred option for Otterpool alongside the rest of the evidence base.

Community consultation and engagement

Finally, community engagement and consultation carries significant weight in the planning process. The Shepway Strategic Growth Options Study is an evidence base document which will inform policy documents made on the basis of the evidence it presents, alongside other relevant considerations. These policy documents will be subject to statutory consultation, and will only be adopted once the Inspector is satisfied that the views and opinions of local stakeholders, including elected Members, landowners and local residents have been taken fully into account.

⁵² More information about 'open book' viability assessments can be found at http://oro.open.ac.uk/45179/3/userdata_documents4_dj4784_Desktop_Tensions_Viability_paper_viability_2015.pdf

Technical Appendices

Appendix A: Review of national and local planning policy

Introduction

This appendix reviews relevant provisions of the national and local policy documents forming the context for planning in Shepway. Where information was common to more than one document, the source used and listed below comprised either:

- The most up-to-date assessment;
- Adopted policy text; or
- Both of the above.

Housing

National policy

National Planning Policy Framework (NPPF)

The NPPF was adopted in March 2012. The document states that at its heart is a presumption in favour of sustainable development, which should be seen as ‘a golden thread running through both plan making and decision-taking’.

Specific points of relevance include the following paragraphs:

Paragraph 17: Allocations of land for development should:

- Prefer land of lesser environmental value, where consistent with other policies;
- Encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value; and
- Actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.

Paragraph 37: Planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities.

Paragraph 38: For larger scale residential developments in particular, planning policies should promote a mix of uses in order to provide opportunities to undertake day-to-day activities including work on site. Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties.

Paragraph 50: To deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning 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.

Department of Communities and Local Government Press Release, November 2016

In November 2016, the Department of Communities and Local Government issued a press release that supported the principle of a new locally-led Garden Town at Otterpool Park in the context of the Government's Locally-led Garden Villages, Towns and Cities programme. This press release can be considered as a material planning consideration in the planning process.

In the press release, Housing and Planning Minister Gavin Barwell MP states that a new Garden Town in Shepway offers a unique opportunity to boost the local economy, jobs and provide new homes.

The press release continues:

'This new locally-led Garden Town at Otterpool Park, Shepway in Kent will be built on previously developed land and public sector land and will deliver up to 12,000 new homes along with schools and other essential facilities. Otterpool Park Garden Town will be supported with £750,000 of additional government capacity funding that will help kick-start work and enable the local council to take forward their proposal.'

Locally-led Garden Villages, Towns and Cities, DCLG, March 2016

Criteria for support of garden towns or cities:

The new garden town, or city, must provide **at least 10,000 new homes**. This may be on a new site away from existing settlements, or take the form of transformational development, both in nature or in scale to an existing settlement.

Expressions must be led by local authorities. We also welcome expressions of interest which include support from private sector developers and/or landowners.

Good design is essential if we are to create sustainable places where people want to live and be part of the local community. It will be important for expressions of interest to demonstrate how the garden town, or city, will be built to a high quality, well designed and attractive. Use of qualitative and quantitative research on local public opinion will be welcomed on issues around design and community.

We welcome expressions of interest which make effective use of previously developed land (brownfield land) and/or public sector land.

The delivery of a garden town, or city, will be a long-term project which is likely to have implications for how housing need is met locally, inform future decisions around strategic transport and other infrastructure, and impact on the location of future employment growth. We expect expressions of interest to demonstrate how the delivery of the new settlement fits with wider strategies for housing growth to meet assessed need, creating new jobs and the delivery of infrastructure to underpin growth.

Local policy

Shepway Core Strategy 2013

The key local policy document relating to Shepway District Council is the adopted Core Strategy, currently being reviewed. The Core Strategy identifies, through Policy SS2: Housing and the Economy Growth Strategy, a requirement for up to 8,000 dwellings from 2006/7 to 2025/26. This equates to a minimum of 350 dwellings a year.

Other policies with direct relevance for residential development in Shepway include:

Policy SS1 District Spatial Strategy: Priority for new development will be on previously-developed land in the Urban Area. The majority of the Urban Area housing development will take place in Folkestone, to enhance its role as a sub-regional centre. Development to meet strategic needs will be led through strategically allocated developments at Folkestone Seafront and Shorncliffe Garrison, Folkestone, and the delivery of strategic mixed-use development at Hythe.

Development in the open countryside and on the coast will only be allowed exceptionally, where a rural/coastal location is essential.

Policy SS6 Spatial Strategy for Folkestone Seafront: Folkestone Seafront is allocated for mixed-use development, providing up to 1,000 homes, in the region of 10,000 sq. m of commercial floorspace, sports facilities and infrastructure.

Policy SS7 Spatial Strategy for Shorncliffe Garrison, Folkestone: The Shorncliffe Garrison complex is allocated for a predominantly residential development of around 1,000 dwellings to 2026, new community facilities, associated enhancements to green infrastructure and upgrades to travel networks.

Policy CSD1 Balanced Neighbourhoods for Shepway: The creation of balanced and popular neighbourhoods through high-quality design proposals which address identified affordable housing needs is promoted. All housing development should include a broad range of tenures.

Policy CSD2 District Residential Needs: Residential development and new accommodation should be designed and located in line with the Spatial Strategy's approach to managing demographic and labour market changes in Shepway and meeting the specific requirements of vulnerable or excluded groups existing with the district. At least half of new homes by 2026 will be three bedroom (or larger) dwellings.

Policy CSD8 New Romney Strategy: A broad location for residential development to the north of the town centre is recommended. The development as a whole should provide around 300 dwellings and a range and size of residential accommodation, including 330% affordable housing.

Policy CSD9 Sellindge Strategy: A major residential-led development in Sellindge parish is recommended. Total residential development will not exceed approximately 250 dwellings with around 30% affordable housing.

Places and Policies Local Plan (Preferred Option, 2016)

When the Places and Policies Local Plan is adopted, this will form part of the statutory Development Plan for the district. The Plan will cover the period of 2006 to 2026.

The Local Plan will sit below the Core Strategy and has two main purposes. The first is to allocate enough land to meet the Core Strategy's requirements for both residential, employment and community uses. The second is to set out the development management policies needed for planning applications and future developments.

The policies in the Local Plan 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 future and existing residents and help to foster healthy lifestyles.

Policy ND6 General Sellindge Policy: The following are proposed residential sites with indicative capacity:

- The Piggeries, Main Road Sellindge (8 dwellings)
- Land West of Jubilee Cottage, Swan Lane, Sellindge (15 dwellings)
- Land rear of Brook Lane Cottages, Brook Lane, Sellindge (11 dwellings)
- Land at Barrow Hill, Sellindge (15 dwellings)
- Silver Spray, Sellindge (5 dwellings)

Policy ND7 Former Lympne Airfield: Site 1 is allocated for residential development with an estimated capacity of 125 dwellings.

Policy ND8 Land rear of Barnstormers, Stone Street, Stanford: The site is allocated for residential development with an estimated capacity of 5 dwellings.

Policy ND9 Land at Folkestone Racecourse: This site is allocated for residential development with an estimated capacity of 11 dwellings.

Policy HB1 Quality Places Through Design: Proposals should:

- Make positive contribution to its location and surroundings, enhancing integration whilst also respecting existing buildings and land uses.
- Facilitates and enables circulation and ease of movement within the locality for all users.
- Create, enhance, improve and integrate areas of public open space, green infrastructure, biodiversity and other public realm assets.
- Provides a clear definition between the public and private realm.

Policy HB2 Cohesive Design: Any proposals should ensure that the local character is protected, particularly with regards to sky and tree lines and the protection of spaces between buildings. Major developments should integrate into the neighbourhood, create a place, and streets and homes for all.

Employment

National policy

NPPF

Paragraph 21:

- Plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries; and
- Facilitate flexible working practices such as the integration of residential and commercial uses within the same unit.

Local policy

Shepway Core Strategy 2013

Policy SS1 District Spatial Strategy: The majority of Shepway's commercial floorspace will be developed in Folkestone, to enhance its role as a sub-regional centre.

Policy SS2 Housing and the Economy Growth Strategy: Approximately 20ha gross of industrial, warehousing and offices (B classes) is targeted between 2006/7 and 2025/26. Approximately 35,000sqm gross of goods retailing (Class A1) is targeted between 2006/7 and 2025/26.

Shepway District Local Plan Review (2006): Policies Applicable 2013 Onwards

Policy E2: Planning permission for business and commercial development or redevelopment will be granted on the new employment opportunity sites listed below:

- Link Park, Lympne (use class B1/B2/B8)

Policy E6a: The District Planning Authority will not permit proposals that would result in the loss of employment uses within or adjoining rural villages.

Places and Policies Local Plan, Preferred Options 2016 (Site Allocations)

Policy E1 Employment Sites: Link Park (Areas 1 & 2), Lympne, is protected for business uses under use classes B1, B1c, B2 and B8.

Urban Design

Local policy

Places and Policies DPD (Preferred Option, 2016)

Policy C1 Creating a sense of place: The council will expect all new major developments to demonstrate a deliverable and fully resourced project for fostering a sense of place through such methods as landscaping, public art, water features and/or lighting.

Any programme for community-building and place-making must engage the local community and could be community-led, having regard to the local circumstances of the site and/or local aspirations.

Transport

National policy

NPPF

Paragraph 30: In preparing Local Plans, local planning authorities should support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport.

Paragraph 35: Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. Therefore, developments should be located and designed where practical to:

- Accommodate the efficient delivery of goods and supplies;
- Give priority to pedestrian and cycle movements, and have access to high quality public transport facilities;
- Create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, avoiding street clutter and where appropriate establishing home zones; and
- Incorporate facilities for charging plug-in and other ultra-low emission vehicles.

Local policy

Shepway Core Strategy Local Plan (2013)

Policy SS3 Place-Shaping and Sustainable Settlements Strategy: Ensuring development is suited to the locality and its needs, and transport infrastructure (particularly walking/cycling). Efficient use should be made of central land in town centres or in easy walking distance of rail and bus stations.

Places and Policies DPD (Preferred Option, 2016)

Policy T1 Street Hierarchy and Site Layout: An application should demonstrate the following:

- Street hierarchy considering pedestrians first and private motor vehicles last
- Permeability through and beyond the site of all users
- The creation of an environment that is safe for all street users, which encourages walking, cycling and use of public transport
- A range of street types creating legibility throughout the development, meeting the needs of all users, and not allowing vehicles to dominate
- Active frontages only, throughout the development, for the purposes of natural surveillance and creating characterful places
- Excessive street furniture and signage is included only when necessary for reasons of safety and comfort of the population

Policy HW4 Protecting and enhancing rights of way: Planning permission will be granted for development likely to give rise to increased travel demands, where the site has (or will attain) sufficient integration and accessibility by walking and cycling including:

- Provision of new cycle and walking routes that connect to existing networks, including the wider Rights of Way network, to strengthen connections between villages, principal towns, market towns, and the wider countryside;
- Protection and improvement of existing cycle and walking routes, including the Rights of Way network, to ensure the effectiveness and amenity of these routes is maintained, including through maintenance, crossings, signposting and waymarking, and, where appropriate, widening and lighting; and
- Provision of safe, direct routes within permeable layouts that facilitate and encourage short distance trips by walking and cycling between home and nearby centres of attraction, and to bus stops or railway stations, to provide real travel choice for some or all of the journey.

Shepway District Local Plan Review (2006): Policies Applicable 2013 Onwards

Policy SD1: Shape new development patterns in a way which reduces the need to travel, especially by car, and increases the attractiveness of walking, cycling and public transport.

Policy TR2: Where major new developments are proposed, permission will not be granted unless provision is made in the layout to allow penetration by buses.

Policy TR6: New development will not be permitted unless provision is made for the needs of pedestrians. The layout and design of development should provide for safe, attractive and convenient pedestrian routes, particularly to public transport routes.

Heritage

National policy

NPPF

Paragraph 58: Planning policies and decisions should aim to ensure that developments respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation.

Paragraph 132: Substantial harm to or loss of a Grade II listed building, park or garden should be exceptional. Substantial harm to or loss of designated heritage assets of the highest significant, notably scheduled monuments, protected wreck sites, battlefields, Grade I and II listed buildings, Grade I and II registered parks and gardens, and World Heritage Sites, should be wholly exceptional.

Paragraph 137: Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites and within the setting of heritage assets to enhance or better reveal their significance.

Local policy

Places and Policies DPD (Preferred Option, 2016)

Policy HE1 Heritage Assets: The District Council will grant permission for proposals which promote an appropriate and viable use of heritage assets, consistent with their protection and conservation, particularly where these bring redundant or under-used buildings and areas back into use or improve public accessibility to the asset.

Policy HE2 Archaeology: Important archaeological sites, together with their settings, will be protected and, where possible, enhanced. Development which would adversely affect them will not be permitted.

Policy HE3 Local list of Buildings and Sites of Architectural or Historic Interest: Proposals for development affecting buildings or sites identified on the Local List of Buildings of Architectural or Historic Interest, or would meet the criteria, will be permitted where the particular characteristics that account for the designation are protected and conserved.

Landscape

National policy

NPPF

Paragraph 109: The planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, geological conservation interests and soils;

Local policy

Shepway Core Strategy Local Plan (2013)

Policy SS1: The future spatial priority for new development in the North Downs area is on accommodating development outside of the AONB and without material impact on its setting; consolidating Hawkinge's growth; and sensitively meeting the needs of communities within the AONB at better-served settlements.

CSD4 (e): Planning decisions will have close regard to the need for conservation and enhancement of natural beauty in the AONB and its setting, which will take priority over other planning considerations. Elsewhere development must not jeopardise the protection and enhancement of the distinctive and diverse local landscapes in Shepway (especially where these support the setting of the AONB), and must reflect the need for attractive and high-quality open spaces throughout the district.

Shepway Places and Policies Consultation Document 2016 (Preferred Option)

Policy NE3: To protect the District's landscapes and countryside: Planning permission will be granted where it can be demonstrated that all the following criteria have been met:

- The natural beauty and locally distinctive features of the AONB are conserved and enhanced;

- Proposals reinforce and respond to, rather than detract from, the distinctive character and special qualities of the AONB;
- Either individually or cumulatively, development does not lead to actual or perceived coalescence of settlements or undermine the integrity or predominantly open and undeveloped, rural character of the AONB and its setting;
- Special Landscape Areas are defined as follows; North Downs (including the scarp and crest), Old Romney Shoreline and Dungeness.
- Local Landscape Areas are defined as follows; Romney Marsh, Sandgate Escarpment and Seabrook Valley, Eaton Lands, Coolinge Land and Enbrook Valley and Mill Lease Valley.

Shepway District Local Plan Review (2006): Policies Applicable 2013 Onwards

Policy SD1: Protect and enhance areas of countryside that are of special quality, particularly the Kent Downs Area of Outstanding Natural Beauty.

Agricultural land

National policy

NPPF

Paragraph 112: Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.

Local policy

Shepway Places and Policies Consultation Document 2016 (Preferred Option)

Policy HW3 Development that supports healthy, fulfilling and active lifestyles: Reduce environmental impact of importing food, development proposals should not result in the loss of the best and most versatile agricultural land (Grades 1, 2 and 3a) unless there is compelling and overriding planning reason to do so and mitigation is provided through the provision of an allotment where there is the demand.

Ecology

National policy

NPPF

Paragraph 110: Plans should allocate land with the least environmental or amenity value, where consistent with other policies in this Framework.

Paragraph 117: To minimise impacts on biodiversity and geodiversity, planning policies should:

- plan for biodiversity at a landscape-scale across local authority boundaries;
- identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation;
- promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan;
- aim to prevent harm to geological conservation interests; and
- where Nature Improvement Areas are identified in Local Plans, consider specifying the type of development that may be appropriate in these Areas.

Local policy

Shepway District Local Plan Review (2006): Policies Applicable 2013 Onwards

Policy SD1: Protect and enhance designated or proposed sites of wildlife importance.

Shepway Places and Policies Consultation Document 2016 (Preferred Option)

Policy NE1 Enhancing and managing access to the natural environment: To enhance access to the natural environment the Council will:

- Target opportunities for improvements on routes and links from urban areas where access is currently poor
- Improve access to key open spaces from all areas
- Manage access to SACs/SPA and require or enhance land to divert recreation activities away from those designations by the provision of enhanced facilities elsewhere for example urban parks

Policy NE2 Biodiversity: Planning permission will be granted for development where it can be demonstrated that the following criteria have been met:

- The biodiversity value of the site is safeguarded;
- Demonstrable harm to habitats or species which are protected or which are of importance to biodiversity is avoided or mitigated;
- The proposal protects, manages and enhances the District's network of ecology and biodiversity sites, including the international, national and local designated sites (statutory and non-statutory), priority habitats, wildlife corridors and stepping stones that connect them.

Open space

National policy

NPPF

Paragraph 74: Existing open space, sports and recreational building and land, including playing fields, should not be built on subject to specific exceptions.

Local policy

Shepway District Local Plan Review (2006): Policies Applicable 2013 Onwards

Policy SD1: Maintain and enhance the provision of recreational open space, amenity land and tree and hedgerow cover

Shepway Places and Policies Consultation Document 2016 (Preferred Option)

Policy C3 Provision of open space: Provision of 5 or more dwellings should contribute or provide open space unless there is sufficient existing open space within close proximity that can accommodate the additional demand.

Policy C4 Formal play space provision: The Council will seek the provision of an adequate level of public open space for leisure, recreation and amenity purposes.

Flood Risk

Local policy

Shepway District Local Plan Review (2006): Policies Applicable 2013 Onwards

Policy SD1: Prevent negative impacts on coastal protection, flood defence, land drainage and groundwater resources.

Retail

National policy

NPPF

Paragraph 23: Planning policies should define a network and hierarchy of centres that is resilient to anticipated future economic changes.

Infrastructure

Local policy

Shepway Core Strategy 2013

Policy SS3 Place-Shaping and Sustainable Settlements Strategy: Development must address social and economic needs in the neighbourhood and not result in the loss of community, voluntary or social facilities.

Policy SS5 District Infrastructure Planning: Infrastructure that is necessary to support development must exist already, or a reliable mechanism must be available to ensure that it will be provided at the time it is needed.

Policy CSD4 Green Infrastructure of Natural Networks, Open Spaces and Recreation: Green Infrastructure (GI) will be protected and enhanced and the loss of GI uses will not be allowed.

Appendix B: Review of local planning evidence base documents

Introduction

This appendix reviews relevant provisions of the local planning evidence base documents forming the context for planning in and around Shepway. It is presented by topic in the same order as the policy review at Appendix A. Within each topic, documents are presented in chronological order by year, with the most recently produced documents first.

Housing

Strategic Housing Land Availability Assessment [SHLAA] (2015/16)

The Strategic Housing Land Availability Assessment (SHLAA) is a technical document comprising a list of sites that might have potential for housing development in the future. The SHLAA forms part of the evidence base to support the delivery of land for housing in the District over the period 2015/16 to 2026 (inclusive).

The 2015/16 SHLAA found capacity for 3,660 homes on 123 sites across Shepway, using the following methodology:

- Stage 1- Initial Assessment on suitability This stage eliminates sites that are not suitable in principle due to their location within sensitive areas (such as a National Nature Reserve) or are smaller than 0.17ha and therefore unable to achieve the development of five or more dwellings.
- Stage 2 – Detailed Assessment on suitability This stage assesses the remaining sites against further suitability criteria, such as if the site is contrary to adopted Core Strategy Local Plan Policies (such as the Settlement Hierarchy). This stage also assesses the impact that potential development could have on the townscape and landscape of the site and physical or infrastructure constraints.
- Stage 3 – Availability The third stage is to assess if there are any issues relating to a site, such as ownership problems or operational requirements that would stop the site being developed.
- Stage 4 – Achievability This is a judgement on the economic viability of the site and if there is a reasonable prospect that the site can be developed now or in the future.
- Stage 5 – Conclusions The conclusion reflects stages 1 to 4 and raises any particularly important issues, such as if a site is considered necessary for the regeneration of the area. Comments were also sought from specific bodies including KCC Highways and Natural England.

On completion of the forms, the sites were scored using a 'traffic light' system. Sites that met the majority of the criteria were awarded with a 'green' rating; sites that met some of the criteria and did not have significant constraints such as flood risk were awarded with a score of 'amber', and sites that had many constraints or did not meet the site threshold of 0.17ha (suitable for the development of 5 or more dwellings) were awarded with a 'red' score.

The 'green' and 'amber' assessment forms were returned to the relevant Land Owner and/or Agent for their comments or any further information they could provide about the site. The individual assessment forms were also sent to other organisations for their comments such as Highways England, Natural England and Kent Downs AONB.

Strategic Housing Market Assessment for East Kent Sub-Region [SHMA] (2009)

The Sub-regional Housing Market Assessment (SHMA) informs Shepway's dwelling target in the Core Strategy. The SHMA covers East Kent Sub-Region housing market.

The critical challenge for this sub-region is tackling the impact of an ageing population, especially one where the proportion of very elderly people is forecast to increase.

The East Kent economy is relatively weak and uncompetitive when compared to other parts of Kent and the South East. Although there is a reasonable stable employment pattern, there are elements of a second tier, less robust economy, especially in coastal towns. The role of housing in turning round economic performance is both to provide appropriate and attractive housing products for higher earners and to ensure that local young families can stay in the sub-region.

Linked to regenerating the economy, there are ambitious plans for housing growth in the region, with an additional 44,400 homes projected to be developed by 2026 in East Kent Sub-Region.

Strategic Housing Market Assessment [SHMA] 2017

An updated SHMA was published in spring 2017 following completion of this report, and is available online at <https://www.shepway.gov.uk/planning/planning-policy/local-plan/core-strategy-review-2016>.

Employment

Shepway Employment Land Review (2011)

The ELR provides an assessment of supply and demand of employment land in the district to form an evidence base to support the review of policies and preparation of Shepway's Core Strategy. The ELR is used by the District Council to inform its future approach to the provision, protection, release or enhancement of employment land and premises.

The main employment areas examined in the study were within Folkestone, as well the employment areas at Hythe, Link Park, New Romney, Lydd and the nuclear power plant at Dungeness.

The majority of existing employment sites are well functioning, predominantly industrial, clusters of employment land, categorised as good to average quality. Most have good/very good access to the strategic road network via the M20 and the continent via the Channel Tunnel. Whereas industrial space is relatively evenly spread across the District, office space is far more concentrated within Folkestone and, to a lesser extent, Hythe.

It was estimated that 25-30,000 m² more office space and 35-40,000 m² of industrial employment space would be needed until 2026 in Shepway.

It was identified that there was almost 25,000 m² of employment space in outstanding but unimplemented permissions. Most of this permitted space (41%) was for B1 uses, with 37% for B8 and 17% for B2 use. Over two thirds of all this permitted space is on three industrial sites, Stonegate Farmers, Mountfield Industrial Estate and Link Park.

In 2008, there was an estimated 64 ha of employment land recorded as available for development in Shepway. This was made up of 43.3 ha allocated sites, 18.3 ha of developments not started on sites with planning permission, and 2.2 ha on existing sites without planning permission. There is about

13,400 m² of available vacant commercial space within the district. However, it is possible that this is an underestimate of vacancy due to omissions from commercial property databases.

The general market view was that most forms of industrial and commercial property were catered for at some level in the District and there were few obvious gaps in types of provision. The main gaps indicated by the study were a need for more industrial land for development, along with modern industrial premises, and particularly small industrial accommodation to meet the expansion needs of local businesses.

Shepway Employment Land Review [ELR] 2017

Shepway District Council advises that an updated ELR will be published in Spring 2017.

Transport

Local Transport Plan for Kent 2011-16

The Local Transport Plan (LTP) sets out Kent's policies and delivery plans for the management and improvement of the local transport network from 2011 to 2016. It is a concise and focussed document that provides Kent's residents and businesses with a clear picture of the County Council's transport priorities at a time of significant economic and environmental challenges.

Kent is an international gateway, with cross-Channel traffic through the Port of Dover and the Channel Tunnel continuing to increase. Kent's airports have plans to expand and are essential catalysts in regenerating their local areas. The planned growth is expected to generate 250,000 extra journeys on Kent's roads by 2026. Coupled with the forecast increase in international traffic, tackling congestion is therefore one of the County Council's priorities.

Kent's population is ageing which will put pressure on the local community services. Providing access to these services for those without a car will continue to be a challenge. Kent also has the largest carbon emissions of any local authority area in the UK.

Five themes were developed for the LTP:

- Growth Without Gridlock
- A Safer and Healthier County
- Supporting Independence
- Tackling a Changing Climate
- Enjoying Life in Kent

Budget allocations for transport will affect Shepway through 'a safer and healthier county' scheme being partly located in the local authority. These include safety schemes, safe routes to school, walking routes and bus route to hospitals. Shepway will also benefit from the 'supporting independence' scheme which provides access to jobs and services for people without access to a private car. Finally Shepway will benefit from the 'Enjoying Life in Kent' scheme that improves access to opportunities and reduces impact of transport on Kent and its communities.

Shepway District Council – Transport Strategy (2011)

Safety and signage were considered to be necessary for walking within Shepway either as a form of leisure, or for community purposes. The geography of the District, and specifically the topography in coastal areas such as Folkestone town centre, can be a hindrance to walking.

Safety is a primary concern for cyclists for both commuting and leisure purposes. Further issues with cycling include gaps in the cycle network and legibility and signage for cyclists.

Bus access to the rural areas of the district has been identified as a priority for action, along with frequency of service. In addition, links to rail stations were identified as an area that could be improved upon.

Accessibility to rail stations, especially by bus, needs to be improved. There is also a need for car and bicycle parking provision at stations.

Highway safety and capacity of links and junctions are priorities for the road network. In terms of parking, priorities include:

- Parking demand associated with major employers;
- Parking associated with new developments;
- On street parking provision (in towns and town centres);
- Off street parking provision and space utilisation;
- Parking at rail stations; and
- Cycle parking facilities.

Shepway Transport Strategy (2017)

Shepway District Council advises that an updated Shepway Transport Strategy will be published in Spring 2017.

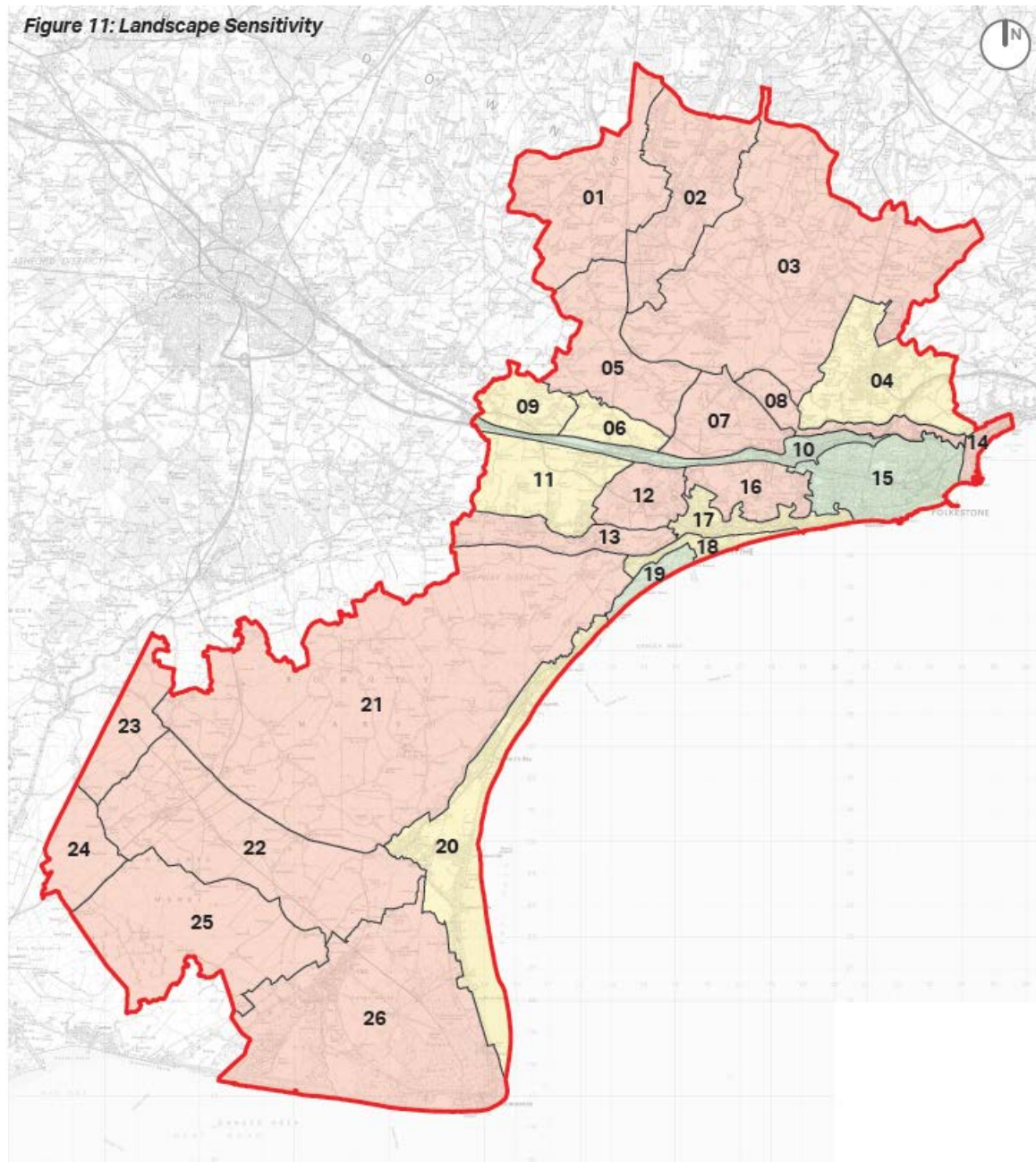
Community Infrastructure

Landscape

High Level Landscape Appraisal (AECOM, 2017)

The High Level Landscape Appraisal divides Shepway into twenty-six Landscape Character Areas (LCAs) and gives each a score based on landscape value, susceptibility to change, and sensitivity to change. The scores and detailed conclusions for each LCA have been taken into account as appropriate within the Phase Two Report of the Strategic Growth Options Study and are mapped and summarised below.

Figure 53: Landscape Sensitivity Mapping across Shepway District



Source: Shepway High Level Landscape Appraisal, AECOM (2016)

Table 8: Summary of conclusions of High Level Landscape Appraisal

Landscape Character Area	Corresponding High Level Options Character Area	Landscape Value	Landscape Susceptibility	Landscape Sensitivity
LCA 01: Elmsted Valley	1	+4	+2	+6
LCA 02: Elhampark Wood	1	+7	+2	+9
LCA 03: Elham Valley	1	+5	+2	+7
LCA 04: Hawkinge	1	+1	0	+1
LCA 05: Postling Vale	1 + 4	+5	+2	+7
LCA 06: Stanford	4	-2	0	-2
LCA 07: Tolsford Hill	1 + 4	+7	+2	+9
LCA 08: North Downs Ridge	1	+7	+2	+9
LCA 09: Sellindge	4	-1	0	-1
LCA 10: M20 and HS1 Corridor	1 + 2 + 4	-7	-1	-8
LCA 11: Lympne	4	-1	0	-1
LCA 12: Brockhill	4	+6	+2	+8
LCA 13: Greensand Ridge	3 + 4	+7	+2	+9
LCA 14: The Warren Cliffs	2	+8	+2	+10
LCA 15: Folkestone	2	-2	-2	-4
LCA 16: Seabrook Wooded Valleys	1 + 3 + 4	+5	+2	+7
LCA 17: Hythe Wooded Hills	2 + 3 + 4	+1	0	+1
LCA 18: Hythe	3	+2	-2	0
LCA 19: Hythe Ranges	3 + 5	-6	-1	-7

Landscape Character Area	Corresponding High Level Options Character Area	Landscape Value	Landscape Susceptibility	Landscape Sensitivity
LCA 20: Romney Marsh Coast	5 + 6	+1	0	+1
LCA 21: Romney Marsh Proper Farmlands	3 + 5	+5	+1	+6
LCA 22: Brookland Farmlands	5 + 6	+4	0	+4
LCA 23: The Dowels Farmlands	5	+3	+2	+5
LCA 24: Highknock Channel Farmlands	5	+3	+2	+5
LCA 25: Walland Marsh Farmlands	5 + 6	+3	+2	+5
LCA 26: Dungeness	6	+7	+2	+9

Source: Shepway High Level Landscape Appraisal, AECOM (2016)

Kent Downs AONB Management Plan 2014-2019 (Second Revision, April 2014)

The setting of the Kent Downs AONB is broadly speaking the land outside the designated area which is visible from the AONB and from which the AONB can be seen, but may be wider when affected by intrusive features beyond that. It is not formally defined or indicated on a map.

Proposals which would affect the setting of the AONB are not subject to the same level of constraint as those which would affect the AONB itself. The weight to be afforded to setting issues will depend on the significance of the impact. Matters such as the size of proposals, their distance, incompatibility with their surroundings, movement, reflectivity and colour are likely to affect impact. Where the qualities of the AONB which were instrumental in reasons for its designation are affected, then the impacts should be given considerable weight in decisions.

This particularly applies to views to and from the scarp of the North Downs.

Kent Downs AONB Management Plan 2014-2019 (Final Draft, January 2014)

The importance of the Kent Downs AONB setting has been recognised in the AONB Management Plan 2009-2014. This included policies to protect the AONB from inappropriate developments in its setting unless they could be satisfactorily mitigated. The Management Plan was adopted by all planning authorities with land in the AONB. National policy issued by DEFRA also explains that: "it may sometimes be the case that the activities of certain authorities operating outside the boundaries of these areas [nationally protected landscapes] may have an impact within them. In such cases, relevant authorities will also be expected to have regard to the purposes of these areas."

The Secretary of State has been supporting local authority decisions to refuse damaging proposals in the setting of the AONB. In particular, following an inquiry, he refused a road-rail freight interchange in 2010 in the immediate setting of the Kent Downs scarp at Bearsted (the 'Kent International Gateway'), with a key reason being substantial harm to the AONB setting.

Maidstone Local Plan Examination in Public: Response from Kent Downs AONB Unit

In some cases the setting area [of the AONB] will be compact and close to the AONB boundary, perhaps because of natural or human made barriers or because of the nature of the proposed change. However, the setting area may be substantial for example where there is a contrast in topography between higher and lower ground.

Scale, height, siting, use, materials and design are factors that will determine whether a development affects the setting of the AONB. Incompatibility with surroundings, movement, reflectivity and colour are also likely to affect impact. In most cases, the further away a development is from the AONB boundary, the more the impact is likely to be reduced, however a very large or high development may have an impact even if some considerable distance from the AONB boundary. Locations where development and changes to the landscape where the setting of the Kent Downs AONB may be more keenly felt include views to and from the scarp of the North Downs to the Vale of Holmesdale i.e. the A20/M20 corridor

A development may avoid direct physical effects, but introduce other impacts, such as a greater level of traffic, noise and the characteristics of built development or be located outside of the AONB but increase urban fringe pressures on land in the AONB, potentially affecting land management and the Public Rights of Way (PRoW) network. Examples of adverse impacts on the setting of the Kent Downs AONB include:

- development which would have a significant impact on views in or out of the AONB;
- loss of tranquillity through the introduction or increase of lighting, noise, or traffic movement or other environmental impact including dust, vibration and reduction in air quality;
- introduction of abrupt change of landscape character;
- loss or harm to biodiversity, heritage assets and natural landscape, particularly if these are contiguous with the AONB; and
- development giving rise to significantly increased traffic flows to and from the AONB, resulting in erosion of the character of rural roads and lanes.

Taking these factors into consideration, it is not considered possible to provide an absolute definition for setting of the AONB, rather proposals would have to be assessed on a case by case basis taking into account both location and the characteristics of the development under consideration.

Ecology

Kent Biodiversity Action Plan

The following Biodiversity Action Areas fall within Shepway:

- Mid Kent Greensand and Gault (partially covering the Areas of Search in the Phase Two Report)

Flood Risk

Strategic Flood Risk Assessment 2015

Character Area 4 has 2 rivers flowing through it, one to the north of the M20 and East Stour River which runs along the south of the M20 and then later cuts across at Sellindge.

Open Space

Shepway Open Spaces: Sports & Recreation Report 2011

The study highlights the existing surplus/shortfall in sports pitches:

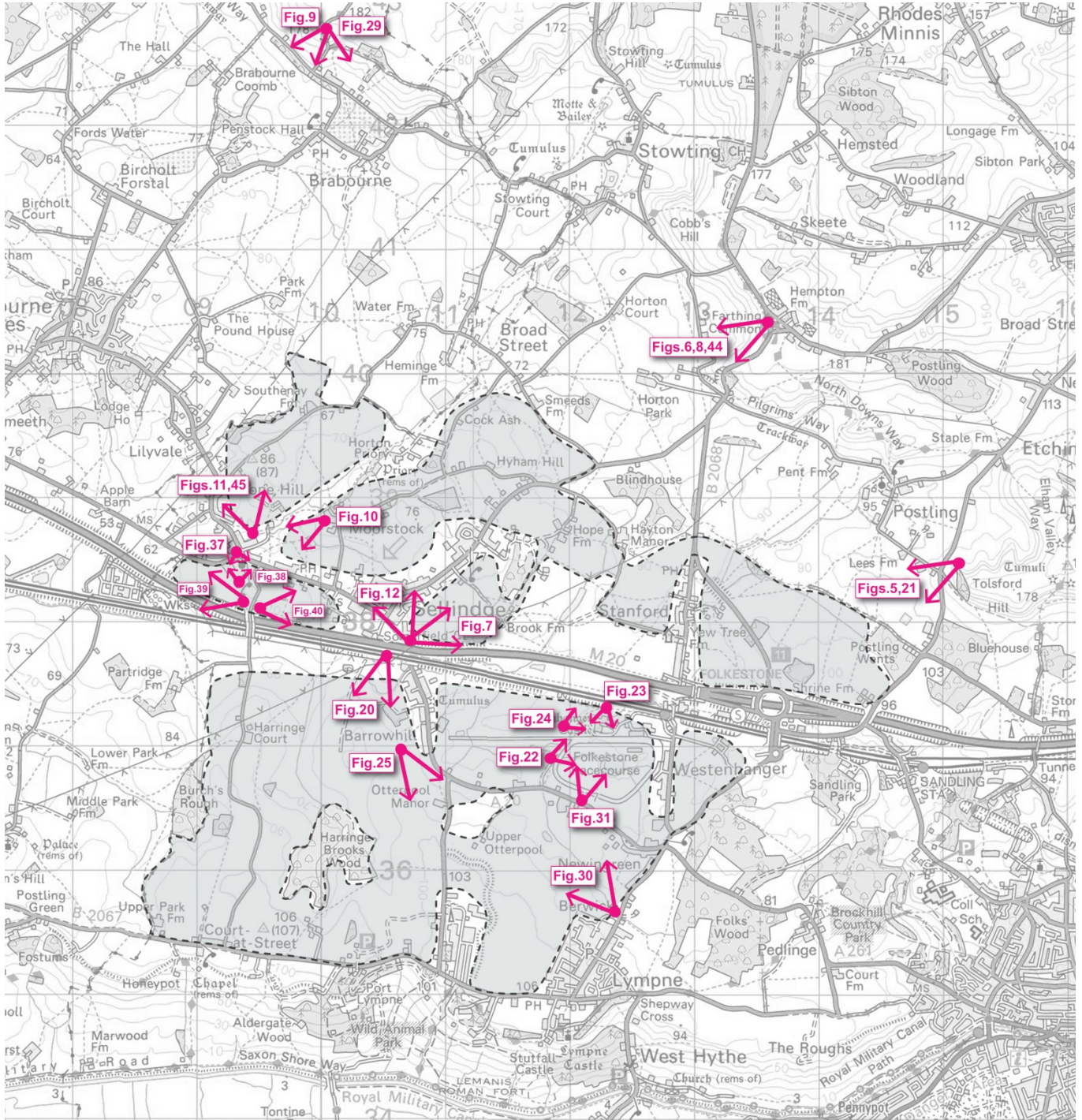
- A surplus at all times of the week for football;
- Shortfalls in cricket for juniors of a limited scale;
- A surplus at all times of the week for rugby, but a significant shortfall in junior rugby pitches on a Sunday; and
- A surplus at all times of the week for rugby, but some shortfalls in junior rugby pitches on a Saturday.

In summary, there are surpluses for all adult pitches throughout the week. Nevertheless, junior sports provision could improve.

There are four current major green spaces within Shepway: the Coastal Park at Folkestone, Brockhill Country Park at Hythe, Dungeness National Nature Reserve and The Warren at Folkestone.

Overall, Shepway has a good quantity of sports pitches, parkland and play spaces.

Appendix C: Map of viewpoints from which photographs in report were taken



Appendix D: Examples of Inspector's reports referencing the setting of an AONB

To ensure a detailed understanding of how the study area's location within the setting of the Kent Downs AONB should inform the conclusions of the Phase Two Report, AECOM researched Inspector's reports from across England that reference the need to protect the setting of an AONB in a context where development is proposed within that setting. The findings of the research, which are presented in the table below, should be read in conjunction with the conclusions of this report and the Kent Downs AONB Management Plan as summarised in Appendix B above.

Example number	Description of development	AONB characteristics	Decision	Inspector's conclusions
1	60 dwellings on the edge of Alderton, Gloucestershire ⁵³	Cotswolds AONB surrounds the site on many sides	Dismissed	<p>The site and its setting consist of features characteristic of the AONB landscape. Alderton is not considered to be a buffer between the site and the AONB. The appeal site is seen as forming part of the gentle slope that falls from the AONB. The development would impact on the setting of the AONB through a loss of openness and pasture use. Certain views of the AONB would be lost.</p> <p>From a number of points on the Winchcombe Way, impact on views would be 'substantial adverse'. The site makes an important contribution to the foreground setting of the AONB. The development would be harmful to the character and appearance of the area, through the loss of a long, rectangular open pasture field, leaving a smaller one uncharacteristic of the AONB.</p>

⁵³ <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?caseid=2222147>

Example number	Description of development	AONB characteristics	Decision	Inspector's conclusions
2	112 dwellings on the edge of Stroud, Gloucestershire ⁵⁴	Cotswolds AONB 110m from site	Dismissed	<p>The site lies in the Slad Valley as it enters Stroud. The key decision needing determination was whether, in the site context, Stroud itself or the Slad Valley AONB was the more dominant feature. The inspector found the boundary between Stroud and the countryside was indistinct and that the appeal site appeared visually as open countryside. A landscape assessment had previously indicated moderate sensitivity to development here.</p> <p>A previous allocation in this general location was rejected on landscape grounds, supporting the Council's contention that the valley remained a green finger extending into Stroud at this location. The Inspector concluded that the site is an integral part of the Slad Valley, which has more than local significance, and would result in urban projection into a rural area (bordering open countryside on three of four sides) and hence the visual loss of the 'green finger'.</p>

⁵⁴<http://wam.wychavon.gov.uk/WAM/doc/Appeal%20Correspondence-1061387.pdf?extension=.pdf&id=1061387&location=volume2&appid=1001&contentType=application/pdf&pageCount=1>

Example number	Description of development	AONB characteristics	Decision	Inspector's conclusions
3	47 dwellings on the edge of Alderton, Gloucestershire ⁵⁵	Site along boundary of Cotswolds AONB but outside it- itself within an SLA	Allowed	<p>Site is on flat land closely related to existing village; hedgerow boundaries and tree belts would, in time, screen views from local footpaths. Cotswold AONB did not object. Inspector did not accept arguments that it would shift the balance between urban and rural in views out of the AONB, noting that Alderton is a relatively small element of the view within the landscape and the development would do little to change existing character of both Alderton and the surrounding fields in wider views.</p> <p>The site is physically separated from rising land in the AONB by a playing field, which, though it is in the AONB itself, is more obviously urban in function. There is no 5-year supply of housing and Alderton is a settlement allocated for some growth.</p>

⁵⁵ <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?caseid=2209001>

Example number	Description of development	AONB characteristics	Decision	Inspector's conclusions
4	210 dwellings on edge of Haywards Heath, Sussex ⁵⁶	Site along boundary of Cotswolds AONB but outside it	Allowed	<p>Site is relatively self-contained in visual terms and there are only limited views into it from the public realm outside the site. Design and layout incorporate important mitigation measures. Offset of 50 metres from AONB boundary with more planting added to existing tree belt to have screening effect in ten years. Inspector concluded that scheme could impact on AONB visually but also through indirect effects of traffic on remoteness and tranquility.</p> <p>However, direct visual impacts would be limited. Effect on wider landscape of AONB very minor and localised, so overall effect considered negligible. This part of AONB not remote or tranquil, close to busy roads, and conclusion is of no material harm to the landscape and scenic beauty of the AONB.</p>
5	100 dwellings on the edge of Dursley, Gloucestershire ⁵⁷	Site abuts Cotswolds AONB to south and is surrounded by it on three sites at a distance of around 500m	Dismissed	<p>Transition between Dursley and surrounding countryside including AONB can be easily seen from surrounding vantage points. Proposal would reduce views to the AONB beyond. The open character of the appeal site makes an important contribution in restricting the encroachment of the town into the countryside.</p> <p>The development would neither protect nor enhance an area of land whose features are characteristic of the landforms on the edge of the Cotswolds plateau and whose proximity to it contributes to the setting of the AONB.</p>

⁵⁶ <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?caseid=2218078>

⁵⁷ <http://www.richboroughstates.co.uk/live/appeals/771a.pdf>

Example number	Description of development	AONB characteristics	Decision	Inspector's conclusions
6	150 dwellings on the edge of Corsham, Wiltshire ⁵⁸	Edge of Cotswolds AONB is 650 metres north from site	Allowed	Visual effects not widespread; no intervisibility between site and AONB. The AONB boundary is on the other side of a low ridge from the appeal site, so no material impact.

⁵⁸ <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?caseid=2222641>

Example number	Description of development	AONB characteristics	Decision	Inspector's conclusions
7	New industrial estate of up to 56,000 square metres at A20/M20 link roundabout, Hollingbourne, Kent ⁵⁹	In setting of Kent Downs AONB- around 600 metres from AONB edge	Dismissed	<p>Transport corridor between AONB and site less visually intrusive than might be supposed; moving vehicles visible but road itself hidden by topography and vegetation. From the south the development would be visually prominent in views to the AONB. The scale of the developments would be significant, dominating the foreground in these views, such that the views to the AONB would be interrupted. This would have a detrimental impact on the setting of the AONB that would be 'moderate adverse', given the sensitivity of the appeal site to change.</p> <p>In the longer views from the AONB it is true that there is little that is distinctive about the landform of the site. However, this is precisely why the development would cause harm. The site does not, at present, draw the eye and is seen as part of a homogenous wider vista and this would change, as described above, if the proposed development went ahead.</p> <p>The sensitivity of those receptors most affected, the walkers using the public rights of way, particularly those within the AONB, would be high. The development would fail to protect the setting of the AONB.</p>

⁵⁹ http://www.maidstone.gov.uk/__data/assets/pdf_file/0013/121162/ORD-011-Waterside-Park-Appeal-Decision-Letter-23-July-2015.pdf

Example number	Description of development	AONB characteristics	Decision	Inspector's conclusions
8	120 dwellings on the edge of Winchcombe, Gloucestershire ⁶⁰	Cotswolds AONB is on the other side of the road from the site, but footpaths with public access within AONB more distant	Allowed	<p>Site forms part of AONB setting but visual impact from footpaths within AONB lessened by distance. Existing sense of tranquility in AONB would not change. Impact on views out of the AONB considered insignificant. In views towards the AONB visual effect would be more pronounced, and adverse impacts on its setting are considered significant.</p> <p>Whilst these impacts would be confined to limited viewpoints it seems unlikely that they would diminish in time, even with proposed landscaping. However, when taken as a whole, the NPPF's social and economic elements suggest this would be sustainable development.</p>

⁶⁰ <http://www.richboroughstates.co.uk/live/appeals/68a.pdf>

Example number	Description of development	AONB characteristics	Decision	Inspector's conclusions
9	82 dwellings on the edge of Lenham, Kent ⁶¹	Boundary of Kent Downs AONB is about 200 metres away	Allowed	<p>Site has a visual and physical relationship to AONB by virtue of its proximity. Inspector notes particular concern over building heights at northern edge of site (i.e. closest to AONB) and notes that the development here should be a sensitive and sympathetic transition to the open landscape and scenic beauty of areas to the north- this was achieved through redesign and increasing the width of the landscape buffer to 15 metres. The main views from within the AONB would, by virtue of their respective locations and accompanying distances, be limited and already include built forms in and around Lenham and the A20.</p> <p>Such views would be experienced at relatively short intervals and the inspector found they would not be so intrusive as to be inconsistent with the wider existing panoramas in and around the site. Given the location and extent of the intervening land, and the absence of public views from within the appeal site, the Inspector found the direct contribution of the appeal site as part of the viewed foreground to the AONB to be limited. The inspector considered the scheme would provide for satisfactory mitigation in accordance with the Kent Downs AONB Management Plan. Whilst not enhancing the AONB, the scheme would not cause significant harm and would thereby not fail to conserve the AONB.</p>

⁶¹http://www.maidstone.gov.uk/__data/assets/pdf_file/0009/125757/ORD-032-Land-West-of-Ham-Lane,-Lenham-Appeal-Decision-24-June-2016.pdf

Example number	Description of development	AONB characteristics	Decision	Inspector's conclusions
10	20 dwellings on the edge of Harrietsham, Kent ⁶²	Kent Downs AONB abuts site to west and north	Dismissed	<p>Although the site is not within the AONB, the Inspector considered that it forms part of the immediate setting of the AONB and its openness and appearance gives a clear visual association with land within the AONB. The loss of the character and openness of part of the site would have a clear and negative effect on the setting of the AONB here.</p> <p>The unacceptable effects of the proposal on the landscape character of the area, including its position at the edge of the AONB, were considered to significantly and demonstrably outweigh the benefits that would arise from the proposal.</p>

⁶² <http://www.richboroughstates.co.uk/live/appeals/1512a.pdf>

Example number	Description of development	AONB characteristics	Decision	Inspector's conclusions
11	Various proposed site allocations in and around Blandford Forum and Shaftesbury (both Dorset) ⁶³	Nine sites at Blandford and ten sites at Shaftesbury	Three sites each at Blandford and Shaftesbury considered suitable for development.	<p>Across all sites, the following landscape criteria were key in the assessment of suitability in relation to AONB setting:</p> <ul style="list-style-type: none"> *Openness of landscape (the more open, the less suitable) *Avoiding ridgelines and promoting development on lower land *Potential for retention of mature vegetation as screening, and for further screening *Surrounding existing development *Potential for development to be dispersed via e.g. green wedges to avoid single block, lower densities etc. *Views from key vantage points within the AONB *Views into the AONB from outside it *Historic field and hedgerow pattern

⁶³https://www.dorsetforyou.gov.uk/media/204226/North-Dorset-Local-Plan-2011-to-2026-Part-1---Further-Work-MHD011-note-setting-out-weight-attached-to-AONB/pdf/MHD011_Note_setting_out_weight_attached_to_AONB_-_Web_Version.pdf.

Example number	Description of development	AONB characteristics	Decision	Inspector's conclusions
12	89 dwellings on the edge of Chinnor, Oxfordshire ⁶⁴	Chilterns AONB boundary around 400m south of site	Allowed	<p>The site can be viewed from the open space on the escarpment rising up beyond Chinnor to the southeast, which is within the AONB. From here there are panoramic and far reaching views across the lower lying land below. Such 'fine long views' are identified as one of the special qualities of the AONB. Chinnor appears prominently in the foreground when looking out from this spot and the appeal site would be evident on the edge of Chinnor.</p> <p>Given the use of appropriate materials and the proposed landscaping, there is no reason why the proposed development would be viewed as anything more than another part of Chinnor, in its context as a large village within an expansive open landscape.</p> <p>The development of the site would not introduce a distinct new built form into a setting where none currently exists and Chinnor would not encroach further towards the AONB as a result of it. Any impact upon the AONB, in relation to views from it, would be negligible and there would be no impact upon users' enjoyment of it. The AONB Conservation Board also did not object to the appeal proposal.</p>

⁶⁴ <http://www.richboroughstates.co.uk/live/appeals/1044a.pdf>

Example number	Description of development	AONB characteristics	Decision	Inspector's conclusions
13	155 dwellings on the edge of Banwell, Somerset ⁶⁵	Mendip Hills AONB boundary abuts site	Dismissed	<p>Very alluring rural scene and this part of the AONB is of considerable quality. New urban extension would markedly intrude into the landscape and seriously detract from the important and valued physical and perceptual attributes of the site. In so doing, the proposal, to a limited extent, would also detract from the immediate setting of this part of the AONB.</p> <p>There would be no significant impairment upon important long-distant views of the AONB from across the Moors and Levels.</p> <p>There is also no cogent evidence to demonstrate that the proposal would significantly affect the quality of views from within the AONB. Whilst it seems likely that the development or parts of it would be visible from Banwell Monument, it would be very surprising if this resulted in anything other than a negligible effect on the wide panoramic views which I understand are available from this structure. The proposed development would not harm the special qualities of the AONB, but it would have an adverse impact on its setting and in this sense does not constitute sustainable development.</p>

⁶⁵ <http://www.richboroughstates.co.uk/live/appeals/1404a.pdf>

Appendix E: Calculating residential density at a neighbourhood scale

AECOM has carried out research over a number of years into residential densities at a number of spatial scales. In order to explain the approach taken to density in this report, some context is required.

The thirty dwellings per hectare (dph) often used as a default density in town planning studies was originally formulated (within the now-rescinded PPG3) based on a policy context of recycling relatively small parcels of urban brownfield land. As originally defined in Annex C of PPG3 the 30 dwellings per hectare measurement covered 'net' densities, in other words:

- access roads within the site;
- private garden space;
- car parking areas;
- incidental open space and landscaping; and
- children's play areas where these are to be provided.

They did not include land for other uses that can be provided alongside housing to ensure that development offers a sustainable mix of uses, including:

- Rail, tram, guided bus or other public transport infrastructure
- Community facilities (hospitals, schools, community centres)
- Local shopping precincts
- Major open space such as parks and nature reserves
- Major roads
- Other non-domestic buildings (places of worship, leisure facilities and so on)

This study seeks to identify the larger-scale, often greenfield sites that can help to deliver the new housing needed in Shepway into the future. If these larger sites are to be built as genuinely sustainable neighbourhoods, they will need to include some or all of the uses in the second set of bullet points above.

At the scale of an entire town or city in England, land for enough other uses is required for densities to drop well below the 30-dwelling per hectare mark, including in smaller towns. For the 2011 Census, the Office for National Statistics (ONS) developed a Government definition of 'Built-Up Areas' (BUAs), across England, with an accompanying map to show which settlements have been defined as BUAs⁶⁶. This means it is now possible to calculate the dwelling density of any settlement in England larger than a small village.

⁶⁶ <https://data.gov.uk/dataset/built-up-area>

The methodology that the ONS use to define England's BUAs is available online.⁶⁷ In short, all land uses across the country are defined and mapped. The map is then divided into small grid squares. Certain land uses are defined as 'urban', and where enough of those uses occur in sufficient adjacent grid squares, a BUA is defined.

The Nomis website⁶⁸ then provides the number of hectares forming each BUA, as well as the total number of dwellings within it. This allows the density, in dph, to be measured for each settlement.

The densities of selected settlements within and close to Shepway, for example, are as follows:

- Folkestone: 18.76 dph⁶⁹
- Hythe: 15.98 dph
- Tenterden: 12.57 dph
- Lympne: 11.51 dph
- Lyminge: 11.40 dph
- Crowborough: 10.57 dph
- Sellindge: 8.30 dph

These can be compared with some examples from previous AECOM research:

- Buxton, Derbyshire: Town density: 19.16 dph
- Chichester, Sussex: Town density: 13.08 dph
- Witney, Oxfordshire: Town density: 15.74 dph
- Grantham, Lincolnshire: Town density 19.23 dph
- Kendal, Cumbria: Town density: 15.74 dph
- Stratford-upon-Avon, Warwickshire: Town density: 15.19 dph

The average density for a medium-sized, free-standing town in England therefore, seems to be in the range 10-20 dph and some smaller, more scattered settlements such as Sellindge may be below 10 dph. For the larger settlements, the density reflects the numerous non-residential uses required for the town to function as a service centre. The lower density of Sellindge does not reflect significant non-residential land uses (which are few in number); rather, it reflects its rather linear, dispersed nature.

⁶⁷ See <https://www.ons.gov.uk/ons/guide-method/geography/products/census/lookup/built-up-area-user-guidance.pdf>.

⁶⁸ See <https://www.nomisweb.co.uk/>

⁶⁹ When comparing these density figures with those shown in section 3.2 of this report, which do not include strategic open space, it should be noted that parks in larger settlements like Folkestone will be included within its density figure. However, note that this consideration tends not to apply to the density figures for smaller settlements like Lympne that are usually too small to include extensive amounts of open space within their boundaries.

Densities are slightly higher than the range of 10-20dph when suburban areas are assessed in their own right because most of the non-residential uses that reduce the densities at a town scale tend to be located in town centres.

It is only at masterplanning and application stage that site-specific densities can be determined, based on a detailed contextual analysis for each site. Such an analysis is beyond the scope of this Strategic Growth Options Study.

There are many factors affecting the densities of new development, and many will be at too local a level (e.g. subtle changes in height of land across the site, the proposed location of local facilities within the red line and so on) for a strategic study to cover accurately.

Nevertheless, the indicative density that has been applied in this strategic study should form a firm, evidence-based starting point for the development of new communities in Shepway that use land sustainably and efficiently, offer a wide range of local services and can support public transport while also reducing the need to travel.

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