

# Core Strategy Review - Inspectors' Matters

## Matter 1: Procedural / Legal Requirements

July 2020



**Matter 1: Procedural / Legal Requirements**

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# **Inspectors' Questions for Matter 1**

### **Plan preparation**

1. Has the preparation of the Core Strategy Review been in accordance with the Local Development Scheme in terms of its form, scope and timing?
2. Have requirements been met in terms of the preparation of the Core Strategy Review, notification, consultation and publication and submission of documents?
3. Has the preparation of the Core Strategy Review complied with the Statement of Community Involvement?

### **Sustainability Appraisal**

4. How has the Sustainability Appraisal (SA) informed the preparation of the Core Strategy Review at each stage and how were options considered? How was the revised housing requirement assessed?
5. How has the SA been reported?
6. What were the conclusions of the SA and how has it informed the preparation of the Core Strategy Review?
7. Has the methodology for the SA been appropriate? What concerns have been raised and what is the Council's response to these? Have the requirements for Strategic Environmental Assessment been met?

### **Habitats Regulations Assessment**

8. How was the Habitats Regulations Assessment (HRA) carried out and was the methodology appropriate?
9. What are the relevant designated sites considered?
10. What potential impacts of the Core Strategy Review were considered? What were the conclusions of the HRA and how has it informed the preparation of the Core Strategy Review? How was the revised housing requirement assessed?

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11. Have any concerns been raised regarding the HRA and if so, what is the Council's response to these? How has Natural England been involved?

### **Other matters**

12. Does the Core Strategy Review include policies in relation to the mitigation of and adaptation to climate change? If so which?
13. Has the Council had regard to the other relevant specific matters set out in S19 of the 2004 Act (as amended) and Regulation 10?
14. How have issues of equality been addressed in the Core Strategy Review?

# **Council's Response to Matter 1 Questions**

## **1. Plan Preparation**

### **Question 1**

Has the preparation of the Core Strategy Review been in accordance with the Local Development Scheme in terms of its form, scope and timing?

1.1. The Core Strategy Review (CSR) was set out in the 2016 Local Development Scheme (LDS) (EB 12.60). This set out the profile of the CSR, including the form, scope and timing (table following paragraph 4.6).

1.2. This described the Core Strategy Review as:

*“The overall long term planning strategy for the District, setting out the framework for future homes and economic development together with strategic site allocations and environmental policies.*

*The Core Strategy was adopted in 2013. The proposed review of the Core Strategy will identify how additional housing and employment needs will be met over an extended plan period.”*

1.3. The development of the CSR has kept with the timetable set out in the 2016 LDS. Initial work was undertaken in 2016 through, for example, work on the Strategic Housing Market Assessment (EB 3.20 and 3.30) and the High Level Options Study (EB 4.10).

1.4. The LDS identified consultation on the Regulation 18 draft in the first quarter of 2018. The Regulation 18 draft was published for consultation in March 2018.

1.5. The LDS then suggested that the council would submit the CSR in the first quarter of 2019. While the council did publish the Regulation 19 draft in January 2019 for consultation it was not submitted to the Secretary of State by that target. This was due to the Government publishing several updates to national policy and guidance, one of which amended the standard method by which

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local planning authorities have to calculate their minimum housing needs. The council made the decision to delay submission and to consult on the amendments that would need to be made to the Core Strategy Review that reflect the new minimum housing need figure. Once this had been undertaken, the council submitted the CSR.

- 1.6. The council has been preparing the Places and Policies Local Plan (PPLP) alongside work on the Core Strategy Review. Progress with the PPLP has also necessitated changes to the LDS.
- 1.7. The District Council's Cabinet agreed a revised LDS at the meeting held on 27 May 2020. The revised LDS reflects updates to the preparation of the PPLP and CSR. The LDS sets out new dates for the submission in March 2020 and suggests that the examination process will commence in March 2020 and close in October 2020, with the adoption in November 2020, subject to the Planning Inspectorate availability. (The LDS was prepared before the full extent of the current Covid-19 pandemic became apparent.)

## **Question 2**

Have requirements been met in terms of the preparation of the Core Strategy Review, notification, consultation and publication and submission of documents?

- 1.8. The District Council consider that the requirements in terms of preparation, notification, consultation, publication and submission of documents have been met.
- 1.9. The council has completed a legal compliance checklist (EB 01.93), following the Planning Advisory Service's template, and this sets out how the local planning authority has met the various requirements of legislation and regulations.
- 1.10. The Statement of Consultation (EB 01.90) sets out how the council undertook consultation between 2018 and 2020 to inform the CSR Submission Draft document.

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### **Question 3**

Has the preparation of the Core Strategy Review complied with the Statement of Community Involvement?

- 1.11. The Statement of Community Involvement (EB 01.94) sets out how the council involves the local community in developing planning policies and making planning decisions.
- 1.12. The Consultation Statement (EB 01.90) sets out how the council has involved the community in preparing the CSR at Regulation 18 Preferred Options (paragraphs 2.7 to 2.11), Regulation 19 Submission stage (paragraphs 3.3 to 3.6) and Regulation 19 Revised Housing Requirement. The council considers that this statement shows how it has complied with the Statement of Community Involvement in preparing the CSR.



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### **2. Sustainability Appraisal**

#### **Question 4**

How has the Sustainability Appraisal (SA) informed the preparation of the Core Strategy Review at each stage and how were options considered? How was the revised housing requirement assessed?

- 2.1. The CSR has been subject to Sustainability Appraisal (SA), incorporating Strategic Environmental Assessment (SEA), throughout its preparation. This process has been undertaken by Land Use Consultants (LUC) and is documented in the:
- Scoping Report (EB 02.90);
  - Preferred Options Report and Appendices (EB 02.70);
  - Submission Report, Main and Non-Technical Summary (EB 02.40 & EB 02.50);
  - Historic Environment Assessment (EB 02.30); and
  - SA Addendum for consultation on revised housing numbers (EB 02.10).
- 2.2. The SA has informed each stage of the process. Section 6 of the Folkestone & Hythe Proposed Submission Core Strategy Review SA (EB 02.40) reports on the appraisal of the High Level Growth Options and Section 7 the spatial options at Otterpool and Sellindge options. Section 8 sets out the appraisal of the CSR. The SA Recommendations in Section 8 (paragraphs 8.115 to 8.119) set out how the plan has been amended at each consultation stage.
- 2.3. A SA was carried out specifically for the revised housing requirement, 'Sustainability Appraisal Addendum - Proposed Changes to the Proposed Submission Folkestone & Hythe Core Strategy Review' (EB 02.10). This addendum updates the findings that were presented in the December 2018 SA Report. It should be noted that, as this is an addendum, the two documents should be read together.

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### **Question 5**

How has the SA been reported?

- 2.4. The Sustainability Appraisal has been published for public consultation alongside of the CSR at each stage in the plan making process. Comments have been invited on both the CSR, the SA and HRA in public adverts, the council's web site and in notification letters and emails to statutory consultees, other groups and members of the public. The SA was available on the council's consultation portal alongside the CSR to make comments.
- 2.5. The comments received during the Regulation 18 consultation were passed to the consultants, LUC, to consider and these were then reported to the council's Cabinet when the next draft of the CSR was considered. Comments from the Regulation 19 consultation were also considered by LUC.

### **Question 6**

What were the conclusions of the SA and how has it informed the preparation of the Core Strategy Review?

- 2.6. The Sustainability Appraisal (SA) Report which accompanied the Proposed Submission Core Strategy Review Regulation 19 consultation (EB 02.40, December 2018), taken together alongside the accompanying SA Addendum (EB 02.10, November 2019), assessed each of the proposed policies in the Core Strategy Review against the agreed SA Objectives.
- 2.7. An initial conclusion was that policies SS5, SS10, SS11, CSD3, CSD4, CSD6, CSD7 and CSD8 had not changed enough to generate new significant effects not previously identified during the SA of the adopted Core Strategy in 2013. These judgements were made based on the effects of the policies reported in the SA Report that accompanied the adopted Core Strategy (URS, 2012), but also in the context of the revised plan period, an up-to-date SA baseline and record of relevant plans, policies and programmes.

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- 2.8. Following the Inspectors' initial questions further work was commissioned on the SA of these policies from LUC (see FHDC EX012). This work is included as Appendix 1: Folkestone & Hythe Core Strategy Review – Sustainability Appraisal Addendum, LUC, July 2020.
- 2.9. The remaining policies in the CSR Submission draft were assessed against each of the SA objectives. Section 8 of the SA summarises the assessment findings for these policies (paragraphs 8.14 to 8.19). These are also summarised in Tables 8.2, 8.3 and 8.4. The overall conclusion was that the policies would have an overall positive effect when considered against the SA objectives.
- 2.10. The only negative effect (on all but three policies) was on Objective SA7 'Use land efficiently and safeguard soils, geology and economic mineral reserves'. This reflects the high proportion of best and most versatile agricultural land and the large areas of blanket mineral safeguards in the district. A minor negative effect was recorded for Objective SA4 'Conserve and enhance the fabric and setting of historic assets' on the Garden Settlement and Sellindge policies but this was reduced/offset by the heritage-related requirements the policies put forward. Further SA work specifically focusing on Heritage was also carried out (EB 02.30).
- 2.11. Chapter 8 of the SA Report considers the individual policy effects in-combination with the effects of other policies within the Core Strategy Review (specifically the policies that have not materially changed since the SA and adoption of the Core Strategy in 2013). Consideration is also given to the in-combination effects of the complete Core Strategy Review, the Submission Places and Policies Local Plan (PPLP) and planned growth in neighbouring authorities. A summary of these cumulative effects, together with potential cross-boundary effects, is provided in paragraphs 8.94 to 8.111 in the SA Report.
- 2.12. The SA Recommendations in Section 8 (paragraphs 8.115 to 8.119) set out how the SA informed the policies in the plan.

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### **Question 7**

Has the methodology for the SA been appropriate? What concerns have been raised and what is the Council's response to these? Have the requirements for Strategic Environmental Assessment been met?

- 2.13. The Appraisal methodology is set out in Section 2 of the main SA (EB 02.40) and this has been based on current best practice and the guidance on SA/SEA set out in the National Planning Practice Guidance. Table 2.1 of the SA sets out the main stages of the plan-making process and shows how these correspond to the SA process.
- 2.14. Thirteen representations were raised during the Regulation 19 consultation and these are set out in Appendix 1 together with responses to them. Only five comments were raised to the Addendum. Natural England concurred with the conclusions of no change to the SA as a result of the increased housing requirement.
- 2.15. The District Council is confident that the requirements for Strategic Environmental Assessment have been met. Table 1.1 'Meeting the Requirements of the SEA Regulations' in the main SA document (page 3) sets out the SEA regulation requirements and where these are covered in the SA report.

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### **3. Habitats Regulations Assessment**

#### **Question 8**

How was the Habitats Regulations Assessment (HRA) carried out and was the methodology appropriate?

3.1. The HRA process is set out in the Regulation 19 Submission Version (EB 02.60) paragraphs 1.18 to 1.21. It involved three stages in the assessment:

- Stage 1: Screening (the 'Significance Test');
- Stage 2: Appropriate Assessment (the 'Integrity Test'); and
- Stage 3: Assessment where no alternatives exist and adverse impacts remain taking into account mitigation.

3.2. This methodology was based on three guidance documents:

- National Planning Policy Framework, Department of Communities and Local Government (March 2012) (paragraph 118);
- Assessment of plans and projects significantly affecting European Sites. Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC, European Commission Environment DG, November 2001; and
- Planning for the Protection of European Sites, Guidance for Regional Spatial Strategies and Local Development Documents, Department for Communities and Local Government (DCLG), August 2006.

3.3. The HRA of the Proposed Submission Core Strategy Review policies focuses on the new policies not included in the adopted Core Strategy (2013) and the adopted Core Strategy policies that have been significantly revised. Folkestone & Hythe District's adopted Core Strategy (2013) was subject to HRA and, therefore, the findings of this HRA are considered to remain valid for those existing policies or those which have not significantly changed. The adopted

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Core Strategy policies that have not materially changed have only been appraised through consideration of the in-combination effects with the Core Strategy Review as a whole.

- 3.4. The HRA also includes an updated air quality assessment, undertaken in light of a High Court judgement in April 2017. The judgement (colloquially known as the Ashdown Forest judgement) partially quashed the Lewes District and South Downs National Park Joint Core Strategy as their assessment failed to undertake any form of assessment 'in combination' with growth in other authorities. The air quality assessment in this HRA is, therefore, based on a specific modelling of the location and scale of population growth proposed in the Submission Folkestone & Hythe Core Strategy Review in-combination with forecast changes associated with other plans and projects in neighbouring authorities to avoid these problems.
- 3.5. The Assessment also takes into account the CJEU ruling (People over Wind, Peter Sweetman v Coillte Teoranta (Case C323/17) judgement), which ruled that Article 6(3) of the Habitats Directive should be interpreted as meaning that mitigation measures, specifically measures which avoid or reduce adverse effects, should be assessed as part of an Appropriate Assessment, and should not be taken into account at the screening stage.
- 3.6. The District Council therefore consider that the methodology was appropriate and proportionate to a review of the Core Strategy.

### **Question 9**

What are the relevant designated sites considered?

- 3.7. The identification of the relevant sites are set out in paragraph 2.2 to 2.4 in the HRA (EB 02.60). The sites fall within Folkestone & Hythe district and neighbouring local authority areas. They are:
  - Dungeness, Romney Marsh and Rye Bay Ramsar;
  - Dungeness, Romney Marsh and Rye Bay Special Protection Area (SPA);

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- Dungeness Special Area of Conservation (SAC);
- Wye and Crundale Downs SAC;
- Lydden and Temple Ewell Downs SAC;
- Folkestone to Etchinghill Escarpment SAC;
- Blean Complex SAC;
- Dover to Kingsdown Cliffs SAC; and
- Parkgate Down SAC.

### **Question 10**

What potential impacts of the Core Strategy Review were considered? What were the conclusions of the HRA and how has it informed the preparation of the Core Strategy Review? How was the revised housing requirement assessed?

- 3.8. Table 2.1 of the HRA that accompanied the Submission Draft CSR (EB 02.60) sets out the potential impacts considered.
- 3.9. As required under Regulation 105 of the Conservation of Habitats and Species Regulations 20/10/15 an assessment of the 'likely significant effects' of the plan was undertaken. A screening matrix was prepared in order to assess which policies and site allocations would be likely to have a significant effect on European sites, either alone or in-combination with other plans and projects. The findings of the screening assessment are summarised in Chapter 3 and the full matrix can be found in Appendix 2. Other plans or projects that could give rise to in-combination effects are considered in Chapter 3.
- 3.10. The conclusions are set out in Section 5 of the HRA. Most policies and potential sources of impact were ruled out at the screening stage. However, there were two areas which had potential likely significant effects:
- Folkestone to Etchinghill Escarpment SAC as a result of recreational pressures and changes in air quality; and

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- The Dungeness SAC, SPA and Ramsar sites as a result of recreational pressures.
- 3.11. The Appropriate Assessment concluded that policies in the CSR “... *will not adversely affect the integrity of the Folkestone to Etchinghill Escarpment SAC either alone or in-combination as a result of air pollution.*”
- 3.12. In regard to the recreational impacts, the Appropriate Assessment concluded that “... *Policy SS6, which proposes a New Garden Settlement near Westenhanger, and Policy CSD9, which proposes strategic housing growth at Sellindge, were considered unlikely to contribute to tangible increases in recreational pressures at the Folkestone to Etchinghill Escarpment SAC because both are located over 5km away.*”
- 3.13. This conclusion was strengthened by the incorporation of high quality accessible natural greenspace within the developments which will be provided for by both of these policies, including the provision of a new Country Park and accessible open space and landscaping, updating of the Green Infrastructure Plan and policy commitments to balance demands for public access with ecological and landscape protection, taking into account the impacts of increased access on the Kent Downs Area of Outstanding Natural Beauty (AONB) and Folkestone to Etchinghill Escarpment Special Area of Conservation and other protected areas, which might necessitate the need for mitigation to be secured.
- 3.14. In regards to recreational pressures on Dungeness, the Appropriate Assessment concluded that “... *the strategic approach adopted by the Council in managing and avoiding recreational pressure through the preparation and implementation of the SARMS [Sustainable Access and Recreation Management Strategy] provides a mechanism for ensuring that adverse effects can be avoided by adopting an iterative approach to future management of Dungeness. This approach fulfils the recommendations made by Natural England in response to the Folkestone & Hythe Core Strategy HRA, and therefore the Appropriate Assessment concluded that no adverse effects on*



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*the Dungeness SAC/SPA/Ramsar are predicted as a result of recreational pressure.”*

3.15. The Sustainable Access and Recreation Management Strategy (SARMS) (EB 08.10 and background documents 08.11 to 08.14), together with an Action Plan, was agreed by the District Council’s Cabinet at the meeting on the 17 July 2019. This Strategy was produced with Rother District Council with assistance from Natural England and other partners.

3.16. Overall the Appropriate Assessment concluded that:

*“... subject to implementation of safeguards, the Folkestone & Hythe Proposed Submission Core Strategy Review will not result in adverse effects on Folkestone to Etchinghill Escarpment SAC, Dungeness SAC, SPA, or Ramsar, or other European sites, either alone or in-combination with other plans and projects.”*

3.17. A further assessment was carried out for the housing numbers update, HRA Addendum (EB 02.20), and this was carried out in accordance with the methodology set out in the main HRA report. This concluded that:

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

### **Question 11**

Have any concerns been raised regarding the HRA and if so, what is the Council’s response to these? How has Natural England been involved?

3.18. During the Regulation 19 consultation, two representations to the HRA were made; one by Natural England, the other by a member of the public.

3.19. During the Regulation 19 consultation for the amended housing numbers three representations were made; one by Natural England and two by CPRE Shepway.

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- 3.20. The comments by Natural England agreed with the local planning authority's conclusions of no change to the HRA and SA conclusions as a result of the increased housing requirement.
- 3.21. The comments and responses are summarised in Appendix 1 below.
- 3.22. The HRA required close working with Natural England in order to obtain the necessary information and agree the process, outcomes and any mitigation proposals. Specific issues were also raised with individuals from Natural England. Natural England were also consulted on the Regulation 18 and Regulation 19 CSR HRA.
- 3.23. More recently the council has been made aware of issues relating to water quality at the Stodmarsh European designated site, north east of Canterbury. Natural England wrote to the council on 21 May 2020 to state that information has recently emerged relating to existing water quality impacts on the Stodmarsh European designated sites caused by high nutrient levels including nitrogen and, in particular, phosphorous. Phosphorous originates mainly from permitted wastewater discharges into the River Stour (River Stour catchment).
- 3.24. Natural England states that this has implications for Core Strategy Review and advises that the water quality issues will need to be assessed to determine the impacts on nutrient levels in the Stour catchment, as part of the Habitats Regulations Assessment (HRA).
- 3.25. Natural England states that it is keen to work closely with the council to address these issues in particular to support the Core Strategy Review Examination and the Otterpool Park application.
- 3.26. Officers from the council met with representatives from Natural England, the Environment Agency and water companies on 19 June 2020 and again with Natural England on 25 June 2020 to understand the extent of the issue.
- 3.27. The council is commissioning specialist water quality experts to provide advice and is liaising with consultants LUC for advice on implications for the Habitats Regulations Assessment.

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3.28. An update will be provided to the Inspectors on this issue as soon as possible.

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### 4. Other Matters

#### Question 12

Does the Core Strategy Review include policies in relation to the mitigation of and adaptation to climate change? If so which?

4.1. The National Planning Policy Framework (paragraph 8) sets out the principles of Sustainable Development. Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways:

- An economic objective;
- A social objective; and
- An environmental objective.

4.2. The environmental objective is:

*“... to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and **mitigating and adapting to climate change, including moving to a low carbon economy.**”*

4.3. The Core Strategy Review sets out a strategy with the objectives of sustainable development at the heart of the policies. Policy SS1 sets out the District's Spatial Strategy, focusing suitable development at the new Garden Settlement and then sequentially at the larger sustainable towns and villages, focusing development at those settlements that have services and public transport to reduce travel by car and promote sustainable modes of travel such as walking and cycling.

4.4. This is then reflected in SS3 Place-Shaping and Sustainable Settlements Strategy, which not only considers the settlement hierarchy but also considerations for developments in the areas at risk of flooding over the plan

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period. This policy also includes criteria on sustainable construction measures, including water efficiency and a proportion of energy from renewable and low carbon sources on new-build development.

- 4.5. SS4 sets out the policy for Priority Centres of Activity Strategy, focusing on a 'town centre first' approach to transport generating activity (in line with NPPF paragraphs 86 and 87). SS5 sets out the infrastructure requirements, particularly permitting development that provides a choice of means of transport and allows sustainable travel patterns, for pedestrians, cyclists and/or public transport.
- 4.6. The new Garden Settlement policies also seek to ensure the Government's sustainable development objectives are met, in particular SS7: Place Shaping Principles, part (6) Sustainable access and movement, and SS8: Sustainability and Healthy New Town Principles.

- 4.7. Paragraph 4.184 of the CSR summarises the objectives of SS8:

*“There is the potential for the garden settlement to become a beacon of best practice for environmental sustainability, embracing new technologies to achieve a low carbon, low waste and low water environment, with an aspiration for carbon, water and waste neutrality to be further explored and investigated as masterplanning and policy develops. The need to plan for the supply of water and control water usage will be essential, as the district is an area of ‘serious water stress’”.*

- 4.8. The District Council's Places and Policies Local Plan (PPLP) also sets out relevant policies in the chapter headed 'Climate Change'. This has been through Examination in Public and once adopted, will form part of the Development Plan with the CSR. The Climate Change chapter includes the following policies which will apply across the district:

- Policy CC1: Reducing Carbon Emissions;
- Policy CC2: Sustainable Design and Construction;
- Policy CC3: Sustainable Drainage Systems (SuDS);

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- Policy CC4: Wind Turbine Development;
- Policy CC5: Small Scale Wind Turbines and Existing Development; and
- Policy CC6: Solar Farms.

4.9. Overall these policies, from both local plans, set out the approach in relation to reducing carbon emissions, air quality, managing transport impacts and reducing the need to travel. Furthermore, there are policies that seek to manage flood risk and promote living walls and roofs and on-site vegetation. Accordingly, the plans taken as a whole, achieve this statutory objective of the mitigation of and adaptation to climate change.

### **Question 13**

Has the Council had regard to the other relevant specific matters set out in S19 of the 2004 Act (as amended) and Regulation 10?

- 4.10. The District Council has had regard to the other relevant specific matters as set out in Section 19 of the 2004 Act (as amended) and Regulation 10 (where relevant).
- 4.11. With regard to Section 19, the Core Strategy Review has been prepared with regard to national policies and advice (as illustrated through the references within the plan), and other development plan documents, such as the Places and Policies Local Plan (PPLP).
- 4.12. The Core Strategy Review sets out the strategic priorities and policies and the PPLP sets out the allocations and development management policies, which will form the development plan for the district. (Regarding the relationship between the Core Strategy Review and PPLP see also the council's response to Matter 11, Question 6.)
- 4.13. With regard to Regulation 10, the District Council has consulted Kent County Council (as waste and highway authority), Highways England, the Health and Safety Executive and other statutory bodies to ensure the relevant waste, hazardous substances and highway policies have been properly considered.

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### **Question 14**

How have issues of equality been addressed in the Core Strategy Review?

- 4.14. The issue of equality has been considered in the plan-making process and the CSR seeks to ensure the needs of all the community has been addressed and considered. This includes policies for specialist homes for older people, adaptable homes and the accommodation needs of specific groups such as for Gypsies, Travellers and Travelling Showpeople. Detailed policies and allocations are also included in the PPLP.
- 4.15. The District Council has undertaken an Equality Impact Assessment (EB 01.19). This concluded that:
- “The EqIA has not identified any actual or the potential to cause, adverse impact or discrimination against different groups in the community.”*
- 4.16. A full Equality Impact Assessment Report was not considered to be required.

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**Appendix 1: Folkestone & Hythe Core Strategy Review – Sustainability Appraisal Addendum, LUC, July 2020**





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

Sustainability Appraisal Addendum - Core Strategy Review Policies SS5, SS10, SS11, CSD3, CSD4, CSD6, CSD7 and CSD8

Prepared by LUC  
July 2020

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# 1 Introduction

- 1.1 Folkestone & Hythe District Council commissioned LUC in October 2016 to carry out a Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) of the Review of the Core Strategy Local Plan. There have been four key stages in the Sustainability Appraisal of the Core Strategy Review to date:
- An SA Scoping Report for the Shepway Core Strategy Review was published for consultation in March 2017.
  - An initial SA Report was prepared and consulted upon with the Draft Shepway Core Strategy Review in February 2018.
  - A full SA Report was prepared and consulted upon with the Proposed Submission Core Strategy Review in January 2019.
  - An SA Addendum was prepared in November 2019 to present the likely significant effects for an updated version of the Core Strategy Review prepared following consultation on the Proposed Submission Core Strategy Review in January 2019. The updated version contained a new housing need figure following the publication of the Government's new standard methodology for calculating housing need. The SA Addendum considered the implications of the new calculated housing need for the SA findings reported previously.
- 1.2 This second SA Addendum has been prepared at the request of the Planning Inspectors nominated by the Secretary of State to examine the Proposed Submission Core Strategy Review. It presents a detailed appraisal of the likely significant effects of Core Strategy Review policies SS5, SS10, SS11, CSD3, CSD4, CSD6, CSD7 and CSD8. The effects of these policies were not reported in detail in the full SA Report at an individual policy level because it was considered that the policies had not changed enough to generate new significant effects not previously identified during the SA of the adopted Core Strategy in 2013. These judgements were made based on the effects of the policies reported in the SA Report that accompanied the adopted Core Strategy (URS, 2012), but also in the context of the revised Plan period, an up-to-date SA baseline and record of relevant plans, policies and programmes. The effects of these policies were instead reported in Chapter 8 of the full SA Report as part of the assessment of the cumulative effects of all policies within the Core Strategy Review, as well as in combination with the Folkestone & Hythe Places and Policies Local Plan (PPLP) and other relevant plans, programmes and projects.
- 1.3 The Inspectors have requested that for the SA to clearly meet the requirements of Section 19(5) of the Planning and Compulsory Purchase Act 2004 it must *'carry out an appraisal of the sustainability of the proposals in each Development Plan Document'*, i.e. the effects of every component of the Core Strategy Review (the proposals of the Plan) and their reasonable alternatives should be set out clearly in the SA Report.
- 1.4 In combination with the full SA Report (January 2019) and the first SA Addendum (November 2019), this second SA Addendum (June 2020) fulfils the Inspectors' request and meets the requirements of the Planning and Compulsory Purchase Act 2004<sup>1</sup> and associated SEA Regulations<sup>2</sup>. The three documents should be read together, for example, the SA baseline and summary of relevant policies, plans and programmes used to appraise the significant effects of the Core Strategy Review are not repeated in this SA Addendum but can be found in the full SA Report (January 2019) and first SA Addendum (November 2019).

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<sup>1</sup> The Planning and Compulsory Purchase Act 2004 is available at: <http://www.legislation.gov.uk/ukpga/2004/5/contents>

<sup>2</sup> The Environmental Assessment of Plans and Programmes Regulations 2004 are available at: <http://www.legislation.gov.uk/uksi/2004/1633/contents/made>

## 2 SA of Policies SS5, SS10, SS11, CSD3, CSD4, CSD6, CSD7 and CSD8

2.1 This section follows the same structure as the appraisal of the Proposed Submission Core Strategy Review policies set out in Chapter 8 of the full SA Report (January 2019). **Table 2.1** names the policies appraised in this section and the changes that have been made to the versions set out in the adopted Core Strategy (2013). In addition to these changes, the plan period of the Core Strategy Review has been extended from the adopted Core strategy from the original 2006 to 2031 to the new 2018 to 2037, extending the lifespan of the policies by six years. **Table 2.2** sets out the Council's consideration of reasonable alternatives to policies SS5, SS10, SS11, CSD3, CSD4, CSD6, CSD7 and CSD8. This is followed by the appraisal of the policies, the likely effects of which are set out in **Table 2.3**. The SA Framework used throughout the appraisal of the Folkestone & Hythe Core Strategy Review is included in **Appendix 1**.

**Table 2.1: Summary of changes to policies SS5, SS10, SS11, CSD3, CSD4, CSD6, CSD7 and CSD8 since adoption of adopted Core Strategy (2013)**

| Policy Number and Title  | Notable Changes to adopted Core Strategy Policies (2013) <sup>3</sup>   |
|--|---|
| <b>Spatial Strategy Policies</b>   |   |
| Policy SS5 'District Infrastructure Planning'  | Text revised to recognise the role of Section 106 contributions to District Infrastructure as well as the adoption of the District's Community Infrastructure Levy (CIL) Charging Schedule and Infrastructure Delivery Plan.<br><br>Following sentence deleted:<br><br><i>'Developments must reflect the principle that infrastructure should be used more efficiently, or demand managed more effectively, before the need to increase capacity or deliver new infrastructure is created.'</i> |
| Policy SS10 'Spatial Strategy for Folkestone Seafront' (Previously Policy SS6).              | Reference to Code for Sustainable Homes removed.  |
| Policy SS11 'Spatial Strategy for Shorncliffe Garrison, Folkestone' (Previously Policy SS7). | Reference to Code for Sustainable Homes removed.  |
| <b>Core Strategy Delivery Policies</b>   |   |
| Policy CSD3 'Rural and Tourism Development of Shepway'                                       | Reference to the 'Settlement Network' replaced by ' <i>settlement hierarchy</i> '.  |

<sup>3</sup> Minor text clarifications and typo corrections excluded.

| Policy Number and Title  | Notable Changes to adopted Core Strategy Policies (2013) <sup>3</sup>   |
|--|---|
| Policy CSD4 'Green Infrastructure of Natural Networks, Open Spaces and Recreation' | Elaboration on the requirement to avoid net loss of biodiversity with the addition of a ' <i>need to achieve net gain over and above residual loss</i> '.   |
| Policy CSD6 'Central Folkestone Strategy'  | <p>Policy reference corrected in text.</p> <p>Minor changes to reflect wording of the new NPPF (2018) and the findings of the Retail and Leisure Need Assessment (Lichfields, 2018), specific changes include:</p> <ul style="list-style-type: none"> <li>• Emphasis on the need to deliver investment in both the daytime and evening economy.</li> <li>• Addition of particular examples to deliver wider regeneration through investment in central Folkestone, notably at the bus station site and at Guildhall Street, Gloucester Place and Shellons Street and the redevelopment of the Sainsbury's store and adjacent areas at Bouverie Place West.</li> <li>• Addition of following sentence in relation to the Seafront/Creative Enterprise Zone: '<i>Principles relating to creative enterprise zones will be applied to the Creative Quarter to intensify use for creative and digital industries to ensure no net erosion of space.</i>'</li> </ul> |
| Policy CSD7 'Hythe Strategy'   | No notable changes.   |
| Policy CSD8 'New Romney Strategy'  | <p>Following sentence deleted:</p> <p><i>'Any planning application for the broad location should be preceded by, and consistent with, a single masterplan, addressing these objectives and produced in consultation with the local community, the district councils and key stakeholders.'</i></p> <p>Following sentences added:</p> <p><i>'The layout and design of any proposals for the remaining undeveloped two parcels of land under the broad location must take into account the potential development of the adjoining land parcel and the existing development. In particular the internal road layout of the two parcels allocated to the south east of Cockreed Lane shall not prejudice the future delivery of a 'link' road (criterion C above) to provide a vehicular connection between the two parcels and the developed part of the broad location to the north-east.'</i></p>  |

## Consideration of Reasonable Alternatives

- 2.2 In undertaking the Core Strategy Review the Council has had regard to national planning policy and associated practice guidance, in particular notable changes since the adoption of the Core Strategy in 2013, as well as the changing circumstances and priorities of the District.

- 2.3 The Council has been undertaking a review of an existing plan; given this the Council considered the reasonable alternatives for each policy and area of the plan to be:
- To **delete** a particular policy or area of supporting text – where national policy or local circumstances had changed to such an extent that the particular policy or text was considered to be superseded or irrelevant;
  - To **amend** a particular policy or area of supporting text – where changing national policy or local circumstances meant that the policy or text was still largely appropriate and justified, but that amendments were needed to take account of changes to national policy and guidance or progress with development on a site;
  - To **retain** a particular policy or area of supporting text – where the policy or text remained up-to-date, relevant and consistent with national policy and guidance, or where planning permission had been granted on a site and the policy was needed to guide the remaining phases of development; or
  - To **create a new policy** or area of supporting text – where changing national policy and guidance, or changing local circumstances, meant that a completely new policy or area of text was needed to guide development.
- 2.4 With the exception of the minor changes set out in **Table 2.1** above, adopted policies SS5, SS10, SS11, CSD3, CSD4, CSD6, CSD7 and CSD8 were found to remain in accordance with national policy requirements are therefore still considered to be relevant to the development strategy for the District. Therefore, in the case of the policies considered with this SA Addendum, the policies were retained and no reasonable alternatives were identified for appraisal alongside the preferred policies set out in the Proposed Submission Core Strategy Review. **Table 2.2** sets out the contextual information used to inform these decisions.

**Table 2.2: Consideration of reasonable alternatives to policies SS5, SS10, SS11, CSD3, CSD4, CSD6, CSD7 and CSD8**

| Policy                                | National Policy Context   | District Context                               |
|---------------------------------------|---|--|
| SS5: District Infrastructure Planning | <p>The policy requirement that development should contribute to the District’s current and future infrastructure needs accords with national policy, including:</p> <ul style="list-style-type: none"> <li>• Identify and coordinate the provision of infrastructure (NPPF paragraph 8(a)).</li> <li>• Addressing potential barriers to investment (NPPF paragraph 81(c)).</li> <li>• Realising opportunities from existing or proposed transport infrastructure (NPPF paragraph 102(b)).</li> <li>• Supporting high quality and reliable communications infrastructure (NPPF paragraphs 112).</li> <li>• Social, recreational and cultural facilities (NPPF paragraph 92).</li> <li>• Spaces and facilities for sport and recreation (NPPF paragraph 96).</li> </ul> | Community Infrastructure Levy adopted in 2016. |
| SS10: Spatial Strategy for            | Policy SS10 (formerly SS6) sets out detailed criteria for a major mixed use development at Folkestone Seafront.   | The site has received planning permission.     |

| Policy   | National Policy Context  | District Context  |
|--|--|---|
| Folkestone Seafront  | <p>The allocation – In terms of its land uses, location and design requirements – remains in conformity with national guidance, including:</p> <ul style="list-style-type: none"> <li>• Ensuring the vitality of town centres (NPPF Section 7).</li> <li>• Limiting the need to travel (NPPF paragraph 103).</li> <li>• Promoting a mix of uses (NPPF paragraph 91(a)).</li> <li>• Provision of homes including affordable housing (NPPF paragraph 20).</li> <li>• Requiring good design (NPPF paragraphs 124).</li> <li>• Delivering social, recreational, cultural and community facilities (NPPF paragraph 92).</li> <li>• Meeting the challenge of climate change, flooding and coastal change (NPPF Section 14).</li> <li>• Conserving and enhancing the historic environment (NPPF Section 16).</li> <li>• Allocating sites to promote the effective use of land (NPPF paragraph 117).</li> </ul>                              | and development has commenced.  |
| SS11: Spatial Strategy for Shornccliffe Garrison, Folkestone | <p>Policy SS11 (formerly SS7) sets out detailed criteria for a major mixed use development at Shornccliffe Garrison, Folkestone. The allocation – land uses, location and design requirements – remains in conformity with national guidance, including:</p> <ul style="list-style-type: none"> <li>• Limiting the need to travel (NPPF paragraph 103).</li> <li>• Provision of homes including affordable housing (NPPF paragraph 20).</li> <li>• Requiring good design (NPPF paragraphs 124).</li> <li>• Delivering social, recreational, cultural and community facilities (NPPF paragraph 92).</li> <li>• Access to a network of high quality open spaces (NPPF paragraph 96).</li> <li>• Planning for green infrastructure in new development (NPPF paragraph 150).</li> <li>• Remediating contaminated land (NPPF paragraph 170(f))</li> <li>• Conserving and enhancing the historic environment (NPPF Section 16).</li> </ul> | The site has received planning permission and development is well advanced. |

| Policy   | National Policy Context  | District Context             |
|--|--|------------------------------|
|  | <ul style="list-style-type: none"> <li>Allocating sites to promote the effective use of land (NPPF paragraph 117).</li> </ul>  |                              |
| CSD3: Rural and Tourism Development  | <p>Policy CSD3 meets national guidance, particularly:</p> <ul style="list-style-type: none"> <li>Supporting a prosperous rural economy (NPPF paragraphs 83-84).</li> <li>Guarding against the unnecessary loss of facilities and services (NPPF paragraph 92).</li> <li>Protecting and enhancing valued landscapes (NPPF paragraph 170).</li> <li>Conserving and enhancing landscapes in Areas of Outstanding Natural Beauty (NPPF paragraph 172).</li> <li>Maintaining and enhancing networks of green infrastructure (NPPF paragraph 171).</li> </ul>  | No change in local baseline. |
| CSD4: Green Infrastructure of Natural Networks, Open Spaces and Recreation | <p>Policy CSD4 meets national guidance, particularly:</p> <ul style="list-style-type: none"> <li>Conserving and enhancing the natural environment (NPPF Section 15).</li> <li>Landscapes (PPG paragraphs 8-036-20190721 to 8-042-20190721).</li> <li>Biodiversity and geodiversity (PPG paragraph 8-010-20190721).</li> <li>Maintaining and enhancing networks of green infrastructure (NPPF paragraph 171).</li> <li>Green infrastructure (PPG paragraphs 8-006-20190721 and 8-007-20190721).</li> </ul>  | No change in local baseline. |
| CSD6: Central Folkestone Strategy  | <p>Policy CSD6 meets national guidance including:</p> <ul style="list-style-type: none"> <li>Allocating sites to promote the effective use of land (NPPF paragraph 117).</li> <li>Ensuring the vitality of town centres (NPPF Section 7).</li> <li>Minimising the number and length of journeys needed for employment, shopping, leisure, education and other activities (NPPF paragraph 104).</li> <li>Promoting sustainable modes of transport (NPPF paragraph 108).</li> <li>Promoting a mix of uses (NPPF paragraph 91(a)).</li> <li>Requiring good design (NPPF paragraph 124).</li> <li>Promoting safe and accessible environments (NPPF paragraph 91).</li> </ul> | No change in local baseline. |



| Policy                    | National Policy Context  | District Context   |
|---------------------------|--|--|
|                           | <ul style="list-style-type: none"> <li>Conserving and enhancing the historic environment (NPPF Section 16).</li> </ul>   |  |
| CSD7: Hythe Strategy      | <p>Policy CDS7 meets national guidance including:</p> <ul style="list-style-type: none"> <li>Allocating sites to promote the effective use of land (NPPF paragraph 117).</li> <li>Ensuring the vitality of town centres (NPPF Section 7).</li> <li>Minimising the number and length of journeys needed for employment, shopping, leisure, education and other activities (NPPF paragraph 104).</li> <li>Promoting sustainable modes of transport (NPPF paragraph 108).</li> <li>Promoting a mix of uses (NPPF paragraph 91(a)).</li> <li>Requiring good design (NPPF paragraph 124).</li> <li>Promoting safe and accessible environments (NPPF paragraph 91).</li> <li>Conserving and enhancing the historic environment (NPPF Section 16).</li> </ul> | No change in local baseline.   |
| CSD8: New Romney Strategy | <p>Policy CDS8 meets national guidance including:</p> <ul style="list-style-type: none"> <li>Allocating sites to promote the effective use of land (NPPF paragraph 117).</li> <li>Ensuring the vitality of town centres (NPPF Section 7).</li> <li>Minimising the number and length of journeys needed for employment, shopping, leisure, education and other activities (NPPF paragraph 104).</li> <li>Promoting sustainable modes of transport (NPPF paragraph 108).</li> <li>Promoting a mix of uses (NPPF paragraph 91(a)).</li> <li>Requiring good design (NPPF paragraph 124).</li> <li>Promoting safe and accessible environments (NPPF paragraph 91).</li> <li>Conserving and enhancing the historic environment (NPPF Section 16).</li> </ul> | Broad locations identified in policy for housing development now have planning permission and some sites are under construction. |

**Table 2.3: Summary of effects following the appraisal of Core Strategy Review Policies SS5, SS10, SS11, CSD3, CSD4, CSD6, CSD7 and CSD8**

| SA Objectives  | Policy SS5: District Infrastructure Planning | Policy SS10: Spatial Strategy for Folkestone Seafront | Policy SS11: Spatial Strategy for Shorncliffe Garrison, Folkestone | Policy CSD3: Rural and Tourism Development | Policy CSD4: Green Infrastructure of Natural Networks, Open Spaces and Recreation | Policy CSD6: Central Folkestone Strategy | Policy CSD7: Hythe Strategy | Policy CSD8: New Romney Strategy |
|--|--|---|--|--|---|--|-----------------------------|----------------------------------|
| SA1. Improve the provision of homes, including affordable housing, having regard to the needs of all sections of society, including the elderly. | 0  | ++  | ++   | +  | 0   | +  | +                           | ++                               |
| SA2. Support the creation of high quality and diverse employment opportunities.  | +  | ++  | ++   | ++   | 0   | ++                                       | ++                          | ++                               |
| SA3. Conserve, and where relevant enhance, the quality, character and local distinctiveness of the landscape and townscape.                      | 0  | +/-   | +/-  | +  | ++  | 0  | 0                           | +/-                              |
| SA4. Conserve and enhance the fabric and setting of historic assets.   | 0  | -   | -  | +  | +   | 0  | 0                           | -                                |
| SA5. Conserve and enhance biodiversity, taking into account the effects of climate change.   | +  | +/-   | +/-  | +  | ++  | 0  | 0                           | +/-                              |
| SA6. Protect and enhance green infrastructure and ensure that it meets strategic needs.  | ++   | +   | +  | +  | ++  | 0  | 0                           | +/-                              |
| SA7. Use land efficiently and safeguard soils, geology and economic mineral reserves.  | 0  | ++  | ++   | 0  | 0   | ++                                       | ++                          | -                                |

| SA Objectives   | Policy SS5: District Infrastructure Planning | Policy SS10: Spatial Strategy for Folkestone Seafront | Policy SS11: Spatial Strategy for Shorncliffe Garrison, Folkestone | Policy CSD3: Rural and Tourism Development | Policy CSD4: Green Infrastructure of Natural Networks, Open Spaces and Recreation | Policy CSD6: Central Folkestone Strategy | Policy CSD7: Hythe Strategy | Policy CSD8: New Romney Strategy |
|---|--|---|--|--|---|--|-----------------------------|----------------------------------|
| SA8. Maintain and improve the quality of groundwater, surface waters and coastal waters and the hydromorphological (physical) quality of rivers and coastal waters.   | ++   | 0   | 0  | +  | +   | 0  | 0                           | 0                                |
| SA9. Reduce the risk of flooding, taking into account the effects of climate change.  | ++   | 0   | 0  | +  | +   | 0  | 0                           | 0                                |
| SA10. Increase energy efficiency in the built environment and the proportion of energy use from renewable sources.  | ++   | ++  | ++   | +  | 0   | 0  | 0                           | 0                                |
| SA11. Use water resources efficiently   | ++   | ++  | ++   | 0  | 0   | 0  | 0                           | 0                                |
| SA12. To reduce waste generation and disposal, and achieve the sustainable management of waste.   | ++   | +   | +  | +  | 0   | 0  | 0                           | 0                                |
| SA13. Reduce the need to travel, increase opportunities to choose sustainable transport modes and avoid development that will result in significant traffic congestion and poor air quality.                              | ++   | ++  | ++   | +/-  | 0   | ++                                       | ++                          | ++/-                             |
| SA14. Promote community vibrancy and social cohesion; provide opportunities to access services, facilities and environmental assets for all ages and abilities and avoid creating inequalities of opportunity for access. | ++   | ++  | ++   | ++   | +   | ++                                       | ++                          | ++                               |
| SA15. Reduce crime and the fear of crime.   | +  | +   | +  | 0  | 0   | +  | +                           | +                                |

## Effects of Policy SS5: District Infrastructure Planning

- 2.5 Core Strategy Review Policy SS5 requires development to contribute to the District's current and future infrastructure needs in accordance with national policy. The principles of the policy remain the same as Policy SS5 in the adopted Core Strategy.

### Summary of the effects identified through the SA of the adopted Core Strategy (2013)

- 2.6 The SA of the adopted Shepway Core Strategy (2013) reported that Policy SS5 would generate positive effects on water quality, energy efficiency, reducing flood risk, economic growth, the creation and maintenance of sustainable communities, reductions in inequality, social exclusion and deprivation, education, health and well-being, and sustainable transport.

### Summary of the effects identified through the SA of the Core Strategy Review Submission Draft (February 2020)

- 2.7 It is expected that Core Strategy Review Policy SS5 would have similar effects to those identified during the appraisal of the adopted Core Strategy Policy SS5, although the effects will continue for longer over the Core Strategy Review's extended plan period. Significant positive effects are identified in relation to **SA objectives 6 (Green Infrastructure), 8 (Water Quality), 9 (Flood Risk), 10 (Climate Change Mitigation), 11 (Water Efficiency), 12 (Waste), 13 (Transport and Congestion) and 14 (Access to Services and Facilities)** due to the integral contribution different types of infrastructure investment make to the management of these issues.
- 2.8 Associated indirect benefits are recognised for other SA objectives as minor positive effects in **Table 2.3**.

## Effects of Policy SS10: Spatial Strategy for Folkestone Seafront

- 2.9 Core Strategy Review Policy SS10 sets out the spatial strategy for Folkestone Seafront to guide future phases of a major mixed use development and associated infrastructure, services, and facilities in the area. The principles of the policy remain the same as Policy SS6 in the adopted Core Strategy.

### Summary of the effects identified through the SA of the adopted Core Strategy (2013)

- 2.10 The SA of the adopted Shepway Core Strategy (2013) reported that Policy SS10 would generate positive effects on water quality, energy efficiency, the efficient use of previously developed land, economic growth, employment, housing, the creation and maintenance of sustainable communities, reductions in inequality, social exclusion and deprivation, health and well-being, and sustainable transport.

### Summary of the effects identified through the SA of the Core Strategy Review Submission Draft (February 2020)

- 2.11 It is expected that Core Strategy Review Policy SS10 would have similar effects to those identified during the appraisal of the adopted Core Strategy Policy SS6, although the effects will continue for longer over the Core Strategy Review's extended plan period. Policy SS10 generally has positive effects in relation to the SA objectives. The delivery of 1,000 new dwellings in combination with up to 10,000 sqm of employment land and various community services and facilities is acknowledged to have significant positive effects in relation to **SA objectives 1 (Housing), 2 (Employment) and 14 (Services and Facilities)**.
- 2.12 Further significant positive effects have been identified in relation to **SA objectives 7 (Efficient Use of Land), 10 (Climate Change Mitigation), 11 (Water Efficiency) and 13 (Sustainable Transport)**. The site location in the centre of Folkestone minimises the loss of greenfield land and its natural resources. Furthermore, the level of development supported through the policy

would allow for high standards of energy and water efficiency to be sought. Although the significant scale of the growth has the potential to generate road congestion issues, Folkestone Seafront represents one of the most well connected locations in the District, offering sustainable alternatives to the private car. Furthermore, the delivery of new services and facilities as set out in the policy would further help to reduce the need to travel for local residents and workers.

- 2.13 Mixed minor effects are recorded in relation to SA objectives 3 (Landscape/Townscape) and 5 (Biodiversity). The negative effects acknowledge the significant scale and density of growth and the potential pressures this is likely to put on the existing character and habitats within and in the immediate vicinity of the area. The positive effects acknowledged in relation to these objectives recognise the significant landscaping and enhancement measures planned on the seafront and the opportunities this represents to enhance the townscape setting and local ecological assets.
- 2.14 Similarly a minor negative effect has been recorded against SA objective 4 (Historic Environment). This is due to the allocated area containing a number of heritage assets and potential archaeological remains. Despite this, the policy requires a design that is very high quality, preserving the setting of the key heritage assets and archaeological features of the site, sympathetic to the landscape and coastal character of the area including the retention of the Inner Harbour Bridge, so any adverse effect is only considered to be minor if not negligible.
- 2.15 The close proximity of the site to the coastline presents the possibility of adverse effects against SA objectives 8 (Water quality) and 9 (Flood Risk); however, the policy requires design measures to mitigate flood risk and the supporting text highlights the importance of sustainable urban drainage systems, so adverse effects are not recorded against these objectives.
- 2.16 Associated indirect benefits are recognised for other SA objectives as minor positive effects in **Table 2.3** due to the high standards of environmental performance and public realm provision being sought.

## Effects of Policy SS11: Spatial Strategy for Shorncliffe Garrison, Folkestone

- 2.17 Core Strategy Review Policy SS11 sets out the spatial strategy for Shorncliffe Garrison in Folkestone to guide future phases of residential development and associated infrastructure, services, and facilities in the area. The principles of the policy remain the same as Policy SS7 in the adopted Core Strategy.

### Summary of the effects identified through the SA of the adopted Core Strategy (2013)

- 2.18 The SA of the adopted Shepway Core Strategy (2013) reported that Policy SS11 would generate positive effects on water quality, energy efficiency, the efficient use of previously developed land, economic growth, employment, housing, the creation and maintenance of sustainable communities, reductions in inequality, social exclusion and deprivation, education, health and well-being, and sustainable transport.

### Summary of the effects identified through the SA of the Core Strategy Review Submission Draft (February 2020)

- 2.19 It is expected that Core Strategy Review Policy SS11 would have similar effects to those identified during the appraisal of the adopted Core Strategy Policy SS7, although the effects will continue for longer over the Core Strategy Review's extended plan period. Policy SS11 generally has positive effects in relation to the SA objectives. The delivery of 1,000 new dwellings, an improved military establishment and new community services and facilities, including land and possible contributions towards a new primary school and health/care facility is acknowledged to have significant positive effects in relation to **SA objectives 1 (Housing), 2 (Employment) and 14 (Services and Facilities)**.
- 2.20 Further significant positive effects have been identified in relation to **SA objectives 7 (Efficient Use of Land), 10 (Climate Change Mitigation), 11 (Water Efficiency) and 13 (Sustainable**

**Transport).** The site contains areas of brownfield land where most of the development is expected to take place, whilst existing areas of greenfield land will mainly provide formal open space. Furthermore, the level of development supported through the policy would allow for high standards of energy and water efficiency to be sought. Although the significant scale of the growth has the potential to generate road congestion issues, improvements will be made towards bus services, in addition to walking and cycling, and several road junction improvements are planned in the immediate vicinity. Furthermore, the delivery of facilities as set out in the policy would further help to reduce the need to travel for local residents and workers.

- 2.21 Mixed minor effects are recorded in relation to SA objectives 3 (Landscape/Townscape) and 5 (Biodiversity). The negative effects acknowledge the significant scale and density of growth and the potential pressures this is likely to put the existing character and habitats within and in the immediate vicinity of the area. The positive effects acknowledged in relation to these objectives recognise the significant landscaping and enhancement measures planned and the opportunities this represents to enhance the townscape setting and local ecological assets.
- 2.22 Similarly, a minor negative effect has been recorded against SA objective 4 (Historic Environment). This is due to the allocated area containing a number of heritage assets and potential archaeological remains. Despite this, the policy requires good place-making through the retention of important features, including heritage assets. It also states that townscape, heritage and archaeological analysis should be undertaken prior to the demolition of any buildings. Therefore, any adverse effect is only considered to be minor if not negligible.
- 2.23 Associated indirect benefits are recognised for other SA objectives as minor positive effects in **Table 2.3** due to the high standards of environmental performance and enhancements to green infrastructure and public realm.

## Effects of Policy CSD3: Rural and Tourism Development

- 2.24 Core Strategy Review Policy CSD3 sets out the types of development appropriate in the District's rural and coastal locations outside the District's settlement hierarchy and how land use change will be managed in these locations. The principles of the policy remain the same as Policy CSD3 in the adopted Core Strategy.

### Summary of the effects identified through the SA of the adopted Core Strategy (2013)

- 2.25 The SA of the adopted Shepway Core Strategy (2013) reported that Policy CSD3 would generate positive effects on biodiversity, the countryside and the historic environment, water quality, reducing flood risk, economic growth, employment, and the creation and maintenance of sustainable communities. A negative effect was identified in relation to 13 (Transport and Congestion) sustainable transport for this policy.

### Summary of the effects identified through the SA of the Core Strategy Review Submission Draft (February 2020)

- 2.26 It is expected that Core Strategy Review Policy CSD3 would have similar effects as those identified during the appraisal of the adopted Core Strategy Policy CSD3, although the effects will continue for longer over the Core Strategy Review's extended plan period. Significant positive effects are recorded against **SA objectives 2 (Employment)** and **14 (Access to Services and Facilities)** due to the particular contribution the policy makes to diversifying the District's economy and maintaining the vibrancy and facilities of rural areas.
- 2.27 Several minor positive effects are recorded in **Table 2.3** against SA objectives which would also benefit certain types of rural and tourism development/investment but which are unlikely to be delivered at significant scales through this policy alone, e.g. affordable housing outside the settlement hierarchy.
- 2.28 Mixed minor effects are recorded against SA objective 13 (Transport and Congestion) due to the likelihood of the policy encouraging the delivery of development scatter across the District in

remote locations, increasing road traffic and potentially congestion. This is particularly relevant to tourist, recreation and economic uses; however, the policy encourages sustainable rural transport improvements and that tourism development be located in settlements defined in the settlement hierarchy or on their edges and, as a last resort, rural centres and primary villages. Therefore, this adverse effect is recorded as mixed minor positive/minor negative effects in **Table 2.3**.

## Effects of Policy CSD4: Green Infrastructure of Natural Networks, Open Spaces and Recreation

- 2.29 Core Strategy Review Policy CSD4 covers the District's varied and extensive green and open spaces and sets out strategic requirements for their protection, connection and enhancement. The principles of the policy remain the same as Policy CSD4 in the adopted Core Strategy.

### Summary of the effects identified through the SA of the adopted Core Strategy (2013)

- 2.30 The SA of the adopted Shepway Core Strategy (2013) reported that Policy CSD4 would generate positive effects on biodiversity, the countryside and the historic environment, water quality, reducing flood risk, the creation and maintenance of sustainable communities, and health and well-being.

### Summary of the effects identified through the SA of the Core Strategy Review Submission Draft (February 2020)

- 2.31 It is expected that Core Strategy Review Policy CSD4 would have similar effects to those identified during the appraisal of the adopted Core Strategy Policy CSD4, although the effects will continue for longer over the Core Strategy Review's extended plan period. Significant positive effects are recorded against **SA objectives 3 (Landscape), 5 (Biodiversity) and 6 (Green Infrastructure)** due to the provisions this policy puts in place to protect and enhance the District's natural environment.
- 2.32 More minor positive effects are recorded against several objectives in **Table 2.3** against SA objectives which are likely to benefit indirectly of moderately from improvements to the natural environment, for example the ability of the district to adapt to the effects of climate change and the indirect benefits of green infrastructure for the health and well-being of the District's residents, workers and tourists.

## Effects of Policy CSD6: Central Folkestone Strategy

- 2.33 Core Strategy Review Policy CSD6 sets out a strategic vision for managing future growth within Central Folkestone to guide future phases of mixed-use development and associated infrastructure, services, and facilities in the area. The principles of the policy remain the same as Policy CSD6 in the adopted Core Strategy.

### Summary of the effects identified through the SA of the adopted Core Strategy (2013)

- 2.34 The SA of the adopted Shepway Core Strategy (2013) reported that Policy CSD6 would generate positive effects on the efficient use of previously developed land, economic growth, employment, housing, the creation and maintenance of sustainable communities, education, health and well-being, and sustainable transport.

### Summary of the effects identified through the SA of the Core Strategy Review Submission Draft (February 2020)

- 2.35 It is expected that Core Strategy Review Policy CSD6 would have similar effects as those identified during the appraisal of the adopted Core Strategy Policy CSD6, although the effects will continue for longer over the Core Strategy Review's extended plan period. Policy CSD6 generally



has positive effects in relation to the SA objectives. The delivery of a mix of commercial, cultural, entertainment and educational uses is acknowledged to have significant positive effects in relation to **SA objectives 2 (Employment)** and **14 (Services and Facilities)**.

- 2.36 Further significant positive effects have been identified in relation to **SA objectives 7 (Efficient Use of Land)** and **13 (Sustainable Transport)**. The policy's focus on the centre of Folkestone helps to minimise the loss of greenfield land and its natural resources. Folkestone represents one of the most well connected locations in the District, offering sustainable alternatives to the private car. Furthermore, the delivery of new investment in the centre as set out in the policy would further help to reduce the need to and increase the efficiency of travel for local residents and workers.
- 2.37 Folkestone is a historic place and its growth has the potential to affect its historic assets and character. However, the policy requires high-quality design that is expected to maintain and potentially enhance the existing character and townscape of the area. The policy does not allocate a specific scale or sites for growth but requires the historic Bayle and Leas Conservation Area in the centre of Folkestone to be a focus of preservation and enhancement, so no adverse effects are recorded against SA objectives 3 (Landscape/Townscape) and 4 (Historic Environment).
- 2.38 Associated indirect benefits are recognised for other SA objectives as minor positive effects in **Table 2.3** due to enhancements to the central Folkestone's physical environment/sense of security, in addition to potential housing delivery in central Folkestone.

## Effects of Policy CSD7: Hythe Strategy

- 2.39 Core Strategy Review Policy CSD7 sets out the strategic vision for managing future growth within Hythe to guide future phases of mixed-use development and associated infrastructure, services, and facilities in the area. The principles of the policy remain the same as Policy CSD7 in the adopted Core Strategy.

### Summary of the effects identified through the SA of the adopted Core Strategy (2013)

- 2.40 The SA of the adopted Shepway Core Strategy (2013) reported that Policy CSD7 would generate positive effects on the efficient use of previously developed land, economic growth, employment, housing, the creation and maintenance of sustainable communities, education, health and well-being, and sustainable transport.

### Summary of the effects identified through the SA of the Core Strategy Review Submission Draft (February 2020)

- 2.41 It is expected that Core Strategy Review Policy CSD7 would have similar effects as those identified during the appraisal of the adopted Core Strategy Policy CSD7, although the effects will continue for longer over the Core Strategy Review's extended plan period. Policy CSD7 generally has positive effects in relation to the SA objectives. Facilitating the delivery of investment in Hythe for residents, businesses and tourists is acknowledged to have significant positive effects in relation to **SA objectives 2 (Employment)** and **14 (Services and Facilities)**. The policy focusses on the need to attract additional employment to the town and associated investment in education, upskilling and training.
- 2.42 Further significant positive effects have been identified in relation to **SA objectives 7 (Efficient Use of Land)** and **13 (Sustainable Transport)**. The focus of the policy on Hythe's existing urban area helps to minimise the loss of greenfield land and its natural resources. The policy aims to deliver convenient, flexible and integrated public transport improvements, including better linking in the town centre and coastal bus routes to railway stations and growth locations. Furthermore, the delivery of the types of facilities and services encouraged in the policy would further help to reduce the need to travel for local residents and workers.
- 2.43 The close proximity of Hythe to the coastline presents the possibility of adverse effects against SA objectives 8 (Water quality) and 9 (Flood Risk); however, there is a requirement for investment in



strategic flood defences to protect residents and the Hythe Ranges, so adverse effects are not recorded against these objectives. Similarly, Hythe is a historic place and its growth has the potential to affect its historic assets. However, the policy does not allocate a specific scale or sites for growth but requires new development to respect the historic character of the town and the established grain of the settlement in line with the place-shaping principles, so no adverse effects are recorded against SA objectives 3 (Landscape/Townscape) and 4 (Historic Environment).

- 2.44 Associated indirect benefits are recognised for other SA objectives as minor positive effects in **Table 2.3** due to the high standards of residential and public realm provision being sought.

## Effects of Policy CSD8: New Romney Strategy

- 2.45 Core Strategy Review Policy CSD8 sets out the spatial strategy for future development within New Romney to guide future phases of mixed-use development and associated infrastructure, services, and facilities in the area. The principles of the policy remain the same as Policy CSD8 in the adopted Core Strategy.

### Summary of the effects identified through the SA of the adopted Core Strategy (2013)

- 2.46 The SA of the adopted Shepway Core Strategy (2013) reported that Policy CSD8 would generate positive effects on reducing flood risk, economic growth, employment, housing, the creation and maintenance of sustainable communities, reductions in inequality, social exclusion and deprivation, education, and health and well-being. Negative effects were identified in relation to biodiversity and the efficient use of previously developed land for this policy because the broad location at New Romney is located on greenfield land, but it is recognised that this location is well suited to supporting the regeneration of the town centre. This SA also highlighted some uncertainty related to the effects of growth in and around New Romney in combination with the potential expansion of Lydd Airport on road congestion. The SA Report noted that if the expansion of Lydd Airport was approved the subsequent generation of additional trips would need to be addressed. The expansion has now been approved, extending the runways and a new terminal building to allow passenger flights using aircraft the size of Boeing 737 or Airbus 319. While development has not commenced, when the expansion is complete, it will increase the amount of traffic on the roads connecting the airport to local and regional population centres, including London.

### Summary of the effects identified through the SA of the Core Strategy Review Submission Draft (February 2020)

- 2.47 It is expected that Core Strategy Review Policy CSD8 would have similar effects to those identified during the appraisal of the adopted Core Strategy Policy CSD8, although the effects will continue for longer over the Core Strategy Review's extended plan period. The delivery of 300 dwellings and the provision of employment land and associated contributions to local upskilling and training in combination with investment in the town's retail and tourist centre is acknowledged to have significant positive effects in relation to **SA objectives 1 (Housing), 2 (Employment) and 14 (Services and Facilities)**. A mixed significant positive but minor negative effect is recorded against **SA objective 13 (Sustainable Transport)** because pedestrian and cyclist linkages in the area will be improved, including to and from the areas allocated for development.
- 2.48 New Romney is a rural town and the policy also seeks to provide better vehicular linkages, including the potential future delivery of a 'link' road. In combination, the expansion of the airport and the growth and New Romney has the potential to generate adverse effects against SA objective 13 (Sustainable Transport). However, this effect is considered to be relatively minor given the fact that the vast majority of road traffic to and from the airport will bypass the village on the A259/B2075 to the west of New Romney. Both the A259/B2075 connect the airport to Ashford, including Ashford International Railway Station, the M20 and London beyond. Furthermore, Policy SS1 now states that should development proposals come forward for the further expansion of London Ashford Airport at Lydd, the Council will work with the airport, local

community, and other stakeholders to prepare and adopt an Area Action Plan for the site. If this were to occur, this Area Action Plan would be subject to Strategic Environmental Assessment (SEA).

- 2.49 A minor negative effect is recorded in relation to SA objective 7 (Efficient Use of Land) because residential development is proposed on a site to the north west of New Romney, which comprises greenfield land. However, it is Grade 4 agricultural land and is therefore not considered the best and most versatile agricultural land. Additionally, the site is not safeguarded for potential mineral extraction.
- 2.50 A minor negative effect has been recorded against SA objective 4 (Historic Environment) due to the allocated areas falling within close proximity to a number of known heritage assets and potential archaeological remains. Despite this, the policy requires new development to respect the historic character of the town and improve the setting of historic buildings, including minimising the impact of through traffic within the High Street. Archaeological constraints are required to be examined, with associated mitigation provided at an early stage. Therefore, any adverse effect is only considered to be minor if not negligible.
- 2.51 Minor mixed effects are recorded in relation to SA objectives 3 (Landscape/Townscape), 5 (Biodiversity) and 6 (Green Infrastructure). The negative effects acknowledge the area of greenfield land being lost and the effects this has on the rural character of the town and the potential for habitat fragmentation in close proximity to a SSSI. The positive effects acknowledge the policy's requirement for measures to provide visual and nature conservation enhancement for the benefit of the site and local community and the supporting text's emphasis on the importance of a landscape assessment so as to ensure the integration of the town's extension within the rural landscape of the Romney Marshes.
- 2.52 New Romney is located in an area of strategic coastal flood risk generating the potential for adverse effects against SA objectives 8 (Water Quality) and 9 (Flood Risk); however, the plan acknowledges that the broad location identified for growth within the policy is 'relatively free from tidal flood risks'. The policy requires flooding and surface water attenuation and drainage management measures informed by a Strategic Flood Risk Assessment (SFRA). On a related note, the supporting text to the policy states that Romney Marsh has a sensitive hydrology and high standards are set for water conservation, although these are not set out in the policy. Therefore, adverse effects are not recorded against these objectives.
- 2.53 Associated indirect benefits are recognised for other SA objectives as minor positive effects in **Table 2.3** associated with the policy's encouragement of good design and the need to contribute as relevant to the town's public realm.

## Cumulative and in-combination effects

- 2.54 The cumulative effects set out in paragraphs 8.94 to 8.111 in the December 2018 SA Report published alongside the Proposed Submission version of the Core Strategy Review dated January 2019 remain unchanged. This is because the effects identified for each individual policy appraised here have not materially changed from those identified in the full SA Report.

## Monitoring indicators

- 2.55 The proposed monitoring indicators for monitoring the effects of the Core Strategy Review in the December 2018 SA Report published alongside the Proposed Submission version of the Core Strategy Review dated January 2019 remain unchanged.

# Appendix 1

## SA Framework for the Folkestone & Hythe Core Strategy Review

| SA Objective Reference | SA Objective  | Appraisal questions: will the Plan/option lead to...?  | Relationship with the SEA Topics / District's Health and Well Being |
|------------------------|---|--|---|
| SA1                    | Improve the provision of homes, including affordable housing, having regard to the needs of all sections of society, including the elderly. | <p>Create strategic-scale developments that make significant contributions to local housing needs in the short, medium, and long term?</p> <p>Provision of a high-quality mix of housing developments suitable for the full range of ages and abilities in need of affordable accommodation?</p> <p>The provision of the range of types and tenure of housing as identified in the housing market assessment?</p>  | Population, Human Health and Material Assets                        |
| SA2                    | Support the creation of high quality and diverse employment opportunities.  | <p>An adequate supply of land, skills, and infrastructure (such as ICT and high speed broadband) to meet the requirements of sectors targeted for economic growth and diversification, including those set out in the District's Economic Strategy?</p> <p>New and improved education facilities which will support raising attainment and the development of skills, leading to a work ready population of school and college leavers?</p> <p>The promotion of the development of education services which retain young people through further and higher education in order to develop and diversify the skills needed to make Folkestone &amp; Hythe prosper?</p> <p>Improved access to jobs for local people from all sectors of the community that will lift standards of living?</p> <p>Enhanced vitality and vibrancy of town centres?</p> <p>Expansion or upgrading of key visitor attractions to support the visitor economy?</p> <p>Employment opportunities which address the economic consequences of the de-commissioning of Dungeness nuclear power station?<sup>4</sup></p> <p>Provision of high quality employment sites and associated infrastructure suitable for the likely continuation in a shift from manufacturing to higher skill, service industries?</p> | Population, Human Health and Material Assets                        |
| SA3                    | Conserve, and where relevant enhance, the quality, character and local distinctiveness of   | <p>Areas of the highest landscape sensitivity (i.e. Kent Downs AONB) being protected from adverse impacts on character and setting?</p> <p>Development which considers the existing character, form and pattern of the District's landscapes, buildings and settlements?</p>   | Landscape, Biodiversity, Flora and Fauna                            |

<sup>4</sup> Power generation at Dungeness 'A' finished in 2006; that at Dungeness 'B' is currently scheduled for 2018 but EDF has applied to extend this to 2028; employment levels at the site are typically maintained for several years after operation ceases to carry out de-commissioning.

| SA Objective Reference | SA Objective  | Appraisal questions: will the Plan/option lead to...?  | Relationship with the SEA Topics / District's Health and Well Being    |
|------------------------|---|--|--|
|                        | the landscape and townscape.  | The protection and enhancement of local distinctiveness and contribution to a sense of place?  |  |
| SA4                    | Conserve and enhance the fabric and setting of historic assets.                       | <p>Development that avoids negative effects on listed buildings, conservation areas, scheduled ancient monuments, registered historic parks and gardens, and registered battlefields and their settings?</p> <p>Provision of appropriately scaled, designed and landscaped developments that relate well to and enhance the historic character of the District and contribute positively to its distinctive sense of place?</p> <p>Promotes the enhancement of the District's archaeological resource and other aspects of heritage, such as, parks and open spaces, and areas with a particular historical or cultural association?</p> <p>Promotes access to as well as enjoyment and understanding of the local historic environment for people including the District's residents?</p> <p>Improves participation in local cultural activities?</p> <p>Helps to foster heritage-led regeneration and address heritage at risk?</p> <p>Improves existing and provides new leisure, recreational, or cultural activities related to the historic environment?</p> | Cultural Heritage, including architectural and archaeological heritage |
| SA5                    | Conserve and enhance biodiversity, taking into account the effects of climate change. | <p>Protect and where possible enhance internationally and nationally designated biodiversity sites and species?</p> <p>Avoidance of net loss, damage to, or fragmentation of locally designated and non-designated wildlife sites, habitats and species (including biodiverse brownfield sites)?</p> <p>Opportunities to enhance and increase the extent of habitats for protected species and priority species identified in the Kent BAP or the England Biodiversity Strategy 2020?</p> <p>Opportunities for people to come into contact with resilient wildlife places whilst encouraging respect for and raising awareness of the sensitivity of these sites?</p> <p>Development which includes the integration of ecological habitats and contributes to improvements in ecological connectivity and ecological resilience to current and future pressures, both in rural and urban areas?</p> <p>Maintenance and enhancement of the ecological networks in the District?</p>   | Biodiversity, Flora and Fauna  |

| SA Objective Reference | SA Objective   | Appraisal questions: will the Plan/option lead to...?  | Relationship with the SEA Topics / District's Health and Well Being |
|------------------------|--|--|---|
|                        |  | <p>N.B. Climate change is likely to impact upon habitats and thereby biodiversity. Plan policies which achieve the goals listed above should all help to enhance the ability of wildlife to adapt to a changing climate.</p>   |   |
| SA6                    | <p>Protect and enhance green infrastructure and ensure that it meets strategic needs.</p>  | <p>Provision, stewardship and maintenance of green infrastructure assets and networks (including green open space, river/canal corridors and the coastline), ensuring that this is linked into new and existing developments, to improve the connectivity of green spaces and green networks?</p> <p>N.B. The East Kent Green Infrastructure (GI) Working Group has identified an East Kent GI Typology which encompasses the following GI types:</p> <ul style="list-style-type: none"> <li>- Biodiversity e.g. Natura 2000 sites, SSSIs, LNRs, Local Wildlife Sites.</li> <li>- Civic Amenity e.g. parks, allotments, cemeteries.</li> <li>- Linear features e.g. the Royal Military Canal, railway corridors.</li> </ul> <p>The full list of GI components of this typology is available from the District's GI Report, 2011.</p> | <p>Landscape, Biodiversity, Flora and Fauna</p>                     |
| SA7                    | <p>Use land efficiently and safeguard soils, geology and economic mineral reserves.</p>  | <p>Development that avoids high quality agricultural land?</p> <p>Remediation of contaminated sites?</p> <p>Re-use and re-development of brownfield sites?</p> <p>Efficient use of recycled/ secondary materials?</p> <p>Protection of mineral resources and infrastructure?</p> <p>Development that protects sites valued for their geological characteristics?</p> <p>Development that avoids sterilising local mineral reserves and can be accommodated by existing or planned local mineral reserves?</p>  | <p>Soil, Climatic Factors and Landscape</p>                         |
| SA8                    | <p>Maintain and improve the quality of groundwater, surface waters and coastal waters and the hydromorphological (physical) quality of</p> | <p>Development that will not lead to the deterioration of groundwater, surface water, river or coastal water quality, i.e. their Water Framework Directive status?</p> <p>Development where adequate foul drainage, sewage treatment facilities and surface water drainage are, or can be made, available?</p>   | <p>Water, Biodiversity, Fauna and Flora</p>                         |

| SA Objective Reference | SA Objective   | Appraisal questions: will the Plan/option lead to...?   | Relationship with the SEA Topics / District's Health and Well Being |
|------------------------|--|---|---|
|                        | rivers and coastal waters.   | Development which incorporates SuDS (including their long-term maintenance) to reduce the risk of combined sewer overflows and to trap and break down pollutants?   |   |
| SA9                    | Reduce the risk of flooding, taking into account the effects of climate change.                              | <p>Avoid development in locations at risk from flooding or that could increase the risk of flooding elsewhere having regard to the District's Strategic Flood Risk Assessment, taking into account the impacts of climate change?</p> <p>Create development which incorporates SuDS (including their long-term maintenance) to reduce the rate of run-off and reduce the risk of surface water flooding and combined sewer overflows?</p> | Water, Soil, Climatic Factors and Human Health                      |
| SA10                   | Increase energy efficiency in the built environment and the proportion of energy use from renewable sources. | <p>Create strategic-scale developments that make significant and lasting contributions to the UK's national carbon target of reducing emissions by at least 80% from 1990 levels by 2050?</p> <p>Create connected energy networks that provide local low carbon and renewable electricity and heat?</p>   | Air, Climatic Factors, and Human Health                             |
| SA11                   | Use water resources efficiently.   | <p>Development where adequate water supply is, or can be made, available?</p> <p>Water efficient design and reduction in water consumption (e.g. rainwater recycling/grey water reuse and BREEAM)?</p>  | Water and Climatic Factors  |
| SA12                   | To reduce waste generation and disposal, and achieve the sustainable management of waste.                    | <p>Will it promote sustainable waste management practices through a range of waste management facilities?</p> <p>Will it reduce hazardous waste?</p> <p>Will it increase waste recovery and recycling?</p> <p>Will it protect existing waste facilities and infrastructure or support the delivery of new facilities or infrastructure?</p>   | Soil, Climatic Factors and Material Assets                          |
| SA13                   | Reduce the need to travel, increase opportunities to choose sustainable                                      | A complementary mix of land uses within compact communities that minimises the length of journeys to services and facilities and employment opportunities, increases  | Air, Climatic Factors, Population and Human Health                  |

| SA Objective Reference | SA Objective  | Appraisal questions: will the Plan/option lead to...?  | Relationship with the SEA Topics / District's Health and Well Being |
|------------------------|---|--|---|
|                        | transport modes and avoid development that will result in significant traffic congestion and poor air quality.  | <p>the proportion of journeys made on foot or by cycle, and are of a sufficient density to support and enhance local services and public transport provision?</p> <p>Development in locations well served by public transport, cycle paths and walking routes?</p> <p>Development of new and improved sustainable transport networks, including cycle and walking routes, to encourage active travel and improve connectivity to local service centres, transport hubs, employment areas and open/green spaces?</p>  |   |
| SA14                   | Promote community vibrancy and social cohesion; provide opportunities to access services, facilities and environmental assets for all ages and abilities and avoid creating inequalities of opportunity for access. | <p>Create well-designed developments that contain compact communities with a sufficient critical mass or density to support local services and public transport provision?</p> <p>Create new opportunities to improve educational attainment, qualification levels and participation in education and training through access to existing or the provision of new educational infrastructure?</p> <p>Provision of new or enhancement of existing leisure facilities for young people, where thresholds/standards require these?</p> <p>Create opportunities to lead healthier lifestyles, including development that enhances existing and /or makes provision for and maintenance towards open spaces, sports and recreational facilities e.g. publicly available pitches, allotments, swimming pools, courts, etc.?</p> <p>Provision of new or enhanced local health services to support new and growing communities?</p> <p>Improvements to strategic public transport infrastructure?</p> <p>Reintegration of physically divided or highly linear villages or neighbourhoods through, for example, provision of central social infrastructure?</p> <p>Provision for the specific needs of disabled and older people?</p> | Population, Human Health and Material Assets                        |
| SA15                   | Reduce crime and the fear of crime.   | Reduced levels of crime, anti-social behaviour and the fear of crime through high quality design and intervention, i.e. street layout, public space provision, passive surveillance, lighting etc.?  | Population and Human Health   |



**Matter 1: Procedural / Legal Requirements**

**Appendix 2: Table of SA comments and the Council's responses**

## Matter 1: Procedural / Legal Requirements

**Table A1.1: Regulation 19 consultation comments received in relation to the SA for the Proposed Submission Folkestone & Hythe Core Strategy Local Plan Review (December 2018)**

| Consultee                        | Consultation comments – summarised where appropriate   | Response and any action taken to address consultation comment in the updated SA Report |
|----------------------------------|--|--|
| <b>Natural England</b>           | <p><b>1. Introduction</b></p> <p>Following our previous advice to the Reg 18 consultation, the CSR now contains strengthened policy wording for the garden settlement policies, in particular to mitigate impacts on views from the AONB. In light of this, Natural England concurs with the conclusions drawn in the SA.</p>  | <p>Support noted.</p>  |
| <b>Bilsington Parish Council</b> | <p><b>4. Baseline information</b></p> <p>The appraisal states "the review offers an opportunity to tailor policies that would address private vehicle use within the District, and encourage the use of more sustainable modes of transport in specific areas".</p> <p>Policy SS5 only calls for travel plans for trip generating uses it fails to address the fact that paragraph 4.123 quotes the aim of delivering 8,000 dwellings. This increase will generate additional traffic movements which need the infrastructure to support it.</p> <p>Policy SS5 needs to be strengthened to ensure that the transport infrastructure is in place before development commences. Otherwise there will be a significant increase in private car movement which is unlikely to decrease when alternative transport becomes available.</p> | <p>Noted.</p>  |

## Matter 1: Procedural / Legal Requirements

| Consultee   | Consultation comments – summarised where appropriate   | Response and any action taken to address consultation comment in the updated SA Report   |
|---|--|--|
| <p><b>Aldington &amp; Bonnington Parish Council</b></p> | <p><b>1. Introduction, Paragraph 1.13</b></p> <p>Whilst the sustainability Appraisal has been undertaken in accordance with the National Planning Policy Framework there is no evidence included to suggest that there has been compliance with a Duty to Co-operate. Throughout the document, reference is made only (but multiple times) to even the smallest neighbouring villages and towns within the Folkestone and Hythe District, whilst, in contrast, there is not a single mention of the immediately neighbouring parish of Aldington, which, while located within the Parliamentary constituency of Folkestone &amp; Hythe, for administrative purposes is located within the neighbouring Borough of Ashford. Similarly, the other two Ashford Borough parishes that border Folkestone &amp; Hythe District are not mentioned in the Sustainability Appraisal.</p> <p>A full appraisal needs to be carried out on the effects of the core strategy on all the parishes adjoining the District, including those in the neighbouring administrative area, as they too are enduring growth and they too will be impacted by the proposed developments in Sellindge and at the new garden town.</p> | <p>The SA of the CSR has considered effects on neighbouring plan areas throughout the appraisal of CSR policies and site allocations and their reasonable alternatives and consideration of the cumulative effects of the Plan.</p> <p>Chapter 8 considers the effects of the Proposed Submission Core Strategy Review in combination with the other policies within the Core Strategy in 2013, the District Council’s Proposed Submission Places and Policies Local Plan (PPLP) and finally the wider regional cumulative effects of delivering the growth set out in the Core Strategy Review and Proposed Submission PPLP in combination with the planned growth in the neighbouring authorities of Ashford Borough, Canterbury City, Dover District and Rother District. This assessment acknowledges the potential for significant negative effects against the following SA objectives in the SA framework: 2 (employment), 3 (Landscape), 5 (Biodiversity), 7 (Efficient Use of Land), 9 (Flood Risk) and 14 (Community Cohesion, Services and Facilities), and significant positive effects against SA objectives 2 (Employment), 14 (Community Cohesion, Services and Facilities) and 13 (Sustainable Transport).</p> |
|   | <p><b>1. Introduction, Paragraph 1.12</b></p> <p>The growth options used to inform the Core Strategy Review are flawed in that the high level options tested, whilst relevant, are based on assumptions that are open to interpretation and not necessarily reliable. In terms of the major developments proposed for Sellindge and the new Garden Town the commuting patterns and travel to work areas have not been adequately publicised to enable a true aspect to be seen.</p> <p>Neither of these major developments show large-scale employment opportunities, it could be assumed that at Sellindge a development of 600 dwellings could lead to employment needs for at least 1,200 and the Garden Town of 6,375 dwellings an employment need of upwards of 12,750. This will result in commuting patterns outside of the development and potentially outside of the area.</p>  |  |

## Matter 1: Procedural / Legal Requirements

| Consultee | Consultation comments – summarised where appropriate   | Response and any action taken to address consultation comment in the updated SA Report   |
|-----------|--|--|
|           | <p>The increased commuting patterns will lead to traffic congestion and other transport infrastructure issues, not just on main roads but also on rural roads, including those in neighbouring parishes within Ashford Borough.</p> <p>There is no evidence of the duty to cooperate with neighbouring authorities having been effectively applied.</p> <p>To be fully effective, the Sustainability Appraisal should be more detailed in terms of numbers so as to highlight potential conflicts with other policies and show collaboration with adjoining local planning authorities who are also under pressure to deliver new homes.</p>   | <p>Moreover, the SA has been consulted on at each stage of its development, including statutory consultees and neighbouring planning authorities and organisations.</p>  |
|           | <p><b>4. Baseline Information, Paragraph 4.137</b></p> <p>The commentary of this paragraph on deprivation and social inclusion is inappropriate in that the area of the North Downs where the majority of the development for Folkestone and Hythe District is planned is currently an area of low deprivation. Given the large number of residents likely to be moving into this area, no evidence is provided to suggest that a similar or larger number of jobs is likely to be created for them, particularly within the North Downs area itself.</p> <p>With the strategy as prepared, the levels of deprivation could potentially increase as the number of potential workers moving into the area and the neighbouring planning authority is far in excess of any likely increases in the employment market.</p> <p>Greater emphasis needs to be placed on the provision of employment in the locality rather than reliance upon commuting, which places additional burdens on the road infrastructure and the already stretched public transport services. No clear evidence has been provided within the Core Strategy to show that the provision of a high-speed service from Westenhanger can become a reality.</p> | <p>The baseline information relating to deprivation and social inclusion was collected from the 2015 English Index of Multiple Deprivation.</p> <p>According to Paragraph 4.131 (fifth bullet point), the majority of least deprived SOAs in Folkestone &amp; Hythe are located in the north of the District, in the vicinity of the M20 motorway, the Kent Downs and on the outskirts of Folkestone/Hythe.</p> <p>The Proposed Submission Core Strategy Review states a significant number of jobs will be created within the garden town, which will provide employment opportunities for nearby towns and the wider area. Policy SS2 states that the CSR will deliver approximately 20 ha industrial warehousing and office space and 35,000 sqm of retail space. Policy SS6 states that the new garden settlement must aspire to</p> |

## Matter 1: Procedural / Legal Requirements

| Consultee | Consultation comments – summarised where appropriate  | Response and any action taken to address consultation comment in the updated SA Report  |
|-----------|---|---|
|           | <p><b>5. Sustainability Appraisal Framework, Table 5.1 SA Objective 13</b></p> <p>The SA 13 objective to “reduce the need to travel, increase opportunities to choose sustainable transport modes and avoid development that will result in significant traffic congestion and poor air quality” has only partly been considered, especially in respect of the proposals for Sellindge and Otterpool Park Garden Town, both of which border onto Aldington. With regard to the traffic-modelling exercise, there is no mention of the A20 exit from Sellindge towards Ashford, the neighbouring borough. All statistics have been calculated on the assumption that all traffic will head towards Folkestone to join the M20 when heading towards Ashford. This is disingenuous: Ashford-bound traffic will likely flow west along the A20; and London-bound traffic, likewise west to J10/10A of the M20, rather than going east to J11. Local residents all know of the significant delays that already occur at J10, which are supposedly being reduced with the construction of J10A; this has taken years from initial planning to construction, and it is as yet unknown as to whether it will have the desired effect.</p> <p>When bus travel is mentioned, again this is focused in the opposite direction, away from Ashford. The Core Strategy and its associated Appraisals are written as though the District’s western border is at the edge of the world, and not adjoining several rural villages which happen to be located in another administrative district.</p> <p>In summary, the Sustainability Appraisal is unsound as it has been completely blind to parishes in the neighbouring borough of Ashford and the growth options considered appear only to relate to the Folkestone and Hythe District. To support this contention: Sellindge is referenced in the document 520 times; Lympne 140 times; while the parish of Aldington, which adjoins both, is not mentioned once.</p> <p>A full appraisal needs to be carried out on the effects of the core strategy on all the parishes adjoining the District, including those in the neighbouring administrative</p> | <p>deliver at least 1 job per dwelling, resulting in the creation of a minimum of 6,375 new jobs in the new garden settlement.</p> <p>The SA of the CSR has considered effects on neighbouring plan areas throughout the appraisal of CSR policies and site allocations and their reasonable alternatives and consideration of the cumulative effects of the Plan.</p> <p>Chapter 8 considers the effects of the Proposed Submission Core Strategy Review in combination with the other policies within the Core Strategy in 2013, the District Council’s Proposed Submission Places and Policies Local Plan (PPLP) and finally the wider regional cumulative effects of delivering the growth set out in the Core Strategy Review and Proposed Submission PPLP in combination with the planned growth in the neighbouring authorities of Ashford Borough, Canterbury City, Dover District and Rother District. This assessment acknowledges the potential for significant negative effects against the following SA objectives in the SA framework: 2 (employment), 3 (Landscape), 5 (Biodiversity), 7 (Efficient Use of Land), 9 (Flood Risk) and 14 (Community Cohesion, Services and Facilities), and significant positive effects against SA objectives 2 (Employment), 14</p> |

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|                                | <p>area, as they too are enduring growth and they too will be impacted by the proposed developments in Sellindge and at the new garden town.</p>  | <p>(Community Cohesion, Services and Facilities) and 13 (Sustainable Transport).<br/><br/>Furthermore, the SA has been consulted on at each stage of its development, including statutory consultees and neighbouring planning authorities and organisations.</p> |
| <p><b>Highways England</b></p> | <p><b>6. Appraisal of High Level Growth Options</b></p> <p>The accompanying Sustainability Appraisal (SA) of the Review of the Core Strategy sets out the context and framework for the SA of the Core Strategy Review and reports the appraisal findings of growth options tested to inform the preferred Core Strategy Review policies, as well as the appraisal findings of the policies in the Proposed Submission Core Strategy Review.</p> <p>We have reviewed the Sustainability Appraisal (SA) and have the following comments. Our comments are related only to issues that we consider will affect the SRN.</p> <ul style="list-style-type: none"> <li>• The SA Review of the Core Strategy uses a framework of 15 SA objectives; of these, SA13 is most relevant to Highways England’s interests. The SA13 objective is <i>“Reduce the need to travel, increase opportunities to choose sustainable transport modes and avoid development that will result in significant traffic congestion and poor air quality”</i>.</li> <li>• SA2 is also relevant to our interests due to the way locations have been considered against it. SA2 is <i>“Support the creation of high quality and diverse employment opportunities”</i>. As detailed below, this has some implications for the SRN in the way it has been applied.</li> </ul> | <p>Noted.</p> <p>The SA Framework was developed and consulted on at the scoping stage in December 2016 and subsequently during consultation on the draft and proposed submission CSR and associated SA Reports.</p>   |

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|           | <ul style="list-style-type: none"> <li>• The findings against these SA objectives are summarised for six “character areas”:               <ul style="list-style-type: none"> <li>○ Character area 1: Kent Downs.</li> <li>○ Character area 2: Folkestone and Surrounding Area.</li> <li>○ Character area 3: Hythe and Surrounding Area.</li> <li>○ Character area 4: Sellindge and Surrounding Area (which is further divided into four sub-areas).</li> <li>○ Character area 5: Romney Marsh and Walland Marsh.</li> <li>○ Character area 6: Lydd, New Romney and Dungeness</li> </ul> </li> <li>• The character area findings for the SA objectives are given in Section 6. These are limited in detail at this stage, but appear to have a reasonable overall approach. However, a few areas for improvement are noted:               <ul style="list-style-type: none"> <li>○ Paragraph 6.48, regarding SA2, suggests that access to existing strategic road infrastructure is expected to have a positive effect on this objective (the creation of high quality and diverse employment opportunities). While it is accepted that SRN access can reduce congestion on lower-order roads which are less able to accommodate heavy traffic, Highways England aims to encourage development in locations that are or can be made sustainable, that allow for uptake of sustainable transport modes and support wider social and health objectives. As such, while limiting congestion is important, this should not be achieved in a way that could potentially encourage an increase in overall car use, even if the road network could accommodate such traffic in that location.</li> <li>○ Similarly, Paragraphs 6.65 and 6.66, regarding SA13, attribute a similarly positive effect to proximity to the SRN (notwithstanding that these paragraphs also attribute a positive effect to access to sustainable modes also, which is welcomed).</li> </ul> </li> </ul> |  |

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|                             | <ul style="list-style-type: none"> <li>○ These comments also apply to the SA scoring of locations in Appendices 3 and 4.</li> </ul>   |  |
| <b>Kent Downs AONB Unit</b> | <p><b>6. Appraisal of High Level Growth Options, Table 6.2 and Paragraph 6.37</b></p> <p>The Kent Downs AONB Unit disagrees with many of the scores assigned in relation to the North Downs Character Area, and it is considered that the impacts of strategic scale development on SA Objective 3b, Landscape is significantly underestimated in respect of potential impacts on the Kent Downs AONB.</p> <p>Table 6.2 – The Kent Downs AONB Unit disagrees with the SA Score for Area B of Character Area in respect of SA Objective 3: landscape, where proximity to and visibility from the AONB means that much of this sub area would be highly visible from the nationally protected landscape of the Kent Downs AONB.</p> <p>6.37 – We would contend that the majority of Area B forms the setting for the AONB, rather than ‘some’ of Area B as stated. It forms the setting not just because it borders the AONB (as stated), but because of the inter visibility between this area and the AONB, principally from the escarpment of the Kent Downs to the north. We also query the contention that ‘portions of Area B have been identified as capable of accommodating strategic development without the need for extensive landscape mitigation’. The AONB Unit does not consider that this is the case, with the majority of area B being visible from large swathes of the AONB. It is considered an LVIA is required at this stage to justify such a contention. In view of this we consider a significant negative effects would be more appropriate than the minor negative effect that has been assigned to Area B.</p> <p><b>7. Appraisal of Special Options at Otterpool &amp; Sellindge, Table 7.1 and Paragraph 7.20</b></p> <p>The AONB Unit disagrees with findings for Otterpool A site in respect of SA3 and consider both sites A and B would have significant negative effects, in view of the visibility of the site from the highly sensitive Kent Downs landscape. The topography of the site means that the higher parts of the slope at the western end</p> | <p>The effects recorded against SA objective 3 during the appraisal of the six Character Areas and associated Character Area 4 sub areas (see Appendix 2) drew on the findings of the District’s High Level Landscape Appraisal (2017).</p> <p>The subsequent appraisal of the draft policies set out in the Draft Core Strategy Review (March 2018), including Policy SS6, drew on the same evidence acknowledging that <i>“the development of the new settlement would occur on mostly undeveloped greenfield land and as such would have an adverse impact on the openness and rural character of the countryside”</i>.</p> <p>In response to concerns raised by the Kent Downs AONB Unit and Natural England at the Regulation 18 consultation stage in March 2018 regarding landscape, additional text was added to policies within the Proposed Submission version of the Core Strategy Review. Policy SS6 now requires that the new garden town’s distinctive townscape and outstanding accessible landscape must be informed by the historic character of the area, respond to its setting within the Kent Downs AONB landscape and mitigate impact in views from the scarp of</p> |



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|           | <p>of the site, immediately north of Aldington Road would be particularly visible in views from the north.</p> <p><b>8. Appraisal of Proposed Submission Core Strategy Review, Tables 8.2 and 8.3</b></p> <p>Table 8.2 – We disagree with the mixed minor effects assigned to SA Objective SA3 in respect of policies SS1, SS2, SS3 and SS4. Allocating strategic large scale development on land in the setting of the Kent Downs AONB is likely to result in significant detrimental effects on the landscape. It is acknowledged that the policy would have some benefits in restricting development in other sensitive areas, but a significant impact on the landscape would nevertheless occur.</p> <p>Table 8.3 – We disagree with the ‘mixed minor effects’ assigned in respect of SA3 for policies SS6, SS7, SS8 and SS9. Large areas of the strategic allocation are visible from the AONB without any landscape mitigation, but notwithstanding this, we do not consider a development of the scale and density proposed is capable of being satisfactorily mitigated in views from the AONB.</p> | <p>the Kent Downs. Similar text was added to policies SS7, SS9 and CSD9 (Sellindge).</p> <p>The effects recorded against SA objective 3 during the appraisal of Area B drew on findings of the District’s Growth Options Study Phase Two Report (2017) and High Level Landscape Appraisal (2017). In the appraisal matrix for Area B in Character Area 4, we state that Area B is bordered by the Kent Downs AONB. In line with the SA Framework, Area B scores a minor negative effect.</p> <p>The Growth Options Study Phase Two Report (2017) states that land within Area B located west of Barrowhill, between Barrowhill and Westenhanger on the site of the former racecourse, would be suitable strategic development without need for extensive mitigation.</p> <p>As stated in Paragraph 6.21, the effects against SA objective 3 are expected to be more significant where development would take place within or in close proximity to the AONB, including areas which make up its setting as well as in areas which have been identified as having high sensitivity in terms of landscape character in Folkestone &amp; Hythe’s High Level Landscape Appraisal (2017). According to the High Level Landscape Appraisal, the Landscape Character Area in which Area B falls is</p> |

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|  |   | described as having medium landscape sensitivity.  |
| <b>Kent County Council – Growth, Environment and Transport</b> | <b>Appendix 2</b><br>Reference to the Energy White Paper: Our Energy Future (2003) echoes the policy to reduce carbon emissions by 60% by 2050. It should be noted that this policy is slightly outdated, and the current policy is to reduce carbon emissions by 80% by 2050. This target is being reviewed in light of current understanding and may lead to a zero carbon target by 2050.          | Noted.   |
| <b>Sellindge Parish Council</b>                                | <b>Appendix 4</b><br>Sellindge B should not be considered until well after 2050.<br>Sellindge C is totally unacceptable as it includes the nature reserve provided by site B in policy CSD9 plus blatant backfilling to Swan Lane.<br>Sellindge D is also totally unacceptable due to the same reason for Sellindge C plus it will introduce a built environment to the east boundary to the village. | Sellindge site allocation options C and D both scored a significant negative effect against SA objective 5: biodiversity, due to the fact it contains areas of BAP priority habitat and falls within 40m of Gibbin’s Brook SSSI.<br>The appraisal of CSD9 acknowledges that the development on land to the south and east of the exiting village will be located on greenfield land, resulting in the potential for habitat loss and fragmentation.<br>Furthermore, development to the east of the village is located within 450m of Gibbins |

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|           |  | <p>Brook SSSI, generating the potential for increased recreational pressures on the SSSI. However the SA also acknowledges that the supporting text of the policy requires that impacts on the SSSI should be minimised and funding provided for its enhancement and protection. Furthermore, the policy requires that the growth be incorporated within and bordered by appropriate landscape, including a new village green/common, substantial woodland planting at the rural edges of the village, all of which have the potential to deliver new habitats for priority nature conservation species. Overall, a mixed effect (minor positive/minor negative) is therefore expected on this SA objective.</p> |

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**Table A1.2: Regulation 19 consultation comments received in relation to the HRA for the Proposed Submission Folkestone & Hythe Core Strategy Local Plan Review (December 2018)**

| Consultee                     | Consultation comments – summarised where appropriate  | Response and any action taken to address consultation comment in the updated SA Report   |
|-------------------------------|---|--|
| <p><b>Natural England</b></p> | <p>As a minor note upfront, the HRA makes reference to the Conservation of Habitats and Species Regulations 2010 (para 2.6), which should be updated to the Conservation of Habitats and Species Regulations 2017 (as amended).</p> <p>We also note the HRA is based on the housing level which includes the garden settlement allocation of 6,375 homes, for the Local Plan period up to 2036/7, and that this has risen from 5,500 in the Reg 18 consultation. The envisaged ultimate quota for the allocation beyond the plan period is still 10,000 homes, which will need to be assessed and subject to the subsequent Local Plan reviews and associated HRAs, which should be noted in this current CSR.</p> <p>The CSR and HRA should also emphasise that any forthcoming application for the garden settlement will need to provide supporting information for a project-level HRA.</p> <p>In our previous Reg. 18 advice, we noted that whilst the CSR HRA has clearly included the emerging PPLP for in-combination assessment in terms of air quality, this is less clear for the other impact pathways, principally recreation pressure, on European sites. Whilst the PPLP HRA concluded no adverse effect on integrity for European sites (reiterated in para 1.12 of the CSR HRA), including recreation pressure, with which Natural England concurred, we advise the CSR HRA should make clear the PPLP has been assessed in combination for all impact pathways.</p> | <p>The latest Conservation of Habitats and Species Regulations 2017 have been review and are noted. In addition, the HRA of Main Modifications to the CSR will make it clear that the assessment of in-combination effects included consideration of all potential effects on European Sites. If no Main Modifications to the CSR are identified then a HRA clarification note will be published to confirm all forms of in-combination effects were considered during the HRA of the Proposed Submission CSR.</p> |

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|  | <p>We note the updated HRA now takes account of the recent People over Wind judgment where avoidance and mitigation measures cannot be taken into consideration at the screening stage for likely significant effect.</p> <p>In light of this, we concur with the European sites (including Ramsar sites) identified which may be affected by the CSR, and the screening assumptions as displayed in Table 2.2.</p> <p>Natural England concurs with the findings of the HRA of no likely significant effect in relation to air quality and recreational impact on the following European sites:</p> <ul style="list-style-type: none"><li>• Blean Complex SAC</li><li>• Dover to Kingsdown Cliffs SAC</li><li>• Lydden and Temple Ewell Downs SAC</li><li>• Parkgate Down SAC</li><li>• Wye and Crundale Downs SAC</li></ul> <p><b>Dungeness protected sites – recreational pressure</b></p> <p>With regard to recreational pressure, the evidence base for the Sustainable Access and Recreation Management Strategy (SARMS), namely the 2014-15 visitor surveys which have come to light since the adoption of the 2013 Core Strategy, demonstrate the majority of the potential recreational pressure, and increase in pressure, would be from visitors through tourism. The bulk of visitors come from far beyond the Folkestone &amp; Hythe District (approximately 75% of visitors come from up to 87km away).</p> <p>Natural England envisages the SARMS will enable a series of precautionary measures to be implemented across the protected sites, particularly through stakeholder partnership. However we consider the appropriate means for funding for the SARMS are still to be discussed and agreed. At this stage we would not advocate developer contributions from local proposals in the district, based on the evidence. We advise that the council, as well as Rother District Council, should address the funding needs through their respective tourism growth plans.</p> <p>Natural England is due to meet with the Council to discuss the emerging SARMS in more detail, of which its governance and funding will form a key part.</p> | Support noted. |
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With regard to the garden settlement, given its distance away from the Dungeness protected sites, and that it will provide considerable onsite greenspace provision, we do not consider this allocation will have a likely significant effect on the Dungeness sites through recreational pressure.

Ultimately, we advise the SARMS should not be considered as specific avoidance mitigation for local development coming forward, but that it provides useful policy context against which the CSR can be assessed. We consider the CSR, alone and in-combination with other plans and projects, can be screened out from having a likely significant effect through recreational pressure on the Dungeness protected sites at this stage, and does not need to be taken forward to Appropriate Assessment.

We advise the HRA should be updated to reflect this.

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| Consultee | Consultation comments – summarised where appropriate  | Response and any action taken to address consultation comment in the updated SA Report |
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|           | <p><b>Folkestone to Etchinghill Escarpment SAC – air quality and recreational pressure</b></p> <p>Natural England’s advice has not significantly changed since our previous response to the Reg 18 consultation. That is, we concur with the conclusion made of no adverse effect on integrity on the Folkestone to Etchinghill Escarpment SAC for the CSR alone and in-combination, in terms of air quality.</p> <p>As a precautionary measure however, given this site’s proximity to key traffic routes and its vulnerability to air pollution, we support the commitment by the Council to undertake monitoring of air quality along the A20 in proximity to the SAC, to review the situation and enable changes to onsite management where necessary, in conjunction with ourselves.</p> <p>For recreation pressure, given the garden settlement will provide substantial onsite greenspace and open access, Natural England concurs that the CSR, alone and in-combination, will not have an adverse effect on integrity on this site.</p> <p><b>Dungeness, Romney Marsh and Rye Bay Ramsar , Special Protection Area (SPA) and Dungeness SAC – air quality, physical damage/ loss, water quantity/ quality</b></p> <p>advised in our previous response to the Reg 18 consultation, we concur with the conclusion made of no adverse effect on integrity on the Dungeness sites for the CSR alone and incombination in terms of air quality, physical damage/ loss and water quantity/ quality.</p> | <p>Support noted.</p>  |

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**Table A1.3: Regulation 19 consultation comments received in relation to the Historic Environment Assessment for the Proposed Submission Folkestone & Hythe Core Strategy Local Plan Review (December 2018)**

| Consultee   | Consultation comments – summarised where appropriate  | Response and any action taken to address consultation comment in the updated SA Report   |
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| <p><b>Member of the general public (ref. 1202432)</b></p> | <p>I am concerned that the Roman Villa /Palace unearthed on what will be Otterpool Park is not damaged in any way, it should be preserved at all costs and made into a covered asset for people to visit. I am not against the development of Otterpool as housing will be needed over the years to come, but wilful destruction of a historic monument would be the last straw. Could you please give me your assurance that the Villa/Palace will be separate from the development.</p> | <p>Submission Draft Policies SS6, SS7, SS8 and SS9 associated with the allocation and development management of the new garden settlement require the development of a heritage strategy that identifies how the development will enhance local heritage assets and their setting designated and non-designated heritage assets and setting out how the long term, viable use of heritage assets will be established and where necessary providing mechanisms for their integration into the development. IN addition, the policies require the heritage strategy to include an archaeology strategy, with an initial archaeological assessment guiding archaeological works and to inform decisions about preservation in situ or investigation. The archaeology strategy should then be kept under active review. Furthermore, the supporting text to these policies acknowledges the valuable contribution the area's heritage assets, in particular Westenhanger Castle and its setting, together with other non-designated heritage assets, can make a significant contribution to the character of the new</p> |



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| Consultee | Consultation comments – summarised where appropriate | Response and any action taken to address consultation comment in the updated SA Report   |
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|           |  | settlement that can help attract future residents, businesses and visitors and create a strong sense of place from the outset. |

**Table A1.4: Regulation 19 consultation comments received in relation to the SA Appraisal Addendum (November 2019)**

| Consultee              | Consultation comments – summarised where appropriate   | Response and any action taken to address consultation comment in the updated SA Report  |
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| <b>Natural England</b> | <p><b>1.4 - 1.11</b></p> <p>Natural England concurs with the LPA’s conclusions of no change to the HRA and SA conclusions as a result of the increased housing requirement.</p>  | Support Noted   |
| <b>KCC</b>             | <p><b>Appendix 1 - SA2, SA6, SA10, SA13 and SA14</b></p> <p>SA2: The PRoW network is a valuable resource that provides significant opportunities as the ROWIP can help contribute towards a robust infrastructure that enables development and encourages economic growth leading to regeneration and attraction of new businesses. A high quality transport network, which enables the public to move around quickly and easily, is an essential requirement for economic growth and prosperity. The PRoW Network can support public transport and the wider highway network, by providing opportunities for recreation and commuting, especially short distance journeys.</p> <p>SA6: KCC requests a specific reference to the ROWIP here to enable access to high quality open green spaces and opportunities for outdoor recreation which should be a priority. The Core Strategy review should aim to increase the provision of accessible green spaces and improve opportunities to access this resource in relatively deprived areas. Good public transport and active travel links with open spaces should be made</p> | <p>Noted.</p> <p>The SA Framework was developed and consulted on at the scoping stage in December 2016 and subsequently during consultation on the draft and proposed submission CSR and associated SA Reports.</p> |

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| Consultee | Consultation comments – summarised where appropriate  | Response and any action taken to address consultation comment in the updated SA Report |
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|           | <p>available, so that the public are not dependent on private vehicle use for visiting these sites. The District Council should also be aware that the County Council is currently working in partnership with Natural England to establish the England Coast Path in this region. This is a new national trail walking route, expected to be completed by 2020, which will secure new access rights for the public to explore the coastline.</p> <p>SA10: This policy should ensure that new developments incorporate good sustainable transport connections, with a high-quality walking and cycling infrastructure available, which can link local amenities together. Replacing private vehicle journeys with active travel should help to address targets for lowering carbon emissions and improving air quality as well as improving public health.</p> <p>SA13: KCC requests a specific mention of the ROWIP, and a specific mention should be made of improving and enhancing the PRow network to enable high quality, safe and attractive walking and cycling connections from new developments to community facilities. An increased population will undoubtedly add to the pressure and importance of the PRow network. Policy should ensure that new developments incorporate good sustainable transport connections providing extensive opportunities of walking, cycling and equestrian activities with multiple benefits, from a health, economic and environmental perspective. The use of PRow contributes significantly towards reducing future health risks and providing an economic boost to the area. Walking and cycling, which are enabled by PRow, also offer opportunities for low carbon recreational activity and active travel.</p> <p>SA14: Policies designed to protect and improve access for all users to open spaces, sports facilities, educational and recreational facilities are welcomed. Improved connectivity should encourage recreational and leisure activity, including access to country parks and other facilities of high leisure use. KCC would again request specific mention of the PRow network as a means of achieving these policy objectives.</p> <p><i>Suggested Changes</i></p> |  |

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| Consultee | Consultation comments – summarised where appropriate  | Response and any action taken to address consultation comment in the updated SA Report   |
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|           | <p>A6: KCC requests a specific reference to the ROWIP here to enable access to high quality open green spaces and opportunities for outdoor recreation which should be a priority.</p> <p>SA13: KCC requests a specific mention of the ROWIP, and a specific mention should be made of improving and enhancing the PRow network to enable high quality, safe and attractive walking and cycling connections from new developments to community facilities.</p> <p>SA14: KCC would again request specific mention of the PRow network as a means of achieving these policy objectives.</p>   |  |
|           | <p><b>Appendix 2 - SA3 - SA15</b></p> <p>SA3 – SA15: KCC PRow and Access Service are part of the wider partnership guiding development in the new garden settlement, and specifically the development of a new access strategy for the development, which covers all the objectives here. KCC requests specific mention of this involvement, as the enhancement and improvement of the PRow network will only be of benefit to the new settlement and the wider surrounding area. This will be an access strategy that seeks to protect and enhance existing public rights of way and create new public rights of way balancing demands for public access with ecological and landscape protection.</p> <p><i>Suggested Changes</i></p> <p>SA3 – SA15: KCC requests specific mention of the KCC PRow and Access Service's involvement as part of the wider partnership guiding development in the new garden settlement, and specifically the development of a new access strategy for the development, which covers all the objectives here.</p> | <p>Noted.</p> <p>The SA Framework was developed and consulted on at the scoping stage in December 2016 and subsequently during consultation on the draft and proposed submission CSR and associated SA Reports.</p> <p>SA3 – SA15 each deal with a particular issue which the PRow would probably not influence (such as water efficiency). Only SA13 could be influenced by PRow.</p> |

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| Consultee                  | Consultation comments – summarised where appropriate  | Response and any action taken to address consultation comment in the updated SA Report  |
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| <p><b>CPRE Shepway</b></p> | <p><b>Review of Policies, Plans and Programmes – 1.12</b></p> <p>The NPPF at paragraph 149 requires plans to take a proactive approach to mitigation and adapting to climate change.</p> <p>On 12 June 2019 the Prime Minister announced that the UK will eradicate its net contribution to climate change by 2050. A statutory instrument was laid in Parliament which amended the net UK carbon account target from 80% to 100%<sup>1</sup>.</p> <p>The recent House of Commons Science and Technology Committee report<sup>2</sup> in its conclusions and recommendations encourages the Government “to develop and act on policies to ensure that the UK is on track to meet a 2050 net-zero emissions target” and that “it must seek to achieve this through, wherever possible, domestic emissions reduction.”<sup>3</sup> With regard to decarbonising transport the Committee state “The Government’s current long-term for decarbonising transport focus heavily on reducing exhaust emissions and increasing sales of low-emissions vehicles, rather than delivering a low-emissions transport system. In the long-term, <b>widespread personal vehicle ownership does not appear to be compatible with significant decarbonisation.</b> The Government should not aim to achieve emission reductions simply by replacing existing vehicles with lower-emission vehicles.” And continues “it must develop a strategy to stimulate a low-emissions transport system, with the metrics and targets to match. This should aim <b>to reduce the number of vehicles required</b>, for example by: promoting and improving public transport; reducing its cost relative to private transport; encouraging vehicle usership in place of ownership; and encouraging and <b>supporting increased levels of walking and cycling.</b>”<sup>4</sup>[CPRE Kent emphasis].</p> <p>This change will need to be taken into consideration.</p> <p><sup>1</sup> The Climate Change Act 2008 (2050 Target Amendment) Order 2019: <b>2.</b>—(1) Section 1 of the Climate Change Act 2008</p> <p><sup>2</sup> House of Commons Science and Technology Committee 20<sup>th</sup> Report – Clean Growth: Technologies for meeting the UK’s emissions reduction</p> | <p>Noted.</p> <p>The SA Framework was developed and consulted on at the scoping stage in December 2016 and subsequently during consultation on the draft and proposed submission CSR and associated SA Reports.</p> <p>The SA Framework sets out a number of objectives that consider issues with climate change (for example SA5. Conserve and enhance biodiversity, taking into account the effects of climate change).</p> <p>On the whole, the Garden Settlement policies score well against the SA Objectives.</p> |

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| Consultee | Consultation comments – summarised where appropriate  | Response and any action taken to address consultation comment in the updated SA Report  |
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|           | <p>targets. <a href="https://publications.parliament.uk/pa/cm201719/cmselect/cmsctech/1454/145402.htm">https://publications.parliament.uk/pa/cm201719/cmselect/cmsctech/1454/145402.htm</a></p> <p><a href="#">3</a> Ibid Conclusions and recommendations paragraph 3</p> <p><a href="#">4</a> Ibid Conclusions and recommendations paragraph 31</p> <p><i>Suggested Changes</i></p> <p>Demonstrate how development in the district, especially that at Otterpool Park for which design codes have not yet been drafted will contribute to the national 2050 target.</p>  |   |
|           | <p><b>Appendix 2 - SA matrices</b></p> <p>The only assessment is the Assessment of Policies SS6, SS7, SS8 and SS9: Guiding Development within a New Garden Settlement on pages 20 to26.</p> <p>Windfall sites will now provide 10.5% of all dwellings. Given that there is no knowing where they will be located what controls are proposed so that they will meet the SA Objectives, for example:</p> <ul style="list-style-type: none"> <li>• SA7 Use land efficiently and safeguard soils etc. Will all windfall sites achieve this?</li> <li>• SA13 Reduce the need to travel. Will windfall sites be located in sustainable locations supporting public transport and active travel; and be well located to local service centres etc.?</li> </ul> <p><i>Suggested Changes</i></p> <p>Consider the effect of windfall sites.</p> | <p>Paragraph 1.13 sets out why policies that had not changed enough to generate new significant effects since the SA of the adopted Core Strategy in 2013 had not been specifically tested. Only those that had changed significantly or where new were tested in the SA. All policies were tested for in-combination effects.</p> <p>Windfall sites will be permitted against the Policies in the CSR and the PPLP, which have been tested through the SA process.</p> |

**Table A1.4: Regulation 19 consultation comments received in relation to the HRA Appraisal Addendum (November 2019)**

## Matter 1: Procedural / Legal Requirements

| Consultee                     | Consultation comments – summarised where appropriate   | Response and any action taken to address consultation comment in the updated SA Report   |
|-------------------------------|--|--|
| <p><b>Natural England</b></p> | <p><b>Paragraphs 1.3 - 1.5</b></p> <p>Natural England concurs with the LPA’s conclusions of no change to the HRA and SA conclusions as a result of the increased housing requirement.</p>  | <p>Noted.</p>  |
| <p><b>CPRE Shepway</b></p>    | <p><b>Table 1.1</b></p> <p>Total of column 3 should be 13,160 to match Table 4.3 of the first submission draft.</p> <p><i>Suggested Change</i></p> <p>delete 12,845, substitute 13,160</p> <hr/> <p><b>1.8, 1.9 and 1.12</b></p> <p>It is not clear why only 7,700 new homes out of 13,515 are considered.</p> <p>The plan total provision has increased from 12,845 (or 13,160) homes to 13,515, we do not therefore understand how this can be said at paragraph 1.12:</p> <p>"Given that the proposed changes to the provision of housing in relation to SS6 <b>will not result in additional site allocations within the district ...</b>"</p> <p><i>Suggested Change</i></p> <p>The assessment needs to be re-done or the reasons for the apparent discrepancy in housing numbers needs to be explained within this document.</p> | <p>Agreed.</p> <p>Whilst the individual figures for the source for housing supply are correct, the overall figure should be 13,160.</p> <hr/> <p>The air quality impact of the housing numbers in the PPLP had already been modelled. The modelling for the CSR tested an additional 8,000 dwellings on top of the PPLP results. Therefore a figure greater than the total number of dwellings has been considered.</p> <p>Because the new figure of 7,700 additional homes fell below the modelled 8,000 it was concluded that the results were still relevant.</p> |