

Sustainability Appraisal of Places and Policies Local Plan

Appraisal of first draft 'Issues and Options' version

Draft Report Prepared by LUC November 2014 **Project Title**: SA of Places and Policies Local Plan

Client: Shepway District Council

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Table 2.1: SA Framework objectives and appraisal questions

1 Introduction

Introduction

- 1.1 The purpose of this report is to set out the findings of the Sustainability Appraisal (SA), incorporating the requirements of the Strategic Environmental Assessment (SEA) Directive and Regulations, of the first consultation draft of the emerging Shepway District Council Places and Policies Local Plan (hereafter referred to as the PPLP).
- 1.2 This SA Report follows on from an SA Scoping Report which was published for consultation in April 2014. It reproduces the information contained in the Scoping Report in relation to the relevant policy context, baseline information and the SA methodology and also responds to consultation comments received on the Scoping Report.
- 1.3 This SA Report is being made available for consultation in line with requirements of the SEA Directive and Regulations.
- 1.4 It should be recognised that the SA findings are not the only factors taken into account by Local Planning Authorities when determining which plan options to take forward. There will often be a number of positive and negative sustainability effects identified for each option and other factors such as public opinion, deliverability, and conformity with national policy that will also be taken into account by plan-makers when selecting preferred options for their plan.

Sustainability Appraisal and Strategic Environmental Assessment

- 1.5 An SA is a systematic process that must be carried out during the preparation of a Local Plan. Its role is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.
- This process is an opportunity to consider ways by which the plan can contribute to improvements in environmental, social and economic conditions, as well as a means of identifying and mitigating any potential adverse effects that the plan might otherwise have. By doing so, it can help make sure that the proposals in the plan are the most appropriate given the reasonable alternatives. It can be used to test the evidence underpinning the plan and help to demonstrate how the tests of soundness have been met. SA should be applied as an iterative process informing the development of the Local Plan.
- 1.7 Under the Planning and Compulsory Purchase Act 2004, SA is mandatory for Local Plans. For these documents it is also necessary to conduct an environmental assessment in accordance with the requirements of the SEA Directive (European Directive 2001/42/EC), and the SEA Regulations which transpose the SEA Directive into English law¹. Therefore, it is a legal requirement for the Places and Policies Local Plan to be subject to SA and SEA.
- 1.8 The requirements to carry out SA and SEA are distinct, although it is possible to satisfy both using a single appraisal process. Government guidance² provides information to assist users in complying with the requirements of the SEA Directive and Regulations through a single integrated SA process this is the process that is being undertaken for the PPLP. In addition, the guidance widens the approach of SEA to include social and economic as well as environmental issues. From

 $^{^{1}}$ The Environmental Assessment of Plans and Programmes Regulations 2004 (Statutory Instrument 2004 No. 1633)

² Contained within the National Planning Practice Guidance website (http://planningguidance.planningportal.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/sustainability-appraisal-requirements-for-local-plans/) and A Practical Guide to the Strategic Environmental Assessment Directive, ODPM September 2005.

here on, the term 'SA' should therefore be taken to mean 'SA incorporating the requirements of the SEA Directive and SEA Regulations'.

Meeting the requirements of the SEA Directive

1.9 This SA Report includes some of the required elements of the final 'Environmental Report' (the output required by the SEA Directive). Table 1.1 signposts the relevant sections of the SA Report that are considered to meet the SEA Directive requirements (the remainder will be met during subsequent stages of the SA). This table will be included in the SA Report at each stage of the SA process to show how the SEA Directive requirements have been met.

Table 1.1: Meeting the Requirements of the SEA Directive

SEA Directive Requirements	Covered in this SA Report?
Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated. The information to be given is (Art. 5 and Annex I):	The SA Reports produced to accompany consultation on the Proposed Submission Places and Policies Local Plan version will constitute the final 'environmental report'.
 a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes; 	Chapter 3.
 The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme; 	Chapter 4.
c) The environmental characteristics of areas likely to be significantly affected;	Chapter 4.
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.;	Chapter 4.
e) The environmental protection, objectives, established at international, community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	Chapter 3 and Appendix 2.
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects);	Chapter 5 and Appendix 1
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Requirement will be met at a later stage in the SA process. Recommendations for policy improvement, including to avoid or minimise adverse effects, are included in Appendix 1.
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Requirement will be met at a later stage in the SA process.
 i) a description of measures envisaged concerning monitoring in accordance with Art. 10; 	Requirement will be met at a later stage in the SA process.
j) a non-technical summary of the information provided under the above headings	Requirement will be met at a later stage in the SA process.
The report shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (Art. 5.2)	Throughout the SA process.
Consultation: • authorities with environmental responsibility, when deciding on the scope and level of detail of the information which must be included in the environmental report (Art. 5.4)	Consultation with the relevant statutory environmental bodies on the Scoping Report was undertaken during Spring 2014. Responses to representations are set out in Appendix 4.
authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of	Public consultation on the first draft Shepway Places and Policies Local Plan and accompanying SA is currently proposed for early in 2015. Further consultation will be

SEA Directive Requirements	Covered in this SA Report?
the plan or programme (Art. 6.1, 6.2)	undertaken for the Final Draft and Proposed Submission versions of the Plan.
• other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Art. 7).	Unlikely to be relevant to the Shepway Places and Policies Local Plan.
Taking the environmental report and the results of the consultat making (Art. 8)	ions into account in decision-
Provision of information on the decision: When the plan or programme is adopted, the public and any countries consulted under Art.7 must be informed and the following made available to those so informed:	Requirement will be met at a later stage in the SA process.
the plan or programme as adopted	
 a statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report of Article 5, the opinions expressed pursuant to Article 6 and the results of consultations entered into pursuant to Art. 7 have been taken into account in accordance with Art. 8, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and the measures decided concerning monitoring (Art. 9) 	
Monitoring of the significant environmental effects of the plan's or programme's implementation (Art. 10)	Requirement will be met at a later stage in the SA process.

Habitats Regulations Assessment

- 1.10 Under Article 6 (3) and (4) of the Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (Habitats Directive) land-use plans, including Local Plans, are also subject to Habitats Regulations Assessment (HRA). The purpose of HRA is to assess the impacts of a land-use plan against the conservation objectives of a European Site and to ascertain whether it would adversely affect the integrity of that site.
- 1.11 The HRA process for the PPLP will be undertaken by LUC on behalf of Shepway District Council during later stages of the production of the Local Plan and the findings will be taken into account in the SA where relevant.
- 1.12 The broad steps that will be followed in carrying out the HRA are set out in Table 1.2.

Table 1.2 Proposed approach to HRA of People and Places Local Plan

1. Identify European sites	To identify which European sites may be affected by the PPLP we will follow the approach adopted for the HRA of the Core Strategy (see below table). We will then review and update, if necessary, the sites information recorded in the 2012 HRA of the Core Strategy to understand the factors contributing to their integrity.
2. Assess in- combination effects	Identify other plans and projects and their potential affect the European sites identified in Task 1 in-combination with the PPLP. This would draw on and update the work carried out for the HRA of the Core Strategy.
3. Screen second consultation draft of PPLP and produce HRA commentary.	Screen the site allocation and policy options within the PPLP for their potential for likely significant effects on European sites. Consider whether any recommendations made by the HRA of the Core Strategy have been implemented. Suggest measures to mitigate any potentially significant effects identified. Produce HRA commentary, outlining the potential for likely significant effects of each option or group of related options.
4. Review consultation	Take account of consultation comments received on HRA of PPLP.

responses	
5. Amend HRA Report for Proposed Submission Local Plan	Assess Plan changes and amend HRA Report to reflect these. Update incombination assessment, if necessary.

1.13 The starting point for the HRA of the PPLP will be those European sites scoped into the HRA of the Shepway Core Strategy, including the joint HRA with Rother District Council in relation to the Dungeness complex of European sites. These were:

1.14 <u>Dungeness complex</u>

- Dungeness SAC.
- Dungeness to Pett Level SPA.
- Dungeness, Romney Marsh and Rye Bay potential SPA.
- Dungeness, Romney Marsh and Rye Bay proposed Ramsar site.

1.15 Other European sites

- Folkestone to Etchinghill Escarpment SAC.
- Parkgate Down SAC.
- Dover to Kingsdown Cliffs SAC.
- Lydden to Temple Ewell Downs SAC.

Structure of SA Report

- 1.16 The remainder of this report is structured as follows:
 - Chapter 2 sets out the methodology for the SA process, including the framework of SA objectives and associated appraisal questions being used to appraise the PPLP; detailed assumptions for the SA of site allocations are set out in Appendix 3. Appendix 5 demonstrates how the SA framework has been derived from the sustainability issues facing Shepway District, relevant policy objectives and the requirements of the SEA Directive. Appendix 4 sets out the representations received on the SA Scoping Report and LUC's responses to them.
 - **Chapter 3** outlines the PPLP, its relationship with other relevant plans and programmes and the environmental protection objectives of relevance to the SA objectives and the Local Plan, drawing on a detailed policy review set out in **Appendix 2**.
 - **Chapter 4** provides a sustainability profile of Shepway District, which has informed the SA framework and appraisal of the Local Plan and which addresses SEA Directive reporting requirements.
 - Chapter 5 summarises the results of the SA of the PPLP which are set out in detail in Appendix 1.
 - **Chapter 6** describes the arrangements for consultation on this SA Report and summarises the next steps in the SA process.

Appraisal methodology and SA framework 2

- 2.1 As described in Chapter 1, the SA work incorporates the requirements of the SEA Directive and Regulations. The approach to carrying out the SA for the PPLP is based on current best practice and the following guidance:
 - A Practical Guide to the SEA Directive (September 2005), Office of the Deputy Prime Minister.
 - SA guidance within national Planning Practice Guidance³.
- 2.2 The SA has been undertaken in close collaboration with the Shepway District Council officers responsible for drafting the PPLP in order to fully integrate the SA process with the production of the Plan.

The SA process

2.3 As set out in national planning practice guidance, the SA process typically comprises a number of stages as follows:

Main stages of SA

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

Stage B: Developing and refining options and assessing effects

Stage C: Prepare the SA Report

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

Stage E: Post adoption reporting and monitoring

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

- 2.4 The scoping stage of the Sustainability Appraisal was undertaken by LUC, and the Scoping Report⁴ was published for consultation in April 2014. The Scoping Report involved the following main tasks:
 - Outlining the PPLP, its relationship with other relevant plans and programmes and the environmental protection objectives of relevance to the SA objectives and the Local Plan, drawing on a detailed policy review.
 - Providing a sustainability profile of Shepway District to inform the proposed SA framework and meet SEA Directive reporting requirements.
 - Setting out the proposed methodology for the remainder of the SA process, including the framework of SA objectives, appraisal questions and associated assumptions that will now be used to appraise the PPLP.
- 2.5 The Scoping Report was made available to the three SEA 'Consultation Bodies' (English Heritage, the Environment Agency, and Natural England) and the public for a five week consultation period. Where appropriate, revisions have been made to information from the Scoping Report in light of consultation responses, and these are presented within this SA report (the reviewed review of plans, policies and programmes can be found in Appendix 2 and the reviewed baseline information is in Chapter 4. A full list of consultation comments received in relation to the Scoping Report, together with a description of how each has been addressed is included in Appendix 4. The SA

³ http://planningguidance.planningportal.gov.uk/

⁴ Shepway District Council Sustainability Appraisal Scoping Report for the Places and Policies Local Plan, LUC, April 2014.

Framework is contained in Chapter 2 of this Report, and includes minor changes in response to consultation responses to the Scoping Report.

Stage B: Developing and refining options and assessing effects

- 2.6 The detailed methodology applied to appraise the sustainability effects of the Shepway PPLP is described later in this Chapter.
- 2.7 Developing options for a plan is an iterative process usually involving a number of consultations with public and stakeholders. Consultation responses and the SA can help to identify where there may be other 'reasonable alternatives' to the options being considered for a plan. Work on the preparation of the Shepway PPLP is in its early stages and this is the first consultation on the site and policy options identified by the Council. The PPLP will go through a number of iterations before it is adopted, by refining the policy and site options presented in the current version into detailed draft policies and site allocations. Throughout this process, SA will remain an integral component of plan preparation. Each time there is a formal consultation on the PPLP it will be accompanied by a SA Report.

Part 3 of the SEA Regulations 12(2) require that:

"The report shall identify, describe and evaluate the likely significant effects on the environment of:

- (a) Implementing the plan or programme; and
- (b) Reasonable alternatives taking into account the objectives and the geographical scope of the Plan or Programme."

Schedule 2 (h) of the SEA Regulations requires that the Environmental Report includes a description of:

- "(h) an outline of the reasons for selecting the alternatives dealt with"
- Therefore, the SA must appraise not only the policies or site allocations preferred by the PPLP but "reasonable alternatives" to those policies and allocations. This implies that alternatives that are not reasonable do not need to be subject to appraisal and it is notable that the objectives of the plan and its geographical scope should be taken into account. Examples of alternatives that are unlikely to be reasonable include alternatives that do not meet the objectives of the plan or national policy (e.g. the NPPF), or are not within the geographical scope of the plan. In addition, the SEA Regulations do not require <u>all</u> alternatives to be subject to appraisal, just "reasonable alternatives".

Alternatives considered in the preparation of the Shepway PPLP

2.9 The options which the Council is considering in the first draft of the PPLP and which have been subject to SA at this stage are outlined in the third column of the detailed assessment table in Appendix 1.

Housing and the settlements alternatives (Part One of the PPLP)

- 2.10 Strategic housing allocations have already been allocated through the Core Strategy process and were subject to SA at that time. Section 2 of the PPLP describes the process that the Council is going through to identify reasonable alternative small to medium sized housing site options for inclusion in the PPLP as follows. Potential sites have been identified during late 2013 and early 2014 by a 'call for sites' process, supplemented by the Council's own desktop analysis. This evidence will feed into a review of the Strategic Housing Land Availability Assessment (SHLAA). The Council will then subject candidate housing sites from the SHLAA review to a sieving process whereby they are assessed for their:
 - **Suitability** whether the site offers a suitable location for development, taking into account policy restrictions such as designations; physical problems or limitations such as access or flood risk; potential impacts such as on landscape or biodiversity; contribution to regeneration priority areas; and the environmental conditions which would be experienced by prospective residents and neighbouring areas.
 - Availability whether there are no legal or ownership problems.

- **Achievability** whether there is a reasonable prospect that housing will be developed on the site at a particular point in time, in light of the economic viability of the site and the capacity of the developer to complete and sell the housing over a certain period.
- 2.11 Housing sites assessed by the Council as being suitable, available and achievable will be included as reasonable alternatives at the second Draft Plan stage of the PPLP and will be assessed as reasonable alternatives by the SA at that stage. The current, first draft of the PPLP lists housing sites which have completed much of this sieving process (Appendix A of the PPLP, plus Appendix B for sites which may not be appropriate in their entirety) but until they have also been assessed by the Council for their achievability they cannot be considered reasonable alternatives; they will be subject to SA once this process is complete. Appendix C of the PPLP lists sites which have already been eliminated from the sieving process.
- 2.12 This section of Part One of the PPLP describes a single policy option, "Policy option for housing distribution", and this has been subject to SA at this stage. Unlike other policy options in the PPLP, no alternative aspects of or alternatives to the policy have been described. This option sets out principles for determining the number of dwellings to be provided at each tier in the settlement hierarchy and applies those principles to calculate guideline numbers of dwellings for each tier in total and average new dwellings per settlement in the tier. The Council's reason for not putting forward any alternatives for this policy is that it is indicative at this stage of policy development.

Economic development alternatives (Part One of the PPLP)

- 2.13 As described in Section 3 of the PPLP, the Council's 2011 Employment Land Review sets out the need for additional employment land/space of particular types at particular settlements in the District. Some of these have been met since the study was completed. Additional work, in the form of discussions with local landowners and business representatives, is being undertaken for the draft Shepway Economic Development Strategy 2014-2019 and the draft Shepway Town Centres Study to identify potential sites to address the remaining need in three categories:
 - Modern office space in and around Folkestone town centre, especially in and around Folkestone Central Station.
 - Larger office accommodation within the M20 corridor.
 - Smaller, more flexible accommodation throughout the urban area.
- 2.14 The current, first draft of the PPLP lists potential employment allocation sites but until they have been assessed by the Council for their deliverability they cannot be considered reasonable alternatives. They will therefore be subject to SA once this process is complete. The SA has assessed development management policy options relating to the principles for determining locations for economic development.

Town centres alternatives (Part One of the PPLP)

2.15 As described in Section 4 of the PPLP, the Council is currently undertaking a Town Centre Study. Whilst the final report is not yet available, emerging findings are reproduced in the PPLP. These cover quantitative requirements for retail floorspace and food and drink floorspace over the Plan period, broad locations where town centre allocations may be required and a range of potential site allocations to meet these needs. Until these potential site allocations have been assessed by the Council for their deliverability they cannot be considered reasonable alternatives. They will therefore be subject to SA once this process is complete. The SA has assessed development management policy options relating to the principles for determining locations for allocating town centre development.

Gypsy and Travellers alternatives (Part One of the PPLP)

2.16 As described in Section 5 of the PPLP, a Gypsy, Traveller and Travelling Showpeople needs assessment carried out by the four East Kent Local Authorities indicates that seven additional pitches will be required in Shepway during the Plan period. At this stage, the Plan does not identify site options but sets out alternative criteria in Development Management policy option H3 for identifying sites at a later stage. Option H3 has been subject to SA at this stage.

Infrastructure alternatives (Part One of the PPLP)

2.17 Section 6 of the PPLP does not identify site options for infrastructure but rather sets out different approaches to funding infrastructure via developer contributions. These alternatives have been subject to SA at this stage.

Local Green Spaces alternatives (Part One of the PPLP)

2.18 Section 7 of the PPLP reiterates the Core Strategy policy commitment to safeguarding existing open space in the District. The Council proposes to achieve this by designating existing open spaces as Local Open Spaces in line with NPPF criteria. Site options are being identified from the last call for sites and from any further potential sites suggested during consultation on this first draft of the Plan. Reasonable alternative site options will be described in a later version of the Plan and will be subject to SA at that stage.

Heritage alternatives (Part One of the PPLP)

2.19 Section 8 of the PPLP provides contextual information and asks questions in relation to possible policy approaches to protection of the historic environment and does not relate to site allocations. The related Development Management policy options have been subject to SA at this stage.

Development management policies alternatives (Part Two of the PPLP)

2.20 Part Two of the PPLP describes emerging development management policy options under a range of topic areas. At this stage of the plan making process it is unclear, in many cases, whether the final policy will ultimately contain just one of the policy elements put forward (i.e. they are true alternatives) or many of them. As such, an overarching sustainability commentary has been provided for each policy number which draws out, where appropriate, the separate effects of different elements of each emerging policy, without assuming that it represents an alternative to the other policy aspects described unless this is explicitly the case.

Stage C: Prepare the SA Report

2.21 Although not formally required until the Publication stage of a plan, this SA Report has been prepared to accompany the initial options consultation for the PPLP in order to make the SA commentary available to consultees. The SEA Directive requirements met by the combined SA/SEA process to date are listed in Table 1.1. The report will provide the basis for subsequent SA Reports at each stage in the PPLP's preparation. Relevant elements of the SA Report will be updated at each stage of the PPLP's preparation, for example to reflect changes in the baseline sustainability issues or the policy context.

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

2.22 Shepway District Council is seeking stakeholder views on both the first draft PPLP and this SA Report. In responding to representations, the Council may change policy approaches in the next version of the PPLP. New versions of policies and site allocations will need to be subject to further SA, and the SA Report will need to be updated. Any comments made on this SA Report will also need to be addressed during the next phase of the SA process and reported in the subsequent version of the SA Report.

Stage E: Post adoption reporting and monitoring

- 2.23 The SEA Regulations require certain information to be made available following the adoption of a plan or programme for which SA/SEA has been undertaken. Once the Council is ready to adopt the PPLP, LUC will draft an Adoption Statement, as a separate report to the final SA Report. It will contain sections describing how each of the requirements in SEA Regulation 16(4)(a)-(f) have been met during the integrated SA/SEA process for the Local Plan. The sections will therefore cover:
 - How environmental considerations have been integrated into the plan.
 - How the environmental report and the opinions expressed during consultations have been taken into account.
 - The reasons for choosing the plan as adopted, in the light of the other reasonable alternatives dealt with. SA of Shepway's Places and Policies Local Plan Document 19 November 2013.

The measures decided concerning monitoring of significant environmental effects.

Appraising the sustainability effects of the Shepway PPLP

- 2.24 This SA Report describes the process undertaken to date in carrying out the SA of Shepway's PPLP. It sets out the findings of the appraisal, highlighting any likely effects (both positive and negative, and taking into account where relevant the likely secondary, cumulative, synergistic, short, medium and long-term and permanent and temporary effects), making recommendations for improvements and clarifications that may help to mitigate negative effects and maximise the benefits of the plan.
- 2.25 This is the first stage in the preparation of the PPLP and much of the Plan document is dedicated to describing issues to be addressed and to asking consultees questions relevant to allocation of sites and definition of policies at later stages in the plan-making process. Although some potential site allocation options have been included in the PPLP to seek early stakeholder opinions on them the Council has not yet completed the process of determining which of these options will be deliverable; as such they do not yet represent reasonable alternatives which require SA. As a consequence, the SA commentary on Part One of the PPLP at this stage only covers the two policy options described by the PPLP on broad housing distribution and on developer contributions. Part Two of the Plan contains many more policy options and SA commentary has been provided for each of these. SA work at this stage is necessarily high level and takes the form of a sustainability commentary on emerging options for policy rather than matrices detailing sustainability effects in relation to every SA objective. Further, more detailed SA work will need to take place at the next stage of plan-making (second draft PPLP) once reasonable alternative sites have been fully defined and development management policy text has been drafted.
- 2.26 The SA findings for the first draft PPLP are summarised in Chapter 5, including an assessment of the potential cumulative impacts of the PPLP options when taken together.

Determining significance

- 2.27 It is the role of SA to identify those effects of the Plan which are significant. Schedule 1 of the SEA Regulations sets out criteria for determining the likely significance of effects. These criteria relate to:
 - The characteristics of the plan or programme, in this case the Shepway PPLP.
 - The characteristics of the effects and of the area likely to be affected, in this case baseline conditions and sustainability issues facing the District, as set out in Chapter 4.
- 2.28 As described above, the first draft of the PPLP contains initial, high level options for policy direction and does not yet identify reasonable alternative site allocations. As such it is judged inappropriate to attempt to distinguish between minor and significant sustainability effects at this stage. Instead, commentary is provided on the likely type and direction (positive or negative) of effects on the baseline in relation to sustainability objectives.
- 2.29 When Plan options are more fully defined in the second draft PPLP a more detailed assessment will be appropriate and this will conclude as to which of the identified effects are significant and which are minor. From the second draft Plan stage, therefore, each policy and site allocation option will be assessed against each SA objective, and a judgement will be made as to the likely significance of the effects of the option on the SA objective. These judgements will differentiate between significant effects and other more minor effects through the use of colour coded symbols, as shown in the key below. Mixed effects will be recorded for an SA objective where there is potential for positive effects in relation to one aspect of the objective/one appraisal question but potential for negative effects in relation to another. Temporary effects will be denoted by the letter 'T' in brackets after the score.

Key to symbols and colour coding to be used in the SA of the Local Plan

++ Significant positive effect likely

+	Minor positive effect likely	
0	Negligible effect likely	
-	Minor negative effect likely	
	Significant negative effect likely	
+/-	Mixed effect likely	
?	Likely effect uncertain	
(T)	Temporary effect	

- 2.30 The dividing line between sustainability scores is often quite small. Where we distinguish significant effects from more minor effects this is because, in our judgement, the effect of the allocation or policy on the SA objective will be of such magnitude that it will have a noticeable and measurable effect compared with other factors that may influence the achievement of that objective.
- 2.31 In determining the significance of the effects of the options contained in the PPLP it will be important to bear in mind its relationship with the other documents in the planning system such as the NPPF and the Core Strategy (as described in Chapter 3Error! Reference source not found. of this report), as the policies they contain may provide additional safeguards or mitigation of potential effects.
- 2.32 As explained above, the PPLP includes some initial thoughts on potential sites for the purpose of receiving comments on them from the public at an early stage in the process but these do not yet represent reasonable alternative site allocations for the purposes of SA. When these are assessed at the next stage (second draft PPLP) a series of judgements will have to be made to determine the significance of effects. To guide these judgements, detailed assumptions have been developed in relation to each SA objective, as set out in Appendix 3. These assumptions were subject to consultation with the statutory consultees during the Scoping stage, and comments received by the consultees have been addressed in the revised version of the assumptions in Appendix 3, and will be used during the appraisal of the reasonable alternative site allocations.

SA framework

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

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

- 2.33 The development of a set of SA objectives is a recognised framework within which the likely environmental and other sustainability effects of a plan can be described, analysed and compared. The SA therefore takes an 'objectives-led' approach to the assessment i.e. the effects of the policies and allocations of the PPLP on the baseline are assessed in relation to a set of sustainability objectives.
- 2.34 The SA objectives set out in this chapter took those developed for SA of the Shepway Core Strategy as a starting point and amended them to reflect an up to date assessment of sustainability issues facing the District as well as the different scope of the PPLP (i.e. containing site allocations and development management policies rather than strategic policies). The objectives were consulted on during the SA Scoping stage and the representations received were considered when deciding whether any amendments were required to the SA objectives,

supporting assessment criteria and detailed assumptions for SA of site allocations. LUC's response to each of the consultation comments is documented in Appendix 4.

- 2.35 As demonstrated in Appendix 5, the framework of SA objectives:
 - Addresses the sustainability issues identified in Chapter 4.
 - Takes into account the environmental protection objectives set out at the international and national level (a requirement of the SEA Directive and Regulations) insofar as they are relevant to the PPLP (see Appendix 2).
 - Ensures that all of the SEA Directive topics ((a) to (l) in the box above) are covered.
- 2.36 The framework of SA objectives is set out in Table 2.1. The SA framework also provides indicative appraisal questions to illustrate the types of consideration that will be relevant when assessing Plan policies and allocations against them.

Table 2.1: SA Framework objectives and appraisal questions

Ref	SA objectives	Appraisal questions: will the Plan/option lead to?
SA1	Reduce the risk of flooding, taking into account the effects of climate change.	Development which supports and corresponds with the Water Framework Directive, the NPPF, Technical Guidance to the NPPF and the flood risk management policies of the EA?
		Development which has regard to the Shepway Strategic Flood Risk Assessment?
		Development which incorporates SuDS (including their long-term maintenance) to reduce the rate of run-off and reduce the risk of surface water flooding and combined sewer overflows?
SA2	Increase energy efficiency in the built environment, the proportion of energy use from renewable sources and	Developments that are energy efficient in their design and construction and which provide opportunities for combined heat and power?
	resilience to a changing climate and extreme weather.	Greater consideration of climate change adaptation within planning and design?
		An increase in the number of large scale renewable energy schemes
		An increase in the local/on-site renewable energy generating capacity?
		A decrease in oil consumption?
		Opportunities for modal shift away from private motor vehicles?
		Support for managing the natural environment in a way that recognises its potential to deliver climate change adaptation services?
		N.B. Climate change is also likely to impact upon habitats and thereby biodiversity. This issued is dealt with under SA objective 9.
SA3	Promote community vibrancy, provide opportunities to access services, facilities and environmental assets for all and	Well-designed, compact communities which are of a sufficient critical mass or density to support local services and public transport provision?
	avoid creating inequalities of opportunity for access.	Opportunities to improve educational attainment, qualification levels and participation in education and training through access to existing or the provision of new educational infrastructure in relation to new residential developments?
		Provision of new or enhancement of existing leisure facilities for young people at the neighbourhood level, where thresholds/standards require these?
		Opportunities to lead healthier lifestyles, including development that enhances existing and /or makes provision for and maintenance towards sports and recreational facilities e.g. publicly available pitches,

Ref	SA objectives	Appraisal questions: will the Plan/option lead to?
		allotments, swimming pools, courts, etc.?
		Adequate provision of health services to support new communities through the enhancement of existing facilities or through the creation of new?
		Developments, especially in deprived communities, which reduce car dependence by ensuring employment opportunities, health services, educational facilities, shops and recreational opportunities are accessible by foot, cycle or public transport?
		Improvements to local public transport infrastructure, especially in deprived communities?
		Reintegration of physically divided or highly linear villages or neighbourhoods through, for example, provision of central social infrastructure?
SA4	Reduce crime and the fear of crime.	Reduced levels of crime, anti-social behaviour and the fear of crime through design i.e. improvements to the environment, street layout, public space provision, passive surveillance, lighting etc.?
SA5	Improve the provision of homes, including affordable housing, having	Sufficient amounts of housing to meet the needs of the community and local economy?
	regard to the needs of all sections of society, including the elderly.	Development which delivers an appropriate mix of housing, including affordable housing and dwellings for older people?
SA6	Support the creation of high quality and diverse employment opportunities.	An adequate supply of land, skills and infrastructure (such as ICT) to meet the requirements of sectors targeted for economic growth and diversification, including those set out in the Shepway Economic Strategy?
		Improved access to jobs for local people from all sectors of the community?
		Enhanced vitality and vibrancy of town centres?
		Expansion or upgrading of key visitor attractions?
		Employment opportunities which address the economic consequences of the de-commissioning of Dungeness nuclear power station? ⁵
		Provision of high quality employment sites and associated infrastructure suitable for the likely continuation in a shift from manufacturing to higher skill, service industries.
SA7	Conserve and enhance the fabric and setting of historic assets.	Development that avoids negative effects on listed buildings, conservation areas, scheduled ancient monuments, registered historic parks and gardens, and registered battlefields and their settings)?
		Development that is well related to the natural environment and characteristic scale, form materials and detailing of the settlement and contributes to a sense of place?
		Promotes the enhancement of the archaeological resource and other aspects of heritage, such as, parks and open spaces, and areas with a particular historical or cultural association?
		Opportunities for the enhancement of historic assets, townscapes and landscapes?
SA8	Conserve, and where relevant enhance, the quality, character and local	Areas of the highest landscape sensitivity being provided with the highest level of policy protection?
	distinctiveness of the landscape and	Development which considers the existing character, form

⁵ 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 arte typically maintained for several years after operation ceases to carry out decommissioning.

Ref	SA objectives	Appraisal questions: will the Plan/option lead to?
	townscape.	and pattern of the landscape, buildings and settlements?
		The protection and enhancement of local distinctiveness and contribution to a sense of place?
		The provision of and maintenance towards green infrastructure assets and networks (including green open space and river/canal corridors) and ensure that this is linked into new and existing developments, to improve the connectivity of green spaces and green networks?
SA9	Conserve and enhance biodiversity, taking into account the effects of climate	Avoidance of net loss, damage to, or fragmentation of designated and non-designated wildlife sites and habitats?
	change.	Opportunities to enhance habitats for protected species and priority species identified in the Kent BAP or the England Biodiversity Strategy 2020?
		Opportunities for people to come into contact with robust wildlife places whilst encouraging respect for and raising awareness of the sensitivity of these sites?
		Development which includes the integration of ecological conditions and contributes to improvement in ecological connectivity in rural and urban areas?
		The maintenance and enhancement of the four large scale ecological networks in the District?
		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.
SA10	Reduce the need to travel; increase opportunities to choose sustainable transport modes and avoid development that will result in significant traffic congestion.	A complementary mix of land uses within compact communities that minimises the length of journeys to services and employment, increases the proportion of journeys made on foot or by cycle, and are of a sufficient density to support local services and public transport provision?
		Development in locations well served by public transport, cycle paths and walking routes?
		Support for the objectives of the Shepway Cycling Plan?
SA11	Use land efficiently and safeguard soils,	Development that avoids high quality agricultural land?
	geology and economic mineral reserves.	The remediation of contaminated sites?
		Development on brownfield sites?
		Development that protects soil processes and functions?
		Development that protects sites valued for their geological characteristics?
		Development that avoids sterilising economic mineral reserves?
SA12	Maintain and improve the quality of groundwater, surface waters and coastal waters and the hydromorphological (physical) quality of rivers and coastal	Development that will not lead to the deterioration of: the quality of groundwater, surface waters or coastal waters; the physical quality of rivers and coastal waters; Water Framework Directive status?
	waters.	Development where adequate foul drainage, sewage treatment facilities and surface water drainage are available?
		Development which incorporates SuDS (including their long-term maintenance) to reduce and the risk of combined sewer overflows and to trap and break down pollutants?
SA13	Use water resources efficiently.	Development where adequate water supply is available?
		Water efficient design and reduction in water consumption (e.g. rainwater recycling/grey water reuse and BREEAM/ EcoHomes Excellent Standard)?

Ref	SA objectives	Appraisal questions: will the Plan/option lead to?
SA14	Protect and enhance green infrastructure and ensure that it meets local needs.	The provision and maintenance of green infrastructure assets and networks (including green open space and river/canal corridors) and ensure that this is linked into new and existing developments, to improve the connectivity of green spaces and green networks?
		N.B. The East Kent Green Infrastructure (GI) Working Group has identified an East Kent GI Typology which encompasses the following GI types:-
		 Biodiversity e.g. Natura 2000 sites, SSSIs, LNRs, Local Wildlife Sites
		Civic Amenity e.g. parks, allotments, cemeteries
		 Linear features e.g. the Royal Military Canal, railway corridors.
		The full list of GI components of this typology is available from the Shepway GI Report, 2011.

General assumptions

- 2.37 The Government has announced that from 2016 all new homes built in England will have to meet strengthened requirements for energy efficiency in the Building Regulations, equivalent to the level 4 energy standard in the voluntary Code for Sustainable Homes. In addition, all new homes built from 2016 will have to be 'zero carbon'. This means that there should be no carbon emissions generated from the energy required to heat and light a home. Where it is not technically feasible or economically viable to eliminate all carbon emissions using on-site measures (e.g. insulation) and on-site renewable energy sources (e.g. solar panels), developers will be allowed to offset residual carbon emissions using off-site measures. The Government is currently consulting on a proposal to exempt small developments from the zero carbon requirement with the Government's preferred option is that developments of 10 units or fewer would be exempt. The SA therefore assumes that all developments of more than 10 homes will be zero carbon and that all smaller developments will be energy efficient.
- 2.38 It is further assumed that all new residential development will be required to be of a high quality such that it will have a neutral or positive effect on health and wellbeing. In addition, water efficiency is covered by the Building Regulations. As explained below, such non-locational factors have only been included in the SA of development management policies, not in the SA of site allocations.

Data limitations and difficulties encountered

- 2.39 The SEA Regulations require that the environmental report should include information on "any difficulties (such as technical deficiencies or lack of know how) encountered in compiling the required information" (Schedule 2(8)). The difficulties encountered in carrying out the SA are described below.
- 2.40 The current draft of the Shepway PPLP is the first version of the Plan. At this stage the Plan document seeks to gather early opinions on issues facing the District and on possible ways in which the Plan might address these. As such, the Plan lacks detail and contains few concrete proposals which can be subject to SA. More detailed assessment will therefore be necessary once the Council has identified deliverable site allocations and has drafted development management policy text.
- 2.41 In many cases, the "Policy Options" described by the PPLP under each policy number may not be mutually exclusive and the preferred policies which will be included in the second consultation draft of the PPLP may ultimately reflect one, several or all of them. As such, an overarching sustainability commentary has been provided for each policy number which draws out, where appropriate, the separate effects of different elements of each emerging policy, without assuming that it represents an alternative to the other policy aspects described unless this is explicitly the
- 2.42 The next consultation version of the Plan (second draft PPLP) is expected to contain large numbers of site allocation options. This presents the risk of inconsistency of approach between different members of the SA team as they conduct appraisals. This risk has been mitigated by the definition of detailed assumptions to be made when judging the effects of sites in relation to each SA objective. Close working within the SA team will also help to ensure that any additional assumptions that are required will be recorded in the table and used by all team members.

3 Relevant policy context

Outline of the Places and Policies Local Plan and its relationship to other plans and programmes

The Environment Report should include:

"an outline of the contents and main objectives of the plan or programme and of its relationship with other relevant plans and programmes"

(SEA Regulations Schedule 2(1))

3.1 Shepway District Council, as the Local Planning Authority (LPA), is preparing a Local Plan in accordance with the Planning and Compulsory Purchase Act, 2004. The key relationship of the Places and Policies Local Plan is with other components of the Local Plan as follows.

Shepway District Council Core Strategy Local Plan

- 3.2 The highest tier document of the Local Plan, the **Core Strategy Local Plan**, was adopted in September 2013. It is a strategic planning policy document and interprets national planning policy from The National Planning Policy Framework (NPPF) in the context of the district of Shepway.
- 3.3 Shepway's Core Strategy Local Plan was adopted on 18th September 2013 and is the long term plan for the District up to 2031. It brings together the objectives and actions of the Government, the Council, residents, businesses and voluntary groups for managing land use and development.
- Taking into account the economic, social and environmental issues relevant to Shepway, the Core Strategy sets out three over-arching strategic objectives:
 - To improve employment, educational attainment and economic performance in Shepway.
 - To enhance the rich natural and historic assets in Shepway.
 - To improve the quality of life and sense of place, vibrancy, and social mix in neighbourhoods, particularly where this reduces existing socio-economic disparities in Shepway.
- 3.5 The Core Strategy seeks to deliver these strategic objectives through a series of strategic policies and strategic allocations to guide development and land use.
- 3.6 Supplementing the Core Strategy is the Shepway District Local Plan Review (2006, policies saved in 2009) which includes policies to manage development applications. However, due to the age of the document, some of these policies are out of date, insufficient or non-compliant with the NPPF which was adopted in March 2012. These policies will be reviewed in preparing the PPLP to inform the new policies that will replace them.

Shepway District Council Places and Policies Local Plan

3.7 Shepway is now preparing its **Places and Policies Local Plan** (PPLP) which must be in general conformity with the Core Strategy and which is the subject of this SA Scoping Report. Its purpose is to outline development sites for new homes and business, to recognise important areas of open space and to provide new development management policies to replace those remaining policies that are still being used from the 2006 Local Plan.

Other Local Plan documents

3.8 The Council published a first draft of the Shepway **Community Infrastructure Levy (CIL) Charging Schedule** for public consultation during September-October 2014. Once adopted, this

- will facilitate charges on new development to provide funding for associated infrastructure requirements, alongside other sources.
- 3.9 New Neighbourhood Planning measures that came into force in April 2012 allow communities to shape new development by coming together to prepare **Neighbourhood Plans**. These Plans, which must be in general conformity with higher tier plans in the Local Plan, are currently being prepared for Hythe, Lympne, New Romney, Sellindge, and St Mary in the Marsh.

Relationships with non-Local Plan documents

3.10 The relationships between the Places and Policies Local Plan and relevant plans and programmes other than the Local Plan are set out in Appendix 2.

Environmental, social and economic policy objectives

The Environment Report should include:

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

(SEA Regulations Schedule 2(5))

- 3.11 A review of relevant International and National plans, policies and programmes has been undertaken, as set out in Appendix 2. Although not a requirement of the SEA Directive / Regulations, the review also covers key sub-national and local plans. Through this process it has been possible to establish:
 - Social, economic and environmental objectives that should be reflected in the framework of SA objectives against which the sustainability of the Places and Policies Local Plan will be appraised.
 - Sustainability issues that can be addressed by the Places and Policies Local Plan.
 - Whether policies in other plans and programmes could lead to cumulative effects in combination with Places and Policies Local Plan options.
- 3.12 In carrying out this policy review we have had regard to the following:
 - The review is not exhaustive. It seeks to identify the main policies, plans and programmes of relevance to the SA and the Places and Policies Local Plan.
 - The policy review is dynamic. New or revised relevant policies, plans or programmes emerge on a regular basis, for example the replacing of the Planning Policy Statements (PPSs) with the NPPF. The review considers the policies, plans and programmes extant at the time of writing.
 - Policies, plans and programmes generally exist within a hierarchy descending from an International/ European to a local level, with the implications for the SA becoming more specific to the Local Plan at lower levels in the hierarchy.
 - The enforceability of policies, plans and programmes also differs at each level of the hierarchy. International Agreements, European Conventions/ Directives represent legislation to support the achievement of certain policies, plans or programmes. The UK Government has, by signing them or enacting them, agreed to continually deliver their objectives or achieve their targets by a specific time. They are, or will eventually be, accompanied by complementary UK legislation which the Government, its authorities/ agencies, private companies or individuals must adhere to. National legislation, policies and strategies are enforceable by the Government, and influence policy approaches at lower levels. At lower levels in the hierarchy the policies, plans, and programmes are more likely to take the form of guidance which will have less legal enforcement but may be related to the achievement of specific targets/ aspirations set out at higher tiers.

- It is seldom possible to achieve absolute consistency with the objectives of other plans. This review seeks to clearly identify compatibility and inconsistency and how they will be addressed in the SA Report.
- 3.13 Relevant objectives identified by the review of plans and policy documents (including the NPPF) are set out in Appendix 2 and summarised in Appendix 5 (second column of table) where they have been used to inform the framework of SA objectives.

4 Baseline information

Introduction

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

The 'Environmental Report' should include:

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

SEA Regulations Schedule 2 (2, 3 and 4)

- 4.2 Sufficient baseline information to meet these requirements has been collected and is organised below by SA theme.
- 4.3 It should not be assumed that all baseline data are currently available, or, that it will be possible to collect missing data in the future. SEA Guidance recognises that data gaps will exist, but suggests that where baseline information is unavailable or unsatisfactory, authorities should consider how it will affect their assessments and determine how to improve it for use in the assessment of future plans. Where there are data gaps in the baseline and forthcoming reports, these are highlighted in the text. The collection and analysis of baseline data is regarded as a continual and evolving process, given that information can change or be updated on a regular basis.
- 4.4 Relevant baseline information will be updated during the SA process as and when new data is published. For example, the following Local Plan technical reports which have not yet been completed are expected to form part of the Places and Policies Local Plan evidence base:
 - Strategic Housing Land Availability Assessment (SHLAA): the council reviews its housing land supply and updates its 5 year supply annually. The current review is ongoing but the Council has released details of the qualifying sites submitted as part of the Strategic Housing Land Availability Assessment (SHLAA) 'call for sites' process.
 - *Town Centre Study:* based upon quantitative and qualitative need and focussing on sites in Folkestone, Hythe and New Romney town centres, but also covering other centres.
 - Strategic Flood Risk Assessment (SFRA) update was commissioned a year ago but is on hold pending EA's re-modelling of flood risk on Romney Marsh.
 - Habitats Regulations Assessment (HRA) will be produced later in the Local Plan timetable.
 - *Heritage Study:* Shepway District Council are discussing scope and nature of required evidence base with English Heritage.
 - Transport Modelling: Modelling has recently been completed by URS to update the analysis in the 2011 Transport Strategy of road junctions requiring improvement. A map depicting results for the key junctions will be available shortly.
 - Local Retail Centres Study: Evidence has been gathered to support policy protection of local parades of shops.

- Community Infrastructure Levy Charging Schedule: The consultation on the CIL Preliminary Draft Charging Schedule (PDCS) closed on the 13th October 2014. The Council is currently reviewing all responses received.
- Socio-Economic Study: For Romney Marsh area to examine the socio-economic implications of the closure of Dungeness 'B' Power Station.
- Sustainable Access Strategy (possible SPD): Surveys of Dungeness and Romney Marsh have been confirmed.

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

The baseline information included within this Report supersedes the baseline profile published in the 2007 SA Scoping Report and is largely based upon information collected for the SA of the Core Strategy⁶, updated and extended where relevant. It provides a snapshot of the current social, economic and environmental situation in the District including the key sustainability issues of relevance to each SA theme, their relevance to the Shepway Local Plan, and their likely future evolution in the absence of the Local Plan.

Climatic factors

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

Climate change mitigation

- 4.7 The Government publishes data on the CO_2 emissions per capita in each Local Authority that are deemed to be within the influence of Local Authorities. The latest available data⁷ show that CO_2 emissions per capita in Shepway fell by 27% over 2005-2012 although this masks widely different falls in the three broad sectors measures: Industry & Commerce -41%; Domestic -8.7%; and Road Transport -8%.
- 4.8 Dungeness 'B' nuclear power station is a significant generator of low carbon energy for the UK Grid. It is currently due to be decommissioned in 2018⁸, although the operator EDF has applied to extend this to 2028. In any event, planning for nuclear power generation is carried out at the national level and is not a direct current concern for the Shepway Local Plan.
- 4.9 The Local Plan is concerned, however, with ways in which renewable energy generation can be achieved at the macro and the micro scales. Twenty six wind turbines have been constructed at Little Cheyne Court, East Guldeford near Brookland which was granted planning permission on appeal. The wind farm has the capacity to generate approximately 52-78 MW, which is enough to power around 33,000 homes. The site raised considerable controversy, not least because of the potential for risk to wildlife and the sensitive landscape more generally. More recently, one onshore 15 m high 5.5 m diameter freestanding horizontal axis wind turbine was granted planning permission at Beech Tree Farm, Elmsted and two solar farms have been granted permission: 204 free standing ground solar panels at Lydd Camp and Solar farm at Sycamore Farm, Old Romney. Planning applications for further large scale wind turbine sites elsewhere in Shepway have been submitted. They are currently undetermined.⁹

 $^{^{6}}$ SA of the Shepway Core Strategy, URS for Shepway District Council, October 2012.

 $^{^{7}}$ DECC (2014) CO₂ emissions within the scope of influence of Local Authorities (previously called National Indicator 186: Per capita CO2 emissions in the LA area)

 $^{{}^{8}\ \}underline{\text{http://www.edfenergy.com/about-us/energy-generation/nuclear-generation/nuclear-power-stations/dungeness-b.shtml}$

⁹ Shepway District Council (2013) Annual Monitoring Report

- 4.10 The energy efficiency of new dwellings is measured in Shepway using the Standard Assessment Procedure (SAP). The SAP is the Government system for rating energy efficiency of dwellings.

 Targets to improve the SAP rating across the District have been set by Shepway District Council.
- 4.11 A CIL and Plan Viability Study to analyse what level of requirements the Local Plan can place on developers (e.g. for sustainable building design) without threatening financial viability was published in July 2014. The study concluded that residential values across Shepway vary significantly, suggesting CIL differentiation for residential development is appropriate. A residential CIL range of between £0 and £125/m² was recommended over four CIL charging rate zones:
 - a) Folkestone (lower end values) & Lydd area (viability scope A);
 - b) Romney Marsh (rural and coastal) and north Folkestone fringe / Hawkinge (B);
 - c) West of Folkestone (Sandgate) and Hythe (C);
 - d) North Downs rural area settlements (D).
- 4.12 It was recommended that no geographic differentiation would be required for non-residential development. Larger format retail (retail warehousing and supermarkets) was recommended to have a charging rate of not more than $£100/m^2$, other non-residential development not being charged CIL. The consultation on the CIL Preliminary Draft Charging Schedule (PDCS) closed on the 13th October 2014. The Council is currently reviewing all responses received.

Sustainability issues and relevance to Shepway Local Plan

- The need to meet national sustainability and carbon reduction targets (such as all new residential development being zero carbon by 2016), The Local Plan could address these through sustainable design and construction standards, reducing reliance on fossil by support for renewables and other low carbon technologies, and reducing the need to travel, especially by private car.
- The sensitivity of the natural environment in Shepway may limit the number of acceptable locations for further large scale renewable energy developments.

Climate change adaptation

4.13 Changes to the climate will bring new challenges to the District's built and natural environments. Hotter drier summers may have adverse health impacts and may exacerbate the adverse environmental effects of air and water pollution. A changing climate may place pressure on some native species and create conditions suitable for new species, including invasive non-native species. Adaptation to changes in flood risk that may result from climate change is dealt with in the separate section on flood risk below.

Sustainability issues and relevance to Shepway Local Plan

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

Flood risk

- 4.14 Risk of flooding is a major concern in Shepway with 55% of the District at or below sea level. Virtually all of the Romney Marsh area is within a flood zone due to its topography. However, the degree of risk varies significantly within the area, being dependent on factors such as topography, hydrological features and position in relation to flood defences.¹⁰
- 4.15 In terms of climate change adaptation, flood defence works have been undertaken at sites across the District. These include a £30 million defence scheme at Dymchurch, covering 2.2.km of

¹⁰ Shepway District Council (2011) Annual Monitoring Report

coastline. This is one of six projects in the "Folkestone to Cliff End Strategy", which is envisaged to protect 14,000 dwellings across Romney Marsh. 11

4.16 A Strategic Flood Risk Assessment (SFRA) update has been commissioned, the conclusions of which will be incorporated in the SA once they become available.

Sustainability issues and relevance to Shepway Local Plan

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

Likely evolution of the issues without Shepway Local Plan

- 4.18 National renewable energy and carbon reduction targets and the NPPF require local authorities to reduce greenhouse gas emissions and actively support energy efficiency and renewable energy. Additionally, the Building Regulations are setting ever-tighter energy efficiency and carbon reduction requirements for new buildings¹². The Local Plan can contribute to climate change mitigation through policies which require higher energy efficiency standards (e.g. for larger allocations) and provide a positive policy approach to the consideration renewable energy applications. The Local Plan also has a role to play in implementing climate change adaptation, for example through appropriate building design and the identification of less vulnerable locations for development. It can also help to ensure that less environmentally sensitive locations are chosen, thereby reducing development pressure on wildlife which may already be under pressure from climate change.
- 4.19 The severity and likelihood of flooding is likely to increase with current trends of climate change. Without a Local Plan it will be more difficult to manage the effects of developments on flood risk, although all developments would need to take account of national policy on flood risk, including the NPPF requirement that "inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere" (paragraph 100).
- 4.20 Climate change and a rising local population are in combination and at certain times of the year, likely to exacerbate water and air pollution independently of any Local Plan. However, without a planned approach to development through the Local Plan, there is less opportunity to adopt a coordinated, spatial approach that would help to manage health and environmental risks.

Population and human health

Demographics

4.21 According to 2011 Census data, the population of Shepway stood at 108,000 people (a change of 12.2% between 2001 and 2011). ONS population projections for Shepway, based on a continuation of recent trends in birth, death and migration rates, indicate a population increase of 13.5% in Shepway over the period 2010-2035. However, past trends may be disrupted by changes in policies relating to future housing and economic growth and for this reason Kent County Council produces population forecasts which take account of future house building plans in each of the Kent districts' Core Strategies. The Shepway Core Strategy aim of delivering 8,000 dwellings between 2006 and 2026 (which would result in a rate of house building in line with trends of recent decades) would result in lesser population growth of 7.3% for 2011-2031 The

http://www.kent.gov.uk/your_council/kent_facts_and_figures/population_and_census/population_forecasts.aspx

 $^{^{11}}$ Shepway District Council (2010) Annual Monitoring Report

¹² For example, April 2014 saw the implementation of Part L 2013 which introduced a 6% uplift over Part L 2010 across the build mix.

¹³ Shepway District Council (2013) Annual Monitoring Report

¹⁴ KCC (2012) 2010-based Sub National Population Projections for Kent Profile

 $^{^{15}}$ Interactive Population Forecast Toolkit available from

- Core Strategy states that this is expected to lead to a more manageable change in the social balance and labour supply and only limited decrease in the size of the labour force.
- 4.22 A small majority of residents in Shepway live in urban areas (60.2%), with the remaining 39.8% to be found living in rural areas. Approximately 1 in 10 people in Shepway (9%) live in isolated dwellings, hamlets or small villages (below 1,000 people). Romney Marsh ward is the largest and the most sparsely populated area in the District.
- 4.23 The rate of household formation in Shepway for the period 2001-2011 was 15.6%, very high relative to the England and Wales average of 7.5%; this is the 11th highest in England and Wales (the next highest increase in Kent is Dartford at 14.6% and ranked 18th).¹⁷ Average household size in Shepway is projected to decrease notably during 2006-206 under all housing growth scenarios, although slightly less so under higher growth scenarios.¹⁸
- 4.24 The average age in Shepway (mid 2012) was 42.7 years (43.9 for females, 41.4 for males). In 2011, births in the district (1,185) narrowly exceeded deaths (1,135). A high proportion of Shepway's population is aged 65 or above, with the District ranking in the top 20% of authorities in England in terms of this indicator. Around 34 % of all households include people over the state retirement age. Shepway is forecast to continue to have a large proportion of older people in its population compared to the Kent County average over the period 2010-2035. This will be in conjunction with a decline in the number of residents who are of working age (16-64).

Crime

4.25 Crime rates are not disproportionately high in Shepway as whole but local pockets of higher crime rates exist.

Health

4.26 Compared to other English authorities, Shepway has a high proportion of people with limiting long term illness. A high percentage of the population claim disability related benefits, with the District ranked amongst the top 20% of authorities in England for this indicator. Life expectancy at the age of 65 for females in Shepway stands at 21.4 years, which is 3.1 years higher than males in the District. This figure is above the Kent County Council (KCC) average of 20.8 and the average for England (20.6). For males in Shepway, life expectancy at age 65 is 18.3 years. This is below the County average (18.5) years, but above the national average of 18 years²⁰.

Deprivation

- 4.27 Based on death rates over the period 2006-2010, the difference in life expectancy between the most and least deprived members of the population is 9.4 years in males and 6.9 years in females.
- 4.28 The Index of Multiple Deprivation (2010) dataset identifies relative deprivation for "Super Output Areas" (SOAs), which are geographical areas of a similar size to electoral wards. An examination of the 2010 Index of Multiple Deprivation data reveals that:
 - Shepway is ranked 90th in the IMD out of 326 local authorities nationally, placing it within the bottom 20-40% of all districts by this measure. It is the 8th most deprived local authority in the South East region.
 - All of the 20% most deprived SOAs in the District are to be found in or around the urban area
 of Folkestone. Four of these SOAs face particularly severe levels of deprivation, with the most
 deprived of these having been ranked 581st out of 32,482 SOAs nationally.
 - Whilst much deprivation is concentrated in the urbanised coastal areas of the District, there are also significant areas of high deprivation in the rural south.
 - The majority of least deprived SOAs in Shepway are located in the north of the District, in the vicinity of the M20 motorway, the Kent Downs and on the outskirts of Folkestone/Hythe. In

¹⁶ KCC (2011) 2010 Ward level population estimates

¹⁷ Shepway District Council (2013) Annual Monitoring Report

¹⁸ Shepway LDF Core Strategy Cabinet Report April 2011 Appendix 1: Strategic Requirement

¹⁹ Shepway District Council (2011) Shepway Housing Strategy 2011-2016

²⁰ KCC (2012) Shepway Equality & Diversity Profile

2007 the least deprived SOA in Shepway ranked 30,824th nationally, whilst in 2010 the least deprived SOA ranked 28,308th nationally.

Access to services

- 4.29 Folkestone has the largest concentration of shops and services in the District. However, due to accessibility factors, residents in the west of the District at New Romney may choose to visit Ashford, whilst those to the north around Elham and Stelling Minnis may look to Canterbury.
- 4.30 Within the rest of the District's town centres, Hythe and New Romney continue to maintain a mixture of essential services and goods provision. Other centres, such as Sandgate and Lydd, have retained convenience goods and local service provision in their small retail units. There is limited future retail need for additional convenience floorspace in the District.²¹
- 4.31 In terms of access to healthcare services for example, the proportion of households within walking distance in rural areas is approximately half that of urban areas. This relative isolation from health services is coupled with a generally older population.²² Around 52% of rural dwellings are within 0.5 mile of a post office service and nearly 50% of rural dwellings are within 500 metres of a primary school.
- 4.32 Forthcoming evidence of relevance to this topic which will be reviewed once available includes:
 - The results of the completed 'Call for Sites' consultation: reasonable suggestions for open space sites will be appraised alongside other reasonable alternatives as part of the SA for the Places and Policies Local Plan.
 - A Town Centre Study based upon quantitative and qualitative need and focussing on sites in Folkestone, Hythe and New Romney town centres, but also covering other centres.

Sustainability issues and relevance to Shepway Local Plan

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

Likely evolution of the issues without Shepway Local Plan

4.33 The issues described above are likely to continue without appropriate policy responses. For example, responding to the housing needs of an ageing population may be less co-ordinated in the absence of the Local Plan.

²¹ Shepway District Council (2013) Annual Monitoring Report

²² Shepway District Council (2011) Shepway Rural Services Study

4.34 The spatial distribution of deprivation and social exclusion in the District is likely to continue without a local policy response e.g. providing opportunities to access jobs, community services and education facilities in areas where these are lacking.

Housing

- 4.35 The housing stock in the District is relatively old, with almost 80% constructed prior to 1980, 42% prior to 1945 and 32% prior to 1919. The worst housing conditions are focused in the older housing stock. There are currently around 450 long-term empty homes in the District. Homelessness in Shepway is a growing issue. The number of households that have approached the Council for help with housing difficulties has risen from 714 in 2009/10 to 987 households in 2010/11. This represents an increase of approximately 38%. Key challenges to housing delivery include the development restrictions posed by the Kent Downs AONB and a lack of large sites, which limits the potential to deliver affordable housing. Shepway has the lowest average household size in Kent and it continues to decline partly driven by the older age profile of the District.²³
- 4.36 House prices have fallen from a peak in 2007, but remain relatively buoyant. The average price of a home stands at £206,412, which is considerably higher than the national average. Highest values are found in the vicinity of Hythe and in rural areas of the District²⁴. Average house prices in 2011 stood at more than six times the average household income in the District and for newly forming households, closer to 9.5 times the average household income.²⁵ More households in the District are therefore looking to affordable housing provision to meet their need, with the number of people registered on the Shepway Housing Waiting List having increased by approximately 14% between January 2010 and January 2011.²⁶
- 4.37 The adopted Core Strategy sets out a minimum delivery target of 8,750 dwellings by 2031 under policy SS2. This equates to a minimum delivery of 350 dwellings per annum from 2006/7 to 2030/31 inclusive.²⁷
- 4.38 From dwellings already completed, and identified potential housing locations in the Core Strategy, it is expected that:
 - At least 7,500 dwellings will be on previously developed land.
 - The requirements of Policy CSD1 will provide approximately 2,000–2,500 affordable housing units.
 - Approximately 6,500-7,000 dwellings will be in the Urban Area (Folkestone/Hythe).²⁸
- 4.39 Reasonable suggestions for residential and mixed-use sites from the Call for Sites Consultation will be appraised alongside other reasonable alternatives as part of the SA for the Places and Policies Local Plan. Furthermore, the Council's review of the Strategic Housing Land Availability Assessment (SHLAA) is currently underway.

Gypsies and travellers

4.40 There is relatively limited local need for Gypsy and Traveller accommodation. A 2014 assessment of the needs of Gypsies and Travellers identified a current provision of four authorised residential pitches in Shepway and a possible need for seven additional pitches between 2013 and 2027.²⁹

Sustainability issues and relevance to Shepway Local Plan

• Lack of affordability of housing is a growing issue in the District. The Local Plan development should seek to meet this growing by reference to up to date evidence on the required mix of dwelling types, sizes and tenures to decrease the number of people living in unfit housing and reduce the increasing number of homeless people in Shepway.

²³ Shepway District Council (2011) Shepway Housing Strategy 2011-2016

²⁴ Shepway District Council (2011) Shepway Housing Strategy 2011-2016

²⁵ Shepway District Council (2011) Shepway Housing Strategy 2011-2016

 $^{^{26}}$ Shepway District Council (2011) Shepway Housing Strategy 2011-2016

²⁷ Shepway Adopted Core Strategy (2013)

²⁸ Shepway Adopted Core Strategy (2013)

²⁹ East Kent Gypsies, Travellers and Travelling Showpeople Accommodation Assessment, Salford University, 2014

Likely evolution of the issues without Shepway Local Plan

4.41 The issue of housing affordability is likely to continue without a positive and proactive approach to delivery of local housing through an up to date Local Plan for the District, for example delivery of a range of dwelling types and tenures to meet need. A coordinated approach to housing allocation is essential to ensure that housing delivery takes place in a sustainable manner and to ensure that those sites which are both suitable (e.g. with fewer environmental constraints) and deliverable are selected.

Economy and labour market

- 4.42 The recent economic performance of Shepway has been characterised by high unemployment and long-term contraction of established local industries. There has been relatively strong growth in certain areas, such as business financial and other services; however, this has been insufficient to offset the losses to the Shepway's manufacturing base, and distribution and catering sectors. Shepway's future growth is likely to be characterised by continuing rationalisation of traditional manufacturing activities and shift into the service sector, including some movement into higher value activities.³⁰
- 4.43 If recent demographic trends of an ageing population and shrinking average household sizes continue there is the potential for Shepway's working age population to fall, with resulting labour supply issues having a negative effect on economic performance. The amounts and type of development proposed by the Core Strategy are designed to address this and are expected to almost maintain the labour supply to 2026.³¹
- 4.44 Unemployment in Shepway has dropped significantly from 4.3% (September 2012) to 3.3% (September 2013) based on people claiming Jobseeker's Allowance (JSA). The figure of 3.3% is higher than the regional and national average, as well as the majority of the districts in Kent (only Thanet has a higher JSA rate which is 5.5%) although Gravesham and Medway also have a rate of 3.3%. Youth unemployment during 2012/13 stood at 6.0%, just under double the rate than amongst those aged 25-49 (3.5%). Levels of youth unemployment are higher than South East (3.6%) and National levels (5.8%).³²
- 4.45 A large proportion of the employment available within the District is relatively low paid. Employment within higher skilled managerial and professional occupations is comparably low in relation to overall Kent and South East England levels.³³ Employment in the knowledge economy has seen a decline from its peak of 15% in 2007, in contrast to Kent as a whole which has seen a steady overall rise over the period 2003-2010.³⁴
- 4.46 Shepway has a number of economic strengths, including its good transport links (M20 motorway, High Speed rail links to London, and proximity to the Channel Tunnel), low wage levels and land/building costs relative to the wider South East region, a high quality natural environment. Economic weaknesses include its relative remoteness, relatively low rates of entrepreneurship and few residents with higher skills.³⁵ There is a need to increase the take up rate of further education courses and diversify the skills base of the local labour market, to ensure local business sectors are able to improve the long term prosperity of residents.
- 4.47 Due its high quality natural environment and its visitor attractions (such as Port Lympne Wild Animal Park; Romney, Hythe and Dymchurch Railway; Medieval castles and Roman remains; the Battle of Britain Memorial and Museum) the tourism, leisure and hospitality sector represent a significant proportion of the local economy. Research conducted in 2009 estimated that this sector contributes £219.3 million to the local economy and supports around 4,000 jobs. This equates to approximately 11-12% of total jobs in the District.³⁶

³⁰ Shepway District Council (2011) Shepway Employment Land Review

³¹ Shepway District Council (2011) Development Requirements Report

³² Shepway District Council (2013) Annual Monitoring Report

³³ Shepway District Council (2011) Shepway Housing Strategy 2011-2016

³⁴ Shepway District Council (2012) Shepway Economic Development Strategy 2012-2017

³⁵ Shepway District Council (2011) Shepway Housing Strategy 2011-2016

³⁶ Shepway District Council (2012) Shepway Economic Development Strategy 2012-2017

- 4.48 Folkestone is the District's main centre, with the largest concentration of shops and services in Shepway and is a key focus for economic activity. It has suffered a decline over recent years but continues as a tourist destination. It also features insurance and financial services companies, and developing cultural and creative activities. Figures for June 2011 reveal that 74 retail units were vacant in Folkestone Town Centre; the Council reports that high vacancy rates are a particular issue in several areas of the 'secondary frontage'. This represents a vacancy rate of 18.2% against a national average of 12.9%. In recent years the district has seen a considerable amount of regeneration activity, most notably through socio-economic programmes such as the Single Regeneration Budget in Folkestone and the Romney Marsh. Recent positive changes include the fact that Folkestone has begun carve out an identity as an up-and-coming coastal destination; the arrival of High Speed One; the considerable investment in the Old Town to create a Creative Quarter; and plans for the regeneration of Folkestone Seafront. 37
- 4.49 Outside of Folkestone, the main centres of economic activity and employment are industrial estates within the larger towns. On Romney Marsh it is Lydd Airport and Dungeness Power Station that provide much of the employment.³⁸ Having been an element of the Romney Marsh economy for around 50 years, Dungeness 'A' nuclear power station is currently being decommissioned, with this work to be mostly completed by 2015.³⁹ A Romney Marsh Socio-Economic Plan jointly produced by the Council and partner organisations is being used to co-ordinate regeneration projects and as a basis for attracting funding for projects designed to offset the loss of employment associated with the loss of Dungeness 'A'. These projects seek to broaden the employment base and develop education and skills in the local population; associated project locations include Mountfied Road Industrial Estate in New Romney, Kitewell Lane Industrial Estate in Lydd, Lydd Airport and areas around the periphery of Romney Marsh (given the constraints on development within the Marsh posed by flood risk and nature conservation designations).
- 4.50 Dungeness 'B' nuclear power station is still operational; decommissioning is currently set to commence in 2018 but EDF has applied to extend this to 2028. At present the Government has not included Dungeness as a site for new generation power stations due to concerns over potential damage to the Dungeness Special Area of Conservation. A Socio-Economic Study for the Romney Marsh area has been commissioned by Shepway District Council to examine the socio-economic implications of the closure of Dungeness 'B' Power Station. The conclusions of the study will be incorporated into the SA baseline once they have been published. If the decommissioning of Dungeness 'B' follows the pattern set by Dungeness 'A' then the years immediately following cessation of power generation are likely to see an increase in employment over several years associated with the de-commissioning process, before an eventual decline.
- 4.51 The District has an ample quantity of employment land allocated.⁴¹ Despite this quantitative oversupply of employment land in the District, for various qualitative reasons and to help meet the economic aims for Shepway, there is a need for new employment land/space as follows⁴²:
 - Up to 5 ha more land for industrial development on a well located, readily available site in Folkestone if the existing industrial allocations there appear unlikely to come forward and particularly if the Park Farm industrial area continues to experience losses to retail warehouse uses.
 - Between 5,000 and 8,000 m² of office space in and around Folkestone town centre, potentially including some space within the Harbour redevelopment and/or other town centre or edge of centre development sites.
 - Further small incubation premises for business start-ups in Folkestone to encourage indigenous business formation and widen employment opportunities; 3,000 to 5,000 m² of such space could be aimed for by 2026.
- 4.52 In addition, the employment mix on the existing Nickolls Quarry site should include:

 $^{^{}m 37}$ Shepway District Council (2012) Shepway Economic Development Strategy 2012-2017

³⁸ Shepway District Council (2012) Shepway Economic Development Strategy 2012-2017

³⁹ Shepway District Council (2012) Shepway Economic Development Strategy 2012-2017

⁴⁰ http://www.edfenergy.com/about-us/energy-generation/nuclear-generation/nuclear-power-stations/dungeness-b.shtml

⁴¹ Shepway District Council (2013) Annual Monitoring Report

⁴² Shepway District Council (2011) Shepway Employment Land Review

- A broad mix of office and industrial B1 space, of which 2-3 ha should be office space to serve the wider Hythe area;
- Approximately 2-3 ha more land for industrial development or a similar amount of new land within Hythe if Nickolls Quarry does not provide such space.
- 4.53 While Shepway is assessed as having a sufficient supply of employment land to meet future needs in broad quantitative terms, a cautious approach is required to managing the competing pressures on employment sites within the District. 43
- 4.54 Reasonable suggestions for employment and mixed-use sites from the Call for Sites consultation will be appraised alongside other reasonable alternatives as part of the SA for the Places and Policies Local Plan.
- 4.55 A Town Centre Study based upon quantitative and qualitative need and focussing on sites in Folkestone, Hythe and New Romney town centres, but also covering other centres has been commissioned by the Council. Its conclusions will be incorporated in to the baseline of the SA once they become available.

Sustainability issues and relevance to Shepway Local Plan

- Shepway's economic growth is relatively poor. It has suffered from a decline in manufacturing and dependence on relatively low paid and seasonal tourism jobs and on nuclear power generation at Dungeness.
- Unemployment in general and youth unemployment in particular are high in Shepway and many of the jobs available are relatively low paid.
- Shepway has relatively low levels of educational attainment and skills which could hinder economic growth in the District. The Local Plan should seek to support access to education.
- Parts of Folkestone, notably several areas of the 'secondary frontage', suffer from high vacancy rates of retail premises. The Local Plan should support town centre regeneration.
- There is a need for the Local Plan to:
 - o Regenerate the District's principal urban centre, Folkestone.
 - Provide employment land suitable for the likely continuation in a shift from manufacturing to service industries and encourage higher skill, higher paid sectors through provision of high quality employment sites.
 - o Protect and promote appropriate access to its high quality natural environment.
 - $\circ\quad$ Support expansion or upgrading of key visitor attractions.
 - Plan for the consequences of the de-commissioning of Dungeness 'B' nuclear power station.

Likely evolution of the issues without Shepway Local Plan

4.56 Shepway's economy is likely to continue to lag behind that others in the South East without coordinated action from the Local Pan to promote regeneration of its towns, provision of appropriate employment space and access to education and training.

Historic environment

4.57 There is a wealth of notable heritage in the District – Iron Age and Roman settlements, medieval churches, Tudor castles and Napoleonic fortifications and other defensive sites⁴⁴. The District contains over a thousand Listed Buildings, with over a hundred of these listed as Grade I or Grade II*⁴⁵, and 59 Scheduled Monuments. Listed buildings are not evenly distributed throughout the District but concentrated in the Folkestone area, which is home to 200, and in Hythe and Elham, which feature 100 each.

 $^{^{}m 43}$ Shepway District Council (2011) Shepway Employment Land Review

⁴⁴ Shepway District Council (2013) Annual Monitoring Report

⁴⁵ Shepway District Council (2011) Annual Monitoring Report

- 4.58 Shepway District Council has designated 21 Conservation Areas, which make up 1% of the District's land area.⁴⁶
- 4.59 The English Heritage at Risk Register 2014⁴⁷ lists several buildings in Shepway deemed at risk: Martello Towers Nos. 4, 5, 6, 7 and 9; Dymchurch Redoubt; The Parish Church of Church of St Peter, The Durlocks, Folkestone and the Parish Church of St James, Elmsted. Overall, two (Martello Towers nos. 4 and 9) are deemed to be in 'very bad' condition with the rest rated as Poor or Fair.⁴⁸
- 4.60 The Register also identifies monuments deemed to be at risk. In Shepway there are four:
 Romano-British building south of Burch's Rough, Lympne; Motte and Bailey Castle 200m north
 west of Stowting Church; Bowl barrow 150m north east of Red House Farm, Swingfield; and Bowl
 barrow at Minnis Beeches, Swingfield. Three of these are described as having 'extensive
 significant problems' whilst one (Motte and Bailey) is deemed to be 'generally unsatisfactory'. 49
- 4.61 Shepway District Council is discussing the scope and nature of a planned Heritage Impact Study with English Heritage. The conclusions of the study will be incorporated into the SA baseline once they are published.

Sustainability issues and relevance to Shepway Local Plan

• There are many sites, features and areas of historical and cultural interest in the District, a number of which are at risk, and which could be adversely affected by poorly planned development. The Local Plan should seek to conserve and enhance the historic environment.

Likely evolution of the issues without Shepway Local Plan

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

Landscape

- 4.63 Shepway is a coastal District with over 20 miles of coastline, a section of which is designated as Heritage Coast. Over 33% of the District falls within the Kent Downs Area of Outstanding Natural Beauty (AONB). The District has a number of locally designated 'Local Landscape Areas' concentrated around Romney Marsh and also parts of the Sandgate Escarpment and Seabrook Valley, Eaton Lands, Coolinge Lane, Enbrook Valley and Mill Lease Valley.⁵⁰
- 4.64 Shepway features a variety of landscape types, from chalk downland and wooded valleys to areas of marshland. The District of Shepway spans three National Character Areas.
 - The southern half of Shepway is within the Romney Marsh NCA:
 - A flat, open and agricultural landscape, with distinctive drainage dykes, marshes and open skies. Dungeness is the largest shingle foreland in Europe, with a real sense of isolation and remoteness especially along the coast. 20th century development is evident in the towns along the coastal strip. Much of this area is dominated by the imposing power station and associated transmission lines. Past gravel extraction pits, now flooded, military uses and expanding holiday resorts add to the general clutter along the coast.
 - The Wealden Greensand NCA runs in a narrow band west from Folkestone:
 - Belt of Greensand typified by woodlands, scattered settlements and scarp / dip-slope topography. The East Kent section has a gentler, more open aspect and can be described as less intimate and less distinctive than other areas. It is also more marked by development, with the presence of major towns and communication corridors.
 - The northern quarter of the District lies within the North Downs NCA:

48 Shepway District Council (2013) Annual Monitoring Report

⁴⁶ Shepway District Council (2013) Annual Monitoring Report

⁴⁷ English Heritage Risk Register (2014)

⁴⁹ Shepway District Council (2013) Annual Monitoring Report

⁵⁰ Shepway District Council (2013) Annual Monitoring Report

 Distinctive chalk downland with a steep scarp, and broad dip slope incised by valleys or "coombes". Unimproved, species rich grassland and ancient woodland are found on some less fertile soils, although much of the lower dip slope in Kent is fertile and is used for intensive arable agriculture. Rural with scattered and distinctive farmsteads and large houses.⁵¹

Sustainability issues and relevance to Shepway Local Plan

- The District contains a number of distinct rural landscapes as well as those more influenced by human development which could be harmed by inappropriate development.
- 4.65 The Local Plan should ensure that designated landscapes are protected as appropriate and that development outside these designations takes account of the variation in landscape character across the District.
 - Likely evolution of the issues without Shepway Local Plan
- 4.66 Pressures on local landscapes are likely to increase with the rising population of the District, new development and climate change. Without the Local Plan, there is less opportunity to adopt a coordinated, spatial approach to the development of open green spaces/green networks for recreation, walking and cycling networks, and wildlife. Strategic developments allocated through the Local Plan will need to provide capacity for new residential and employment developments without compromising the local integrity of the District's environmental assets, including the District's most sensitive landscapes.

Biodiversity

- 4.67 Shepway District contains a wide range of habitats including species-rich chalk grassland, ancient woodland, low lying marsh, shingle, and dune areas. Two areas (Dungeness and the Folkestone to Etchinghill Escarpment) have been designated Special Areas of Conservation (SACs), which means that are regarded as being of international importance under the EU Habitats Directive⁵². Dungeness is also a National Nature Reserve.
- 4.68 There are 13 Sites of Special Scientific Interest (SSSIs) in Shepway District of varying condition. Eight of these are considered to be broadly in "favourable" condition and three broadly in "unfavourable recovering" condition. One site is classified as "unfavourable no change" and another "unfavourable declining". 53
- 4.69 There is a significant amount of Ancient Woodland in Shepway, concentrated to the west, northwest and north of Folkestone. 26 of the 40 Ancient Woodlands are considered to be in positive management.⁵⁴ The distribution of this woodland is patchy leading to limited ecological connectivity between the areas, although there are some less fragmented areas in the Northwest of the District.
- 4.70 The District contains 40 Local Wildlife Sites. Located mainly to the west and north of Shepway these sites are mainly woodland and species-rich grassland sites, in contrast to the District's SSSIs, which are primarily coastal or wetland habitats.
- 4.71 In support of a "Living Landscapes" approach, Biodiversity Opportunity Areas (BOAs) in Kent have been mapped to indicate where the delivery of Kent Biodiversity Action Plan (BAP) targets should be focused to secure the maximum biodiversity benefits and the best opportunities for establishing large habitat areas and/or networks. It is not intended that nature conservation becomes the primary land-use within the BOAs, so long as the targets and objectives for each area can be met, and development of any kind is not precluded. However, consideration may in some cases need to be given to ensuring that development within a BOA does not significantly increase the fragmentation of wildlife habitats within target areas or preclude significant opportunities for habitat restoration or recreation. Four BOAs have been identified in Shepway:
 - Dover and Folkestone Cliffs and Downs (KT08).

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

⁵¹ Natural England, National Character Areas Profiles (2013) [online] available at: http://www.naturalengland.org.uk/publications/nca/

⁵² Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Fauna and Flora

⁵³ Natural England (2014) Condition of SSSI units [online] available at:

⁵⁴ Shepway District Council (2011) Annual Monitoring Report

- Low Weald Woodlands (KT14).
- Romney Marsh and Rye Bay (KT15).
- East Kent Woodlands and Downs (KT07). 55,56
- 4.72 Some brownfield sites in Kent support nationally and internationally important invertebrate communities.⁵⁷
- 4.73 Shepway District Council intends to commission a Habitats Regulations Assessment (HRA) for the Places and Policies Local Plan, the results of which will be reflected in the SA as relevant, later in the SA process.

Sustainability issues and relevance to Shepway Local Plan

- Shepway contains a significant resource of designated biodiversity sites, a number of which are in unfavourable condition. It also contains a significant but fragmented resource of Ancient Woodland. Shepway's landscape outside of designated sites contains important habitats, including a number which have the potential to contribute to large scale ecological networks. All of these biodiversity assets could be harmed by inappropriate development.
- Green networks for wildlife and natural green spaces need to be fully reflected in the GI Strategy to provide a framework for the consideration of development proposal, and for avoiding harm and gaining enhancements where appropriate.
- 4.74 The Local Plan should ensure that designated wildlife sites are conserved and enhanced and also seek to maintain and enhance the four large scale ecological networks identified in the District.
 - Likely evolution of the issues without Shepway Local Plan
- 4.75 With the population of the District increasing, pressure on recreation and wildlife areas is likely to be exacerbated.
- 4.76 Paragraph 109 of the NPPF seeks to minimise impacts on biodiversity and provide net gains in biodiversity where possible, which may afford some protection to the SSSIs and local designations in the District. The Habitats and Birds Directives provide protection to the internationally designated biodiversity sites in proximity to the District. Adopting a strategic, local approach to the allocation of development will ensure that the impacts of development (both singularly and in combination) on all nature conservation interest can be better managed.
- 4.77 Without the Local Plan there is less opportunity to adopt a co-ordinated approach to the development of green networks for wildlife and natural green spaces designed to steer recreational pressure away from sensitive wildlife sites. Strategic developments allocated through the Local Plan will need to provide capacity for new residential and employment developments without compromising the local integrity of the District's biodiversity assets and ecological networks.
- 4.78 The severity and likelihood of adverse impacts on local ecosystems is also likely to increase with predicted climate change. Without an up to date Local Plan, there is less opportunity to adopt a co-ordinated, spatial approach to managing the effects of this change through careful site allocations and targeted wildlife conservation and enhancement initiatives.

Air pollution

4.79 Shepway District currently has no Air Quality Management Areas⁵⁸. In 2011, all prescribed air quality objectives were met. The highest levels of air pollution are found at busy roadside sites in Folkestone town.⁵⁹

 $^{^{55}}$ The Wildlife Trust, A Living Landscape for the South East available online at:

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

http://www.kentbap.org.uk/kent-boas/

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

Defra, Air Quality Management Areas [online] available at: http://aqma.defra.gov.uk/aqma/home.html

⁵⁹ AEA (2012) Kent and Medway Air Quality Monitoring Network - Annual Report 2011

Sustainability issues and relevance to Shepway Local Plan

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

Likely evolution of the issues without Shepway Local Plan

4.81 The need to travel by unsustainable modes and associated emissions of air pollutants are likely to increase without action from the Local Plan to direct development to sustainable locations an increase provision of sustainable transport infrastructure. Nevertheless, the ability of the Local Plan to influence air pollution in the District is limited by the fact that much of the traffic passing through it is on the strategic road network and driven by regional and national factors. Kent's Local Transport Plan⁶⁰ has a lead role to play in managing transport related issues and its objectives include reducing emissions, encouraging a shift to sustainable transport and tackling congestion, all of which should help to manage transport-related air quality issues, even in the absence of the Local Plan.

Soil

- 4.82 The 2002 Agricultural Land Classification Survey defined approximately 60% of the District's land area as "Excellent" or "Very Good" for agricultural purposes. Romney Marsh ward is the most productive area, containing virtually all of the 'Grade I' agricultural land in the District and a significant proportion of the County's.
- 4.83 There are a range of potentially contaminated sites within the District of which the Council is aware. Contamination can be the result of historic land uses and current uses such as the handling and storage of fuels and the transportation and storage of waste.
- 4.84 Construction aggregates sand, gravel and crushed rock are the most significant (in quantity terms) worked and imported into Kent. Within Shepway, sharp sand and gravel deposits have historically been exploited in the southern part of Romney Marsh although these reserves are to some extent becoming worked out.⁶²

Sustainability issues and relevance to Shepway Local Plan

- Shepway contains some of the most productive agricultural land in the South East but this could be lost to development.
- Shepway contains areas of historically contaminated land which could pose a risk to human health and the natural environment or which could be remediated and brought into appropriate use.
- Shepway contains valuable sand and gravel reserves which could be sterilised by development.
- 4.85 The Local Plan should seek to avoid development on the best and most versatile agricultural land. Where such use is permitted it should, where possible, be temporary and reversible. Previously developed land should be prioritised for development, recognising that brownfield sites may include priority habitats and/or support significant biodiversity interest. The Local Plan should support development which achieves remediation of contaminated sites and avoid development which poses a risk to human health or the wider natural environment. The Local Plan should seek to avoid sterilising economic minerals reserves.

Likely evolution of the issues without Shepway Local Plan

4.86 The NPPF requires local planning authorities to take into account the benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to

 $^{^{60}}$ Kent County Council (2011) Local Transport Plan for Kent 2011-2016

⁶¹ Shepway District Council (2011) Shepway Rural Services Study

⁶² Kent County Council (2014) Kent Minerals and Waste Local Plan 2013-30: Pre-submission Consultation Draft

be necessary, areas of poorer quality land should be used in preference to those of a higher quality. The NPPF also requires local planning authorities to encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value. In relation to minerals, the NPPF requires local planning authorities to avoid needlessly sterilising known locations of minerals resources of local and national importance are by non-mineral development. The Kent Minerals and Waste Local Plan⁶³ seeks to deliver a sustainable, efficient supply of land-won minerals and to safeguard economic mineral resources for future generations and provides a mechanism by which to implement these requirements via its land allocations for minerals extraction.

Water quality and water resources

- 4.87 Kent has one of the lowest levels of rainfall in the country and is extremely dependent on groundwater for drinking water supplies. The condition of aquifers under Shepway in terms of both water quality and quantity is a matter of concern. It is important for security of drinking water supplies and the health of sensitive surface water habitats that new development does not adversely affect the quality or place unsustainable demands on the quantity of these water resources. The Stour Catchment is of particular importance as it contains the District's principal aquifers. A number of Source Protection Zones have been established, mainly in the north of the District, to protect groundwater quality in sensitive areas. The Core Strategy states that Source Protection Zones must be protected and that effective pollution prevention measures are required, as appropriate.
- 4.88 The majority of surface water bodies in Shepway have been classified as having a "moderate" Water Framework Directive (WFD) status. Some areas to the north of the District are classified as being "poor", but none receive the lowest category of "bad". The Seabrook Stream / eastern end of the Royal Military Canal is the only current example of a water course in "good" condition. Given the WFD requirement for all surface waters to achieve "good" status by 2015 it is important, as a precursor to improvements, that the Local Plan prevents any further deterioration in the quality of surface water and where possible supports improvement of water quality.⁶⁵
- 4.89 The quality of Shepway's coastal waters is important, particularly to the District's tourism economy. These are ultimately the 'sink' for urban runoff and whilst the volume of marine water available to dilute pollutants is significant, the Council acknowledges the importance of protecting its generally "excellent" bathing water quality. ⁶⁶
- 4.90 The settlements of Shepway have a good level of coverage from waste water treatment works (WWTWs). Most of them have a current or planned capacity sufficient to meet planned growth although there is potentially insufficient capacity in the strategic wastewater connection between the Westenhanger and Lympne area and the Sellindge WwTW, an issue which the Water Cycle Study recommends is addressed via developer contributions to support strategic development in this area. The Core Strategy (Policy CSD5) requires that "new buildings and dwellings must be delivered in line with wastewater capacity" and that "the quality of water passed on to watercourses and the sea must be maintained or improved". Supporting text specifies that if there is insufficient capacity in the sewerage system to accommodate the increased volumes of flow arising from a new development, the development will need to connect off-site to the nearest point of adequate capacity.
- 4.91 Many parts of Shepway are served by combined sewers, creating the risk that extreme rainfall events (which are increasingly likely under climate change) could lead to combined sewer overflows (CSOs) and associated risks of flooding and adverse effects on water quality. The Water Cycle Study recommends a positive but selective approach to Sustainable Drainage Systems (SuDS) to reduce the amount of water discharged to combined sewers and WwTWs, where technically feasible. ⁶⁸

 $^{^{63}}$ Kent County Council (2014) Kent Minerals and Waste Local Plan 2013-30: Pre-submission Consultation Draft

⁶⁴ Shepway District Council (2011) Shepway Water Cycle Study

⁶⁵ Shepway District Council (2011) Shepway Water Cycle Study

⁶⁶ Shepway District Council (2011) Shepway Water Cycle Study

⁶⁷ Shepway District Council (2011) Shepway Water Cycle Study

⁶⁸ Shepway District Council (2011) Shepway Water Cycle Study

4.92 As Shepway falls within a designated Water Scarcity Status Area, water efficiency measures are appropriate in new development and supported by the Environment Agency. ⁶⁹ The Water Resources Management Plan⁷⁰ concludes that demand for water is unlikely to outstrip supply over the Shepway Core Strategy plan period. The Shepway Water Cycle Report⁷¹ has considered the implications of the Core Strategy on the Water Resources Management Plan and found that the two are consistent but that it is appropriate for local planning policy to directly support efforts to significantly reduce average domestic consumption. The Core Strategy requires all residential developments to achieve a maximum water usage of 105 litres/person/day (as required by Code for Sustainable Homes 'level 3 and level 4') with a more stringent standard of 90 litres/person/day applied to strategic residential allocations at Folkestone Seafront (Policy SS6) and Shorncliffe Garrison, Folkestone (Policy SS7).⁷²

Sustainability issues and relevance to Shepway Local Plan

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

Likely evolution of the issues without Shepway Local Plan

4.94 National plans and strategies encourage new development to meet water efficiency standards and water companies must plan to reduce leaks from the water supply network as well as improve water efficiency. Without the Local Plan, however, it will be more difficult to adopt a co-ordinated approach to water resource planning with water companies and more difficult to implement water efficient design in new development.

Material assets⁷³

Open Space

- 4.95 Shepway features a number of significant open spaces. These include four with greater than local importance for their facilities or natural features: the Coastal Park in Folkestone; Brockhill Country Park in Hythe; Dungeness National Nature Reserve and The Warren, Folkestone. The majority of parks and major open spaces of Shepway are within urban areas, predominantly Folkestone. The Lower Leas Coastal Park, Brockhill Country Park and the Royal Military Canal have Green Flag status in recognition of their value to local people as a recreational resource.⁷⁴
- 4.96 Shepway's latest Annual Monitoring Report records the loss of a number of open spaces to residential development but no gains in the extent of open space were noted.⁷⁵ The Council's

Sustainability Appraisal of Places and Policies Local Plan

⁶⁹ Shepway District Council (2013) Shepway Core Strategy, Policy SS6

 $^{^{70}}$ Veolia Water Southeast (2009) Final Water Resources Management Plan Main Report

 $^{^{71}}$ Shepway District Council (2011) Shepway Water Cycle Study

⁷² Shepway District Council (2012) Shepway Core Strategy, Policy SS6

⁷³ The term 'material assets' in the SEA Directive is not defined and has been interpreted in a variety of ways; in this SA Report it is taken to mean 'infrastructure' in the District including 'green' infrastructure such as open spaces.

⁷⁴ Green Flag Award website [online] accessed at: http://greenflag.keepbritaintidy.org/award-winning-sites/south-east/

⁷⁵ Shepway District Council (2013) Annual Monitoring Report

- 2011 Open Spaces study⁷⁶ and discussion with the Council reveal that whilst the quantity of open space provision in the District is generally adequate that are some issues with the quality of open spaces, particularly parks.
- 4.97 Core Strategy Policy CSD4 states that "Green infrastructure will be protected and enhanced and the loss of GI uses will not be allowed, other than where demonstrated to be in full accordance with national policy, or a significant quantitative or qualitative net GI benefit is realised or it is clearly demonstrated that the aims of this strategy are furthered and outweigh its impact on GI."
- 4.98 A Call for Sites Consultation was completed in February 2014; reasonable suggestions for open space will be appraised alongside other reasonable alternatives as part of the SA for the Places and Policies Local Plan.

Sustainability issues and relevance to Shepway Local Plan

- There is a need for the quality of some open spaces, particularly parks, to be improved. Recent development has resulted in some open spaces in the District being lost with no net gains. Future development could lead to further losses and greater demand.
- 4.99 The Local Plan should seek to ensure that existing open spaces are protected, and where necessary, enhanced. Open space quality improvements should be sought, where relevant.

Transport

- 4.100 Whilst the District is primarily of a rural nature there have been significant improvements in transport connections in and out of Shepway over recent decades. Rail connections have been improved by the High Speed 1 domestic rail service which began to operate in December 2009, reducing the journey time from Folkestone to London to under an hour. According to the operators of the Southeastern rail franchise, High Speed 1 has been steadily drawing additional users from around Kent who wish to take advantage of the reduced journey times it offers to and from central London. All of the four railway stations in Shepway provide direct connections to Dover to the east and Ashford to the northwest, as well as direct rail access into London, at London Bridge, via Ashford and Tonbridge. Of the four stations, it is noted that Folkestone Central is the most intensely used, reflecting its mainline and high speed rail services and its location in Folkestone town centre. To
- 4.101 2001 Census information⁷⁸ indicated that approximately 59% of the Shepway working population travelled to work by car, which is a slightly higher than the average for England. Of those who drive to work, approximately 65% travel to work by car within the District itself. More recent data show that although there is a heavy dependency on the use of private transport to access employment, relatively few people commute out of Shepway (73% of Shepway's working residents worked in Shepway and 77% of its workforce was resident in the District in 2011⁷⁹). This creates a good starting point for efforts to promote decreased car dependency.
- 4.102 The percentage of non-car owners in Shepway is slightly higher than for Kent overall, especially in and surrounding Folkestone, which may well be related to the large elderly population. There is a lower than average modal share of bus use, with 4% travelling to work by this means in comparison to 8% across England.⁸⁰ In March 2011 the Shepway Joint Transport Board adopted the 2011 Shepway Cycling Plan which was endorsed as Council policy in 2013.⁸¹ The document sets out a five year plan promoting cycling across the District. The plan recognises the scope for people to switch to using the bicycle to make local trips, particularly across Romney Marsh, and in parts of Hythe and Folkestone where there is a flat terrain.⁸²
- 4.103 An update of the Shepway Transport Model was commissioned in October 2013 and this is currently being undertaken by URS. The update will reflect the adopted Core Strategy Local Plan 2013 and will incorporate any recent traffic surveys which have been undertaken as part of major

⁷⁶ Shepway District Council (2011) Shepway Open Spaces: Sports & Recreation Report.

⁷⁷ Shepway District Council (2011) Annual Monitoring Report

 $^{^{78}}$ 2011 Census data not available for this measure

 $^{^{79}}$ Commuting Patterns from the Annual Population Survey, Great Britain, 2010 and 2011, ONS, 2013

⁸⁰ URS/Scott Wilson (2011) Shepway District Council Transport Strategy

⁸¹ Shepway District Council (2013) Annual Monitoring Report

⁸² Kent County Council (2011) Shepway Cycling Plan

development proposals. Whilst updated maps showing results for key junctions were not yet available at the time of writing, the Council has confirmed that the new modelling work has not revealed any additional junctions which are predicted to be over-capacity based on the latest assumptions. Additionally, surveys of Dungeness and Romney Marsh have been confirmed for the preparation of a Sustainable Access Strategy/SPD. The details of both documents will be incorporated in the baseline of the SA once they have been published.

Sustainability issues and relevance to Shepway Local Plan

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

Waste

4.105 In 2004/2005, 44,700 tonnes of household waste was collected. Approximately 70% went to landfill sites, 15% was recycled and 9% composted.⁸³ In 2011/2012, 38,000 tonnes of household waste was collected, a reduction of approximately 15%. In 2011/2012, approximately 27% of this waste was recycled and 17% composted (44.2% in total), which constitutes a significant rise and 2% higher than the national average. The annual weight of waste generated per Shepway resident is 376kg, 20kg less than the national average.⁸⁴

Sustainability issues and relevance to Shepway Local Plan

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

Likely evolution of the issues without Shepway Local Plan

- 4.106 With the rising population of the District, pressures on the quality and availability of open space are likely to continue without a planned approach to development. Without the Local Plan there is less opportunity to adopt a co-ordinated, spatial approach to the development of open green spaces/green networks for recreation, walking and cycling networks, and wildlife.
- 4.107 The need to travel and is likely to increase and car dependence is likely to continue without action from the Local Plan to direct development to sustainable locations and increase provision of sustainable transport infrastructure.
- 4.108 Achievement of the waste reduction and recycling objectives will mainly depend on the success of policies in Kent County Council's Minerals and Waste Plan, the County Council being the Waste Planning Authority for Shepway. The increasingly stringent national sustainability requirements of the building regulations will also have a positive contribution.

⁸³ Kent County Council (2007) Kent Joint Municipal Waste Management Strategy, Kent Municipal Solid Waste Baseline Data Annex 1

⁸⁴ UK Governments annual Local Authority Collected and Household Waste Statistics 2011/12 [online] accessed at: https://www.gov.uk/government/.../2011-12_ANNUAL

5 SA findings

5.1 The sustainability effects of each of the spatial policy options for housing and the settlements contained in Part One of the first draft PPLP are set out in Appendix 1 and reproduced below. The sustainability effects of the remaining, more numerous PPLP policy options are set out in Appendix 1 and summarised below in relation to each of the Plan's policy topics. Appendix 1 also provides recommendations for future development of the PPLP options into policy and these are brought together at the end of this Chapter.

Part one of PPLP: Shepway areas and future site allocations

Housing and the settlements

1,519 dwellings in Folkestone.

to travel.

- 5.2 Five principles have been applied to help establish the scale of housing to be provided at each tier in the settlement hierarchy. Two of these rely on existing policy in the Core Strategy and therefore have no effect on the baseline in relation to SA objectives. Principles 2, 3 and 4 are likely to maximise the benefit of housing in the District by reinforcing application of the settlement hierarchy so that housing is directed towards the most sustainable settlements and to where housing land is available, with positive effects for new and improved public service and facility provision (SA3 and SA14); crime prevention (SA4); affordable housing schemes (SA5); sustainable travel patterns (SA10); and urban regeneration and greening (SA7, SA8, SA9, SA11 and SA12). The flexibility introduced by principle 4 is a pragmatic way of meeting objectively assessed housing need in the District, with further benefits for SA5.
- 5.3 Broad sustainability advantages and disadvantages of directing housing towards each major settlement or tier in the settlement hierarchy are set out in Appendix 1 and reproduced below.
- 5.4 **Likely positive sustainability effects:** The Core Strategy made strategic housing allocations to Folkestone Seafront (SS6: up to 1,000 dwellings) and Shorncliffe Garrison (SS7: up to 1,200 dwellings) in Folkestone. The PPLP allocates an additional 1,519 dwellings in the town. The new housing in Folkestone will help to meet affordable housing need in the settlement of the District where the SHMA⁸⁵ indicates that it is greatest, as well as meeting market demand which is likely to be high in this large population centre with positive effects on SA5. It will allow for the efficient use of land through the development of previously developed land (SA11) before greenfield land (SA2 and SA9) with indirect benefits associated with urban regeneration (SA4, SA6, SA8). Positive effects on SA10 are likely to result from directing housing towards a Sub Regional Town where the availability of employment, services and facilities will reduce the need for new residents
- 5.5 **Likely negative sustainability effects:** Although development in the District's Sub Regional Town of Folkestone will provide new residents with access to the town's public transport links, including Folkestone Central Station, it is also likely to result in significant increases in traffic in the area of the District where congestion is already greatest, with negative effects on SA10.
 - 959 dwellings in Hythe and New Romney Town, incorporating Littlestone-on-Sea (480 per settlement)
- 5.6 **Likely positive sustainability effects of residential development at Hythe**: The Core Strategy makes reference to a strategic housing allocation to Nickolls Quarry, Hythe of 1,050 dwellings (saved policy HO2). The PPLP makes an additional allocation of approximately 480 dwellings in Hythe. Hythe is one of two Strategic Towns in Shepway and the new housing will have a positive effect in meeting housing need in the area of the District where need is high (SA5)

 $^{^{85}}$ Strategic Housing Market Assessment for the East Kent Sub-region, 2009

- and will maximise the efficient use of land through the development of previously developed land (SA11) before greenfield land (SA2 and SA9) with indirect benefits associated with urban regeneration (SA4, SA6, SA8). Positive effects on SA10 are likely to result from directing housing towards a Strategic Town where the availability of employment, services and facilities will reduce the need for new residents to travel.
- 5.7 **Likely positive sustainability effects of residential development at New Romney Town** (incorporating Littlestone-on-Sea): New Romney is one of two Strategic Towns in Shepway and is allocated for significant residential development in the region of 480 dwellings. The new housing in New Romney will have a positive effect in meeting housing need in the area of the District where need is high (SA5) and will maximise the efficient use of land through the development of previously developed land (SA11) before greenfield land (SA2 and SA9) with indirect benefits associated with urban regeneration (SA4, SA6, SA8). Positive effects on SA10 are likely to result from directing housing towards a Strategic Town where the availability of employment, services and facilities will reduce the need for new residents to travel.
- 5.8 **Likely negative sustainability effects of residential development at Hythe**: Although development in a Strategic Town will provide new residents with access to public transport links, the significant scale of development proposed has the potential to have an adverse effect on the traffic (SA10). Furthermore, significant development could have an adverse effect on the historic core of the town and the Royal Military Canal (SA7 and SA8).
- 5.9 Likely negative sustainability effects of residential development at New Romney Town (incorporating Littlestone-on-Sea): Although development in a Strategic Town will provide new residents with access to public transport links, the significant scale of development proposed within the town has the potential to have an adverse effect on the traffic (SA10). Furthermore, significant development could have an adverse effect on the strong historic character of the town (SA7 and SA8).
 - 373 dwellings in Lydd Town and Hawkinge (187 per settlement)
- 5.10 Likely positive sustainability effects of residential development at Lydd: Lydd is a Service Centre in the Shepway settlement hierarchy. The policy's allocation of approximately 187 dwellings in the town serves to help sustain grow and consolidate the position of the town as a District Centre serving the local hinterland with shops, employment and public services with positive effects on meeting local affordable housing needs (SA5), public services and facilities (SA3) and employment (SA6). Some positive effects on SA10 are likely to result from directing housing towards a Service Centre where the availability of employment, public services and shops will reduce the need for new residents to travel.
- 5.11 Likely positive sustainability effects of residential development at Hawkinge: Hawkinge is a service centre. The policy's allocation of approximately 187 dwellings in the town serves to help sustain grow and consolidate the position of the town as a District Centre serving the local hinterland with shops, employment and public services with positive effects on meeting local affordable housing needs (SA5), public services and facilities (SA3) and employment (SA6). Some positive effects on SA10 are likely to result from directing housing towards a Service Centre where the availability of employment, public services and shops will reduce the need for new residents to travel.
- 5.12 **Likely negative sustainability effects of residential development at Lydd:** The scale of development proposed within the town has the potential to put increased pressure on existing local services and facilities, unless new and improved public services and facilities can be provided. Furthermore, the construction of roughly 187 dwellings in this relatively small town could have an adverse effect on baseline traffic levels in the town and wider area (SA10).
- 5.13 **Likely negative sustainability effects of residential development at Hawkinge:** The scale of development proposed within the town has the potential to put increased pressure on existing local services and facilities, unless new and improved public services and facilities can be provided. Furthermore, the construction of roughly 187 dwellings in this relatively small town could have an adverse effect on baseline traffic levels in the town and wider area (SA10).

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

- 5.14 Likely positive sustainability effects of residential development at Dymchurch:

 Dymchurch is a rural centre for tourism, local shops and public services and facilities. The policy's allocation of approximately 66 dwellings will help to sustain grow and consolidate its role as a Rural Centre serving the local hinterland with shops, employment and public services with positive effects on meeting local affordable housing needs (SA5), public services and facilities (SA3) and employment (SA6).
- 5.15 **Likely positive sustainability effects of residential development at Elham:** Elham is a rural centre for tourism, local shops and public services and facilities. The policy's allocation of approximately 66 dwellings will help to sustain grow and consolidate its role as a Rural Centre serving the local hinterland with shops, employment and public services with positive effects on meeting local affordable housing needs (SA5), public services and facilities (SA3) and employment (SA6).
- 5.16 **Likely positive sustainability effects of residential development at Lyminge:** Lyminge is a rural centre for tourism, local shops and public services and facilities. The policy's allocation of approximately 66 dwellings will help to sustain grow and consolidate its role as a Rural Centre serving the local hinterland with shops, employment and public services with positive effects on meeting local affordable housing needs (SA5), public services and facilities (SA3) and employment (SA6).
- 5.17 **Likely positive sustainability effects of residential development at Sellindge:** Sellindge is a rural centre for tourism, local shops and public services and facilities. The policy's allocation of approximately 66 dwellings will help to sustain grow and consolidate its role as a Rural Centre serving the local hinterland with shops, employment and public services with positive effects on meeting local affordable housing needs (SA5), public services and facilities (SA3) and employment (SA6).
- 5.18 Likely negative sustainability effects of residential development at Dymchurch:

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

- 209 dwellings in the primary villages (30 per settlement)
- 5.22 **Likely positive sustainability effects:** The modest scale of development within the District's primary villages is unlikely to have a significant effect against any of the SA objectives. However, there is potential for minor benefits meeting local affordable housing needs in the rural areas of the District.
- 5.23 **Likely negative sustainability effects:** The modest scale of development within the District's primary villages is unlikely to have a significant effect against any of the SA objectives. However, the cumulative effects associated with increased populations in the rural areas of the District could result in pressures on small scale and disparate public facilities and services (SA3), increase reliance on the private car with adverse effects on local efforts to reduce congestion (SA10) and mitigate climate change (SA2).
 - 32 dwellings in the secondary villages (5 per settlement)
- 5.24 **Likely positive sustainability effects:** The modest scale of development within the District's secondary villages is unlikely to have a significant effect against any of the SA objectives. However, there is potential for minor benefits meeting local affordable housing needs in the rural areas of the District.
- 5.25 **Likely negative sustainability effects:** The modest scale of development within the District's secondary villages is unlikely to have a significant effect against any of the SA objectives. However, the cumulative effects associated with increased populations in the rural areas of the District could result in pressures on small scale and disparate public facilities and services (SA3), increase reliance on the private car with adverse effects on local efforts to reduce congestion (SA10) and mitigate climate change (SA2).

Infrastructure

5.26 Unsurprisingly, all policy options considered are likely to result in local investment in infrastructure. Site-focussed policy options fail to allow for investment in District-wide infrastructure schemes, reducing the Council's ability to tackle strategic issues with negative effects in relation to reduced ability to provide flood defences and flood alleviation schemes (SA1 and SA12); climate change mitigation and adaptation schemes (SA2 and SA13); new and improved public service and facility provision (SA3 and SA14); crime prevention schemes (SA4); affordable housing schemes (SA5); local employment and training schemes (SA6); sustainable travel schemes (SA10); and urban regeneration and greening (SA7, SA8, SA9, SA11 and SA12).

Part two of PPLP: Development management policies options

5.27 As might be expected, many of the development management policies had broadly positive effects on the topic areas they address. Due to the large number of these positive effects and their disparate nature, they are not readily summarised and instead are described in Appendix 1. A notable exception to this is that in order to secure positive outcomes in the relevant topic area, many of the policy options set out criteria which acceptable developments must meet. Many such criteria inevitably place a greater financial and/or administrative burden on potential developers than existing national or Core Strategy planning policy or the Building Regulations, creating the risk that fewer developments will be delivered than would otherwise be the case. This results in potential negative effects in relation to SA objectives on provision of housing (SA5) and employment land (SA6). Where other types of negative effects were identified by the SA, these are summarised below.

General development management

5.28 Most policy options have generally positive sustainability effects on the topics they address. The only negative effect identified for one policy option was a failure of design to respond to local character.

Housing

- 5.29 Most policy options considered have generally positive sustainability effects on the topics they address. Negative effects identified for certain policy options being considered included:
 - Reducing the integration of Gypsies, Travellers and Travelling Showpeople into the local community by allowing development that is remote from existing settlements (potential negative effects on SA3).
 - Risking inefficient use of land and increasing potential impacts on the countryside by limiting the density of housing development (potential negative effects on SA8, SA9, SA11).
 - Reducing the integration of elderly people into the local community by allowing development of retirement communities (potential negative effects on SA3).
 - Risking poor design quality by providing flexibility in policies governing self-build homes or stifling innovation in sustainable design by being over-prescriptive (potential negative effects on SA1, SA7, SA8, SA9).

Economy

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

Community

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

Transport

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

Natural environment

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

The coast

5.34 Most policy options have generally positive sustainability effects on the topics they address.

Climate change

5.35 Most policy options have generally positive sustainability effects on the topics they address. Negative effects identified for certain policy options being considered included:

- Development of wind turbines/farms in the District could have an adverse effect on the landscapes/ townscapes/ seascapes as well as the settling of heritage assets. Furthermore, it has the potential to increase the rates of bird strike in the District, with adverse effects on biodiversity (potential negative effects on SA7, SA8, SA9).
- Policy options which restrict the development of wind turbines in connection with residential uses or which restrict the development of solar farms could have an adverse effect on promoting climate change mitigation in the District (potential negative effects on SA2).

Health and wellbeing

- 5.36 Most policy options have generally positive sustainability effects on the topics they address. Negative effects identified for certain policy options being considered included:
 - Restricting the number of hot food takeaways in the District has the potential to have an adverse effect on employment in the District (potential negative effects on SA6).

Historic environment

5.37 Most policy options have generally positive sustainability effects on the topics they address.

SA recommendations

5.38 In carrying out the SA of the first draft PPLP, LUC identified a number of opportunities to clarify the policy options, to strengthen their potential positive sustainability effects or to avoid or mitigate their potential negative sustainability effects. These recommendations are presented in Appendix 1 alongside the policy options to which they relate and have also been brought together below for ease of reference.

Economy

- 5.39 **Policy E1:** This policy should set out how it will determine that employment land is surplus to requirements, particularly in light of the conclusion of the Employment Land Review⁸⁶ that "There is no strong case for releasing most existing employment sites and allocations in Shepway". It should also explain how safeguarding of existing employment land will reflect the needs of priority locations for economic regeneration and of emerging or target employment sectors for the District.
- 5.40 **Policy E2:** Both policy options should be explicitly linked to an assessment of market demand for business space and to the anticipated future economic growth of the particular town centre and its role in the settlement hierarchy.
- 5.41 **Policy E3**: As a well as energy efficiency and renewable energy generation, climate-change related criteria could also address efficient use of water resources, mitigation of surface water flood risk and building design that is adapted to a warmer climate.
- 5.42 **Policy E6**: This policy should be explicitly linked to evidence on the spatial distribution of economic development opportunities in the District and on market demand for the types of employment premises provided, including the Shepway Economic Development Strategy, Shepway Employment Land Review and forthcoming Town Centre Study.
- 5.43 **Policy E8:** This policy should be explicitly linked to available evidence on the likely effects of replacing town centre retail units with other services and facilities, including the findings of the forthcoming Town Centre Study.
- 5.44 **Policy E10:** The policy should define what is meant by an 'opportunity area'. The policy should clarify whether it applies to all sites of poor visual amenity or only those that are currently in employment use. Any requirement for good design should be extended to cover benefits for biodiversity and the green infrastructure network. This policy should set out how it will determine whether employment land of poor visual amenity is surplus to requirements, particularly in light

⁸⁶ Shepway District Council (2011) Employment Land Review

- of the conclusion of the Employment Land Review⁸⁷ that "There is no strong case for releasing most existing employment sites and allocations in Shepway".
- 5.45 **Policy E11:** The PPLP recognises that "good design will be required to design out crime and provide a more inclusive place for people to socialise". This policy should explicitly address this need, for example by:
 - Requiring developer contributions to provision of additional late night transport, public toilets, street cleaning, security/policing, good quality street lighting and so on.
 - Avoiding concentrations of licensed premises and/or promoting non-alcohol focused uses/activities.
 - Indicting the types of issue likely to be subject to planning conditions, such as acoustic insulation of bars and music venues.
 - Indicating the types of issues to be addressed by residential design requirements for new dwellings in locations where the night time economy is to be promoted.

Community

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

Transport

5.48 **Policy T6:** If policy option B is pursued it should safeguard the internationally important wildlife communities in the Lydd/Dungeness area, have regard to the likely effect of proposals on other special features in the area and address the potential effects of increased noise on residential amenity, otherwise there is potential for adverse effects on the District's ecological assets (SA9), landscapes and townscapes (SA8) and the amenity of residents (SA3, SA5) and businesses (SA6).

Natural environment

- 5.49 **Policy NE1:** Have regard in this policy to the need to avoid negative effects on biodiversity assets that are sensitive to visitor pressure.
- 5.50 **Policy NE2:** It will be important to ensure that measures taken to offset loss significantly improve the condition and diversity of the wider habitat resource.
- 5.51 **Policies NE2, NE4, NE5:** Target biodiversity enhancement to the Biodiversity Opportunity Areas to address targets in the Kent Biodiversity Action Plan and support the establishment or enhancement of landscape scale ecological networks, thereby maximising biodiversity benefits.
- 5.52 **Policy NE7:** Provide links in the PPLP to existing evidence in relation to recreational pressure on the District's two European sites and on the most appropriate strategy for mitigating such pressure, if relevant. If such evidence is absent, engage with Natural England to explore this issue and, if relevant, to agree an appropriate mitigation strategy.
- 5.53 **Policy NE8:** Provide links in the PPLP to existing evidence in relation to recreational pressure on the Dungeness SAC/pSPA and on the most appropriate strategy for mitigating such pressure, if relevant. If such evidence is absent, engage with Natural England to explore this issue and, if relevant, to agree an appropriate mitigation strategy.

Climate change

5.54 **Policy CC3:** Option B should expand on what represents a 'reasonable alternative' renewable energy source, e.g. does this mean that an alternative is only reasonable if it can deliver the same amount of energy for the same installation cost?

⁸⁷ Shepway District Council (2011) Employment Land Review

5.55 **Policy CC4:** In line with national Planning Practice Guidance, policy criteria should include consideration of the need to conserve heritage assets, the need for and impact of security measures such as lights and fencing, and consideration of the energy generating potential of the proposed site.

Health and wellbeing

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

6 Consultation and next steps

6.1 This SA Report is being made available for consultation alongside the first consultation draft of the PPLP (currently scheduled for early in 2015).

Consultees are asked to consider the following questions in particular:

- 6.2 Have the potentially <u>significant</u> sustainability effects of the first draft Places and Policies Local Plan been identified (Chapter 5 and Appendix 1)? If not, please provide evidence to support suggested additional potentially significant effects.
- 6.3 Comments should be sent to:

Planning Policy Team Shepway District Council Civic Centre Castle Hill Avenue Folkestone CT20 2QY

planning.policy@shepway.gov.uk

6.4 Responses from the consultees will be addressed in the subsequent stages of the SA. The next formal output of the SA process will be at the second Draft Local Plan stage, during which reasonable alternative site allocations will be assessed as well as firmed up development management policies. The results of this assessment will inform the Shepway planning team in their preparation of subsequent iterations of the PPLP. The SA of the second Draft PPLP will be reported in an SA Report which will be published for public consultation alongside the second Draft PPLP (currently scheduled for consultation in summer 2015).

Appendix 1

SA of policy options

Policy No.	Issues	Policy Options	NPPF and Core Strategy Policies / Saved 2006 Local Plan Policies	Likely positive sustainability effects (SA objectives affected – see Table 2.1 for key)	Likely negative sustainability effects (SA objectives affected)
		PART ONE: SHEPWAY AREAS AI	ND FUTURE SITE	ALLOCATIONS	
		Housing and th	he Settlements		
Policy 1	Housing Distribution	Specific housing levels by settlement tier are now set out, using SHLAA evidence (and housing permission completions from 2012/13) and applying the following principles: 1. Core Strategy policy must be applied 2. Core Strategy evidence, notably the 2012 technical note/ SHLAA, should be the starting point for identifying sufficient land in an area to allow subsequent testing of site development options. 3. The total amount of housing planned across settlements in tiers of the Hierarchy should proportionate, it must not be less than the total planned in any tier of the Hierarchy below, 4. There is the scope for flexibility within each tier within the Settlement Hierarchy in order to meet the total figure. 5. Following on from 1, with an adopted Core Strategy in place it is beyond the scope of this plan to review strategic urban extensions (Core Strategy Allocations at Folkestone, or the existing major		Considering the principles of the policy on distribution of housing allocations in the District: • Principles 1 and 5 are likely to have a negligible effect as in the absence of the Places and Policies DPD the Core Strategy would continue to be used to influence the distribution of housing in the District. Strategic housing allocations are made by the Core Strategy. The Core Strategy directs additional housing development to the most sustainable towns and villages, consistent with the settlement hierarchy. • Principles 2, 3 and 4 are likely to maximise the benefit of housing in the District by reinforcing application of the settlement hierarchy so that housing is directed towards the most sustainable settlements and to where housing land is available, with positive effects for new and improved public service and facility provision (SA3 and SA14); crime prevention (SA4); affordable housing schemes (SA5); sustainable travel patterns (SA10); and urban	None identified.

Policy No.	Issues	Policy Options	NPPF and Core Strategy Policies / Saved 2006 Local Plan Policies	Likely positive sustainability effects (SA objectives affected – see Table 2.1 for key)	Likely negative sustainability effects (SA objectives affected)
		allocations with planning permission at Nickolls Quarry, Hythe). These are not included. Applying the 5 principles results in the following guideline amounts to help establish the degree of search for sites in each settlement:		regeneration and greening (SA7, SA8, SA9, SA11 and SA12). • The flexibility introduced by principle 4 is a pragmatic way of meeting objectively assessed housing need in the District, with further benefits for SA5.	
		• 1,519 in Folkestone.		The Core Strategy made strategic housing allocations to Folkestone Seafront (SS6: up to 1,000 dwellings) and Shorncliffe Garrison (SS7: up to 1,200 dwellings) in Folkestone. The PPLP allocates an additional 1,519 dwellings in the town. The new housing in Folkestone will help to meet affordable housing need in the settlement of the District where the SHMA ⁸⁸ indicates that it is greatest, as well as meeting market demand which is likely to be high in this large population centre with positive effects on SA5. It will allow for the efficient use of land through the development of previously developed land (SA11) before greenfield land (SA2 and SA9) with indirect benefits associated with urban regeneration (SA4, SA6, SA8). Positive effects on SA10 are likely to result from directing housing towards a Sub Regional Town where the availability of	Although development in the District's Sub Regional Town of Folkestone will provide new residents with access to the town's public transport links, including Folkestone Central Station, it is also likely to result in significant increases in traffic in the area of the District where congestion is already greatest, with negative effects on SA10.

 $^{^{88}}$ Strategic Housing Market Assessment for the East Kent Sub-region, 2009

Policy No.	Issues	Policy Options	NPPF and Core Strategy Policies / Saved 2006 Local Plan Policies	Likely positive sustainability effects (SA objectives affected – see Table 2.1 for key)	Likely negative sustainability effects (SA objectives affected)
				employment, services and facilities will reduce the need for new residents to travel.	
		959 in Hythe and New Romney Town (incorporating Littlestone- on-Sea) (480 per settlement).		The Core Strategy makes reference to a strategic housing allocation to Nickolls Quarry, Hythe of 1,050 dwellings (saved policy HO2). The PPLP makes an additional allocation of approximately 480 dwellings in Hythe. Hythe is one of two Strategic Towns in Shepway and the new housing will have a positive effect in meeting housing need in the area of the District where need is high (SA5) and will maximise the efficient use of land through the development of previously developed land (SA11) before greenfield land (SA2 and SA9) with indirect benefits associated with urban regeneration (SA4, SA6, SA8). Positive effects on SA10 are likely to result from directing housing towards a Strategic Town where the availability of employment, services and facilities will reduce the need for new residents to travel.	Although development in a Strategic Town will provide new residents with access to public transport links, the significant scale of development proposed has the potential to have an adverse effect on the traffic (SA10). Furthermore, significant development could have an adverse effect on the historic core of the town and the Royal Military Canal (SA7 and SA8).
				New Romney Town (incorporating Littlestone- on-Sea) New Romney is one of two Strategic Towns in Shepway and is allocated for significant residential development in the	Although development in a Strategic Town will provide new residents with access to public transport links, the significant scale of development proposed within the town has the potential to have an adverse effect on the

Policy No.	Issues	Policy Options	NPPF and Core Strategy Policies / Saved 2006 Local Plan Policies	Likely positive sustainability effects (SA objectives affected – see Table 2.1 for key)	Likely negative sustainability effects (SA objectives affected)
				region of 480 dwellings. The new housing in New Romney will have a positive effect in meeting housing need in the area of the District where need is high (SA5) and will maximise the efficient use of land through the development of previously developed land (SA11) before greenfield land (SA2 and SA9) with indirect benefits associated with urban regeneration (SA4, SA6, SA8). Positive effects on SA10 are likely to result from directing housing towards a Strategic Town where the availability of employment, services and facilities will reduce the need for new residents to travel.	traffic (SA10). Furthermore, significant development could have an adverse effect on the strong historic character of the town (SA7 and SA8).
		373 in Lydd Town and Hawkinge (187 per settlement).		Lydd is a Service Centre in the Shepway settlement hierarchy. The policy's allocation of approximately 187 dwellings in the town serves to help sustain grow and consolidate the position of the town as a District Centre serving the local hinterland with shops, employment and public services with positive effects on meeting local affordable housing needs (SA5), public services and facilities (SA3) and employment (SA6). Some positive effects on SA10 are likely to result from directing housing towards a Service Centre where the availability of employment,	The scale of development proposed within the town has the potential to put increased pressure on existing local services and facilities, unless new and improved public services and facilities can be provided. Furthermore, the construction of roughly 187 dwellings in this relatively small town could have an adverse effect on baseline traffic levels in the town and wider area (SA10).

Policy No.	Issues	Policy Options	NPPF and Core Strategy Policies / Saved 2006 Local Plan Policies	Likely positive sustainability effects (SA objectives affected – see Table 2.1 for key)	Likely negative sustainability effects (SA objectives affected)
				public services and shops will reduce the need for new residents to travel.	
				Hawkinge Hawkinge is a service centre. The policy's allocation of approximately 187 dwellings in the town serves to help sustain grow and consolidate the position of the town as a District Centre serving the local hinterland with shops, employment and public services with positive effects on meeting local affordable housing needs (SA5), public services and facilities (SA3) and employment (SA6). Some positive effects on SA10 are likely to result from directing housing towards a Service Centre where the availability of employment, public services and shops will reduce the need for new residents to travel.	The scale of development proposed within the town has the potential to put increased pressure on existing local services and facilities, unless new and improved public services and facilities can be provided. Furthermore, the construction of roughly 187 dwellings in this relatively small town could have an adverse effect on baseline traffic levels in the town and wider area (SA10).
		263 in Dymchurch, Elham, Lyminge and Sellindge (66 per settlement).		Dymchurch Dymchurch is a rural centre for tourism, local shops and public services and facilities. The policy's allocation of approximately 66 dwellings will help to sustain grow and consolidate its role as a Rural Centre serving the local hinterland with shops, employment and public services with positive effects on meeting local affordable housing needs (SA5), public services and	Dymchurch has significant natural and cultural heritage assets. The development of approximately 66 new dwellings could put these assets at risk unless appropriate mitigation measures are put in place to protect and enhance these assets (SA7 and SA9). Furthermore, the construction of roughly 66 dwellings in this relatively small settlement could increase the numbers of private cars on the road with adverse effects on local efforts to reduce

Policy No.	Issues	Policy Options	NPPF and Core Strategy	Likely positive sustainability effects	Likely negative sustainability effects
			Policies / Saved 2006 Local Plan Policies	(SA objectives affected – see Table 2.1 for key)	(SA objectives affected)
				facilities (SA3) and employment (SA6).	congestion (SA10) and mitigate climate change (SA2).
				Elham Elham is a rural centre for tourism, local shops and public services and facilities. The policy's allocation of approximately 66 dwellings will help to sustain grow and consolidate its role as a Rural Centre serving the local hinterland with shops, employment and public services with positive effects on meeting local affordable housing needs (SA5), public services and facilities (SA3) and employment (SA6).	Elham has significant natural and cultural heritage assets. The development of approximately 66 new dwellings could put these assets at risk unless appropriate mitigation measures are put in place to protect and enhance these assets (SA7 and SA9). Furthermore, the construction of roughly 66 dwellings in this relatively small settlement could increase the numbers of private cars on the road with adverse effects on local efforts to reduce congestion (SA10) and mitigate climate change (SA2).
				Lyminge Lyminge is a rural centre for tourism, local shops and public services and facilities. The policy's allocation of approximately 66 dwellings will help to sustain grow and consolidate its role as a Rural Centre serving the local hinterland with shops, employment and public services with positive effects on meeting local affordable housing needs (SA5), public services and facilities (SA3) and employment (SA6).	Lyminge has significant natural and cultural heritage assets. The development of approximately 66 new dwellings could put these assets at risk unless appropriate mitigation measures are put in place to protect and enhance these assets (SA7 and SA9). Furthermore, the construction of roughly 66 dwellings in this relatively small settlement could increase the numbers of private cars on the road with adverse effects on local efforts to reduce congestion (SA10) and mitigate climate change (SA2).
				Sellindge Sellindge is a rural centre for tourism, local shops and public	Sellindge has significant natural and cultural heritage assets. The development of approximately 66 new dwellings could put these

Policy No.	Issues	Policy Options	NPPF and Core Strategy Policies / Saved 2006 Local Plan Policies	Likely positive sustainability effects (SA objectives affected – see Table 2.1 for key)	Likely negative sustainability effects (SA objectives affected)
				services and facilities. The policy's allocation of approximately 66 dwellings will help to sustain grow and consolidate its role as a Rural Centre serving the local hinterland with shops, employment and public services with positive effects on meeting local affordable housing needs (SA5), public services and facilities (SA3) and employment (SA6).	assets at risk unless appropriate mitigation measures are put in place to protect and enhance these assets (SA7 and SA9). Furthermore, the construction of roughly 66 dwellings in this relatively small settlement could increase the numbers of private cars on the road with adverse effects on local efforts to reduce congestion (SA10) and mitigate climate change (SA2).
		209 in the primary villages (30 per settlement).		The modest scale of development within the District's primary villages is unlikely to have a significant effect against any of the SA objectives. However, there is potential for minor benefits meeting local affordable housing needs in the rural areas of the District.	The modest scale of development within the District's primary villages is unlikely to have a significant effect against any of the SA objectives. However, the cumulative effects associated with increased populations in the rural areas of the District could result in pressures on small scale and disparate public facilities and services (SA3), increase reliance on the private car with adverse effects on local efforts to reduce congestion (SA10) and mitigate climate change (SA2).
		32 in the secondary villages (5 per settlement).		The modest scale of development within the District's secondary villages is unlikely to have a significant effect against any of the SA objectives. However, there is potential for minor benefits meeting local affordable housing needs in the rural areas of the District.	The modest scale of development within the District's secondary villages is unlikely to have a significant effect against any of the SA objectives. However, the cumulative effects associated with increased populations in the rural areas of the District could result in pressures on small scale and disparate public facilities and services (SA3), increase reliance on the private car with adverse

Policy No.	Issues	Policy Options	NPPF and Core Strategy Policies / Saved 2006 Local Plan Policies	Likely positive sustainability effects (SA objectives affected – see Table 2.1 for key)	Likely negative sustainability effects (SA objectives affected) effects on local efforts to reduce congestion (SA10) and mitigate climate change (SA2).
		Economic D	evelopment		
		No policy options in Part One of Plan; related DM policy options in Part Two are assessed below.			
		Town C	Centres		
		No policy options in Part One of Plan; related DM policy options in Part Two are assessed below.			
		Gypsy and	Travellers		
		No policy options in Part One of Plan; related DM policy options in Part Two are assessed below.			
		Infrast	ructure		
Infrastructure Policy (no policy number)	Development should provide, contribute to or otherwise address Shepway's current and future infrastructure needs. Infrastructure that is necessary to support development must exist already, or a reliable mechanism must be available to ensure that it will be provided at the time it is needed. Need to make a clear distinction between a continuing need to secure developer contributions toward on-site infrastructure and affordable housing, from the	A: Section 106 planning obligations will be used to secure infrastructure funding contributions where these are: 1) essential to make a development acceptable in planning terms; 2) are directly related to a development; and 3) are fairly and reasonable related in scale and kind to the development. B: S106 agreements will be used to	SS5 and CSD4	All three policy options are likely to result in local investment in infrastructure, potentially including flood defences and flood alleviation schemes (SA1 and SA12); climate change mitigation and adaptation schemes (SA2 and SA13); new and improved public service and facility provision (SA3 and SA14); crime prevention schemes (SA4); affordable housing schemes (SA5); local employment and training schemes (SA6); sustainable travel schemes (SA10); and	Site-focussed policy options A and B do not facilitate investment in District-wide infrastructure schemes which are likely to reduce the Council's ability to tackle strategic issues with negative effects in relation to reduced ability to provide flood defences and flood alleviation schemes (SA1 and SA12); climate change mitigation and adaptation schemes (SA2 and SA13); new and improved public service and facility provision (SA3 and SA14); crime prevention schemes (SA4); affordable housing schemes

Policy No.	Issues	Policy Options	NPPF and Core Strategy Policies / Saved 2006 Local Plan Policies	Likely positive sustainability effects (SA objectives affected – see Table 2.1 for key)	Likely negative sustainability effects (SA objectives affected)
	s106 / planning obligations process; and the need to use the Community Infrastructure Levy (CIL) to secure funding contributions for the broader infrastructure needs of the district.	secure financial contributions for onsite infrastructure, required to enable the development of strategic and key sites in the district. C: Financial contributions toward the district's general infrastructure needs will be collected as per the range of CIL rates and zones set out by the Council's adopted CIL Charging Schedule.		urban regeneration and greening (SA7, SA8, SA9, SA11 and SA12). The criteria listed stated for Option A have no sustainability effect relative to relying on existing policy since these tests are set out in the CIL Regulations and NPPF. By allowing contributions to be pooled for general infrastructure needs, option C facilitates investment in District-wide infrastructure schemes. This will have positive effects in relation to increased ability to provide flood defences and flood alleviation schemes (SA1 and SA12); climate change mitigation and adaptation schemes (SA2 and SA13); new and improved public service and facility provision (SA3 and SA14); crime prevention schemes (SA4); affordable housing schemes (SA4); affordable housing schemes (SA6); sustainable travel schemes (SA10); and urban regeneration and greening (SA7, SA8, SA9, SA11 and SA12). Furthermore, allowing contributions to be pooled for general infrastructure needs will enable the Council to benefit from the economies of scale.	(SA5); local employment and training schemes (SA6); sustainable travel schemes (SA10); and urban regeneration and greening (SA7, SA8, SA9, SA11 and SA12).
		Local Gree	en Spaces		

Policy No.	Issues	Policy Options	NPPF and Core Strategy Policies / Saved 2006 Local Plan Policies	Likely positive sustainability effects (SA objectives affected – see Table 2.1 for key)	Likely negative sustainability effects (SA objectives affected)
		No policy options in Part One of Plan; related DM policy options in Part Two are assessed below.			
		Heri	tage		
		No policy options in Part One of Plan; related DM policy options in Part Two are assessed below.			
		PART TWO: DEVELOPMENT MAI	NAGEMENT POLI	CIES OPTIONS	
		General Developn	nent Managemen	t	
GD1	Provide for high quality design in new development, designing out crime and enhancing a sense of place	A: Continue to define design criteria for development with reference to promoting local distinctiveness through the use of local architectural features, layouts and materials and landscaping. Seek high-quality landscaping measures wherever possible, with a preference for native species planting and tree cover at a scale appropriate to the development Or B: A new policy that sets out generic design criteria with a presumption in favour of high quality architecture and landscaping that are distinctive but do not necessarily respond to local characteristics and which provide simple but robust policy coverage for all development	NPPF: para 17, 56-68 Core Strategy: SS3 Saved LP: BE1	Both policy options should help to ensure high quality design in new development with positive effects on the quality of the landscape and townscape (SA8). In addition, option A would help to conserve and potentially enhance local distinctiveness (SA8) with the preference for native planting and tree cover offering the potential to benefit biodiversity (SA9).	Option B, by failing to ensure that development responds to local characteristics, could have negative effects on the character and local distinctiveness of the landscape and townscape (SA8). It could also be deemed to be non-compliant with the requirement at para 58 of the NPPF for planning policies to ensure that developments "respond to local character and history, and reflect the identity of local surroundings and materials".
GD2	Ensuring satisfactory amenity for existing residents and the future occupiers of new dwellings	A: Continue to define criteria for ensuring adequate amenity in all developments, for example, in terms of natural light, ease of access, privacy, outlook, air quality and noise And/or B: Consider setting internal standards	NPPF: para 17, 56-68, 125 Core Strategy: SS3 Saved LP: BE1	All of the policy options described should help to protect the amenity of residents of new development and that of their neighbours with positive effects on well-being and communities (SA3).	None identified.

Policy No.	Issues	Policy Options	NPPF and Core Strategy	Likely positive sustainability effects	Likely negative sustainability effects
			Policies / Saved 2006 Local Plan Policies	(SA objectives affected – see Table 2.1 for key)	(SA objectives affected)
		for new residential development, for example, minimum bedroom sizes, minimum requirements for space for drying clothes or for laundry facilities And/or C: In new residential developments seek the provision of either: private garden or balcony space, and /or a financial contribution towards the provision of parks and public green space nearby. And/or D: There should be a minimum 'back to back' distance between residential development of 21 metres and a 'side to back' distance of 11m.		In addition, option C would help to ensure provision of private or public open space with potential positive effects on access to environmental assets (SA3) and townscape and landscape (SA8).	
GD3	Ensuring the consideration of environmental issues such as land instability, contamination and pollution	A: Set out measures to deal with the impacts of noise, light and dust pollution either affecting the proposed development, or arising from it And/or B: Encourage development on brownfield sites affected by contamination which can effectively remediate the contamination And/or C: Set standards to ensure that land contamination on development sites is adequately mitigated to provide a safe environment for future occupants And/or D: Require consideration of refuse storage and recycling storage with	NPPF: para 120 Core Strategy: SS3 Saved LP: BE19,U10, U10a, U15	All the policy options described should encourage the efficient use of land and ensure that environmental issues such as noise, contamination and land instability are given full consideration in the planning process (SA11). Option D would help to ensure that waste planning is fully integrated into development proposals so that communities have integrated local services (SA3), which will help to reduce congestion in local areas (SA10). In addition, option E goes beyond the requirement of para 120 of the NPPF, by not only ensuring that the developer and/or landowner provides	None identified.

Policy No.	Issues	Policy Options	NPPF and Core Strategy Policies / Saved 2006 Local Plan Policies	Likely positive sustainability effects (SA objectives affected – see Table 2.1 for key)	Likely negative sustainability effects (SA objectives affected)
		suitable access arrangements for collection to be incorporated into all development proposals. And/ or E: Require evidence when an application is submitted or by planning condition as appropriate that sites within land instability areas can be safely developed without adverse impact on the site or adjoining land.		evidence that land stability issues are safely secured, but that the LPA will use measures of oversight, e.g. planning conditions, to ensure that these are effectively implemented.	
GD4	Address localised flooding and flood risk management	A: Require all development to manage its own surface water run off so that it has a neutral effect on water courses and the local surface water drainage system Or B: Require all development within the flood catchment areas not only to mitigate their own flood risk on site, but to provide extra mitigation to reduce downstream effects arising from the development	NPPF: para 94,99 -104 Core Strategy: SS3, CSD5	Both policy options should help to reduce the risk of flooding, (SA1) while at the same time encouraging the more efficient use of water resources (SA13). In addition Option B would help to encourage greater cooperation between different landowners and developers to ensure improved mitigation measures are adopted both on and off the development site, which will reduce the risk of flooding throughout the District.	None identified.
GD5	Incorporating public art in new development	A: To secure a contribution for art to improve the public realm. The Council will support the inclusion of public art and require all major schemes to include public art that: a. Is integrated into proposals at an early stage of the design process; b. Enhances and creates local distinctiveness and reinforces a sense of place; c. Responds to local character;	NPPF: para 57, Core Strategy: SS3 Saved LP: BE2	Both policy options could help encourage local vibrancy through enhancing the physical environment which could promote social infrastructure and in doing so bring different communities together (SA3 and SA8). Policy option A should help to protect and promote local distinctiveness and a sense of place (SA8). It may also help provide opportunities to	None identified.

Policy No.	Issues	Policy Options	NPPF and Core Strategy Policies / Saved 2006 Local Plan Policies	Likely positive sustainability effects (SA objectives affected – see Table 2.1 for key)	Likely negative sustainability effects (SA objectives affected)
		 d. Makes a positive contribution to the public realm; and e. Engages the local community in its creation. Or B. No new policy is introduced beyond the requirements of national guidance 		improve the environment, public space and promote passive surveillance which could help reduce crime and the fear of crime (SA4). Option B relies on existing policies and therefore has no effect relative to the SA baseline.	
GD6	To guide telecommunications development (including provision of broadband).	Provision for broadband (such as ducting for cables) should be designed and installed as an integral part of development, which minimises visual impact and future disturbance during maintenance. All telecommunications infrastructure should be capable of responding to changes in technology requirements over the period of the development.	NPPF: paras 42-46 Core Strategy: SS5 Saved LP: U11	This policy should help to ensure that advanced and high quality communications infrastructure is available to communities, providing additional means to access services or opportunities to engage in education and employment (SA3 and SA6). In addition this policy could also support local business development by providing adequate infrastructure to support sectors targeted for economic growth (SA6).	None identified.
		Hou	sing		
H1	Providing a mix of housing type and size to meet the needs of Shepway's residents	A: Set a district-wide preferred housing mix policy which will deliver a range of dwelling sizes and types that meets a target that at least half of all new homes by 2026 will have 3 bedrooms or more Or B: Establish an appropriate housing	NPPF: para 47 -55 Core Strategy: CSD2	Option A repeats the requirements of Core Strategy Policy CSD2 and therefore has no sustainability effect relative to the baseline of relying on existing policy. Policy options B and C provide alternative mechanisms for meeting the SHMA ⁸⁹	None identified.

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Policy No.	Issues	Policy Options	NPPF and Core Strategy Policies / Saved 2006 Local Plan Policies	Likely positive sustainability effects (SA objectives affected – see Table 2.1 for key)	Likely negative sustainability effects
					(SA objectives affected)
		mix based on a site-by-site basis Or C. Require major development to provide a percentage on site of dwellings that have 3 bedrooms or more.		recommendation, based on demographics and housing need, that the number of new 1-2 bedroom dwellings be matched with the number of new dwellings with 3 or more bedrooms. As such they would both help to deliver an appropriate mix of housing (SA5).	
H2	Recognising the role of residential garden land in housing delivery	A: Allow the development of back gardens for new housing throughout the urban area subject to certain criteria to ensure there is no harm to the character of the area e.g.: maintain existing road frontage, suitable distance between dwellings, maintaining key existing landscaping and have regard to prevailing density. Or B: Designate areas where the development of back gardens for new housing is considered acceptable in principle Or C: Do not allow the development of back gardens for new housing anywhere in the District	NPPF para 47 - 55, Core Strategy SS3	Options A and B are likely to boost the provision of homes to meet the needs of the community and local economy (SA5). In addition both of these policy options have the potential to help conserve the quality, character and local distinctiveness of the landscape and townscape (SA8).	Option C goes beyond the requirements of para 53 of the NPPF and by resisting all back garden development is likely to have negative effects on the provision of homes or meet the needs of local communities and the economies (SA5). There is some uncertainty as to this effect as it will depend on whether the Council's SHLAA review process identifies sufficient sites to meet housing need in the absence of back garden development.
Н3	Providing for the accommodation needs of specific sections of the community	A: Explore the possibility of providing additional pitches for Gypsies, Travellers and Travelling Showpeople on existing sites within the District And / or B: Allocate new sites for Gypsies, Travellers and Travelling Showpeople in accordance with the sequential	NPPF para 4, Core Strategy CSD2	All of these policy options are likely to improve the provision of sites for accommodating the needs of Gypsies, Travellers and Travelling Showpeople and in doing so provide an appropriate mix of temporary and permanent housing sites for these communities (SA5).	None identified.

Policy No.	Issues	Policy Options	NPPF and Core Strategy Policies / Saved 2006 Local Plan Policies	Likely positive sustainability effects (SA objectives affected – see Table 2.1 for key)	Likely negative sustainability effects (SA objectives affected)
		approach and environmental assessment criteria set out in the Core Strategy And/or C: Set a site size threshold and a proportion of traveller pitches/plots for large housing developments		In addition by setting aside a proportion of homes in larger developments for Gypsies, Travellers and Travelling Showpeople, option C could provide opportunities to increase access to local services and could support efforts to increase levels of integration and cohesion while reducing inequality (SA3). This approach is supported in Paragraphs 4.8 to 4.10, Planning Policy For Traveller Sites, which supports the enabling of the provision of suitable accommodation from which travellers can access services, reduce tensions between settled and traveller communities and increases the number of traveller sites in appropriate locations with planning permission.	
Policy number missing from draft PPLP	To provide a criteria based policy that can be applied to applications for sites for Gypsies, Travellers and Travelling Showpeople that are not designated.	A: In considering applications for seasonal, temporary or permanent use of land by Gypsies and Travellers, or the extension of existing sites, planning permission will only be acceptable within or adjoining the settlement boundary and subject to the following criteria being met: Compatible with national flood risk policy Appropriately screened or capable of being so through additional measures No adverse impact on the residential amenity or existing buildings or uses Access should not be detrimental to	NPPF para 47 - 55, Core Strategy CSD2	The inclusion of the development criteria in options A and B is likely to reduce the risk of flooding (SA1), as well as protect landscape and townscape (SA8), wildlife (SA9) and cultural and historic assets (SA7). By restricting development to within or adjoining the settlement boundary, option A provides opportunities to increase access to local services (SA3, SA10) and could support increases integration and cohesion while reducing	By allowing development more remote from existing settlements but accessible to local services and facilities, option B may have negative effects on integration, cohesion and reduction of inequality (SA3) and the landscape (SA8), notwithstanding the requirement for appropriate landscaping.

Policy No.	Issues	Policy Options	NPPF and Core Strategy Policies /	Likely positive sustainability effects	Likely negative sustainability effects
			Saved 2006 Local Plan Policies	(SA objectives affected – see Table 2.1 for key)	(SA objectives affected)
		highway safety		inequality (SA3).	
		Established personal need			
		No adverse effect on the visual or other essential qualities of the AONB, SSSI, national or local nature reserve or conservation area.			
		OR			
		B: In considering applications for seasonal, temporary or permanent use of land by Gypsies and Travellers, or the extension of existing sites, planning permission will be acceptable both inside and outside of the settlement boundary subject to the following criteria being met:			
		Compatible with national flood risk policy			
		Appropriately landscaped or capable of being so through additional measures			
		No adverse impact on the residential amenity or existing buildings or uses			
		Access should not be detrimental to highway safety			
		Established personal need			
		Accessible to local services and facilities			
		No adverse effect on the visual or other essential qualities of the AONB, SSSI, national or local nature reserve or conservation area.			
H4	Recognising the need to develop housing at an appropriate density to make	A: Create policies that seek to maximise the density on housing sites in the urban areas where that can be	NPPF para 47, 59; Core	Option A is likely to increase the amount of housing that can be provided in the District's	By limiting the density of housing development to the prevailing pattern, option B could increase

Policy No.	Issues	Policy Options	NPPF and Core Strategy Policies / Saved 2006 Local Plan Policies	Likely positive sustainability effects (SA objectives affected – see Table 2.1 for key)	Likely negative sustainability effects (SA objectives affected)
	better use of previously developed land and existing infrastructure	achieved without harm to local character (so as to minimise development outside urban areas) Or B: Establish an appropriate density based on a site-by-site basis informed by the prevailing pattern of settlement in the vicinity and only in exceptional circumstances encouraging a higher density to enable the delivery of more dwelling units	Strategy SS3 Saved LP: SD1, HO2	existing urban areas, thereby reducing pressure to develop greenfield land with potential positive effects in relation to the landscape (SA8), biodiversity (SA9) and efficient use of land (SA11). Protection would be given to the quality, character and local distinctiveness of urban communities (SA8). By limiting the density of housing development to the prevailing pattern, option B would be likely to provide stronger protection to the quality, character and local distinctiveness of urban communities (SA8) than option A.	pressure to develop greenfield land with potential negative effects in relation to the landscape (SA8), biodiversity (SA9) and efficient use of land (SA11).
Н5	Providing for accommodation for our ageing population and vulnerable members of our community	A: Plan for more Lifetime Homes, suitable for disabled and elderly residents which are capable of being adapted to meet the needs of residents as their life needs change over time. On sites of 10 or more, 20% of dwellings will meet the Lifetime Homes standards And/ or B: Encourage the development of more retirement homes and specialist homes that help people to live independently, but have facilities or support available when they need them Or C: Encourage the development of retirement communities that	NPPF para 47 - 55, Core Strategy CSD2 Saved LP: HO13	All of these policy options are likely to help provide housing that is suitable for the elderly, helping to address the predicted ageing of Shepway's population over the Plan period with positive effects on SA5. By bringing buildings back into use, option D has the potential to promote vibrancy (SA3) and discourage anti-social behaviour (SA4) e.g. illegal dumping. By concentrating housing for the elderly in particular locations, option C could help to support provision of appropriate services and facilities for this section of the community, for instance community centres or appropriate public transport	Option C may result in segregation of elderly people from the wider community with negative effects on SA3.

Policy No.	Issues	Policy Options	NPPF and Core Strategy Policies / Saved 2006 Local Plan Policies	Likely positive sustainability effects (SA objectives affected – see Table 2.1 for key)	Likely negative sustainability effects (SA objectives affected)
		comprise of different types of housing and care facilities in a single location And/or D: Encourage the change of use of existing homes to specialist residential accommodation		services, with positive effects on equality of opportunity to access such services and facilities (SA3).	
H6	To consider the impact that converting large homes to flats has on the character of an area and the amenity of other residents (for example parking problems).	A: The Council will grant planning permission for the conversion of larger houses into flats, or maisonettes subject to criteria including design, parking, location, distribution and amenity And/or B: A policy that identifies location/ property that could generally be suitable for HMO use, e.g. unused accommodation within shopping frontages on major transport routes? And/or C: Should planning permission for new or extended HMOs only be granted outside those areas where there are existing significant concentrations' of HMOs, and if so should standard minimum and potentially maximum thresholds be applied to establish which those areas are?	NPPF para 47 - 55 Core Strategy SS3 Saved LP: HO8, HO9	All three options, but particularly A and B, could help to bring empty housing and buildings back into residential use, helping to increase housing provision and respond to the reduction in average household size predicted by the SHMA ⁹⁰ (SA5).	Option B on its own would fail to allow the Council to control potential negative impacts in relation to local townscape character, amenity of existing residents and creation of mixed, vibrant communities of converting a significant proportion of an area's large homes into flats (SA3, SA8).
Н7	To ensure that the conversion of rural buildings to houses, replacement dwellings and extensions respect the character of their surroundings	A: Develop criteria based policies for conversions, replacement dwellings and extensions to dwellings to ensure that they respect the character of the countryside	NPPF para 55 Core Strategy CSD3 Saved LP:	Both policy options should help to ensure that the conversion of rural buildings to housing is of good design quality but only option A would ensure that it is	By relying on generic design policies, option B risks failing to reflect local character and distinctiveness with negative effects on SA8.

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Policy No.	Issues	Policy Options	NPPF and Core Strategy Policies / Saved 2006 Local Plan Policies	Likely positive sustainability effects (SA objectives affected – see Table 2.1 for key)	Likely negative sustainability effects (SA objectives affected)
	and reflect local vernacular and design	Or B: Rely upon generic design policies to assess such proposals	CO19, CO20, CO21	sensitive to local character and distinctiveness (SA8). Furthermore where development is within or in close proximity to a heritage site, option A is likely to increase the likelihood of the development being sensitive to the historic environment (SA7).	
H8	To provide for self-build housing	A. At strategic sites a minimum of 2% of the dwellings shall be to meet Government aspirations to increase self-build developments. These schemes will: 1. Be individually designed, employing innovative approaches throughout that cater for changing lifetime needs 2. Provide for appropriate linkages to infrastructure and day to day facilities 3. Include a design framework to inform detailed design of the individual units, where more than one self-build unit is proposed. Or B. A criteria based policy on a site by site basis	NPPF para 47 - 55 Saved LP: BE1	Both policy options will help to support the provision of sites for self-build and in doing so increase the provision of housing that meets local need, and potentially provide affordable housing with positive effects on SA5. By supporting individual innovation, option A may go beyond the requirements of site-wide criteria-based policy (option B) and result in greater energy efficiency, use of renewable energy sources and designs that are better adapted to a changing climate (SA1). Option B, is likely to ensure that development enhances local quality, character and distinctiveness (SA8) and is related to its local environment in terms of character and scale which will be particularly important on sites within or in close proximity to cultural heritage assets (SA7).	By providing significant scope for flexibility in the design of new developments, option A may lead to development which is of poor design quality or not in keeping with the local townscape, landscape, and cultural heritage assets (SA7, SA8) and which fails to conserve or enhance local biodiversity (SA9). By failing to allow for architectural innovation, option B may fail to incorporate the best measures in relation to energy efficiency, use of renewable energy sources and designs that are adapted to a changing climate (SA1).
	·	Econ	omy	•	

Policy No.	Issues	Policy Options	NPPF and Core Strategy Policies / Saved 2006 Local Plan Policies	Likely positive sustainability effects (SA objectives affected – see Table 2.1 for key)	Likely negative sustainability effects (SA objectives affected)
E1	Making the best and most sustainable use of existing employment land	A: Retain existing employment land unless there is clear evidence that it is surplus to requirements, the continued use of the land for employment purposes would have a significant deleterious effect on residential amenity, the redevelopment of the site for a suitable alternative use would enable another more suitable employment site to come forward or that continued allocation for commercial use is demonstrated not to be viable And /Or B: Identify alternative non-employment uses for surplus employment land, accompanied by policies to manage the release of these sites for housing or other suitable uses.	NPPF para 21- 22, Core Strategy SS2, SS4 Saved LP: E1, E2, E4	Both policy options provide the district with the opportunity to plan positively for the location of employment within the district (SA6). In focusing on the release of surplus land for housing and other uses, there is potential for both policy options to ensure the efficient use of land is achieved and that development is located within brownfield sites (SA11). This could help to support the integration of housing and services close to employment which would reduce the need to travel (SA10) while helping to create vibrant communities (SA3) Option A sets out a strategy for identifying and retaining employment land, which will help to ensure that the supply of land is adequately equipped with suitable infrastructure and that it meets local demand (SA6). In addition, the criteria include consideration of residential amenity, which could help to ensure that community vibrancy and access to services and facilities is not negatively affected (SA3), but instead, the provision of employment land helps to ensure that that there is a complementary mix of land uses that minimises the length of journeys and reduces traffic congestion (SA10). This could help to maintain a sense of	None identified.

Policy No.	Issues	Policy Options	NPPF and Core Strategy Policies / Saved 2006 Local Plan Policies	Likely positive sustainability effects (SA objectives affected – see Table 2.1 for key)	Likely negative sustainability effects (SA objectives affected)
				place for new or existing communities (SA8). Recommendation: This policy should set out how it will determine that employment land is surplus to requirements, particularly in light of the conclusion of the Employment Land Review ⁹¹ that "There is no strong case for releasing most existing employment sites and allocations in Shepway". It should also explain how safeguarding of existing employment land will reflect the needs of priority locations for economic regeneration and of emerging or target employment sectors for the District.	
E2	Directing business to sustainable locations, in particular office uses to town centre /edge of centre areas	A: Incorporate Areas for Small Business and/or Town Centre Business Areas into Town Centre designations and promote a more flexible approach to economic development in these areas Or B: Specifically define areas within or near town centres where business/office uses will be located	NPPF18-21, 23- 27 Core Strategy SS2, SS4 Saved LP: S3- S7	Both policy options are likely to have a positive effect upon ensuring that there is an adequate supply of land and infrastructure to meet the requirements of targeted office based businesses. In addition this will also help to ensure that there is improved access to employment and that the vibrancy of town centres is enhanced (SA3 and SA6). By defining the particular locations within/near town centres where business/office uses will be permitted, option B would allow the Council to	None identified.

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Policy No.	Issues	Policy Options	NPPF and Core Strategy Policies / Saved 2006 Local Plan Policies	Likely positive sustainability effects (SA objectives affected – see Table 2.1 for key)	Likely negative sustainability effects (SA objectives affected)
				ensure that these uses are concentrated in locations that are accessible to residential areas and well served by public transport hubs/routes. This could help to reduce the need to travel, provide opportunities to travel by sustainable modes and help to avoid traffic congestion (SA10). Recommendation: Both policy options should be explicitly	
				linked to an assessment of market demand for business space and to the anticipated future economic growth of the particular town centre and its role in the settlement hierarchy.	
E3	Ensuring that employment development contributes to climate change avoidance and mitigation (energy efficiency/renewable energy)	A: Include specific criteria to secure provision of renewable energy, and energy efficiency measures, in new economic/employment development Or B: Apply generic design and sustainability criteria in considering proposals for new economic development	NPPF para 18, 95-99 Core Strategy SS3 Saved LP: SD1, U14	Both policy options could support the increased use of renewable energy and low carbon energy and in doing so provide opportunities for developers to take into consideration climate change adaptation measures within their development proposals (SA2), although option A offers more certainty in this respect.	None identified.
				Recommendation: As a well as energy efficiency and renewable energy generation, climate-change related criteria could also address efficient use of water resources, mitigation of surface water flood risk and building design that is adapted to a warmer climate.	

Policy No.	Issues	Policy Options	NPPF and Core Strategy Policies / Saved 2006 Local Plan Policies	Likely positive sustainability effects (SA objectives affected – see Table 2.1 for key)	Likely negative sustainability effects (SA objectives affected)
E4	Securing new economic development on designated employment land with good transport connections to meet identified needs and encourage inward investment	A: Identify specific designated employment sites where particular types or sizes of unit should be provided. Or B: Identify specific designated employment sites where a less prescriptive approach to future economic development would be appropriate, allowing the market to determine the exact nature of commercial provision on those sites. Or C: Allow a more flexible approach to future economic development on all designated employment sites.	NPPF 21-22 Core Strategy SS2, SS4 Saved LP: SD1, E1, E2, E4	All policy options will help to ensure that there is an adequate supply of land which is suitable for targeted economic growth and the diverse range of business needs (SA6). Options B and C include an element of flexibility which would allow the particular form of economic development to respond to market signals, creating more certainty that economic benefits will be realised. The most prescriptive option, A, would allow the Council to ensure that economic uses which are likely to generate large volumes of additional traffic movements are well connected to the transport network, helping to avoid congestion and longer journeys than necessary (SA10).	The most flexible option, C, would not allow the Council to ensure that economic uses which are likely to generate large volumes of additional traffic movements are well connected to the transport network, possibly resulting in more congestion and longer journeys than necessary (SA10).
E5	Managing economic development outside designated employment sites	A: Encourage new economic development outside designated employment sites provided it meets an identified need and policy criteria And B: Allow existing employment land outside designated employment sites to be redeveloped for other uses subject to identified policy criteria Or C: Apply more general development	NPPF 21-22 Core Strategy SS2, SS4 Saved LP: SD1, E1, E2, E4	The effects of policy options A and B are subject to considerable uncertainty at this stage as it is unclear what these criteria will be. Subject to the criteria applied, policy options B and C would allow release of employment land outside designated employment sites for other uses with positive effects on efficient use of land (SA11) and potentially on provision of	Option A may hinder redevelopment of brownfield sites which are currently allocated for employment use by providing more easily developed greenfield alternatives, with negative effects on settlement vibrancy (SA3), landscape and townscape (SA8) and efficient use of land (SA11). By allowing employment land to be redeveloped for other uses, option B could result in an insufficient supply of employment

Policy No.	Issues	Policy Options	NPPF and Core Strategy Policies / Saved 2006 Local Plan Policies	Likely positive sustainability effects (SA objectives affected – see Table 2.1 for key)	Likely negative sustainability effects (SA objectives affected)
		management criteria to assessing proposals for creation or loss of employment land outside designated areas.		housing (SA6) if land is release for housing development.	land with negative effects on SA6. This is uncertain as it will depend on the criteria attached to the policy and whether quantitative and qualitative market demand can be met without this employment land outside of designated employment sites.
E6	Offices and employment areas supporting economic innovation and the knowledge economy	A: Encourage mixed used development in all town centres, including start up or live-work units. And/or B: Focus new office development in Folkestone and Hythe Town Centres. And C: Identify opportunities for small and start-up business units in New Romney Town Centre.	NPPF 21, 23 Core Strategy SS2, SS4, CSD6 Saved LP:, E1, E2, S3-S7	There are few good existing office sites in Shepway and these are primarily within or on the edge of Folkestone Town Centre. Some of the existing large, single occupier buildings may be difficult to sub-divide or re-let if vacated. ⁹² All of these policy options would help to broaden the range of the District's office space provision so that that it better caters for small/start-up businesses in a wider range of locations, helping to support economic growth (SA6). By directing office, small business or live-work units to town centres, all policy options should help to ensure that employment areas are accessible from transport hubs, are near where people live and have access to other essential infrastructure. This will help to deliver settlement vibrancy (SA3), high quality employment space (SA6), sustainable travel patterns (SA10) and efficient	By not focusing development within any particular town centres, option A may fail to support the economic development of settlements which have the greatest potential to become clusters for growth in the knowledge economy (SA6). Recommendation: This policy should be explicitly linked to evidence on the spatial distribution of economic development opportunities in the District and on market demand for the types of employment premises provided, including the Shepway Economic Development Strategy, Shepway Employment Land Review and forthcoming Town Centre Study.

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Policy No.	Issues	Policy Options	NPPF and Core Strategy Policies / Saved 2006 Local Plan Policies	Likely positive sustainability effects (SA objectives affected – see Table 2.1 for key)	Likely negative sustainability effects (SA objectives affected)
				use of land (SA11). By not focusing development within any particular town centre, option A will help to ensure that availability to these units and employment opportunities are spread throughout the district (SA6). Options B and C define the towns in which the LPA is planning to encourage the clustering of the knowledge economy and in doing so could enhance the viability and vitality of these centres (SA3) as well as ensure that local infrastructure is in place to support a higher skilled service economy (SA6). Option B is particularly likely to have positive effects on SA6 as there is a need for further small incubation premises for business start-ups in Folkestone to encourage indigenous business formation and widen employment opportunities.	
E7	Providing for the needs of small and medium sized businesses	A: Set maximum size thresholds in certain town centre areas to ensure business units remain small and employment areas develop different specialities. Or	NPPF 21, 23 Core Strategy SS2, SS4	All three policies are likely to ensure that there are smaller business units within town centres, helping to ensure that local people can access jobs locally in small and medium sized companies (SA6). Through	Option B may fail to provide for the needs of small and medium sized businesses, including need for further small incubation premises for business start-ups in Folkestone to encourage indigenous business formation

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Policy No.	Issues	Policy Options	NPPF and Core Strategy Policies / Saved 2006 Local Plan Policies	Likely positive sustainability effects (SA objectives affected – see Table 2.1 for key)	Likely negative sustainability effects (SA objectives affected)
		B: Do not set size thresholds to allow maximum flexibility. And/or C: Encourage provision of smaller units on other designated employment sites.		encouraging the increased provision of units in the town centres, this policy is likely to reduce the need to travel and support use of sustainable transport modes (SA10). Options A and C are likely to support and encourage the clustering of business in particular areas of a town centre or within designated employment sites, which would support development of specialty business clusters. Option B is more likely to ensure that a range of units are provided for a range of business types and uses. Businesses will be able to expand within their existing locations, which will help to sustain town centres, local jobs and the quality of the local environment (SA3, SA6, SA8).	and widen employment opportunities. 94 This would have negative effects on SA6.
E8	Town centre and shopping areas (primary and secondary) Policies that protect the vitality and viability of retailing in town centres.	A: Continue to set minimum percentage thresholds for the occupancy of the shopping street by shopping uses. Where a stretch of the street is below the desired threshold, changes of use away from shops will be resisted. Or B: Prevent all changes of use away from shopping use regardless of the occupancy levels (except in special	NPPF 23-27 Core Strategy SS3, SS4 Saved LP: S3- S7	Policy options A and C are likely to help town centres remain vibrant and of an acceptable quality by allowing for a mix of services and facilities, as well as scope for residential development (SA3 and SA8). By providing for shops, services and facilities in a central location, these options are also likely to have positive effects on reducing the need to travel or	By resisting change of use away from retail, option B is at risk of not being consistent with NPPF (para 23) and Core Strategy (Policy SS4) requirements for a mix of active uses in town centres with potential negative effects on vibrancy and access to services other than retail (SA3). Failure to allow other facilities to be provided in central locations could also have negative effects on

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Policy No.	Issues	Policy Options	NPPF and Core Strategy Policies /	Likely positive sustainability effects	Likely negative sustainability effects
			Saved 2006 Local Plan Policies	(SA objectives affected – see Table 2.1 for key)	(SA objectives affected)
		circumstances). Or C: Prevent changes of use away from shopping where it would create a certain number of non-retail units adjacent to each other. Or D: Introduce greater flexibility by allowing changes of use away from shopping into specified other uses, but risk losing valued retail units.		providing the opportunity to use sustainable transport as transport nodes are centrally located (SA10). Options A, B & C would help to ensure that local retail employment sites are protected and are well connected to local labour (SA6, SA10). Option D provides the greatest flexibility. Assuming that the 'other specified uses' are town centres uses such as community infrastructure, public services, and leisure and cultural facilities, this would facilitate town centre vibrancy (SA3) and improvements to the night time economy (SA6) and enjoyed by local communities (SA3).	reducing the need to travel or providing the opportunity to use sustainable transport as transport nodes are centrally located (SA10). By allowing greater scope for change of use away from retail, option D risks a significant shift of shopping activity to out of town shopping centres and increased loss of retail business to competing centres such as Ashford with negative effects on Shepway's economy (SA6). Town centre vibrancy (SA3) could also suffer if the non-retail uses provided attract fewer people than the retail ones that are lost. Recommendation: This policy should be explicitly linked to available evidence on the likely effects of replacing town centre retail units with other services and facilities, including the findings of the forthcoming Town Centre Study.
E9	Promoting the vitality and viability of town centres, or isolated parades, by maintaining an appropriate proportion of non-shopping uses	A: Introduce a flexible approach to allow non-retail uses (for example crèches, leisure activities or health centres) where these would complement retail uses and contribute to vitality and viability. Or B: Encourage the co-location of services, infrastructure facilities to create mini "hubs" and to release other land/buildings for further	NPPF 23-27, 28 Core Strategy SS3, SS4 Saved LP: S3- S8	Both policy options are likely to support community vibrancy and access to opportunities to engage in employment, leisure and educational opportunities (SA3). The integration of these within town centres could also add to their vibrancy, diversify employment opportunities and therefore increase the attraction of town centres to businesses (SA 6). Furthermore the integration of services will also	None identified.

Policy No.	Issues	Policy Options	NPPF and Core Strategy Policies /	Likely positive sustainability effects	Likely negative sustainability effects
			Saved 2006 Local Plan Policies	(SA objectives affected – see Table 2.1 for key)	(SA objectives affected)
		development.		help to reduce travel times between residential and service locations which will encourage more sustainable uses of transport (SA10) and potentially encourage more efficient uses of land (SA11).	
				In smaller rural settlements, areas, this policy is also likely to support settlement vibrancy (SA3) and, by creating 'minihubs', increase trips to the settlement centre, helping to support the viability of all existing and new shops, services and facilities located there.	
E10	Improving sites of poor visual amenity which detract from the appearance of town centres and stimulate beneficial redevelopment	A: Where there is an economically feasible case for redevelopment of sites that do not contribute to the attractiveness of the town identify an opportunity area, accepting flexibility of use in return for very high quality, historically sympathetic design and finishing materials Or B: Leave it entirely to the market and treat incoming proposals on a caseby-case basis	NPPF 23 Core Strategy SS3, SS4 Saved LP: SD1	Option A enables the LPA to plan positively to 'identify priority areas for economic regeneration, infrastructure provision and environmental enhancement' in line with the NPPF (Para 21.5). The resulting redevelopment of redundant sites within town centres would be likely to have positive effects on vibrancy (SA3) and efficient use of land (SA11). The requirement for high quality design has the potential for positive effects in relation to crime and anti-social behaviour (SA4) and through appropriate lighting, passive surveillance etc. High quality design could also deliver positive effects in relation to the setting of historic assets (SA7) and townscape character (SA8). In addition it	Both policy options allow for redevelopment of sites of poor visual amenity. By providing flexibility to redevelop employment sites for other uses such as residential, this policy risks not meeting the requirements of para 23.10 of the NPPF, which states that 'where town centres are in decline, local planning authorities should plan positively for their future to encourage economic activity' with negative effects on SA6. Recommendations: The policy should define what is meant by an 'opportunity area'. The policy should clarify whether it applies to all sites of poor visual

Policy No.	Issues	Policy Options	NPPF and Core Strategy Policies / Saved 2006 Local Plan Policies	Likely positive sustainability effects (SA objectives affected – see Table 2.1 for key)	Likely negative sustainability effects (SA objectives affected)
				may help to provide opportunities to provide more adequate employment sites with suitable infrastructure, which could meet new business needs and help to ensure that there is a supply of employment for local people (SA6).	amenity or only those that are currently in employment use. Any requirement for good design should be extended to cover benefits for biodiversity and the green infrastructure network. This policy should set out how it will determine whether employment land of poor visual amenity is surplus to requirements, particularly in light of the conclusion of the Employment Land Review 15 that "There is no strong case for releasing most existing employment sites and allocations in Shepway".
E11	Managing a lively, safe and social evening/night time economy in the larger town centres which does not detract from the retail offer of town centres or harm residential amenity	A: Encourage the provision of food, drink and entertainment uses where they are appropriately located and would not lead to an undue loss of shopping units and would not cause harm to local residential amenity. Or B: Not to actively promote an expansion of the night time economy and maintain the existing balance of uses	NPPF 23 Core Strategy SS4 Saved LP: S3- S7	Shepway has high unemployment with large numbers of shop vacancies in its towns. Option A encourages the diversification of business in the District's larger town centres where uses would not lead to an undue loss of shopping units and would not cause harm to local residential amenity. Increasing the provision of hospitality businesses in the town centres is likely to enhance the District as a visitor attraction, generating more jobs (SA6) and improving town centre vibrancy and access to a diverse range of facilities and services (SA3).	Encouraging the provision of food, drink and entertainment uses through the implementation of Policy option A has the potential to increase crime and antisocial behaviour in town centres (SA4) and reduce residential amenity if not carefully managed. Increased provision of certain hot food outlets could promote unhealthy lifestyles (SA3). Recommendation: The PPLP recognises that "good design will be required to design out crime and provide a more inclusive place for people to socialise". This policy should explicitly address this need, for example

 $^{^{95}}$ Shepway District Council (2011) Employment Land Review

Policy No.	Issues	Co	NPPF and Core Strategy	Likely positive sustainability effects	Likely negative sustainability effects
			Policies / Saved 2006 Local Plan Policies	(SA objectives affected – see Table 2.1 for key)	(SA objectives affected)
				Option B would have a negligible effect as it would maintain the existing balance of uses in the town centre.	by: Requiring developer contributions to provision of additional late night transport, public toilets, street cleaning, security/policing, good quality street lighting and so on. Avoiding concentrations of licensed premises and/or promoting non-alcohol focused uses/activities. Indicting the types of issue likely to be subject to planning conditions, such as acoustic insulation of bars and music venues. Indicating the types of issues to be addressed by residential design requirements for new dwellings in locations where the night time economy is to be promoted.
E12	Education/training	A: Allocate the East Kent College site for mixed use development that will enhance the educational offer on the campus And/or B: Work with partners such as Kent County Council, skills providers and neighbouring authorities to promote and deliver improved education facilities and increased education opportunities including support for identifying and developing vocational and skills improvement facilities in the borough	NPPF 23, 70, 72 Core Strategy SS3, SS5, CSD6, CSD7	Both policies promote the enhancement of education and training facilities in the District (SA3) which will generate employment opportunities and create a local skilled workforce (SA6). This is particularly important in a District which has an economy built long-term contracting industries, the majority of which are low paid. Improving education and training in the District will increase the pool of highly skilled workers in the District, helping to diversify the District's	None identified.

Policy No.	Issues	Policy Options	NPPF and Core Strategy Policies / Saved 2006	Likely positive sustainability effects (SA objectives affected – see Table 2.1 for key)	Likely negative sustainability effects (SA objectives affected)
E13	Tourism and tourist facilities	A: Supporting proposals for new visitor accommodation provided that: (i) They are well related to the primary road network and/or have good public transport accessibility; (ii) Will not create parking congestion in the area they are located; and (iii) Do not impact upon the character and amenity of neighbouring buildings and the surrounding area. And/or B: Encouraging extensions and improvements to existing visitor accommodation subject to other development management policies. And/or C: Where a loss of visitor accommodation is proposed within the district it will need to be demonstrated that: (i) The existing use is no longer	NPPF 23,28 Saved LP: TM2	economic base. The benefits associated with Policy option A are likely to be focussed on the East Kent College campus, whereas Option B's focus is much broader, including other skills providers and neighbouring authorities. Therefore, Option B has the potential to generate more significant benefits to education facilities and increased education opportunities in the District. Policy options A and B promote the improvement and expansion of tourism facilities (an important industry in the District). Both policies are likely to have a positive effect by attracting more tourists to the District which in turn will generate more employment in the District (SA6) and help support the viability of services and facilities (e.g. public transport, leisure facilities) which serve both residents and visitors (SA3). Inclusion of criteria within this policy or as other development management policies to ensure accessibility will help to mitigate potential negative impacts in relation to traffic or parking congestion (SA10), local amenity (SA3) and the character of the surrounding area (SA8). Policy option C outlines the	Policy options A and B promote the expansion and improvement of tourism facilities in the District. This is likely to attract more tourists to the area, which could have an adverse effect on the integrity of biodiversity assets that are sensitive to visitor pressure (SA9). Option D does not promote the safeguarding, expansion or improvement of tourism facilities in the District, which could have an adverse effect on the sustainability of the tourism industry in the District (SA6).

Policy No.	Issues	Policy Options	NPPF and Core Strategy Policies / Saved 2006 Local Plan Policies	Likely positive sustainability effects (SA objectives affected – see Table 2.1 for key)	Likely negative sustainability effects (SA objectives affected)
		viable or feasible. It will also need to be demonstrated that other visitor accommodation types are not feasible or viable at the site; (ii) The proposal provides an alternative use that meets the strategic needs of the Core Strategy Local Plan; (iii) The new use does not impact upon the character or amenity of the area and neighbouring uses or adversely impact upon the transport network. Or D: Consider proposals for redevelopment or change of use of existing visitor accommodation on a site by site basis but without the presumption that the existing use should be retained.		exceptional circumstances in which the loss of existing visitor accommodation will be permitted. This option is likely to protect viable tourism facilities whilst opening-up opportunities for failing business to be reinvented into viable economic concerns (SA3 and SA6). Policy option D permits the redevelopment or change of use of existing visitor accommodation without the presumption that the existing use should be retained. This is likely to generate greater opportunities for developers to propose and develop alternative land uses in the District, with potential positive effects on housing provision (SA5), other employment uses (SA6) and the efficient use of land (SA11). Both policy options C and D offer a degree of flexibility which supports the diversification of the District's economy. This would help to support growth in higher skilled, higher paid sectors than tourism, with positive effects on the economy (SA6). The ability to convert visitor accommodation that is no longer needed would also support improvement to the vibrancy (SA3) and character (SA8) of Shepway's towns.	

Policy No.	Issues	Policy Options	NPPF and Core Strategy Policies / Saved 2006 Local Plan Policies	Likely positive sustainability effects (SA objectives affected – see Table 2.1 for key)	Likely negative sustainability effects (SA objectives affected)
E14	Caravan and camping sites	A. Support the upgrade, expansion of existing touring caravan and camping sites and the provision of new touring caravanning in sustainable locations where specific criteria are met including there being no harm to the character of the countryside and the undeveloped coast, the amenity of nearby residential property and there being no risk from flooding. Or B. That other than small enhancements and additions there be a presumption against the expansion and development of additional touring camping and caravanning sites. And/ or C. That there be a presumption against the provision and expansion of static caravan and holiday chalet sites. Or D. That additional static holiday caravans and chalet uses be supported in sustainable locations that meet specific criteria relating to location, transport, flood risk and environmental impact. And/or E. That existing static caravan and chalet parks be permitted to open all year around subject to safeguards relating to flood risk, prevention of residential uses establishing and suitable on site management arrangements being in place.	NPPF 28,100, 103, 106 Core Strategy SS3, CSD3 Saved LP: TM3, TM4 and TM5	All policy options attempt to prevent harm to the character of the countryside and the undeveloped coast (SA8), the amenity of nearby residential property (SA3) and to manage flood risk (SA1), all of which are essential to maintaining the District's economic role as a visitor attraction (SA6). Policy options A, D, E and F promote the expansion of existing touring caravan and camping sites and the provision of new touring caravanning in sustainable locations where specific criteria are met. Both policies are likely to have a positive effect by attracting more tourists to the District which in turn will generate more employment in the District (SA3 and SA6).	Policy options A, D, E and F promote the expansion and improvement of caravan and camping sites in the District, with the potential for negative effects on the setting of heritage assets (SA7) and landscapes (SA8). They would also be likely to attract more tourists to the area, which could have a negative effect on the integrity of biodiversity assets that are sensitive to visitor pressure (SA9). Conversely, Policy options B and C have a presumption against the provision and expansion of static caravan and holiday chalet sites which could have an adverse effect on the sustainability of the tourism industry in the District (SA6).

Policy No.	Issues	Policy Options	NPPF and Core Strategy Policies / Saved 2006 Local Plan Policies	Likely positive sustainability effects (SA objectives affected – see Table 2.1 for key)	Likely negative sustainability effects (SA objectives affected)
		F. Planning permission will be granted for development designed to enhance facilities within existing caravan sites, including accommodation and the replacement of static caravans by chalets, provided that the above criteria is adhered to and: (a) It would not be visually intrusive and; (b) It would not unacceptably affect the living conditions of nearby residents (c) there being no risk from flooding			
		Comn	nunity		
C1	To safeguard existing community facilities	A: The Council will ensure the provision of a network of community facilities, providing essential public services throughout the district by protecting existing community sites that still serve, or have the ability to serve, the needs of the community. And/or B: The Council will only permit the loss of existing community facilities where: i. It can be demonstrated that there is no need for the existing premises or land for a community use and that it no longer has the ability or flexibility to serve the needs of the community; ii. The existing use is located on the ground floor within a Main Retail	NPPF para 70 Core Strategy SS3, SS5, CSD3, CSD8, CSD9 Saved LP: SC4, SC7	The District has a number of deficiencies in local services and deficiencies, particularly in rural areas. Both policy options safeguard existing community facilities in the District, retaining access to local facilities, services and environmental assets (SA3), including open spaces (SA14) in the District.	Both policy options safeguard existing community facilities in the District, which is likely to restrict the stock of existing buildings that can be converted for residential (SA5) and employment development (SA6). Comparing the two policy options, Policy B is likely to have a less significant adverse effect as it provides useful criteria outlining the exceptional circumstances in which existing community facilities can be converted or demolished.

Policy No.	Issues	Policy Options	NPPF and Core Strategy Policies / Saved 2006 Local Plan Policies	Likely positive sustainability effects (SA objectives affected – see Table 2.1 for key)	Likely negative sustainability effects (SA objectives affected)
C	The provision of unounded	Frontage, a Shopping Parade or other major commercial frontage; or iii. Community facilities of equivalent floor space or benefit(either on site or off site as part of a comprehensive redevelopment) that meets the current or future needs are provided.	NDDE nove 70	All three caling actions make	The allocation of land for your
C2	The provision of upgraded community and formal recreation facilities	A: Allocate land in the plan for the provision of new facilities based on assessed needs And/or B: Allow a flexible approach to delivering new and improved community and formal recreational uses which may include the need to build on part of an area of existing open space in order to provide better quality facilities and bring about environmental improvements and regeneration. And/or C: Allow more flexible use of vacant retail units for other business uses, community facilities or residential use	NPPF para 70, 72, 73, 74 Core Strategy SS3 CSD3 CSD8 CSD9 Saved LP: LR9, BE13, HO2	All three policy options make provision for the upgrading and development of new community and formal recreation facilities (SA3 and SA14). Such improvements are likely to result in indirect benefits for the District, helping promote healthier lifestyles (SA3) and to reduce crime (SA4). Improving healthier lifestyles is particularly important in Shepway with its general lack of health facilities in the rural areas and a high proportion of individuals with limiting long-term illnesses. The allocation of land for new facilities in policy option A and the provision for the more flexible use of vacant properties for other business uses, community facilities are likely to create more jobs in the District (SA6). Policy option B's provision for development on existing open spaces where this provides better quality facilities has the potential for positive effects in relation to access to community and recreation facilities (SA3)	The allocation of land for new facilities based on assessed needs in policy option A is more likely to result in the allocation of greenfield land than options B and C which make provision for the regeneration of previously developed land. Therefore, option A has the potential to have a negative effect on efficient use of land (SA11). Recommendation: It is suggested that the elements of option C relating to conversion of vacant retail units to business or residential use be moved to another policy to ensure that this policy remains focused on community/recreation provision.

Policy No.	Issues	Policy Options	NPPF and Core Strategy Policies / Saved 2006 Local Plan Policies	Likely positive sustainability effects (SA objectives affected – see Table 2.1 for key)	Likely negative sustainability effects (SA objectives affected)
C3	Providing open space, informal recreation provision and other green infrastructure to meet the current and future needs of the District addressing deficiencies and taking into account planned development	A: Allocate new sites for open space and informal recreation facilities in accordance with the proposals set out in open spaces: sports and recreation report 2011 and the emerging play strategy. Or B: As above but the emphasis being to provide new open space and informal recreation facilities as part of the redevelopment of larger sites.	NPPF para 73 Core Strategy CSD4, SS6, SS7, Saved LP: LR9	and townscape (SA8). Both policy options make provision for new sites for new open space and informal recreation facilities (SA3 and SA14). Such improvements are likely to result in indirect benefits for the District, helping promote healthier lifestyles (SA3), reduce crime (SA4) and offer the potential for biodiversity enhancement (SA9). Supporting healthier lifestyles is particularly important in Shepway with its general lack of health facilities in the rural areas and a high proportion of individuals with limiting long-term illnesses. Policy A is informed by the Open Spaces: Sports and Recreation Report 2011 and the emerging play strategy, both of which identify the areas of greatest need for open spaces and informal recreation facilities. Relative to option B which focusses on major developments, Policy A is likely	The allocation of new sites for new open space and informal recreation facilities is more likely to result in the allocation of greenfield land, which has the potential to have an adverse effect on efficient use of land relative to regeneration of brownfield sites (SA11).
C4	Creating a balance between permitting appropriate use of the countryside for recreation and protecting natural resources and the character of	A: Develop criteria based policies for equestrian development and other recreational activities that are sustainable and appropriate to a rural location to ensure they respect the character of the countryside, based	NPPF para 17, 114, 115 Core Strategy CSD3, CSD4	maximise the benefits of new open space and informal recreation facilities. Supporting healthier lifestyles is particularly important in Shepway with its general lack of health facilities in the rural areas and a high proportion of individuals with limiting long-	None identified.

Policy No.	Issues	Policy Options	NPPF and Core Strategy Policies / Saved 2006 Local Plan Policies	Likely positive sustainability effects (SA objectives affected – see Table 2.1 for key)	Likely negative sustainability effects (SA objectives affected)
	the rural areas	on the Kent Downs AONB good practice guide Or B: Rely upon generic design policies to assess such proposals	Saved LP: CO22	term illnesses. Policy option A's criteria-based approach is likely to promote the development of appropriate recreation uses in the countryside (SA3 and SA14) while safeguarding the special character of the countryside (SA7, SA8 and SA9). By encouraging the creation of new recreational uses in the countryside, Policy A is likely to have indirect benefits for promoting healthier lifestyles in the District (SA3) and generating new sources of employment (SA6). Policy option B would have a negligible effect relative to the SA baseline as it relies on existing planning policy.	
C5	Rural services and creating a balance between protecting the countryside and supporting the rural economy	A: Develop criteria based policies for the re-use and adaptation of rural buildings and other development associated with small scale business uses in the countryside to ensure they respect the character of the Countryside and in particular the AONB Or B: Rely upon generic design policies to assess such proposals	NPPF para 28 Core Strategy CSD3 Saved LP: CO19	Policy option A's criteria-based approach is likely to promote the development of appropriate small scale business uses in the countryside, improving access to services (SA3) and supporting the rural economy (SA6) while safeguarding the special character of the countryside and in particular the AONB (SA7, SA8 and SA9). Improving the provision of local services and facilities is particularly important in the District's rural areas where the population is largely made-up of older people who may find it more difficult to travel to access	None identified.

Policy No.	Issues	Policy Options	NPPF and Core Strategy Policies / Saved 2006 Local Plan Policies	Likely positive sustainability effects (SA objectives affected – see Table 2.1 for key)	Likely negative sustainability effects (SA objectives affected)
				these services.	
				Policy option B is likely to have a negligible effect as it relies on existing planning policy.	
C6	Providing enhancements to existing open spaces and formal and informal recreation facilities	A: Require developer or Community Infrastructure Levy (CIL)contributions for new provision/ enhancements to nearby open space and recreation facilities to meet the needs of all new residential development And/or B: Require where practicable major new development to improve the quality of existing open spaces and recreation facilities in the local vicinity Or C. Require major development to provide on-site open space provision based on the Fields in Trust Benchmark Standard	NPPF para 70, 73 Core Strategy SS3, SS5, CSD4 Saved LP: SD1, LR9	The District has a deficiency in good quality open space, particularly Parks. Furthermore, in recent years, some of the District's open space has been lost to make way for new housing development. Supporting healthier lifestyles is particularly important in Shepway with its general lack of health facilities in the rural areas and a high proportion of individuals with limiting longterm illnesses. All three policy options are likely to result in local investment for the provision of new and upgrading of open spaces and formal and informal recreation facilities (SA3 and SA14). Such improvements are likely to result in indirect benefits for the District, helping promote healthier lifestyles (SA3) and to reduce crime (SA4). By allowing contributions to be pooled for green infrastructure, option A will enable the Council to address larger scale deficiencies and plan green infrastructure improvements strategically, maximising the above benefits for the District's communities.	Site-focussed policy options B and C do not facilitate investment in District-wide green infrastructure schemes. This may reduce the Council's ability to tackle deficiencies in larger scale open spaces (SA14) or improve the connectivity of biodiversity networks (SA9.

Policy No.	Issues	Policy Options	NPPF and Core Strategy Policies / Saved 2006 Local Plan Policies	Likely positive sustainability effects (SA objectives affected – see Table 2.1 for key)	Likely negative sustainability effects (SA objectives affected)
C7	Local Green Space	A. Planning permission will only be granted for development proposals on designated Local Green Space that protect its openness, permanence and special quality. The Council will support designation of Local Green Space through Neighbourhood Plans where the space has a special character and significance to the local community by virtue of its beauty, historic significance, recreational value or wildlife value. Or B. The Council will protect and safeguard the extent of the district's Local Green Spaces as designated on the Policies Map by applying the same level of protection afforded to Metropolitan Green Belt in national planning policy to Local Green Spaces in the District.	NPPF para 76, 77 Core Strategy CSD4	The District has a deficiency in good quality open space, particularly Parks. Furthermore, in recent years, some of the District's open space has been lost to make way for new housing development. Both policy options are likely to have a negligible effect as they reiterate national planning policy requirements.	Both policy options are likely to have a negligible effect as they reiterate national planning policy requirements.
C8	Protection and enhancement of Public Rights of Way (PRoW). Create a network to link up open spaces and provide an improved network of pedestrian and cycle routes	A. Specifically allocate land to create a network of pedestrian routes, cycleways and bridleways between residential areas and main destinations, links between urban areas and the countryside and routes through the countryside in conjunction with the Green Infrastructure Strategy And/Or B: Require developers on a case by case basis to link up new residential developments with the footpath / cycleway / bridleway network	NPPF para 75 Core Strategy CSD4 Saved LP: LR8	Both policy options are likely to promote the protection and enhancement of the existing PRoW network which is likely to benefit the District's ambitions to promote healthier lifestyles and improve local connectivity (SA3 and SA14), promote sustainable modes of transport (SA10) and reduce greenhouse gas emissions from road traffic (SA2). Option A, in conjunction with the Green Infrastructure Strategy, is likely to create more opportunities to tackle	Policy option B's requirement for developers to connect new residential schemes to the existing PRoW network has the potential to make it harder to develop new residential schemes in the District with potentially adverse effects on housing provision (SA5).

Policy No.	Issues	Policy Options	NPPF and Core Strategy Policies / Saved 2006 Local Plan Policies	Likely positive sustainability effects (SA objectives affected – see Table 2.1 for key)	Likely negative sustainability effects (SA objectives affected)
60			NDDE 70	strategic issues and deliver greater enhancement of the PRoW network than Policy B, which operates on an application-by-application basis.	
C9	Provision of new community facilities in Hythe	A. That development will be permitted on land at Princes Parade for a hub of new community uses including a leisure centre with swimming pool, a relocated Seabrook elementary school, and a canal side park. Planning permission will be subject to the following requirements being met:- i. Any housing development being limited to that which is demonstrated to be necessary to providing sustainable community uses; ii. The decontamination of the land; iii. High quality design of buildings and landscaping that reflects the site's unique seafront location; iv. Development preserving and where possible enhancing the setting of the Royal Military Canal and other heritage assets; v. Provision of sustainable transport to and from the site. Or B. Development will be permitted on suitable individual sites in and adjoining Hythe for essential new community uses and in a particular leisure centre with swimming pool	NPPF para 70 Core Strategy CSD3, CSD7 Saved LP: TM8	All three policy options will generate new community facilities, including open space, in Hythe (SA3 and SA14) with indirect benefits for generating employment (SA6), reducing crime (SA4) and reducing the need to travel (SA10). All three policy options have regard for safeguarding the open character of the countryside surrounding Hythe (SA8) and protecting local heritage assets (SA7). Policy option A promotes the development of a canal side park which is likely to generate more significant contributions to the Council's ambitions to create new community facilities and open spaces (SA3 and SA14). Furthermore, option A promotes housing development necessary for providing sustainable community uses (SA5) and land decontamination (SA11). Policy option C makes provision for a more modest development at Princes Parade. This is likely to generate less significant new community facilities in Hythe (SA3 and SA14) with indirect benefits for generating employment (SA6), reducing crime (SA4) and promoting	All three policy options represent major allocations on the edge of Hythe. Despite measures outlined to safeguard the existing landscapes surrounding Hythe (SA8) and local heritage assets (SA7), the scale of the development has the potential for some adverse effects in relation to these issues. Furthermore, no mitigation measures have been made for biodiversity loss (SA9). As option C makes provision for a more modest development at Princes Parade, the associated adverse effects of development on the edge of Hythe are likely to be less significant. Recommendations: Provide links in the PPLP to evidence of the need for new community facilities in Hythe. Consider biodiversity enhancement as a requirement of planning permission for new community facilities in Hythe.

Policy No.	Issues Policy Options	NPPF and Core Strategy	Likely positive sustainability effects	Likely negative sustainability effects	
			Policies / Saved 2006 Local Plan Policies	(SA objectives affected – see Table 2.1 for key)	(SA objectives affected)
		and a relocated Seabrook elementary school.		sustainable travel (SA10).	
		Planning permission will be subject to the following requirements being met:-			
		 i. The site is in a sustainable location with good access from a range of travel modes; 			
		ii. The development would not have an adverse impact on the amenity of nearby residential properties;			
		iii. High quality design of buildings and landscaping are included;			
		iv. There would be no adverse incursion of the development into the open countryside;			
		v. There is no adverse impact on acknowledged heritage assets;			
		vi. The site is sequentially acceptable having regard to flood risk.			
		And/or			
		C. Planning permission will only be granted on Land at Princes Parade for minor development that is related to low key leisure uses associated with the enjoyment of the adjoining coastline and canal and which preserves the predominantly open character of the site.			
		Trans	sport		
T1	Parking Standards	A: Rely on adopted Kent County Council parking standards (IGN3), supported by national guidance, Kent Design and Shepway Transport	NPPF para 39, 40 Core Strategy	The District has a high dependency on the private car. Whilst air quality is generally not an issue, this nevertheless	None identified.

Policy No.	Issues	Policy Options	NPPF and Core Strategy Policies / Saved 2006 Local Plan Policies	Likely positive sustainability effects (SA objectives affected – see Table 2.1 for key)	Likely negative sustainability effects (SA objectives affected)
		Strategy And/or B: Produce new Shepway adopted parking standards based on local circumstances which also include criteria for the design and layout of parking spaces (including garages) in new developments And C: Adopted parking standards may be varied where:- i) the location is well served by public transport and there would be no adverse effect on road safety or traffic management; ii) this would allow development which would preserve or enhance the character or appearance of a conservation area, or assist the reuse of a building of architectural or historic interest which is a recognised heritage asset. iii) Measures are included in the development or a commuted sum payment section 106 contribution is made for improvements to or measures to assist encourage the use of public transport, cycling or walking. And/or D: In Folkestone Town Centre and Hythe Town Centre, new leisure, retail, office or commercial development should provide essential operational parking only on site.	SS3, SS5 Saved LP: TR12, TR14, CO16	has negative effects in relation to traffic congestion and greenhouse gas emissions. Policy option A relies on existing planning policy and would therefore have a negligible effect relative to the SA baseline. Policy options B, C and D are likely to have a positive effect on transport (SA10) in the District by tailoring parking requirements to local needs. Policy options C and D go further than B in that they are more prescriptive, identifying specific areas or circumstances where parking and congestion are important issues and seeking to restrict the use of the private car in favour of more sustainable modes. Therefore, policy options C and D are likely to have a more positive effect on sustainable transport (SA10), with indirect benefits for the District's ability to mitigate the effects of climate change (SA2).	

Policy No.	Issues	Policy Options	NPPF and Core Strategy Policies / Saved 2006 Local Plan Policies	Likely positive sustainability effects (SA objectives affected – see Table 2.1 for key)	Likely negative sustainability effects (SA objectives affected)
T2	Site Layout	In assessing the layout of new residential development and mixed use schemes that include residential development priority should be given to - A. Non car based modes of transport in the site layout OR B. Maximising the provision of on-site and off-site parking, including visitor parking in those areas with poor access to public transport. AND C. Maximising permeability and enhancing pedestrian and cycle access; OR D. Reducing permeability in site layouts where needed to meet secure by design principles; AND E. Provision of home zones and other pedestrian priority roads and spaces; OR F. Designing for a clear separation between vehicle movements and pedestrian and cycle movements.	NPPF para 35, 36, 38 Core Strategy SS3, SS5 Saved LP: BE1, TR5, TR6, TR12	The District has a high dependency on the private car. All six policy options are likely to have a positive effect on improving transport links and accessibility in the District (SA10). Policy options A, C, E and F are likely to promote travel by sustainable modes (SA10) with indirect positive effects on climate change mitigation (SA2) and healthier lifestyles (SA3). Policy D is likely to have a positive effect on crime reduction through the promotion of secure by design principles (SA4).	Policy B makes provision for private vehicles in areas with poor access to public transport and Policy D reduces permeability for sites that need to meet secure by design principles. Both policy options have the potential to have an adverse effect on the adoption of alternative modes of transport to the private car (SA10), with indirect adverse effects on climate change mitigation (SA2) and the promotion of healthier lifestyles (SA3).
ТЗ	Sustainable Transport	A. All developments of over 10 dwellings or over 1,000 sq. metres gross of commercial floorspace shall incorporate facilities for charging plug-in and other ultra-low emission vehicles, unless the applicant demonstrates that this is not feasible	NPPF para 35, 38 Core Strategy SS3, SS5	The District has a high dependency on the private car and below average bus use. All three policy options are likely to have a positive effect on the promotion of sustainable	All three policy options go beyond existing national planning policy, thereby increasing the financial burden on developers. This could make it harder to develop new residential (SA5) and employment (SA6) schemes in the District,

Policy No.	Issues	Policy Options	NPPF and Core Strategy Policies / Saved 2006 Local Plan Policies	Likely positive sustainability effects (SA objectives affected – see Table 2.1 for key)	Likely negative sustainability effects (SA objectives affected)
		on site. OR B. All applications of over 10 dwellings or over 1,000 sq. metres gross of commercial floorspace shall include a travel plan demonstrating how the development will achieve the objectives of sustainable development, unless it is demonstrated that there are extenuating circumstances that justify such a plan not being required. OR C. All applications of over 10 dwellings or over 1,000 sq. metres gross of commercial floorspace shall include disabled parking spaces, cycle parking and motor cycle parking in a publically accessible locations within the development.	Saved LP: TR5, TR13	transport alternatives (SA10) which has indirect benefits for the District's ability to mitigate the effects of climate change (SA2) and promote healthier lifestyles (SA3). Policy options A and C are focused on particular modes of sustainable travel (plug-in and other ultra-low emission vehicles or bicycles, respectively). In contrast, option B requires the preparation of a travel plan to achieve the broader requirements of sustainable development and may therefore have a more significant positive effects of the types described above.	with potentially adverse effects against their associated SA objectives.
T4	Highway Safety and Highway Congestion	A. Proposals which involve the formation of a new access, or would result in the intensification of the use of an existing access, will only be permitted where:- i) the access is not detrimental to the safety of vehicle traffic, cyclists and pedestrians or ii) the access can alternatively be improved to a standard acceptable to the Highway Authority or iii) the applicant can demonstrate by means of a transport impact study that the proposal would not increase	NPPF para 32,34, 35 Core Strategy SS3, SS5 Saved LP: TR11	The District has a high dependency on the private car. Policy A is more prescriptive than Policy B; however both are likely to have a positive effect on the promotion of highway safety and the reduction of highway congestion in the District (SA10).	Both policy options go beyond existing national planning policy, increasing the financial burden on developers which could make it harder to develop new residential (SA5) and employment (SA6) schemes in the District, with potentially adverse effects against their associated SA objectives.

Policy No.	Issues	Policy Options	NPPF and Core Strategy Policies / Saved 2006 Local Plan Policies	Likely positive sustainability effects (SA objectives affected – see Table 2.1 for key)	Likely negative sustainability effects (SA objectives affected)
		the risk of accidents or create delays. And B: Development that would lead to significant increased traffic congestion on the existing road network will not be permitted unless suitable mitigation measures are included within the application and funded by the developer.			
T5	Traffic Management and New Transport Schemes	A: All major residential, commercial and mixed use development should: i) promote measures to increase the use of public transport, cycling and walking; ii) demonstrate a positive impact on sustainable travel; iii) not have a detrimental impact on highway safety for pedestrians, cyclists, public transport users and private vehicles users. And/or B: All strategic level development (development that has travel implications beyond its local environment) should: i) provides direct investment that improves public transport, cycling and walking between the site and town centre; ii) results in increased opportunities for sustainable travel including	NPPF para 30, 32,34, 35 Core Strategy SS3, SS5 Saved LP: TR2, TR6, TR12, TR13	The District has a high dependency on the private car. Both policy options are likely to have a positive effect on the promotion of sustainable transport alternatives (SA10) which has indirect benefits for the District's ability to mitigate the effects of climate change (SA2) and promote healthier lifestyles (SA3).	Both policy options go beyond existing planning policy, increasing the financial burden on developers which could make it harder to develop new residential (SA5) and employment (SA6) schemes in the District, with potentially adverse effects against their associated SA objectives. Option B focusses on 'strategic level' development (development that has travel implications beyond its local environment) rather than all major development, which would suggest that fewer schemes would be effected by the policies' requirements. Thus, option B is likely to have a less significant adverse effect.

Policy No.	Issues	Policy Options	NPPF and Core Strategy Policies / Saved 2006 Local Plan Policies	Likely positive sustainability effects (SA objectives affected – see Table 2.1 for key)	Likely negative sustainability effects (SA objectives affected)
		penetration by buses; iii) has a positive impact on highway safety for pedestrians, cyclists, public transport users and private vehicles users.			
T6	London Ashford (Lydd) Airport	A. Carry forward policy TR15 which states that the District Planning Authority will permit proposals for the expansion of facilities at Lydd Airport directly related to the commercial and recreational flying use provided there would be no significant impact upon the internationally important wildlife communities in the Lydd/Dungeness area. Regard will also be given to the likely effect of proposals on other special features in the area, particularly the power station. Or B. Develop a new policy for the airport but which takes account of the planning permission for the extended runway and new terminal buildings.	NPPF para 31, 33 Core Strategy SS3, SS5 Saved LP: TR14	Lydd Airport has planning permission for an extended runway and new terminal building. Both policy options promote Lydd Airport as a local and regional transport hub, with positive effects on the District's transport network (SA10), access to facilities and services (SA3) and employment opportunities (SA6). Option A proposes the retention of a saved policy; option B proposes the creation of a new policy that considers the implications of the recent planning permission for the extended runway and new terminal buildings. It is likely that a new policy will provide more opportunity to capitalise on the latest developments at Lydd Airport, with more significant positive effects.	Both policy options promote the expansion of the airport and are likely to have adverse effects on the District's ability to mitigate and adapt to the effects of climate change (SA2) as well as increasing noise levels experienced by local communities (SA3, SA5). Recommendation: If policy option B is pursued it should safeguard the internationally important wildlife communities in the Lydd/Dungeness area, have regard to the likely effect of proposals on other special features in the area and address the potential effects of increased noise on residential amenity, otherwise there is potential for adverse effects on the District's ecological assets (SA9), landscapes and townscapes (SA8) and the amenity of residents (SA3, SA5) and businesses (SA6).
T7	Lorry Parking	A. Proposals for a strategic lorry parking facility will only be approved where it can demonstrate it has: i) good access to the M20 ii) no impact on the Area of Outstanding Natural Beauty or other local landscape designations or	NPPF para 31, Core Strategy SS5 Saved LP: TR9, TR10	Both policy options restrict the location and scale of lorry parking facilities in the District with the potential to reduce congestion on the District's strategic and minor road network (SA10), safeguard the special qualities of the AONB	Policy option A is targeted at 'strategic lorry parking facilities' assumed to be of a significant scale. Option B is targeted at 'small lorry parking facilities'. Restrictions on the scale of lorry parking facilities have the potential to have an adverse

Policy No.	Issues	Policy Options	NPPF and Core Strategy Policies / Saved 2006 Local Plan	Likely positive sustainability effects (SA objectives affected – see Table 2.1 for key)	Likely negative sustainability effects (SA objectives affected)
		natural or ecological features iii) no impact on villages or small settlements in the vicinity OR B. Proposals for small lorry parking facilities will only be approved where it can be demonstrated that they have: i) provide good access to the M20 ii) have no impact on the Area of Outstanding Natural Beauty or other local landscape designations or natural or ecological features iii) have no impact on villages or small settlements in the vicinity; and iv) provide choice and flexibility	Policies	and countryside (SA8 and SA9) and the amenity of small settlements (SA5 and SA8).	effect on employment in the District (SA6).
		Natural En	vironment		
NE1	To enhance access to the natural environment	A: To target opportunities for improvements on routes and links from urban areas where access is currently poor Or B: To focus on a more general approach of improving access to key open spaces from all areas.	Core Strategy CSD4 Saved LP: SD1	Both policy options are likely to have a positive effect in improving accessibility to the natural environment and their open spaces (SA3 and SA14). Policy A is likely to have a more positive effect on improving access to environmental assets in the District's urban areas (SA3), with indirect positive contributions to improving health and wellbeing (SA3) and reducing crime (SA4).	Both policy options have the potential to put the biodiversity at risk where habitats and species are sensitive to visitor pressure (SA9). Recommendation: Have regard in this policy to the need to avoid negative effects on biodiversity assets that are sensitive to visitor pressure.
				Policy B is likely to generate a greater range of benefits to strategic issues, such as climate change adaptation and	

Policy No.	Issues	Co	NPPF and Core Strategy Policies /	Likely positive sustainability effects	Likely negative sustainability effects
			Saved 2006 Local Plan Policies	(SA objectives affected – see Table 2.1 for key)	(SA objectives affected)
				mitigation (SA2) and flood resilience (SA1), at a more limited number of open spaces.	
NE2	To provide for biodiversity offsetting	Where major development proposals result in biodiversity loss, identify areas on site or off site for biodiversity offsetting on a case by case basis. Or Identify in the local plan boundaries for GI corridors which would be supported by developer contributions or CIL?	Core Strategy CSD4 Saved LP: CO1	Both policy options are likely to play a positive role in enhancing biodiversity in the District (SA9). Investment in green infrastructure can also result in indirect benefits to other strategic issues, such as climate change adaptation and flood resilience (SA1 and SA2), crime prevention (SA4), landscape and townscape improvements (SA8), improved access to environmental assets/open spaces (SA3 and SA14) and the promotion and provision of sustainable transport routes (SA10). The second policy option has a greater potential to conserve and enhance biodiversity (SA9) by focussing investment in the areas where it is likely to have the greatest positive effect: GI corridors. Furthermore, establishing a link between biodiversity offsetting and CIL communicates more clearly the mechanism through which funds will be raised.	As the catalyst for biodiversity offsetting is biodiversity loss, there is an inevitable risk of adverse effects on local biodiversity (SA9). Recommendations: It will be important to ensure that measures taken to offset loss significantly improve the condition and diversity of the wider habitat resource. Target biodiversity enhancement to the Biodiversity Opportunity Areas to address targets in the Kent Biodiversity Action Plan and support the establishment/enhancement of landscape scale ecological networks, thereby maximising biodiversity benefits.
NE3	Protecting the District's landscapes and countryside	A: Commission a landscape appraisal that identifies areas of countryside in addition to the AONB that make an important contribution at a local level to the natural beauty of the district and develop policies to ensure that they continue to contribute to	Core Strategy SS1, CSD4 Saved LP: CO1, CO4, CO5	All three policy options are likely to have a positive effect on improving the quality and character of the District's landscapes (SA8). The protection of the countryside is likely to have indirect benefits	Policy options B and C focus on the landscapes and countryside within and immediately adjacent to the AONB. Therefore, these policy options are likely to neglect other areas of the District with high quality landscapes and

Policy No.	Issues	Policy Options	NPPF and Core Strategy Policies / Saved 2006 Local Plan Policies	Likely positive sustainability effects (SA objectives affected – see Table 2.1 for key)	Likely negative sustainability effects (SA objectives affected)
		the character of the area, protect the natural environment and are not adversely impacted by new development. And/or B: Develop a criteria based policy, in addition to Core Strategy and national policy, to protect and manage the AONB, including views into and out of it, in line with the AONB Management Plan. And/or C: Develop policies to protect the high quality areas of landscape that abut the AONB.		for other strategic issues, such as biodiversity enhancement (SA9). Policy option A will result in creation of a robust evidenced-based policy that considers the landscape value of the entire District rather than just the AONB in Policy B and high quality areas that abut the AONB in Policy C and is therefore likely to result maximise the positive effect on the District's landscapes (SA8).	countryside (SA8).
NE4	Achieving a balance between accommodating new growth and ensuring the protection of important habitats and species that contribute to the biodiversity of the District	A: Develop additional policies to protect, manage and enhance important habitats and species that are not already subject to Core Strategy policy and national planning guidance. And/or B: Promote additional sites of biodiversity value to ensure that they are protected and sensitively managed, and where appropriate provide opportunities for access and education. Or C: Concentrate on improving existing sites such as Local Nature Reserves.	Core Strategy SS1,CSD4 Saved LP: CO11	Policy options A and B propose the protection and/or designation of additional areas of local conservation value to those already designated in National Planning Policy and the Core Strategy. This would likely result in the safeguarding of larger areas of habitat within the District (SA9). Policy C would concentrate investment on existing ecological designations thought to contain the most sensitive and valuable species and habitats in the District. Such an approach would maximise the existing ecological value of the District (SA9) and potentially improve public access to wellmanaged environments.	Policy options A and B are likely to result in the safeguarding of larger areas of habitat within the District making it harder to develop new residential (SA5), employment (SA6) and infrastructure schemes (SA10) in the District, with potentially adverse effects against their associated SA objectives. Recommendation: Target biodiversity enhancement to the Biodiversity Opportunity Areas to address targets in the Kent Biodiversity Action Plan and support the establishment/enhancement of landscape scale ecological networks, thereby maximising biodiversity benefits.

Policy No.	Issues	Policy Options	NPPF and Core Strategy Policies / Saved 2006 Local Plan Policies	Likely positive sustainability effects (SA objectives affected – see Table 2.1 for key)	Likely negative sustainability effects (SA objectives affected)
NE5	Promoting the positive enhancement of biodiversity in the District	A: Require developers to demonstrate how major development will maintain and where possible, positively enhance the biodiversity of the site. And/or B: Require landscaping in new developments to use native species that reflect the landscape character of the area. And/or C: Where possible require developments to incorporate wildlife corridors / links between habitats. And/or D: Require developers to provide an ecological survey at the time of submitting a planning application unless there is clearly no ecological interest on the site.	Core Strategy SS1, CSD4	All four policy options are likely to have a positive effect on enhancing biodiversity in the District (SA9). Option A focuses the requirements for local ecological mitigation and enhancement on major developments, which is likely to improve the deliverability of small-medium scale developments in the District, with positive effects for housing (SA5) and employment (SA6). Conversely, Policy D requires all developments to carryout ecological surveys helping to safeguard all habitats and species with ecological value (SA9). Option B is likely to make a positive contribution to the District's landscapes (SA8) but a more limited contribution to biodiversity (SA9). Option C has a more strategic focus, requiring developments to improve ecological networks and wildlife corridors. A strategic approach is likely to result in greater synergies with other strategic issues, such as climate change adaptation and flood resilience (SA1 and SA2), crime prevention (SA4), landscape and townscape improvements (SA8), improved access to environmental assets/open spaces (SA3 and SA14) and the promotion and	Option A limits the ability for local planning policy to manage the cumulative effects of small-medium scape development on local biodiversity, with the potential for some adverse effects on biodiversity (SA9). Conversely, Option D is likely to hinder the deliverability of small-medium scale housing (SA5) and employment (SA6) developments in the District as it requires developments of all sizes to carry out an ecological survey. Recommendation: Target biodiversity enhancement to the Biodiversity Opportunity Areas to address targets in the Kent Biodiversity Action Plan and support the establishment/enhancement of landscape scale ecological networks, thereby maximising biodiversity benefits.

Policy No.	Issues	Policy Options	NPPF and Core Strategy Policies / Saved 2006	Likely positive sustainability effects (SA objectives affected – see	Likely negative sustainability effects (SA objectives affected)
			Local Plan Policies	Table 2.1 for key)	
				provision of sustainable transport routes (SA10).	
NE6	Preventing adverse impacts upon / loss of specific features that contribute to biodiversity such as trees and ponds	A: Develop policies to ensure protection of trees, hedgerows, ponds and other features within development sites where of ecological and landscape importance.	Core Strategy CSD4 Saved LP: CO11, CO13	By requiring the protection and retention of all features with the potential for ecological or landscape value, the policy is likely to have a positive effect on landscape (SA8) and biodiversity (SA9) in the District.	The policy is relatively rigid, protecting all trees, hedgerows, ponds and other ecological features on sites with ecological and landscape value. Without a degree of flexibility in the policy, it is likely to have an adverse effect on the deliverability of some housing (SA5) and employment (SA6) schemes in the District.
NE7	Ensuring that increased recreational pressure does not have an adverse impact upon the SAC/SPAs	A: Develop policies and allocate land to divert recreation activities away from the SAC by the provision of enhanced facilities elsewhere, for example urban parks. And/or B: Manage access to Dungeness SAC/SPAs complex.	Core Strategy CSD4 Saved LP: CO11, CO14	Both policy options are likely to have a positive effect on enhancing biodiversity in the District (SA9). Policy A proposes the allocation of Suitable Alternative Natural Greenspace (SANG) to relieve pressure on the District's SAC/SPAs whereas Policy B proposes the active management of the District's international designations. While the former has the potential to alleviate pressure on the SAC/SPA the active management proposed in the latter is likely to more directly manage the adverse effects associated with recreation pressures.	The allocation of additional SANG through the implementation of Policy A would result in the safeguarding of larger areas of land within the District making it harder to develop new residential (SA5), employment (SA6) and infrastructure schemes (SA10) in the District, with potentially adverse effects against their associated SA objectives. Recommendation: Provide links in the PPLP to existing evidence in relation to recreational pressure on the District's two European sites and on the most appropriate strategy for mitigating such pressure, if relevant. If such evidence is absent, engage with Natural England to explore this issue and, if relevant, to agree an appropriate mitigation strategy.
NE8	Development and Disturbance of Birds in Dungeness Special Protection Areas and pRamsar	A: Set out criteria based policy to protect sites of international nature conservation importance. This should	Core Strategy SS1, CSD4 Saved LP:	Policy option A is likely to result in a more significant positive effect on biodiversity (SA9).	Option A may result in the safeguarding of areas adjacent to Dungeness SAC/pSPA, making it

Policy No.	Issues	Policy Options	NPPF and Core Strategy Policies / Saved 2006 Local Plan Policies	Likely positive sustainability effects (SA objectives affected – see Table 2.1 for key)	Likely negative sustainability effects (SA objectives affected)
	site	take into account the zone of influence around the sites. Or B: Rely on national guidance and Core Strategy CSD4.	CO14	Option B relies on the District's Core Strategy and National planning policy and therefore has a negligible effect relative to the SA baseline.	harder to develop new residential (SA5), employment (SA6) and infrastructure schemes (SA10) in the District, with potentially adverse effects against their associated SA objectives. Recommendation: Provide links in the PPLP to existing evidence in relation to recreational pressure on the Dungeness SAC/pSPA and on the most appropriate strategy for mitigating such pressure, if relevant. If such evidence is absent, engage with Natural England to explore this issue and, if relevant, to agree an appropriate mitigation strategy.
		The C	Coast		
CP1	Integrated Coastal Zone Management	A: Establish criteria that integrate the aims and objectives of the shoreline plan and marine plans with local plan policies for establishing Coastal Change Management Areas (see CP2 below). Or B: Define Coastal Change Management Plans in the body of the plan.	NPPF para 105 Core Strategy Policies CSD4, CSD5	Policy options will help to reduce the risk of flood from coastal change by avoiding inappropriate development in vulnerable areas (SA1). Both options may also have indirect positive effects in relation to safeguarding the special qualities of the Shepway Coastline, i.e. its heritage (SA7), landscape/seascape (SA8), biodiversity (SA9), climate change adaptation (SA2), local facilities, services and environmental assets (SA3) and water quality (SA12). The protection and enhancement of these special qualities is likely to make the District's coastline a more	Both policy options are likely to result in the safeguarding of large areas of the District's coastline which could make it harder to develop new residential (SA5), employment (SA6) and infrastructure schemes (SA10) in the District, with potentially adverse effects against their associated SA objectives.

Policy No.	Issues	Policy Options	NPPF and Core Strategy Policies / Saved 2006 Local Plan Policies	Likely positive sustainability effects (SA objectives affected – see Table 2.1 for key)	Likely negative sustainability effects (SA objectives affected)
				popular place to visit, live and work, with positive effects on employment in the District (SA6).	
CP2	To designate Coastal Change Management Areas and managed proposed development within those areas.	A. Development proposals for new dwellings or conversion of existing buildings to residential use will not be permitted in the Coastal Change Management Areas (CCMAs) identified on the Policies Map. And B. Planning applications for all other types of development within the CCMAs including redevelopment, extensions to existing property and development or intensification of land uses, will be permitted where a Coastal Change Vulnerability Assessment has been produced to demonstrate that there will be no increased risk to life, nor any significant increased risk to property. And C. Proposals for new or replacement coastal defence schemes will be permitted where it can be demonstrated that the works are consistent with the management approach for the frontage presented in the relevant Shoreline Management Plan, and there will be no material adverse impact on the environment or that these impacts can be mitigated.	NPPF para 106, 107.108 Core Strategy Policies SS1, SS3, SS5, CSD4, CSD5 Saved LP: SD1, CO6	All three policy options are likely to have a positive effect on reducing the risk of flooding (SA1) with potential indirect benefits in relation to safeguarding the special qualities of the Shepway Coastline, i.e. its heritage (SA7), landscape/seascape (SA8), biodiversity (SA9), climate change adaptation (SA2), local facilities, services and environmental assets (SA3) and water quality (SA12). The protection and enhancement of these special qualities is likely to make the District's coastline a more popular place to visit, live and work, with positive effects on employment in the District (SA6).	All three policy options are likely to result in the safeguarding of large areas of the District's coastline which could make it harder to develop new residential (SA5), employment (SA6) and infrastructure schemes (SA10) in the District, with potentially adverse effects against their associated SA objectives, although the safeguarded areas would subject to high flood risk and therefore unlikely to be suitable for many forms of development in the long term.
CP3	Development around the Coast (Quality)	A. Maintaining policies for protecting the undeveloped Folkestone and Dover Heritage Coast.	NPPF para 106, 107, 108, 114 Core Strategy	Policy options A, C and E protect undeveloped areas of the District's Heritage Coast and are	Option E that identifies additional areas of Heritage Coast and/or Undeveloped Coast sites (options,

Policy No.	Issues	Policy Options	NPPF and Core Strategy Policies / Saved 2006 Local Plan Policies	Likely positive sustainability effects (SA objectives affected – see Table 2.1 for key)	Likely negative sustainability effects (SA objectives affected)
		Or B. Having no specific policy for the undeveloped Folkestone and Dover Heritage Coast relying instead on generic planning policies. And/or C. Maintaining the existing policy for Undeveloped Coast Sites at West Hythe, Dymchurch, St Mary's Bay and Dungeness. Or D. Having no specific policy for Undeveloped Coast sites at West Hythe, Dymchurch, St Mary's Bay and Dungeness. Or E. Identifying additional areas of Heritage Coast and/or Undeveloped Coast sites. Or F. General criteria that control development along the coast to include safeguarding areas of land to allow for coastal defence work and to prevent storm damage to buildings. May in certain circumstances limit development along the coast.	Policies SS1, SS3,CSD4, CSD5 Saved LP: SD1, TM5, CO6, LR7	likely to have more positive effects on safeguarding the special qualities of the District's coastline, i.e. its heritage (SA7), landscape/seascape (SA8), biodiversity (SA9), coastal flooding resilience (SA1), climate change adaptation (SA2), environmental assets (SA3) and water quality (SA12) than the other options. A Places and Policies DPD that relies on existing generic planning policies in the Local Plan is likely to have a negligible effect (option B).	and areas for coastal defence work, could make it harder to develop new residential (SA5), employment (SA6) and infrastructure schemes (SA10) in the District, with potentially adverse effects against their associated SA objectives.
		Climate	Change		
CC1	Carbon emissions/ carbon reduction policy	A: Require the provision of a suite of energy efficiency, water efficiency and sustainable design measures in new housing and commercial developments e.g. use of ground or air source heat pumps, orientation for	Core Strategy Policy SS3 Saved LP: SD1	Policy option C relies on existing national planning policy and Building Regulations would have a negligible effect relative to the baseline (although these national policies are still likely to	Policy options A and B, which go beyond existing national planning policy and Building Regulations, would increase the financial burden on developers, which could make it harder to develop

Policy No.	Issues	Policy Options	NPPF and Core Strategy Policies / Saved 2006 Local Plan Policies	Likely positive sustainability effects (SA objectives affected – see Table 2.1 for key)	Likely negative sustainability effects (SA objectives affected)
		solar gain, provision of water butts, compost bins and outdoor drying facilities in addition to that required by the Building Regulations. And/or B: That the local planning authority rely on CIL contributions to fund local carbon reduction projects where it is not technically feasible to incorporate measures on site prior to the introduction of Allowable Solutions. Or C: Rely on the provisions of national guidance and the higher level policies expressed in the Core Strategy and the Building Regulations to ensure development contributes towards minimising energy and water usage, and carbon dioxide emissions.		require all new residential developments of more than 10 homes to be zero carbon from 2016 and smaller developments to meet high standards). Policy options A and B which go beyond existing national planning policy and building regulations would have a positive effect on improving the District's contribution to climate change mitigation and adaptation (SA2) and water efficiency (SA13). These positive effects relative to the baseline would be temporary since all new homes will have to meet zero carbon (larger developments) or stringent energy standards (smaller developments) from 2016. Furthermore, option B is likely to maximise the community benefits of carbon reduction projects by pooling CIL contributions for investment in larger local carbon reduction schemes, delivering the benefits of economies of scale.	new residential (SA5), employment (SA6) and infrastructure schemes (SA10) in the District, with potentially adverse effects against their associated SA objectives.
CC2	Wind Turbine Development	Planning permission will be granted for the development of wind turbines, subject to considerations including noise impacts, safety, ecology, interference with electromagnetic transmissions, heritage, shadow flicker, energy output, cumulative landscape and visual impacts, decommissioning. Extensions and Alterations to	Core Strategy Policy SS3 Saved LP: U14	The policy is likely to encourage the development of Wind Turbines/Farms in the District with positive effects on the District's ability to mitigate the effects of climate change (SA2). It is also likely to have lesser, indirect positive effects on employment in the District (SA6).	Development of wind turbines/farms in the District could have an adverse effect on the landscapes/ townscapes/ seascapes (SA8) as well as the settling of heritage assets (SA7). Furthermore, it has the potential to increase the rates of bird strike in the District, with adverse effects on biodiversity (SA9).

Policy No.	Issues	Policy Options	NPPF and Core Strategy Policies / Saved 2006 Local Plan	Likely positive sustainability effects (SA objectives affected – see Table 2.1 for key)	Likely negative sustainability effects (SA objectives affected)
		Existing Wind Farms Extensions to existing wind farms will be supported provided that the proposals are in keeping with the character of the existing development and satisfy criteria a) to i) above. Proposals to re-commission or repower a wind farm will be supported provided that the development meets criteria a) to i) above taking full account of the effects of the extended timescale. Wind Turbine Development Affecting the Area of Outstanding Natural Beauty (AONB) There will be a presumption against large scale wind development in the AONB. Developments involving more than one turbine, or turbines with a hub height of over 25m, will not be permitted. Small scale wind development within the AONB will be permitted provided that its impacts on the environment are acceptable and its installed capacity is commensurate with the needs of the property or business. Development outside of the AONB which has a substantial impact on interior views within the AONB, or important views of the AONB, will not be permitted.	Policies	The policy's presumption against large-scale wind turbines/farms in the AONB is likely to safeguard the special qualities of the AONB, i.e. its heritage (SA7), landscape/seascape (SA8), and biodiversity (SA9).	
CC3	Wind turbines and existing residential development	Wind turbines in connection with existing residential use A. Wind turbines to provide energy for existing residential dwellings will	Core Strategy Policy SS3 Saved LP: U14	Both policies are likely to have a positive effect in safeguarding the amenity of local residents (SA3, SA5) as well as the District's heritage assets (SA7),	Both policy options restrict the development of wind turbines in connection with residential uses which could have an adverse effect on promoting climate

Policy No.	Issues	Policy Options	NPPF and Core Strategy Policies / Saved 2006 Local Plan Policies	Likely positive sustainability effects (SA objectives affected – see Table 2.1 for key)	Likely negative sustainability effects (SA objectives affected)
		only be acceptable where: A single turbine is proposed for an existing dwelling; The scale of the turbine is not overwhelming in relation to the height of nearby dwellings; There is no adverse impact on the setting of a listed building, a conservation area or other heritage asset; The turbine does not cause any adverse impact on the amenity of a nearby dwelling(s) by way of obstructed outlook, noise or flicker; The turbine does not have any adverse visual impact on the scenic beauty of the Kent Downs Area of Outstanding Natural Beauty or other sensitive local landscapes; There are no adverse ecology impacts arising from the development; The turbine is finished in an appropriate colour to minimise its visual impact; The turbine is removed when no longer operational. Or B. Wind turbines for existing residential uses will only be acceptable where the above criteria are met and additionally the applicant has demonstrated that they have explored all reasonable alternatives for less intrusive forms of renewable energy		landscapes, townscapes and seascapes (SA8) and biodiversity (SA9). Option B goes one step further than option A by requiring applicants to demonstrate that they have explored all reasonable alternatives for less intrusive forms of renewable energy. The second policy approach is more positive than the first as it promotes alternative low carbon and renewable technologies as opposed to just restricting the use of one. Therefore, option B may have a minor positive effect on the district's contribution to climate change mitigation (SA2).	change mitigation in the District (SA2). Recommendation: Option B should expand on what represents a 'reasonable alternative' renewable energy source, e.g. does this mean that an alternative is only reasonable if it can deliver the same amount of energy for the same installation cost?

Policy No.	Issues	Policy Options	NPPF and Core Strategy Policies / Saved 2006 Local Plan Policies	Likely positive sustainability effects (SA objectives affected – see Table 2.1 for key)	Likely negative sustainability effects (SA objectives affected)
		such as ground source heating.			
CC4	Solar Farms	A. The development of new solar farms or the extension of existing solar farms will only be acceptable where: The proposed solar farm does not have any adverse visual impact on the scenic beauty of the Kent Downs Area of Outstanding Natural Beauty or other sensitive local landscapes; The proposed solar farm does not result in the direct loss of amenity to nearby residential properties by virtue of glare or other disturbance; Any necessary ancillary building works are minimised so as not to adversely impact on the character of the surrounding area; There are no adverse ecology impacts arising from the development; A suitable landscaping and screening strategy is included with the application; The solar panels and supporting frames are finished in an appropriate colour to minimise visual impact; The solar panels are removed when no longer operational. Or B. Solar farms will only be acceptable where the above criteria are met and additionally the solar farm will not result in the loss of the best and most	Core Strategy Policy SS3 Saved LP: U14	Both policy options are likely to have a positive effect in safeguarding the amenity of local residents (SA3, SA5) as well as the District's heritage assets (SA7), landscapes, townscapes and seascapes (SA8) and biodiversity (SA9). However, the second policy goes one step further by preventing solar farms from being constructed on the best and most versatile agricultural land, thereby safeguarding them (SA12).	Both policy options restrict the development of solar farms in the District which could have an adverse effect on promoting climate change mitigation (SA2). However, the second policy goes one step further by preventing solar farms from being constructed on the best and most versatile agricultural land, and therefore has greater potential for negative effects on SA2. Recommendation: In line with national Planning Practice Guidance, policy criteria should include: - Consideration of the need to conserve heritage assets. - The need for and impact of security measures such as lights and fencing. - Consideration of the energy generating potential of the proposed site.

Policy No.	Issues	Policy Options	NPPF and Core Strategy Policies / Saved 2006 Local Plan Policies	Likely positive sustainability effects (SA objectives affected – see Table 2.1 for key)	Likely negative sustainability effects (SA objectives affected)
		versatile agricultural land.			
CC5	Renewable energy/ Off site renewable energy	A. Develop a renewable energy strategy that identifies suitable sites for renewable energy and promotes the development of Combined Heat and Power (CHP) networks. Or B. Establish policy that requires CHP solutions to be assessed for all large scale residential, commercial and institutional planning applications. Or C. Not have a policy relating to CHP.	Core Strategy Policy SS3 Saved LP: U14	Options A and B both have a positive effect on promoting renewable and low carbon energy technologies in the District (SA2). Option A is more comprehensive, committing to a renewable energy strategy which could identify opportunities and need for renewable and low carbon technologies in the borough. Therefore the significance of its positive effect on the District's contribution to climate change mitigation is likely to be greater. Development of a renewable energy strategy could help to avoid the need to assess every large scale development for its CHP potential, reducing the burden on developers, with positive effects on SA5 and SA6.	Option B requires all large scale residential, commercial and institutional planning applications to assess the potential for CHP solutions. This policy has the potential to make it harder to develop new residential (SA5), employment (SA6) schemes in the District, with potentially adverse effects against their associated SA objectives.
CC6	Encouraging and promoting sustainable transport measures	A: Require larger schemes to incorporate transport measures such as charging points for electric vehicles and parking space for one or more car club vehicles. And/or B: Ensure that the requirements of Travel Plans can be implemented on development sites through, for example allowing sufficient space for cycle parking / storage and easy access for pedestrians.	Core Strategy Policy SS5 Saved LP: TR13	Both policy options are likely to have a positive effect on promoting more sustainable and cleaner modes of transport (SA10) with indirect benefits for the District's ability to mitigate the effects of climate change (SA2). Furthermore, investment in public transport measures are likely to result in improved access to local public facilities, services and environmental assets (SA3).	Both policy options go beyond existing national planning policy and Building Regulations, increasing the financial burden on developers, which could make it harder to develop new residential (SA5), employment (SA6) and infrastructure schemes (SA10) in the District, with potentially adverse effects against their associated SA objectives.

Policy No.	Issues	Policy Options	NPPF and Core Strategy Policies / Saved 2006 Local Plan Policies	Likely positive sustainability effects (SA objectives affected – see Table 2.1 for key)	Likely negative sustainability effects (SA objectives affected)
CC7	Waste/Recycling	A. Require all planning applications, other than for small extensions or minor development, to make external provision for on-site waste and recycling storage. Or B. Allow internal waste and recycling storage.	Core Strategy Policies SS3 SS6 Saved LP: U10	Both policy options are likely to have a positive effect on promoting more sustainable developments in the District with indirect benefits for the District's ability to mitigate the effects of climate change (SA2).	Both policy options go beyond existing national planning policy and Building Regulations, increasing the financial burden on developers, which could make it harder to develop new residential (SA5) and employment (SA6) schemes in the District, with potentially adverse effects against their associated SA objectives.
CC8	Sustainable design measures for extensions to existing buildings	A. Require planning applications for extensions to dwelling houses and commercial buildings to include sustainable design measures when applicants apply for planning permission, unless the improvements are not viable. Or B. To rely on Building Regulations in respect of these matters.	Core Strategy Policy SS3 Saved LP: SD1	The first policy is likely to have a positive effect on promoting more sustainable developments in the District with indirect benefits for the District's ability to mitigate and adapt to the effects of climate change (SA2). The second policy relies on Building Regulations and is therefore likely to have a negligible effect relative to the SA baseline.	The first policy goes beyond existing national planning policy and Building Regulations, increasing the financial burden on developers, which could make it harder to develop new residential (SA5) and employment (SA6) schemes in the District, with potentially adverse effects against their associated SA objectives.
CC9	Efficient and sustainable water use	A. Introduce a specific policy that limits water use requiring water saving measures in new homes with a per person consumption target lower than 105 litres per day. Or B. Introduce a specific policy that limits water use requiring water saving measures in new homes with a per person consumption target lower than 90 litres per day. Or C. Have no policy on water saving measures in new homes and rely on the Building Regulations, including	Core Strategy Policies SS3 CSD5 CSD9 Saved LP: U4	Policy options A and B are likely to have a positive effect on improving water efficiency in the District (SA13) and adapting to the effects of climate change (SA2). Option B has a lower consumption target and is therefore likely to have a more positive effect. Option C relies on Building Regulations and will therefore have a negligible effect relative to the SA baseline.	Policy options A and B go beyond existing national planning policy and building regulations, increasing the financial burden on developers, which could make it harder to develop new residential (SA5) and employment (SA6) schemes in the District, with potentially adverse effects against their associated SA objectives. Option B has a lower consumption target and is therefore likely to have a more significant adverse effect.

Policy No.	Issues	Policy Options	NPPF and Core Strategy Policies / Saved 2006 Local Plan Policies	Likely positive sustainability effects (SA objectives affected – see Table 2.1 for key)	Likely negative sustainability effects (SA objectives affected)
		possible future amendments.			
		Health and	Wellbeing		
HW1	To consider the effects of hot food takeaways on health and potential planning policy actions	A: A planning policy to restrict the development of new hot food takeaways within walking distance (e.g. 400 metres) of schools, parks, leisure centres, youth facilities and other similar locations. Or B: To limit the overall number of takeaways in a settlement or shopping frontage. Or C: Not to control the location of takeaways unless they have an adverse impact on residential amenity or highway safety.	Core Strategy SS3	Shepway has a high proportion of people with limiting long term illness. Options A and B are likely to have a positive effect on encouraging healthier lifestyles in the District (SA3). Policy C relies largely on existing planning policy would have a negligible effect relative to the SA baseline.	By restricting/reducing the number of hot food takeaways in the District, policy options A and B have the potential to have an adverse effect on employment in the District (SA6).
HW2	Development should contribute to addressing the causes of ill-health, improving the health and well-being of the local population and reducing health inequalities.	A: For residential development of 100 or more units and non-residential development in excess of 1,000 sq. m a Health Impact Assessment will be required, which will measure wider impact upon healthy living and the demands that are placed upon health services and facilities arising from the development. Where significant impacts are identified, measures to address the health requirements of the development should be provided and/or secured by planning obligations or planning conditions as appropriate. A Health Impact Assessment for smaller forms of development may also be required where the proposal is likely to give rise to a significant impact on health.	Core Strategy SS3	The requirement of Health Impact Assessments and the implementation of their recommendations in policy options A and B are likely to have a positive effect on promoting healthier lifestyles and improving access to facilities and services (SA3) including open spaces (SA14). Option C relies on existing planning policy which will have a negligible effect relative to the SA baseline.	Option A adopts a scale threshold at which Health Impact Assessments are required whereas option B proposes requiring Health Impact Assessments for specific forms of development. Both go beyond existing national planning policy, increasing the financial burden on developers, which could make it harder to develop new residential (SA5) and employment (SA6) schemes in the District, with potentially adverse effects against their associated SA objectives.

Policy No.	Issues	Policy Options	NPPF and Core Strategy Policies / Saved 2006 Local Plan Policies	Likely positive sustainability effects (SA objectives affected – see Table 2.1 for key)	Likely negative sustainability effects (SA objectives affected)
HW3	Development that supports	Or B: The above but identify specific forms of development. Or C: No requirements for Health Impact Assessments. A:To increase create and safeguard	Core Strategy	Shepway has a high proportion	Both policy options go beyond
	healthy, fulfilling and active lifestyles	opportunities for healthy, fulfilling and active lifestyles, and the creation of healthy neighbourhoods in Shepway and to reduce the environmental impact of importing food, development proposals should: a. Incorporate food growing in the design and layout of buildings and landscaping of all major developments; b. Not result in the loss of existing allotments; and c. Not result in the loss of the best and most versatile agricultural land (Grades 1, 2 and 3a). Or B: A policy that: a. Prevents the net loss of existing allotments; b. Requires all homes of 3 bedrooms or more to include garden space that can be used for growing food; and c. Which protects the loss of grade 3a agricultural land to new development unless there is a compelling and overriding planning reason to do so.	SS3 Saved LP: SD1, TM5, LR3, LR11,	of people with limiting long term illness. Both policy options are likely to have positive effects on encouraging healthier lifestyles in the District (SA3) and the protection of the Districts best and most versatile land (SA11). Policy A restricts development on all Grades 1, 2 and 3a agricultural land and requires the incorporation of food growing facilities on all major developments, which is likely to have a greater positive effect than policy B.	existing national planning policy, increasing the financial burden on developers, which could make it harder to develop new residential (SA5) and employment (SA6) schemes in the District, with potentially adverse effects against their associated SA objectives. Policy A restricts development on all Grades 1, 2 and 3a agricultural land and requires the incorporation of food growing facilities on all major developments, which is likely to have a greater adverse effect than policy B. Recommendation: Consider adding Grades 1 and 2 agricultural land to policy option 3(c); protection of moderate quality land without protection of excellent and very good quality seems illogical.

Policy No.	Issues	Policy Options	NPPF and Core Strategy Policies / Saved 2006 Local Plan Policies	Likely positive sustainability effects (SA objectives affected – see Table 2.1 for key)	Likely negative sustainability effects (SA objectives affected)
		Historic En	vironment		
HE1	Promoting and reinforcing the special character of designated conservation areas in the District	A: Require the design of new development in conservation areas to draw inspiration from local street patterns, building heights, local architectural styles and prevalent materials while remaining distinctive in its own right. Proposed development should take account of approved Conservation Area Appraisals. OR B: Promote high quality design of new buildings in conservation areas that while having reference to historical surroundings is innovative, distinctive and contemporary in character. And/or	SS3 Saved LP: SD1, BE4	All three policy options are likely to have a positive effect in safeguarding the historic character (SA7) of the District's landscapes and townscapes (SA8).	All policy options go beyond existing national planning policy, increasing the financial burden on developers, which could make it harder to develop new residential (SA5) and employment (SA6) schemes in the District, with potentially adverse effects against their associated SA objectives. Policy B is more flexible than Policy A in that it encourages high quality, innovative, distinctive and contemporary design in conservation areas and is therefore likely to have a lesser adverse effect.
		C: Require advertisements to reflect historic or locally distinct design wherever possible and to minimise visual obtrusiveness (whilst recognising their function).			
HE2	Balancing the need for change and new development against the need to protect the historic environment and heritage assets.	A: Require all new development to preserve or enhance the architecture, historic interest and setting of our built heritage and heritage assets. And/or B: Recognise that even in historic environments in some cases modern design can contribute to a sense of place and economic vitality, particularly where the existing character is poorly defined, or of limited visual amenity.	Core Strategy SS3 Saved LP: SD1, BE5, BE6	Policy options A, B and C all contribute positively to safeguarding the historic character (SA7) of the District's landscapes and townscapes (SA8). Option D largely relies on existing planning policy and is therefore likely to have a negligible effect.	Policy options A, B and C go beyond existing national planning policy, increasing the financial burden on developers, which could make it harder to develop new residential (SA5) and employment (SA6) schemes in the District with potentially adverse effects against their associated SA objectives. However, options B and C are more flexible than A, recognising that modern design can contribute to a sense of place and

Policy No.	Issues	Policy Options	NPPF and Core Strategy Policies / Saved 2006 Local Plan Policies	Likely positive sustainability effects (SA objectives affected – see Table 2.1 for key)	Likely negative sustainability effects (SA objectives affected)
		And/or C: Give a greater weight to the need for preservation of listed buildings as "going concerns" when considering the use of buildings, as opposed to requiring strict compliance with the preferred land uses in the development plan. Or D: Rely upon generic design policies for the assessment of proposals affecting the use of listed buildings.			economic vitality and recognising that listed buildings are "going concerns" when considering the use of buildings, as opposed to requiring strict compliance with the preferred land uses. Therefore, options B and C are likely to have a less adverse effect that Policy A.
HE3	Ensuring adequate and proportional protection of buildings, gardens, landscapes, structures and archaeological features which are of local historical merit, but which do not meet the national standards for statutory listing	A: Establish a policy that, informed by a Heritage Strategy, identifies buildings, gardens, landscapes, structures and archaeological features that should be afforded an appropriate level of importance and protection as heritage assets. Or B: Establish a policy that requires the assessment of development on non-designated heritage assets on a case by case basis having regard to generic design policies and the requirements of the NPPF. And/or C: In Areas of Archaeological Potential and where appropriate elsewhere require the preservation in situ of archaeological remains that are considered to be of national or local interest unless there is an overriding case based on the needs and requirements of a development.	Core Strategy SS3 Saved LP: SD1, BE18	All three policy options are likely to help safeguard local heritage assets not recognised as being of national importance (SA7); however policy options A and C protect specific heritage assets, buildings, gardens, landscapes, structures and archaeological features. Policy B largely has regard to generic design policy options and the requirements of the NPPF, which would suggest that it is likely to have a negligible effect relative to the SA baseline.	Policy options A and C go beyond existing national planning policy, increasing the financial burden on developers, which could make it harder to develop new residential (SA5) and employment (SA6) schemes in the District, with potentially adverse effects against their associated SA objectives.

Appendix 2

Review of other policies, plans and programmes

Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Shepway District Council Local Plan
INTERNATIONAL		
European		
EU Seventh Environmental Action Plan (2002-2012)	The EU's objectives in implementing the programme are: (a) to protect, conserve and enhance the Union's natural capital; (b) to turn the Union into a resource-efficient, green and competitive low-carbon economy; (c) to safeguard the Union's citizens from environment-related pressures and risks to health and wellbeing; (d) to maximise the benefits of the Union's environment legislation; (e) to improve the evidence base for environment policy; (f) to secure investment for environment and climate policy and get the prices right; (g) to improve environmental integration and policy coherence; (h) to enhance the sustainability of the Union's cities; (i) to increase the Union's effectiveness in confronting regional and global environmental challenges.	Include sustainability objectives to protect and enhance the natural environment and promote energy efficiency.
SEA Directive 2001 Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment	Provide for a high level of protection of the environment and contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development. The Directive must be applied to plans or programmes whose formal preparation begins after 21 July 2004 and to those already in preparation by that date.	Requirements of the Directive must be met in Sustainability Appraisals.
The Industrial Emissions Directive 2010 Directive 2010/75/EU on industrial emissions (integrated pollution prevention and control)	This Directive lays down rules on integrated prevention and control of pollution arising from industrial activities. It also lays down rules designed to prevent or, where that is not practicable, to reduce emissions into air, water and land and to prevent the generation of waste, in order to achieve a high level of protection of the environment taken as a whole. The Directive sets emission limit values for substances that are harmful to air or water.	Local Plan documents should take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF. Include SA objective for reducing pollution.

Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Shepway District Council Local Plan
Energy Performance of Buildings Directive 2010 on the energy performance of buildings 2010/31/EU	The Directive aims to promote the energy performance of buildings and building units.	Local Plan documents should take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF.
	It requests that member states adopt either national or regional methodology for calculating energy performance and minimum requirements for energy performance.	Include SA objective relating to the energy performance/efficiency of existing and proposed buildings.
The Birds Directive 2009 Directive 2009/147/EC is a codified version of Directive 79/409/EEC as amended	The preservation, maintenance, and re-establishment of biotopes and habitats shall include the following measures: • Creation of protected areas. • Upkeep and management in accordance with the ecological needs of	Local Plan documents should make sure that the upkeep of recognised habitats is maintained and not damaged from development.
amenueu	 opkeep and management in accordance with the ecological needs of habitats inside and outside the protected zones. Re-establishment of destroyed biotopes. Creation of biotopes. 	Avoid pollution or deterioration of habitats or any other disturbances effecting birds.
		Include SA objectives for the protection of birds.
The Waste Framework Directive 2008 Directive 2008/98/EC on waste	Prevention or reduction of waste production and its harmfulness. The recovery of waste by means of recycling, re-use or reclamation. Recovery or disposal of waste without endangering human health and without using processes that could harm the environment.	Local Plan documents should take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF.
	Development of clean technology to process waste and promote recycling.	Include SA objectives that minimise waste production as well as promote recycling.
The Floods Directive 2007 Directive 2007/60/EC on the assessment and management of flood risk	Establish a framework for the assessment and management of flood risk, aiming at the reduction of the adverse consequences for human health, the environment, cultural heritage and economic activity associated with floods. Preliminary Flood Risk Assessments to be completed by December 2011. Flood Hazard Maps and Flood Risk Maps to be completed by December 2013. Flood Risk Management Plans to be completed by December 2015.	Local Plan documents should take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF. Include SA objectives that relate to flood management and reduction of risk.
The Water Framework Directive 2000 Directive 2000/60/EC establishing a framework for community action in the field of water policy	Protection of inland surface waters, transitional waters, coastal waters and groundwater.	Local Plan documents should take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF.
,		Include SA objectives to protect and minimise the impact on water quality.

Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Shepway District Council Local Plan
The Environmental Noise Directive 2002 Directive 2002/49/EC relating to the assessment and management of environmental noise	Defines a common approach to avoid, prevent and reduce the adverse effects due to the exposure to environmental noise. It also provides a basis for developing European wide measures to deal with noise emitted by road and rail vehicles, infrastructure, aircraft and outdoor, industrial and mobile machinery. Principles of the directive include: • Monitoring the environmental problems. • Informing and consulting the public. • Addressing local noise issues • Developing a long-term EU strategy.	Local Plan documents should take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF. Include SA objectives to manage and reduce the impacts of noise.
The Landfill Directive 1999 Directive 99/31/EC on the landfill of waste	Prevent or reduce negative effects on the environment from the landfilling of waste by introducing stringent technical requirements for waste and landfills.	Local Plan documents should take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF.
	Reduce the amount of biodegradable waste sent to landfill to 75% of the 1995 level by 2010. Reduce this to 50% in 2013 and 35% by 2020.	Include SA objectives to increase recycling and reduce the amount of waste.
The Drinking Water Directive 1998 Directive 98/83/EC on the quality of water intended for human consumption	Protect human health from the adverse effects of any contamination of water intended for human consumption by ensuring that it is wholesome and clean.	Local Plan documents should take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF.
	Member States must set values for water intended for human consumption.	Include SA objectives to protect and enhance water quality.
The Air Quality Framework Directive 1996 Directive 96/62/EC on ambient air quality assessment and management	Avoid, prevent and reduce harmful effects of ambient air pollution on human health and the environment.	Local Plan documents should take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF.

Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Shepway District Council Local Plan
		Include SA objectives to maintain and enhance air quality.
Air Quality Directive 2008 Directive 2008/50/EC on ambient air quality and cleaner air for Europe	This directive sets legally binding limits for: Lead Nitrogen dioxide Sulphur dioxide Benzene Carbon Monoxide Arsenic Cadmium Nickel Benzo(a)pyrene Polycyclic aromatic hydrocarbons ozone Particulate matter	Local Plan documents should take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF. Include SA objectives to maintain and enhance air quality.
The Packaging and Packaging Waste Directive 1994 Directive 94/62/EC on packaging and packaging waste	Harmonise the packaging waste system of Member States. Reduce the environmental impact of packaging waste. By June 2001 at least 50% by weight of packaging waste should have been recovered, at least 25% by weight of the totality of packaging materials contained in packaging waste to be recycled with a minimum of 15% by weight for each packaging material.	Local Plan documents should take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF. Include SA objectives to minimise the environmental impact of waste and promote recycling.
The Habitats Directive 1992 Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora	Promote the maintenance of biodiversity taking account of economic, social, cultural and regional requirements. Conservation of natural habitats and maintain landscape features of importance to wildlife and fauna.	Local Plan documents should take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF. Include SA objectives to protect and maintain the natural environment and important landscape features.
The Nitrates Directive 1991 Directive 91/676/EEC on nitrates from agricultural sources.	Reduce water pollution caused or induced by nitrates from agricultural sources and prevent further such pollution. Identification of vulnerable areas.	Local Plan documents should take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF.

Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Shepway District Council Local Plan
		Include SA objectives to reduce water pollution.
The Urban Waste Water Directive 1991 Directive 91/271/EEC concerning urban waste water treatment	Protect the environment from the adverse effects of urban waste water collection, treatment and discharge, and discharge from certain industrial sectors.	Develop policies that take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF.
		Include sustainability objectives to reduce water pollution.
European Spatial Development Perspective (1999)	Economic and social cohesion across the community. Conservation of natural resources and cultural heritage. Balanced competitiveness between different tiers of government.	Local Plan documents should take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF.
		Include SA objectives to conserve natural resources and cultural heritage.
European Landscape Convention (Florence, 2002)	The convention promotes landscape protection, management and planning.	Local Plan documents should take account of the Convention.
		Include SA objectives to protect the urban and rural landscape and identify opportunities for enhancement.
European Convention on the Protection of the Archaeological Heritage (Valletta, 1992)	Protection of the archaeological heritage, including any physical evidence of the human past that can be investigated archaeologically both on land and underwater.	Local Plan documents should take account of the Convention.
Revision of the 1985 Granada Convention	Creation of archaeological reserves and conservation of excavated sites.	Include SA objectives to protect the archaeological heritage.
Other International		I.
Johannesburg Declaration on Sustainable Development (2002)	 Commitment to building a humane, equitable and caring global society aware of the need for human dignity for all. Renewable energy and energy efficiency. 	Local Plan documents should take account of the Declaration.
	 Accelerate shift towards sustainable consumption and production. Greater resource efficiency. 	Include SA objectives to enhance the natural environment, promote renewable energy and

Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Shepway District Council Local Plan
	New technology for renewable energy.Increase energy efficiency.	energy efficiency and sustainable use of natural resources.
Aarhus Convention (1998)	 Established a number of rights of the public with regard to the environment. Local authorities should provide for: The right of everyone to receive environmental information The right to participate from an early stage in environmental decision making The right to challenge in a court of law public decisions that have been made without respecting the two rights above or environmental law in general. 	Local Plan documents should take account of the Convention. Ensure that public are involved and consulted at all relevant stages of SA production.
NATIONAL		
National Planning Policy Framework (NPPF) (DCLG, 2012)	Presumption in favour of sustainable development. Delivering sustainable development by:	Local Plan documents must be in conformity with the NPPF.
		SA should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors.
	Building a strong, competitive economy.	Set out clear economic visions for that particular area.
		Include a sustainability objective relating to strengthening the economy.
	Ensuring vitality of town centres.	Recognise town centres as the heart of their communities.
		Include a sustainability objective relating to the vitality of town centres.
	Promoting sustainable transport	To implement sustainable transport modes depending on nature/location of the site, to reduce the need for major road transport infrastructure.

Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Shepway District Council Local Plan
		Include a sustainability objective relating to sustainable transport.
	Supporting high quality communications infrastructure.	Enhance the provision of local community facilities and services by supporting the expansion of electronic communications networks.
		Consider the sustainability implications of any new communications infrastructure.
	Delivering a wide choice of high quality homes.	Identify size, type, tenure and range of housing that is required in particular locations.
		Include a sustainability objective relating to housing availability and quality.
	Requiring good design.	Establish a strong sense of place to live, work and visit.
		Include a sustainability objective relating to good design.
	Promoting healthy communities.	Promote safe and accessible environments with a high quality of life and community cohesion.
		Include a sustainability objective relating to health and well-being.
	Protecting Green Belt Land.	To prevent the coalescence of neighbouring towns.
		Consider the sustainability implications of any policies which may result in coalescence.
	Meeting the challenge of climate change, flooding, and coastal change.	Use opportunities offered by new development to reduce causes/impacts of flooding.

Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Shepway District Council Local Plan
		Include a sustainability objective relating to climate change mitigation and adaption, to include minimising the risk of flooding.
	Conserving and enhancing the natural environment.	Recognise the wider benefits of biodiversity.
		Include a sustainability objective relating to the conservation and enhancement of the natural environment.
	Conserving and enhancing the historic environment	Sustain and enhance heritage assets and put them to viable uses consistent with their conservation. A plan may be considered unsound if there has been no proper assessment of the significance of heritage assets in the area, and the plan does not contain a positive strategy for the conservation, enhancement and enjoyment of the historic environment. Include a sustainability objective relating to the
		conservation and enhancement of heritage assets.
	Facilitating the use of sustainable materials.	Include policies which identify and safeguard mineral resources and associated infrastructure and promote the use of recycled/secondary materials prior to the extraction of primary materials.
		Include a sustainability objective relating to sustainable use of materials.
White Papers		
Natural Environment White Paper, 2011 The Natural Choice: securing the value o nature (HM Government, 2011)	 Protecting and improving our natural environment. Growing a green economy. Reconnecting people and nature. 	Local Plan documents should protect the intrinsic value of nature and recognise the multiple benefits it could have for communities.
		Include a sustainability objective relating to the

Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Shepway District Council Local Plan
		enhancement of the natural environment and consider the multiple benefits that the natural environment can provide (e.g. health benefits).
Electricity Market Reform White Paper 2011, Planning our Electric Future: A White Paper for Secure, Affordable and Low-Carbon Electricity (DECC, 2011)	This White Paper sets out the Government's commitment to transform the UK's electricity system to ensure that our future electricity supply is secure, low-carbon and affordable.	Local Plan documents should support renewable energy generation and encourage greater energy efficiency.
,	15 per cent renewable energy target by 2020 and 80 per cent carbon reduction target by 2050.	Include sustainability objectives to reduce carbon emissions and increase proportion of energy generated from renewable sources.
The Future of Transport White Paper 2004: A network for 2030 (DfT, 2004)	 Ensure we can benefit from mobility and access while minimising the impact on other people and the environment, now and in the future. Get the best out of our transport system without damaging our overall quality of life. Develop strategies that recognise that demand for travel will increase in the future. Work towards a transport network that can meet the challenges of a growing economy and the increasing demand for travel but can also achieve the government's environmental objectives. Provides targets for emission reductions, now superseded by later agreements. Transport is currently responsible for about a quarter of total emissions. 	Local Plan documents should provide for an increase in demand for travel whilst minimising impact on the environment. Policies also needed to promote public transport use rather than increasing reliance on the car. Include sustainability objectives to reduce the need to travel and improve choice and use of sustainable transport modes.
Water White Paper, 2011 Water for Life	Objectives of the White Paper are to: Paint a clear vision of the future and create the conditions which enable the water sector and water users to prepare for it; Deliver benefits across society through an ambitious agenda for improving water quality, working with local communities to make early improvements in the health of our rivers by reducing pollution and tackling unsustainable abstraction; Keep short and longer term affordability for customers at the centre of decision making in the water sector; Protect the interests of taxpayers in the policy decisions that we take; Ensure a stable framework for the water sector which remains attractive to investors;	Include sustainability objectives that relate to water quality and quantity.

Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Shepway District Council Local Plan
	Stimulate cultural change in the water sector by removing barriers to competition, fostering innovation and efficiency, and encouraging new entrants to the market to help improve the range and quality of services offered to customers and cut business costs; Work with water companies, regulators and other stakeholders to build understanding of the impact personal choices have on the water environment, water resources and costs; and Set out roles and responsibilities – including where Government will take a stronger role in strategic direction setting and assessing resilience to future	
	challenges, as well as clear expectations on the regulators.	
Urban White Paper 2000, Our Towns and Cities: The Future – delivering an urban renaissance (ODPM, 2000)	Provide for new sustainable homes that are attractive, safe and practical. Retain people in urban areas by, for example, making them more desirable places to live. Improve quality of life, opportunity and economic success through tailored solutions in towns and cities.	Local Plan documents should seek to deliver better towns and cities taking into account the key aims of the White Paper.
	3.8 million more homes needed by 2021. Local strategies needed to meet the needs of local people developed through partnerships. Sets targets for development on brownfield sites and through conversion of existing buildings now superseded by the NPPF.	Include sustainability objectives to ensure that the majority of new development is built on brownfield sites and aim to improve the quality of life of residents in towns and cities.
Rural White Paper 2000, Our Countryside: The Future – a fair deal for rural England (ODPM, 2000)	 Facilitate the development of dynamic, competitive and sustainable economies in the countryside. Maintain and stimulate communities and secure access to services for those who live and work in the countryside. Conserve and enhance rural landscapes. Increase opportunities for people to get enjoyment from the countryside. 	Local Plan documents should help increase employment and services in the rural parts of the District whilst conserving the landscape. Include sustainability objectives that aim to improve the economies of rural areas with minimal impact to the environment.
Policies and Strategies		
National Planning Practice Guidance, DCLG, 2014	Provides further guidance to be read along side the National Planning Policy Framework on a range of topics that link to the promotion of sustainable development including: Air quality Climate change Conserving and enhancing the historic environment Flood risk	The NPPG sets out a range of social, economic and environmental considerations for the preparation of the Local Plan. It also includes information on undertaking sustainability appraisals which can be taken into consideration.

Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Shepway District Council Local Plan
National Planning Policy for Waste (2014)	Health and well being Housing and economic development Natural environment Minerals Rural housing Open space Transport Waste Water supply, wastewater and water quality Key planning objectives are identified within National Planning Policy for Waste, requiring panning authorities to:	Include sustainability objective that relates to waste reduction.
	help deliver sustainable development through driving waste management up the waste hierarchy Ensure waste management is considered alongside other spatial planning concerns provide a framework in which communities take more responsibility for their own waste help secure the recovery or disposal of waste without endangering human health and without harming the environment, ensure the design and layout of new development supports sustainable waste management	reduction.
Door to Door: A Strategy for Improving Sustainable Transport Integration (DfT, 2013)	 The strategy focuses on four core areas which need to be addressed so that people can be confident in choosing greener modes of transport: Accurate, accessible and reliable information about different transport options Convenient and affordable tickets Regular and straightforward connections at all stages of the journey and between different modes of transport Safe and comfortable transport facilities The strategy also includes details on how the Government is using behaviour change methods to reduce or remove barriers to the use of sustainable transport, and working closely with stakeholders to deliver a better-connected transport system. 	Local Plan documents should take into account their role in addressing the four core areas outlined in the Strategy. Include SA objectives relating to high quality, efficient sustainable transport systems.
Planning Policy for Traveller Sites (DCLG,	This document sets out the Government's planning policy for traveller sites,	The Core Strategy and Gypsy and Traveller Site

Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Shepway District Council Local Plan
2012)	replacing ODPM Circular 01/2006: Planning for Gypsy and Traveller Caravan Sites and Circular 04/2007: Planning for Travelling Showpeople. It sets out the Government's aims in respect of Traveller's sites, including:	Allocation Policies will need to be in conformity with this document which sets out national policy for planning for Traveller sites.
	 To ensure that local planning authorities, working collaboratively, develop fair and effective strategies to meet need through the identification of land for sites. To encourage local planning authorities to plan for sites over a reasonable timescale. That plan-making and decision-taking should protect Green Belt from inappropriate development. For local planning authorities to ensure that their Local Plan includes fair, realistic and inclusive policies. To increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply. To reduce tensions between settled and traveller communities in plan making and planning decisions. To enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure. For local planning authorities to have due regard to the protection of local amenity and local environment. 	Include a sustainability objective relative to supply of housing available to all.
DECC (2011) UK Renewable Energy Roadmap (updates setting out progress and changes to the strategy dated 2013 and 2013)	Make the UK more energy secure Help protect consumers from fossil fuel price fluctuations. Help drive investment in new jobs and businesses in the renewable energy sector. Keep the UK on track to meet carbon reduction objectives	Include objectives relating to renewable energy generation and energy efficiency.
Biodiversity 2020: A Strategy for England's Wildlife and Ecosystem Services (DEFRA, 2011)	The aim of the Strategy is to guide conservation efforts in England up to 2020. Moving further on from 2020, the ambition is to move from a net biodiversity loss to gain. The strategy includes 22 priorities which include actions for the following sectors: • Agriculture	Local Plan documents should take into account their role in seeking to prevent the degradation of biodiversity and ecosystem services within Shepway. Local Plan documents should also recognise their contribution to securing a net gain in biodiversity.

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	 Forestry Planning and Development Water Management Marine Management Fisheries Air Pollution Invasive Non-Native Species 	Include SA objective relating to the protection and enhancement of the natural environment.
Safeguarding our Soils: A Strategy for England (DEFRA, 2009)	The vision is "by 2030, all England's soils will be managed sustainability and degradation threats tackled successfully. This will improve the quality of England's soils and safeguard their ability to provide essential services for future generations". The Strategy highlights the areas for priority including: Better protection for agricultural soils. Protecting and enhancing stores of soil carbon. Building the resilience of soils to a changing climate. Preventing soil pollution. Effective soil protection during construction and development. Dealing with our legacy of contaminated land.	Local Plan documents should help protect and enhance the quality of soils and seek to sustainably manage their quality for future generations. Include SA objective which seeks to safeguard and enhance the quality of soil.
The Code for Sustainable Homes: Setting the standard in sustainability for new homes (DCLG, 2008)	The Code is a standard designed to improve the sustainability of new homes. This sets out the assessment process and performance standards required for the Code for Sustainable Homes. In January 2014 the Government responded to the Environmental Audit Committee's report on the Housing Standards Review consultation, stating that necessary standards would, as far as possible, be consolidated into Building Regulations.	Local Plan documents should take into account their roles in promoting the implementation of the Code (or corresponding sustainability requirements in the Building Regulations) for all residential development. Include SA objectives which promote sustainable development and seek to achieve higher levels of efficiency (e.g. in energy, water etc.) where appropriate.
Laying the Foundations: A Housing Strategy for England (DCLG, 2011)	Aims to provide support to deliver new homes and improve social mobility.	Local Plan documents should encourage development of residential properties.

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		Include SA objectives that assesses whether housing need is being met.
Securing the Future: Delivering UK Sustainable Development Strategy (DEFRA, 2005)	Enable all people throughout the world to satisfy their basic needs and enjoy a better quality of life without compromising the quality of life for future generations. There are 4 shared priorities: • sustainable consumption and production; • climate change and energy; • natural resource protection and environmental enhancement; and • sustainable communities. Sets out indicators to give an overview of sustainable development and priority areas in the UK. They include 20 of the UK Framework indicators and a further 48 indicators related to the priority areas.	Local Plan documents should meet the aims of the Sustainable Development Strategy. Include SA objectives to cover the shared priorities.
Building a Greener Future: Policy Statement (DCLG, 2007)	This Statement confirms the government's intention to achieve 25% more energy efficient homes by 2010, 44% more efficient homes by 2013 and zero carbon (net carbon emissions should be zero per annum) homes by 2016.	Local Plan documents should ensure residential development is zero carbon by 2016. Include SA objectives which seek to improve the energy efficiency of proposed developments and encourage uptake of renewable energy.
The UK Renewable Energy Strategy (DECC, 2009)	 Increase our use of renewable electricity, heat and transport, and help tackle climate change. Build the UK low-carbon economy, promote energy security and take action against climate change. 15% of energy from renewable sources by 2020. Reducing UK CO₂ emissions by 750 million tonnes by 2030. 	Local Plan documents should encourage developments that would support renewable energy provision including electricity, heat and transport. Include SA objectives relating to increasing energy provided from renewable sources.
The Energy Efficiency Opportunity in the UK (DECC, 2012)	This is an Energy Efficiency Strategy aiming to realise the wider energy efficiency potential that is available in the UK economy. The Strategy identifies four barriers to energy efficiency which need to be overcome which include: • Embryonic markets. • Information. • Misaligned financial incentives.	Local Plan documents should seek to address the barriers identified within the Strategy and improve the existing building stock through appropriate adaptation measures. Include SA objectives relating to energy efficiency and adaptation of the existing building stock.

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	 Undervaluing energy efficiency. The Strategy draws attention to maximising the potential of existing dwellings by implementing 21st century energy management initiatives on 19th century homes. 	
The National Adaptation Programme – Making the Country Resilient to a Changing Climate (Defra, 2013)	 The report sets out visions for the following sectors: Built Environment – "buildings and places and the people who live and work in them are resilient to a changing climate and extreme weather and organisations in the built environment sector have an increased capacity to address the risks and take the opportunities from climate change". Infrastructure – "an infrastructure network that is resilient to today's natural hazards and prepared for the future changing climate". Healthy and resilient communities – "a health service, a public health and social care system which are resilient and adapted to a changing climate. Communities and individuals, including the most vulnerable, are better prepared to cope with severe weather events and other impacts of climate change. Emergency services and local resilience capability take account of and are resilient to, a changing climate". Agriculture and Forestry – "profitable and productive agriculture and forestry sectors that take the opportunities from climate change, are resilient to its threats and contribute to the resilience of the natural environment by helping maintain ecosystem services and protect and enhance biodiversity". Natural Environment – "the natural environment, with diverse and healthy ecosystems, is resilient to climate change, able to accommodate change and valued for the adaptation services it provides". Business – "UK businesses are resilient to extreme weather and prepared for future risks and opportunities from climate change". Local Government – "Local government plays a central in leading and supporting local places to become more resilient to a range of future risk and to be prepared for the opportunities from a changing climate". 	Local Plan documents should take account of the visions set out in the Programme. Include SA objectives which seek to promote the implementation of adaptation measures to make Shepway more resilient to a changing climate.
Healthy Lives, Healthy People: our Strategy for public health in England (Department of Health, 2010)	Protect the population from serious health threats; helping people live longer, healthier and more fulfilling lives; and improving the health of the poorest, fastest. Prioritise public health funding from within the overall NHS	Policies within the Local Plan documents should reflect the objectives of the strategy where relevant.

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	budget.	Include SA objectives relating to health and wellbeing.
The Air Quality Strategy for England, Scotland, Wales and Northern Ireland (DEFRA, 2007)	 Make sure that everyone can enjoy a level of ambient air quality in public spaces, which poses no significant risk to health or quality of life. Render polluting emissions harmless. Sets air quality standards for 13 air pollutants. 	Local Plan documents should take account of the likely impact on air quality from development. Include SA objectives to protect and improve air
Future Water: The Government's Water Strategy for England (DEFRA, 2008)	Sets out how the Government want the water sector to look by 2030 and an outline of the steps which need to be taken to get there.	quality. Local Plan documents should aim to contribute to the vision set out in this Strategy.
	 The vision for 2030 is one where we, as a country have: "improved the quality of our water environment and the ecology it supports, and continue to maintain high standards of drinking water quality from taps; Sustainably managed risks from flooding and coastal erosion, with greater understanding and more effective management of surface water; Ensure a sustainable use of water resources, and implement fair, affordable and cost-reflective water charges; Cut greenhouse gas emissions; and Embed continuous adaptation to climate change and other pressures across the water industry and water users". 	Include SA objectives which seek to protect, manage and enhance the water environment.
Water for People and the Environment: Water Resources Strategy for England and Wales (Environment Agency, 2009)	The Strategy vision for water resource "is for there to be enough water for people and the environment, meeting legitimate needs". Its aims include: To manage water resource and protect the water environment from climate change. Restore, protect, improve and value species and habitats that depend on water. To contribute to sustainable development through good water management. People to understand how water and the water environment contribute to their quality of life.	Policies within the Local Plan should reflect the aims of the strategy where relevant. Include SA objective which seeks to promote water management and efficiency.

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The National Flood and Coastal Erosion Risk Management Strategy for England (Environment Agency, 2011)	This Strategy sets out the national framework for managing the risk of flooding and coastal erosion. It sets out the roles for risk management authorities and communities to help them understand their responsibilities.	Local Plan documents should seek to reduce and manage the risk of all type of flooding.
	 The strategic aims and objectives of the Strategy are to: "manage the risk to people and their property; Facilitate decision-making and action at the appropriate level – individual, community or local authority, river catchment, coastal cell or national; Achieve environmental, social and economic benefits, consistent with the principles of sustainable development". 	The SA framework should include objectives/indicators which seek to reduce the risk and manage flooding sustainably.
Waste Strategy for England 2007 (DEFRA, 2007)	 Future of waste management – the government commitment. Tackle the amount of waste produced, by breaking the link between economic growth and waste production. Put waste which is produced to good use through substantial increases in re-use, recycling, composting, and recovery of energy. 	Local Plan documents should encourage the minimisation of waste production and the maximisation of recycling and re-use of materials. SA objectives should seek to ensure waste is minimised and promote recycling and reuse.
SUB-NATIONAL/REGIONAL		
Kent Minerals and Waste Plans	 Set out the vision and strategy for mineral provision and waste management in Kent Contain a number of development management policies for evaluating minerals and waste planning applications Consider strategic site provision for all minerals and waste management facilities, and Plan to the year 2030. 	Local Plan documents should take into the mineral supply and waste hierarchies and ensure mineral supply is not compromised. Take account of mineral safeguarding areas, new primary extraction facilities and safeguarded existing facilities during the selection of land for development.
		The SA framework should include objectives which consider the safeguarded sites and areas for future minerals supply.
Local Transport Plan for Kent 2011-2016	The Plan explains how the County will prioritise planned measures under five Themes based on the previous Government's five National Transport Goals as set out in the LTP3 Guidance, but made relevant to Kent:	The Shepway Places and polices Local Plan should take into account the five themes of the Plan and ensure they are not compromised.
	Growth Without GridlockA Safer and Healthier County	SA objectives/indicators should seek to improve access to sustainable high quality modes of

Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Shepway District Council Local Plan
	 Supporting Independence Tackling a Changing Climate Enjoying Life in Kent 	transport, ensure safety on the network is enhanced and reduce congestion.
East Kent Local Investment Plan 2011- 2026	 The Local Investment Plan (LIP) family of publications present the East Kent Local Strategic Partnership's (LSP) proposals to deliver its vision: By 2030, East Kent will have blended the best of its coastal location, landscape, culture and heritage to build a lasting beacon of success for the benefit of all its communities. 	Local Plan documents should take into account their role in addressing the key themes and priorities identified within the Investment Plan. The SA framework should include objectives/indicators which consider a range of social, economic and environmental matters.
Lighting the way to success The EKLSP Sustainable Community Strategy (2009)	"Lighting the Way to Success" is a long-term vision – it looks forward more than 20 years to 2030. By 2030, East Kent will have blended the best of its coastal location, landscape, culture and heritage to build a lasting beacon of success for the benefit of all its communities.	The Shepway Places and policies Local Plan should take into account its role in achieving the objectives set out in the East Kent Community Strategy. The SA framework should include objectives/indicators which consider a range of
A Living Landscape for the South East	Vision for the South East ecological network.	social, economic and environmental matters. The Shepway Places and Policies Local Plan should take into account its role in promoting the green network across the area.
		The SA framework should include objectives/indicators which seek to maintain and enhance the green network.
East Kent Gypsy and Traveller Accommodation Assessment Report (2014)	 Assess the accommodation needs of Gypsies and Travellers in the sub-region from 2013 – 2027. 	The Shepway Places and Policies Local Plan should take into account its role in allocating and safeguarding sites for Gypsy and traveller accommodation.
		The SA framework should include objectives/indicators which seek to preserve the rights of gypsy and travellers and improve their integration into the local community.
Growing the Garden of England: A strategy for environment and economy in	 The 2011 strategy has three themes: Living well within our environmental limits. Rising to the climate change challenge. 	The Shepway Places and Policies Local Plan should take into account its role in protecting, managing and maximising the benefits of the District's

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Kent (2011)	 Valuing our natural, historic and living environment. It is one of a suite of strategies, developed in 2010, that supports a revised Vision for Kent to deliver social, economic and environmental 	Ecosystem Services without compromising the environment.
	wellbeing for Kent's communities over the next 20 years. The 2011 strategy sets out how we will achieve a high-quality Kent environment, low carbon, resilient to climate change, and that has a thriving 'green economy' at its heart.	The SA framework should include objectives/indicators which seek to maximising the benefits of the District's Ecosystem Services without compromising the environment.
Kent Biodiversity Action Plan & Securing the value of nature in Kent (2011)	Action plans for the 85 UK BAP priority species and 28 BAP habitats	The Shepway Places and Polices Local Plan should protect the intrinsic value of the identified habitats and seek to improve them where possible.
		The SA framework should include an objective/indicator which seeks to conserve and enhance the identified habitats and species.
Kent Design Initiative (and Guide)	Initiative to create a showcase of great buildings, memorable and attractive new places that reinforce Kent's distinctive character.	The Shepway Places and Polices Local Plan should contain development management policies that are consistent with the content of the Kent Design Guide.
		The SA framework should include an objective/indicator which seeks to retain the character of the District built environment and promote its qualities in new developments.
Kent Health and Affordable Warmth Strategy	Fuel poverty is linked to general poverty. Strategy aimed at leading to the eradication of fuel poverty in Kent.	Local Plan documents should take into account their role in providing local communities with more opportunities to improve their health and wellbeing
Active Lives: 2007-2016, Kent Adult Social Services	A picture of how Kent Adult Social Services will look in 10 years' time.	and reduced inequality.
Social Sci Vices		The SA framework should include objectives/indicators which consider a range of social and environmental matters, including health and wellbeing and affordable warmth.
Kent Downs AONB management plan (2009-2014)	The ultimate goal of the Management Plan is to ensure that the natural beauty and special character of the landscape and vitality of the communities are recognised, maintained and strengthened well into the future	Local Plan should take account of the special qualities of the Kent Downs AONB and ensure that its policies are compatible with those outlined within the management plan.

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Strategic Housing Market Assessment for the East Kent Sub-region (SHMAA) (2009)	The study has identified twenty-one local housing markets, some of which straddle district boundaries, and some of which cross into areas administered by other local authorities. The proximity of East Kent to Kent Thames Gateway (which includes part of Swale), Ashford, and the London housing markets all exert influence on the housing and employment markets in the sub-region. There are different degrees of isolation and interaction with, for example, the Thanet markets being self-contained, while others, such as local markets based within Swale and Canterbury, exhibiting broader horizons. All told, however, compared to the rest of Kent and the rest of the South East, East Kent is relatively isolated and self-contained.	The SA framework should include objectives/indicators which consider landscape and ecological matters. The Shepway Places and Policies Local Plan should provide sites for high quality, affordable homes with an appropriate range of tenures, layouts and designs and encourage the refurbishment of empty homes in the District. SA objectives should improve access to good quality and affordable housing.
East Kent Homelessness Strategy (2010-2013) Action Plan	Major considerations include homelessness prevention, temporary accommodation and long-term housing solutions	The Shepway Places and Policies Local Plan should take into account its role in supplying and safeguarding accommodation for the homeless. SA should consider use of district wide
		homelessness data as an indicator.
LOCAL		
Shepway Rural Services Study (2011)	 This study aims to review the current position of rural areas within Shepway by combining existing data sources and officer field studies to aid in the assessment of Local Plan policies and inform the direction of future policy. 	The Shepway Places and Policies Local Plan should take into account the needs and opportunities of the Districts rural economy. The SA framework should consider the needs and opportunities of the District's rural economy and
		communities.
Shepway District Local Brownfield Strategy (2011)	The key aim of Shepway's Brownfield Land Strategy is to develop an understanding of the brownfield land in the area and to establish how this can be brought back into productive and beneficial use.	The Shepway Places and Policies Local Plan should maximise the use of brownfield before allocating land on greenfield sites.
		The SA framework should consider the need to maximise the efficiency of land use in the District by using brownfield land before greenfield land.

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Population Forecasts 2006 - 2026	Forecasts/ projections have been produced for the district as a whole and for individual wards within the district.	The Shepway Places and Policies Local Plan should take into account its role in supplying accommodation and employment opportunities for its growing population.
		SA should consider the use of accurate and up-to- date population data as an indicator.
Shepway Employment Land Review (2011)	Employment land review to inform the preparation of the District's planning policies.	The Shepway Places and Policies Local Plan should provide sites for a range of high quality employment sites with an appropriate range of use classes.
		SA objectives should improve access to good quality, easily accessible employment opportunities.
Retail Need Assessment Study (2010 Update)	The study identifies a lower expenditure growth to 2026 compared with the 2007 study, and consequently identifies lower need for retail floor space compared to figures given in the 2008 update.	The Shepway Places and Policies Local Plan should provide sites for a range of retail sites.
	This reflects the impact of the current recession on retail expenditure growth forecasts for the next ten year period.	SA objectives should improve access to good quality and a good range of easily accessible retail services.
Folkestone Town Centre Spatial Strategy (2011)	Key objective of the study is to improve the quality and functionality of the public realm through identifying:	The Shepway Places and policies Local Plan should take into account the existing visions for Shepway's town centres and contribute to the regeneration of Folkestone town centre.
	pedestrians, particularly from the station to the town centre and seafront; o opportunities to enhance the character and public realm of the town centre.	The SA framework should consider regeneration of key areas within Shepway District.
Windfalls, Housing Supply and Policy Update (2012)	Evidence supporting modifications put forward by Shepway District Council to its Core Strategy Local Plan [G15] in October 2012.	The Shepway Places and Policies Local Plan should provide high quality, affordable homes with an appropriate range of tenures, layouts and designs and encourage the refurbishment of empty homes in the District.
		SA objectives should improve access to good quality and affordable housing.

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Economic Viability Assessment (2011)	A district-wide affordable housing viability assessment for housing delivery over the lifetime of the Core Strategy.	The Shepway Places and Policies Local Plan should provide high quality, affordable homes and encourage the refurbishment of empty homes in the District.
		SA objectives should improve access to good quality and affordable housing.
Strategic Housing Land Availability Assessment (SHLAA) (2009-2010) & Update (2011-2012)	The Shepway SHLAA has produced a very large amount of information. However the conclusions are clear: the identified pool of possible housing sites is more than sufficient to allow a genuine range of strategic options to be considered.	The Shepway Places and Policies Local Plan should provide sites for high quality, affordable homes with an appropriate range of tenures, layouts and designs and encourage the refurbishment of empty homes in the District.
		SA objectives should improve access to good quality and affordable housing.
Open Spaces, Sports and Recreation Study (2011)	The purpose of this report is to inform the Shepway planning policies for planning, especially the Core Strategy. It does this by bringing together findings of two primary research studies undertaken by Shepway District Council on open space topics; and is complemented by other evidence base studies.	The Shepway Places and Polices Local Plan should take into account its role in protecting formal playing pitches from inappropriate development and ensuring the supply of formal playing pitches meets the demand.
		Include a sustainability objective relating to the protection, enhancement, increasing provision of, increasing participation in and improving access to the District's sports pitches and facilities.
Shepway Green Infrastructure Report (2011)	This report comprises the evidence base in respect of Green Infrastructure (GI), which is essentially the network of multi-functional green space which supports natural and ecological processes and is integral to the health and quality of life of sustainable communities.	The Shepway Places and Policies Local Plan should take into account its role in promoting the green network across the area. The SA framework should include
		objectives/indicators which seek to maintain and enhance the green network.
Shepway Strategic Flood Risk Assessment (SFRA) (2009) – to be updated	 This study provides an analysis of the main sources of flood risk to the District, together with a detailed means of appraising development allocations and existing planning policies against the risks posed by coastal flooding over this coming century. 	Policies within the Local Plan should reflect the actions identified within the assessment where relevant.

Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Shepway District Council Local Plan
		Include SA objective which seeks to promote flood risk management.
Shepway Water Cycle Study (2011)	This report examines the issues relating to water within the context of the district and the physical characteristics of its hydrology. One of the primary reasons for producing this report was to investigate the potential impact of new growth proposed under the Core Strategy. The report provides a simple analysis of the hydrology of the district in the context of the South East of England, a résumé of existing planning legislation and an overview of the Water Framework Directive, the primary piece of legislation that exists to protect the quantity and quality of water in the natural environment.	Policies within the Local Plan should reflect the actions identified within the study where relevant. Include SA objective which seeks to promote water management and efficiency.
Shepway Transport Strategy (2011) Appendices and Update Highways Impact Report (2012) – to be updated.	The remit of the Transport Strategy is to include and consider both transport matters which relate to the existing district area, as well as those relating to the potential Strategic Site allocations which have been made for future development.	The Shepway Places and polices Local Plan should consider transport matters relating to its strategic site allocations for future domestic, economic and mixed-use developments. SA objectives/indicators should seek to improve access to sustainable high quality modes of transport, ensure safety on the network is enhanced and reduce congestion.
Shepway Economic Development Strategy (2012-2017)	This strategy provides a framework for the economic development of Shepway over the coming years and followed the Council's Corporate Plan 2012-2017 which sets out to support the growth and sustainability of the economy to increase prosperity.	The Shepway Places and Policies Local Plan should seek to promote economic growth through an appropriate allocation of mixed-use developments and town centre regeneration in line with the vision and priorities set out in the strategy. The SA framework should include objectives/indicators which consider a range of social, economic and environmental matters.
Shepway Housing Strategy 2011-2016	There are approximately 48,200 residential dwellings in the Shepway District. Overall the housing market within Shepway is essentially similar to other district housing markets across South East England. Owner-occupation is the dominant form of tenure. The key differences for the Shepway District are the relatively high proportion of private rented accommodation and the relatively low proportion of council and housing association rented accommodation.	The Shepway Places and Policies Local Plan should provide high quality, affordable homes and encourage the refurbishment of empty homes in the District. SA objectives should improve access to good quality and affordable housing.

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Shepway Core Strategy (2013)	Key part of the Local Plan, containing the spatial strategy for the area and strategic planning policies.	The Shepway Places and Policies Local Plan should build on the spatial and strategic planning policies outlined in the Shepway Core Strategy.
		The SA framework should include objectives/indicators which consider a range spatial and strategic policies coving the spectrum of sustainable development issues.
Shepway Crime and Disorder Reduction Strategy (2005-2008)	 Aims to build safer communities by addressing key causal factors of crime by fostering good partnerships between the voluntary, private and public sectors and the local community. 	The Shepway Places and Policies Local Plan should ensure measures are secured which enhance community safety and reduce the fear of crime.
		Include a sustainability objective which seeks to make Shepway a safer place.
Shepway Contaminated Land Strategy (2002)	 Requirement of Environmental Protection Act 1990. Sets out the approach to identification of contaminated land across Shepway and how certain sites will be designated special sites. 	The Shepway Places and Policies Local Plan should ensure that contaminated land is taken into account when selecting sites for development and in consideration of appropriate mitigation.
		The SA framework should include an objective/indicator which considers soils, including the potential for pollution of soils (e.g. from sources of contaminated land).
		The SA framework should include an objective/indicator which considers the benefits of sport and recreation facilities (particularly open space) in improving the health and wellbeing of the District's residents.
Shepway Sports and Physical Activity Strategy (2004)	 Encourage residents to participate in sporting activity, to improve the health and well-being of local residents in line with key national targets/ initiatives, to ensure access to sports facilities for all and develop a wide variety of sport in Shepway. 	The Shepway Places and Policies Local Plan should ensure new developments provide or enhance an appropriate sport and recreation facilities in close proximity.
Shepway Playing Pitch Strategy (2004)	Ensuring future provision of pitches is balanced, meets the needs of the community and is protected for future generations.	The Shepway Places and Policies Local Plan should take into account its role in protecting formal playing pitches from inappropriate development and

Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Shepway District Council Local Plan
		ensuring the supply of formal playing pitches meets the demand.
		Include a sustainability objective relating to the protection, enhancement, increasing provision of, increasing participation in and improving access to the District's sports pitches and facilities.
Beachy Head to south Foreland SMP (2006)	Coastal defence management plan for Beachy Head to south Foreland to provide a 'route map' for decision makers to move from the present situation towards a more sustainable future.	Policies within the Local Plan should reflect the actions identified within the management plan.
Folkestone to Cliff End Flood and Erosion Management Plan	The Folkestone to Cliff End Flood and Erosion Management Strategy sets out our plan to manage flood and erosion risks along this coastline.	Include SA objective which seeks to promote flood and erosion risk management.
Shepway CIL and Local Plan Viability Study	Analyses what level of requirements the Local Plan can place on developers (e.g. for sustainable building design) without threatening financial viability.	A residential CIL range of between £0 and £125/m² has been recommended/proposed over four CIL charging rate zones:
Shepway CIL Charging Schedule	 The consultation on the CIL Preliminary Draft Charging Schedule (PDCS) closed on the 13th October 2014. The document sets out: The background and regulations governing CIL; It's relationship to the delivery of the Local Plan; The viability methodology used to arrive at the proposed CIL rates; The proposed rates that developers will need to pay when undertaking different types of development in different parts of the District, once a CIL charging schedule is adopted; and An indication of how CIL receipts will be allocated in support of the infrastructure required to support development of the area. The Council is currently reviewing all responses received. 	 e) Folkestone (lower end values) & Lydd area (viability scope – A); f) Romney Marsh (rural and coastal) and north Folkestone fringe / Hawkinge (B); g) West of Folkestone (Sandgate) and Hythe (C); h) North Downs rural area settlements (D). No geographic differentiation has been proposed for non-residential development. Only larger format retail – retail warehousing and supermarkets – have a proposed rate of not more than £100/m2. All other non-residential development would not be charged.
Commissioned Reports Pending Publica		
Strategic Housing Land Availability Assessment (SHLAA) Update	Subject to an annual update in line with NPPF requirements.	To be established post publication.
Town Centre Study	To focus on sites in Folkestone, Hythe and New Romney Town Centres, but will also cover other centres.	To be established post publication.
Strategic Flood Risk Assessment (SFRA)	On hold pending EA's re-modelling of flood risk on Romney Marsh.	To be established post publication.

Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Shepway District Council Local Plan
Update		
Shepway Energy Study	Energy Capacity, renewable and low carbon energy opportunities and constraints, energy efficiency of building stock.	To be established post publication.
Shepway Heritage Study	Discussing scope and nature of required evidence base with English Heritage.	To be established post publication.
Shepway Transport Study	Update completed which identifies road junctions requiring improvement, for example Shorncliffe Garrison.	To be established post publication.
Shepway Air Quality Study	 Air quality across the district is usually quite good and there is no need to take action in respect of introducing any air quality management areas (AQMAs) although potential air quality issues may arise in proximity to the A20 and M20. 	To be established post publication.
Shepway Employment Study	• Significant over-supply of employment land in the District and a need to rationalise this and identify which sites are suitable for mixed use.	To be established post publication.
Shepway Local Retail Centres Study	 Evidence has been gathered to support policy protection of local parades of shops. 	To be established post publication.
	•	
Shepway Socio-economic Study	Particularly focuses on the Romney Marsh Area and impacts of loss of employment associated with closure of Dungeness Nuclear Power Station	To be established post publication.
Shepway Sustainable Access Strategy (possible SPD)	Surveys of Dungeness and Romney Marsh have been confirmed.	To be established post publication.
Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Shepway District Council Local Plan
INTERNATIONAL		
European		
SEA Directive 2001 Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment	Provide for a high level of protection of the environment and contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development.	Requirements of the Directive must be met in Sustainability Appraisals.
	The Directive must be applied to plans or programmes whose formal preparation begins after 21 July 2004 and to those already in preparation	

Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Shepway District Council Local Plan
	by that date.	
The Industrial Emissions Directive 2010 Directive 2010/75/EU on industrial emissions (integrated pollution prevention and control)	This Directive lays down rules on integrated prevention and control of pollution arising from industrial activities. It also lays down rules designed to prevent or, where that is not practicable, to reduce emissions into air, water and land and to prevent the generation of waste, in order to achieve a high level of protection of the environment taken as a whole. The Directive sets emission limit values for substances that are harmful to air or water.	Local Plan documents should take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF. Include SA objective for reducing pollution.
Energy Performance of Buildings Directive 2010 on the energy performance of buildings 2010/31/EU	The Directive aims to promote the energy performance of buildings and building units. It requests that member states adopt either national or regional methodology for calculating energy performance and minimum requirements for energy performance.	Local Plan documents should take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF. Include SA objective relating to the energy performance/efficiency of existing and proposed buildings.
The Birds Directive 2009 Directive 2009/147/EC is a codified version of Directive 79/409/EEC as amended	The preservation, maintenance, and re-establishment of biotopes and habitats shall include the following measures: Creation of protected areas. Upkeep and management in accordance with the ecological needs of habitats inside and outside the protected zones. Re-establishment of destroyed biotopes. Creation of biotopes.	Local Plan documents should make sure that the upkeep of recognised habitats is maintained and not damaged from development. Avoid pollution or deterioration of habitats or any other disturbances effecting birds. Include SA objectives for the protection of birds.
The Waste Framework Directive 2008 Directive 2008/98/EC on waste	Prevention or reduction of waste production and its harmfulness. The recovery of waste by means of recycling, re-use or reclamation. Recovery or disposal of waste without endangering human health and without using processes that could harm the environment. Development of clean technology to process waste and promote recycling.	Local Plan documents should take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF. Include SA objectives that minimise waste production as well as promote recycling.
The Floods Directive 2007 Directive 2007/60/EC on the assessment	Establish a framework for the assessment and management of flood risk, aiming at the reduction of the adverse consequences for human health, the	Local Plan documents should take account of the Directive as well as more detailed policies derived

Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Shepway District Council Local Plan
and management of flood risk	environment, cultural heritage and economic activity associated with floods. Preliminary Flood Risk Assessments to be completed by December 2011. Flood Hazard Maps and Flood Risk Maps to be completed by December 2013. Flood Risk Management Plans to be completed by December 2015.	from the Directive contained in the NPPF. Include SA objectives that relate to flood management and reduction of risk.
The Water Framework Directive 2000 Directive 2000/60/EC establishing a framework for community action in the field of water policy	Protection of inland surface waters, transitional waters, coastal waters and groundwater.	Local Plan documents should take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF. Include SA objectives to protect and minimise the impact on water quality.
The Environmental Noise Directive 2002 Directive 2002/49/EC relating to the assessment and management of environmental noise	Defines a common approach to avoid, prevent and reduce the adverse effects due to the exposure to environmental noise. It also provides a basis for developing European wide measures to deal with noise emitted by road and rail vehicles, infrastructure, aircraft and outdoor, industrial and mobile machinery. Principles of the directive include: • Monitoring the environmental problems. • Informing and consulting the public. • Addressing local noise issues • Developing a long-term EU strategy.	Local Plan documents should take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF. Include SA objectives to manage and reduce the impacts of noise.
The Landfill Directive 1999 Directive 99/31/EC on the landfill of waste	Prevent or reduce negative effects on the environment from the landfilling of waste by introducing stringent technical requirements for waste and landfills. Reduce the amount of biodegradable waste sent to landfill to 75% of the 1995 level by 2010. Reduce this to 50% in 2013 and 35% by 2020.	Local Plan documents should take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF. Include SA objectives to increase recycling and reduce the amount of waste.
The Drinking Water Directive 1998 Directive 98/83/EC on the quality of water intended for human consumption	Protect human health from the adverse effects of any contamination of water intended for human consumption by ensuring that it is wholesome and clean.	Local Plan documents should take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF.

Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Shepway District Council Local Plan
	Member States must set values for water intended for human consumption.	Include SA objectives to protect and enhance water quality.
The Air Quality Framework Directive 1996 Directive 96/62/EC on ambient air quality assessment and management	Avoid, prevent and reduce harmful effects of ambient air pollution on human health and the environment.	Local Plan documents should take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF. Include SA objectives to maintain and enhance air quality.
Air Quality Directive 2008 Directive 2008/50/EC on ambient air quality and cleaner air for Europe	This directive sets legally binding limits for: Lead Nitrogen dioxide Sulphur dioxide Benzene Carbon Monoxide Arsenic Cadmium Nickel Benzo(a)pyrene Polycyclic aromatic hydrocarbons ozone Particulate matter	Local Plan documents should take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF. Include SA objectives to maintain and enhance air quality.
The Packaging and Packaging Waste Directive 1994 Directive 94/62/EC on packaging and packaging waste	Harmonise the packaging waste system of Member States. Reduce the environmental impact of packaging waste. By June 2001 at least 50% by weight of packaging waste should have been recovered, at least 25% by weight of the totality of packaging materials contained in packaging waste to be recycled with a minimum of 15% by weight for each packaging material.	Local Plan documents should take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF. Include SA objectives to minimise the environmental impact of waste and promote recycling.
The Habitats Directive 1992 Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora	Promote the maintenance of biodiversity taking account of economic, social, cultural and regional requirements. Conservation of natural habitats and maintain landscape features of importance to wildlife and fauna.	Local Plan documents should take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF.

Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Shepway District Council Local Plan
		Include SA objectives to protect and maintain the natural environment and important landscape features.
The Nitrates Directive 1991 Directive 91/676/EEC on nitrates from agricultural sources.	Reduce water pollution caused or induced by nitrates from agricultural sources and prevent further such pollution. Identification of vulnerable areas.	Local Plan documents should take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF.
		Include SA objectives to reduce water pollution.
The Urban Waste Water Directive 1991 Directive 91/271/EEC concerning urban waste water treatment	Protect the environment from the adverse effects of urban waste water collection, treatment and discharge, and discharge from certain industrial sectors.	Develop policies that take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF.
		Include sustainability objectives to reduce water pollution.
European Spatial Development Perspective (1999)	Economic and social cohesion across the community. Conservation of natural resources and cultural heritage. Balanced competitiveness between different tiers of government.	Local Plan documents should take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF.
		Include SA objectives to conserve natural resources and cultural heritage.
European Landscape Convention (Florence, 2002)	The convention promotes landscape protection, management and planning.	Local Plan documents should take account of the Convention.
		Include SA objectives to protect the urban and rural landscape and identify opportunities for enhancement.
European Convention on the Protection of the Archaeological Heritage (Valletta, 1992)	Protection of the archaeological heritage, including any physical evidence of the human past that can be investigated archaeologically both on land and underwater.	Local Plan documents should take account of the Convention.
Revision of the 1985 Granada Convention	Creation of archaeological reserves and conservation of excavated sites.	Include SA objectives to protect the archaeological heritage.

Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Shepway District Council Local Plan
Other International		
Johannesburg Declaration on Sustainable Development (2002)	 Commitment to building a humane, equitable and caring global society aware of the need for human dignity for all. Renewable energy and energy efficiency. Accelerate shift towards sustainable consumption and production. Greater resource efficiency. New technology for renewable energy. Increase energy efficiency. 	Local Plan documents should take account of the Declaration. Include SA objectives to enhance the natural environment, promote renewable energy and energy efficiency and sustainable use of natural resources.
Aarhus Convention (1998)	 Established a number of rights of the public with regard to the environment. Local authorities should provide for: The right of everyone to receive environmental information The right to participate from an early stage in environmental decision making The right to challenge in a court of law public decisions that have been made without respecting the two rights above or environmental law in general. 	Local Plan documents should take account of the Convention. Ensure that public are involved and consulted at all relevant stages of SA production.
NATIONAL		
National Planning Policy Framework (NPPF) (DCLG, 2012)	Presumption in favour of sustainable development. Delivering sustainable development by:	Local Plan documents must be in conformity with the NPPF. SA should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors.
	Building a strong, competitive economy.	Set out clear economic visions for that particular area. Include a sustainability objective relating to strengthening the economy.
	Ensuring vitality of town centres.	Recognise town centres as the heart of their communities.

Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Shepway District Council Local Plan
		Include a sustainability objective relating to the vitality of town centres.
	Promoting sustainable transport	To implement sustainable transport modes depending on nature/location of the site, to reduce the need for major road transport infrastructure.
		Include a sustainability objective relating to sustainable transport.
	Supporting high quality communications infrastructure.	Enhance the provision of local community facilities and services by supporting the expansion of electronic communications networks.
		Consider the sustainability implications of any new communications infrastructure.
	Delivering a wide choice of high quality homes.	Identify size, type, tenure and range of housing that is required in particular locations.
		Include a sustainability objective relating to housing availability and quality.
	Requiring good design.	Establish a strong sense of place to live, work and visit.
		Include a sustainability objective relating to good design.
	Promoting healthy communities.	Promote safe and accessible environments with a high quality of life and community cohesion.
		Include a sustainability objective relating to health and well-being.

Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Shepway District Council Local Plan
	Protecting Green Belt Land.	To prevent the coalescence of neighbouring towns.
		Consider the sustainability implications of any policies which may result in coalescence.
	Meeting the challenge of climate change, flooding, and coastal change.	Use opportunities offered by new development to reduce causes/impacts of flooding.
		Include a sustainability objective relating to climate change mitigation and adaption, to include minimising the risk of flooding.
	Conserving and enhancing the natural environment.	Recognise the wider benefits of biodiversity.
		Include a sustainability objective relating to the conservation and enhancement of the natural environment.
	Conserving and enhancing the historic environment	Sustain and enhance heritage assets and put them to viable uses consistent with their conservation. A plan may be considered unsound if there has been no proper assessment of the significance of heritage assets in the area, and the plan does not contain a positive strategy for the conservation, enhancement and enjoyment of the historic environment.
		Include a sustainability objective relating to the conservation and enhancement of heritage assets.
	Facilitating the use of sustainable materials.	Include policies which identify and safeguard mineral resources and associated infrastructure and promote the use of recycled/secondary materials prior to the extraction of primary materials.
		Include a sustainability objective relating to sustainable use of materials.

Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Shepway District Council Local Plan
Planning Policy for Traveller Sites (DCLG, 2012)	 This document sets out the Government's planning policy for traveller sites, replacing ODPM Circular 01/2006: Planning for Gypsy and Traveller Caravan Sites and Circular 04/2007: Planning for Travelling Showpeople. It sets out the Government's aims in respect of Traveller's sites, including: To ensure that local planning authorities, working collaboratively, develop fair and effective strategies to meet need through the identification of land for sites. To encourage local planning authorities to plan for sites over a reasonable timescale. That plan-making and decision-taking should protect Green Belt from inappropriate development. For local planning authorities to ensure that their Local Plan includes fair, realistic and inclusive policies. To increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply. To reduce tensions between settled and traveller communities in plan making and planning decisions. To enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure. For local planning authorities to have due regard to the protection of local amenity and local environment. 	The Core Strategy and Gypsy and Traveller Site Allocation Policies will need to be in conformity with this document which sets out national policy for planning for Traveller sites. Include a sustainability objective relative to supply of housing available to all.
White Papers		
Natural Environment White Paper, 2011 The Natural Choice: securing the value of nature (HM Government, 2011)	 Protecting and improving our natural environment. Growing a green economy. Reconnecting people and nature. 	Local Plan documents should protect the intrinsic value of nature and recognise the multiple benefits it could have for communities. Include a sustainability objective relating to the enhancement of the natural environment and consider the multiple benefits that the natural environment can provide (e.g. health benefits).
Electricity Market Reform White Paper	This White Paper sets out the Government's commitment to transform the	Local Plan documents should support renewable

Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Shepway District Council Local Plan
2011, Planning our Electric Future: A White Paper for Secure, Affordable and Low-Carbon Electricity (DECC, 2011)	UK's electricity system to ensure that our future electricity supply is secure, low-carbon and affordable.	energy generation and encourage greater energy efficiency.
	15 per cent renewable energy target by 2020 and 80 per cent carbon reduction target by 2050.	Include sustainability objectives to reduce carbon emissions and increase proportion of energy generated from renewable sources.
The Future of Transport White Paper 2004: A network for 2030 (DfT, 2004)	 Ensure we can benefit from mobility and access while minimising the impact on other people and the environment, now and in the future. Get the best out of our transport system without damaging our overall quality of life. Develop strategies that recognise that demand for travel will increase in the future. Work towards a transport network that can meet the challenges of a growing economy and the increasing demand for travel but can also achieve the government's environmental objectives. Provides targets for emission reductions, now superseded by later agreements. Transport is currently responsible for about a quarter of total emissions. 	Local Plan documents should provide for an increase in demand for travel whilst minimising impact on the environment. Policies also needed to promote public transport use rather than increasing reliance on the car. Include sustainability objectives to reduce the need to travel and improve choice and use of sustainable transport modes.
Urban White Paper 2000, Our Towns and Cities: The Future – delivering an urban renaissance (ODPM, 2000)	Provide for new sustainable homes that are attractive, safe and practical. Retain people in urban areas by, for example, making them more desirable places to live. Improve quality of life, opportunity and economic success through tailored solutions in towns and cities. 3.8 million more homes needed by 2021. Local strategies needed to meet the needs of local people developed through partnerships. Sets targets for development on brownfield sites and through conversion of existing buildings now superseded by the NPPF.	Local Plan documents should seek to deliver better towns and cities taking into account the key aims of the White Paper. Include sustainability objectives to ensure that the majority of new development is built on brownfield sites and aim to improve the quality of life of residents in towns and cities.
Rural White Paper 2000, Our Countryside: The Future – a fair deal for rural England (ODPM, 2000)	 Facilitate the development of dynamic, competitive and sustainable economies in the countryside. Maintain and stimulate communities and secure access to services for those who live and work in the countryside. Conserve and enhance rural landscapes. Increase opportunities for people to get enjoyment from the countryside. 	Local Plan documents should help increase employment and services in the rural parts of the District whilst conserving the landscape. Include sustainability objectives that aim to improve the economies of rural areas with minimal impact to the environment.

Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Shepway District Council Local Plan
Policies and Strategies		
Door to Door: A Strategy for Improving Sustainable Transport Integration (DfT, 2013)	 The strategy focuses on four core areas which need to be addressed so that people can be confident in choosing greener modes of transport: Accurate, accessible and reliable information about different transport options Convenient and affordable tickets Regular and straightforward connections at all stages of the journey and between different modes of transport Safe and comfortable transport facilities The strategy also includes details on how the Government is using behaviour change methods to reduce or remove barriers to the use of sustainable transport, and working closely with stakeholders to deliver a better-connected transport system. 	Local Plan documents should take into account their role in addressing the four core areas outlined in the Strategy. Include SA objectives relating to high quality, efficient sustainable transport systems.
Biodiversity 2020: A Strategy for England's Wildlife and Ecosystem Services (DEFRA, 2011)	The aim of the Strategy is to guide conservation efforts in England up to 2020. Moving further on from 2020, the ambition is to move from a net biodiversity loss to gain. The strategy includes 22 priorities which include actions for the following sectors: • Agriculture • Forestry • Planning and Development • Water Management • Marine Management • Fisheries • Air Pollution • Invasive Non-Native Species	Local Plan documents should take into account their role in seeking to prevent the degradation of biodiversity and ecosystem services within Shepway. Local Plan documents should also recognise their contribution to securing a net gain in biodiversity. Include SA objective relating to the protection and enhancement of the natural environment.
Safeguarding our Soils: A Strategy for England (DEFRA, 2009)	The vision is "by 2030, all England's soils will be managed sustainability and degradation threats tackled successfully. This will improve the quality of England's soils and safeguard their ability to provide essential services for future generations".	Local Plan documents should help protect and enhance the quality of soils and seek to sustainably manage their quality for future generations.
	The Strategy highlights the areas for priority including:	Include SA objective which seeks to safeguard and enhance the quality of soil.

Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Shepway District Council Local Plan
	 Better protection for agricultural soils. Protecting and enhancing stores of soil carbon. Building the resilience of soils to a changing climate. Preventing soil pollution. Effective soil protection during construction and development. Dealing with our legacy of contaminated land. 	
The Code for Sustainable Homes: Setting the standard in sustainability for new homes (DCLG, 2008)	The Code is a standard designed to improve the sustainability of new homes. This sets out the assessment process and performance standards required for the Code for Sustainable Homes. In January 2014 the Government responded to the Environmental Audit Committee's report on the Housing Standards Review consultation, stating that necessary standards would, as far as possible, be consolidated into Building Regulations.	Local Plan documents should take into account their roles in promoting the implementation of the Code (or corresponding sustainability requirements in the Building Regulations) for all residential development. Include SA objectives which promote sustainable development and seek to achieve higher levels of efficiency (e.g. in energy, water etc.) where appropriate.
Laying the Foundations: A Housing Strategy for England (DCLG, 2011)	Aims to provide support to deliver new homes and improve social mobility.	Local Plan documents should encourage development of residential properties. Include SA objectives that assesses whether housing need is being met.
Securing the Future: Delivering UK Sustainable Development Strategy (DEFRA, 2005)	Enable all people throughout the world to satisfy their basic needs and enjoy a better quality of life without compromising the quality of life for future generations. There are 4 shared priorities: • sustainable consumption and production; • climate change and energy; • natural resource protection and environmental enhancement; and • sustainable communities. Sets out indicators to give an overview of sustainable development and priority areas in the UK. They include 20 of the UK Framework indicators and a further 48 indicators related to the priority areas.	Local Plan documents should meet the aims of the Sustainable Development Strategy. Include SA objectives to cover the shared priorities.
Building a Greener Future: Policy	This Statement confirms the government's intention to achieve 25% more	Local Plan documents should ensure residential

Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Shepway District Council Local Plan
Statement (DCLG, 2007)	energy efficient homes by 2010, 44% more efficient homes by 2013 and zero carbon (net carbon emissions should be zero per annum) homes by 2016.	development is zero carbon by 2016. Include SA objectives which seek to improve the energy efficiency of proposed developments and encourage uptake of renewable energy.
The UK Renewable Energy Strategy (DECC, 2009)	 Increase our use of renewable electricity, heat and transport, and help tackle climate change. Build the UK low-carbon economy, promote energy security and take action against climate change. 15% of energy from renewable sources by 2020. Reducing UK CO₂ emissions by 750 million tonnes by 2030. 	Local Plan documents should encourage developments that would support renewable energy provision including electricity, heat and transport. Include SA objectives relating to increasing energy provided from renewable sources.
The Energy Efficiency Opportunity in the UK (DECC, 2012)	This is an Energy Efficiency Strategy aiming to realise the wider energy efficiency potential that is available in the UK economy. The Strategy identifies four barriers to energy efficiency which need to be overcome which include: • Embryonic markets. • Information. • Misaligned financial incentives. • Undervaluing energy efficiency. The Strategy draws attention to maximising the potential of existing dwellings by implementing 21 st century energy management initiatives on 19 th century homes.	Local Plan documents should seek to address the barriers identified within the Strategy and improve the existing building stock through appropriate adaptation measures. Include SA objectives relating to energy efficiency and adaptation of the existing building stock.
The National Adaptation Programme – Making the Country Resilient to a Changing Climate (Defra, 2013)	 The report sets out visions for the following sectors: Built Environment – "buildings and places and the people who live and work in them are resilient to a changing climate and extreme weather and organisations in the built environment sector have an increased capacity to address the risks and take the opportunities from climate change". Infrastructure – "an infrastructure network that is resilient to today's natural hazards and prepared for the future changing climate". Healthy and resilient communities – "a health service, a public health 	Local Plan documents should take account of the visions set out in the Programme. Include SA objectives which seek to promote the implementation of adaptation measures to make Shepway more resilient to a changing climate.

Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Shepway District Council Local Plan
	 and social care system which are resilient and adapted to a changing climate. Communities and individuals, including the most vulnerable, are better prepared to cope with severe weather events and other impacts of climate change. Emergency services and local resilience capability take account of and are resilient to, a changing climate". Agriculture and Forestry – "profitable and productive agriculture and forestry sectors that take the opportunities from climate change, are resilient to its threats and contribute to the resilience of the natural environment by helping maintain ecosystem services and protect and enhance biodiversity". Natural Environment – "the natural environment, with diverse and healthy ecosystems, is resilient to climate change, able to accommodate change and valued for the adaptation services it provides". Business – "UK businesses are resilient to extreme weather and prepared for future risks and opportunities from climate change". Local Government – "Local government plays a central in leading and supporting local places to become more resilient to a range of future risk and to be prepared for the opportunities from a changing climate". 	
Healthy Lives, Healthy People: our Strategy for public health in England (Department of Health, 2010)	Protect the population from serious health threats; helping people live longer, healthier and more fulfilling lives; and improving the health of the poorest, fastest. Prioritise public health funding from within the overall NHS budget.	Policies within the Local Plan documents should reflect the objectives of the strategy where relevant. Include SA objectives relating to health and wellbeing.
The Air Quality Strategy for England, Scotland, Wales and Northern Ireland (DEFRA, 2007)	 Make sure that everyone can enjoy a level of ambient air quality in public spaces, which poses no significant risk to health or quality of life. Render polluting emissions harmless. Sets air quality standards for 13 air pollutants. 	Local Plan documents should take account of the likely impact on air quality from development. Include SA objectives to protect and improve air quality.
Future Water: The Government's Water Strategy for England (DEFRA, 2008)	Sets out how the Government want the water sector to look by 2030 and an outline of the steps which need to be taken to get there.	Local Plan documents should aim to contribute to the vision set out in this Strategy.
	The vision for 2030 is one where we, as a country have: • "improved the quality of our water environment and the ecology it supports, and continue to maintain high standards of drinking water	Include SA objectives which seek to protect, manage and enhance the water environment.

Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Shepway District Council Local Plan
	 quality from taps; Sustainably managed risks from flooding and coastal erosion, with greater understanding and more effective management of surface water; Ensure a sustainable use of water resources, and implement fair, affordable and cost-reflective water charges; Cut greenhouse gas emissions; and Embed continuous adaptation to climate change and other pressures across the water industry and water users". 	
Water for People and the Environment: Water Resources Strategy for England and Wales (Environment Agency, 2009)	 The Strategy vision for water resource "is for there to be enough water for people and the environment, meeting legitimate needs". Its aims include: To manage water resource and protect the water environment from climate change. Restore, protect, improve and value species and habitats that depend on water. To contribute to sustainable development through good water management. People to understand how water and the water environment contribute to their quality of life. 	Policies within the Local Plan should reflect the aims of the strategy where relevant. Include SA objective which seeks to promote water management and efficiency.
The National Flood and Coastal Erosion Risk Management Strategy for England (Environment Agency, 2011)	This Strategy sets out the national framework for managing the risk of flooding and coastal erosion. It sets out the roles for risk management authorities and communities to help them understand their responsibilities. The strategic aims and objectives of the Strategy are to: • "manage the risk to people and their property; • Facilitate decision-making and action at the appropriate level – individual, community or local authority, river catchment, coastal cell or national; • Achieve environmental, social and economic benefits, consistent with the principles of sustainable development".	Local Plan documents should seek to reduce and manage the risk of all type of flooding. The SA framework should include objectives/indicators which seek to reduce the risk and manage flooding sustainably.
Waste Strategy for England 2007 (DEFRA, 2007)	Future of waste management – the government commitment. • Tackle the amount of waste produced, by breaking the link between	Local Plan documents should encourage the minimisation of waste production and the

Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Shepway District Council Local Plan
	 economic growth and waste production. Put waste which is produced to good use through substantial increases in re-use, recycling, composting, and recovery of energy. 	maximisation of recycling and re-use of materials. SA objectives should seek to ensure waste is minimised and promote recycling and reuse.
SUB-NATIONAL/REGIONAL		
Kent Minerals and Waste Plans	 Set out the vision and strategy for mineral provision and waste management in Kent Contain a number of development management policies for evaluating minerals and waste planning applications Consider strategic site provision for all minerals and waste management facilities, and Plan to the year 2030. 	Local Plan documents should take into the mineral supply and waste hierarchies and ensure mineral supply is not compromised. Take account of mineral safeguarding areas, new primary extraction facilities and safeguarded existing facilities during the selection of land for development. The SA framework should include objectives which consider the safeguarded sites and areas for future
Local Transport Plan for Kent 2011-2016	The Plan explains how the County will prioritise planned measures under five Themes based on the previous Government's five National Transport Goals as set out in the LTP3 Guidance, but made relevant to Kent:	minerals supply. The Shepway Places and polices Local Plan should take into account the five themes of the Plan and ensure they are not compromised.
	 Growth Without Gridlock A Safer and Healthier County Supporting Independence Tackling a Changing Climate Enjoying Life in Kent 	SA objectives/indicators should seek to improve access to sustainable high quality modes of transport, ensure safety on the network is enhanced and reduce congestion.
East Kent Local Investment Plan 2011- 2026	 The Local Investment Plan (LIP) family of publications present the East Kent Local Strategic Partnership's (LSP) proposals to deliver its vision: By 2030, East Kent will have blended the best of its coastal location, landscape, culture and heritage to build a lasting beacon of success for the benefit of all its communities. 	Local Plan documents should take into account their role in addressing the key themes and priorities identified within the Investment Plan. The SA framework should include objectives/indicators which consider a range of
Lighting the way to success The EKLSP Sustainable Community Strategy (2009)	"Lighting the Way to Success" is a long-term vision – it looks forward more than 20 years to 2030. By 2030, East Kent will have blended the best of its coastal location, landscape, culture and heritage to build a lasting beacon of success for the benefit of all its communities.	social, economic and environmental matters. The Shepway Places and policies Local Plan should take into account its role in achieving the objectives set out in the East Kent Community Strategy.

Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Shepway District Council Local Plan
		The SA framework should include objectives/indicators which consider a range of social, economic and environmental matters.
A Living Landscape for the South East	Vision for the South East ecological network.	The Shepway Places and Policies Local Plan should take into account its role in promoting the green network across the area. The SA framework should include objectives/indicators which seek to maintain and
East Kent Gypsy and Traveller Accommodation Assessment Report (2007-2012)	 Assess the accommodation needs of Gypsies and Travellers in the subregion from 2007 – 2011; and then from 2012 – 2017. Report is due to be replaced. 	enhance the green network. The Shepway Places and Policies Local Plan should take into account its role in allocating and safeguarding sites for Gypsy and traveller accommodation.
		The SA framework should include objectives/indicators which seek to preserve the rights of gypsy and travellers and improve their integration into the local community.
Growing the Garden of England: A strategy for environment and economy in Kent (2011)	 The 2011 strategy has three themes: Living well within our environmental limits. Rising to the climate change challenge. Valuing our natural, historic and living environment. It is one of a suite of strategies, developed in 2010, that supports a revised Vision for Kent to deliver social, economic and environmental wellbeing for Kent's communities over the next 20 years. The 2011 strategy sets out how we will achieve a high-quality Kent environment, low carbon, resilient to climate change, and that has a thriving 'green 	The Shepway Places and Policies Local Plan should take into account its role in protecting, managing and maximising the benefits of the District's Ecosystem Services without compromising the environment. The SA framework should include objectives/indicators which seek to maximising the benefits of the District's Ecosystem Services without
Kent Biodiversity Action Plan & Securing the value of nature in Kent (2011)	economy' at its heart. • Action plans for the 85 UK BAP priority species and 28 BAP habitats	compromising the environment. The Shepway Places and Polices Local Plan should protect the intrinsic value of the identified habitats and seek to improve them where possible.
		The SA framework should include an objective/indicator which seeks to conserve and enhance the identified habitats and species.

Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Shepway District Council Local Plan
Kent Design Initiative (and Guide)	Initiative to create a showcase of great buildings, memorable and attractive new places that reinforce Kent's distinctive character.	The Shepway Places and Polices Local Plan should contain development management policies that are consistent with the content of the Kent Design Guide.
		The SA framework should include an objective/indicator which seeks to retain the character of the District built environment and promote its qualities in new developments.
Kent Health and Affordable Warmth Strategy	Fuel poverty is linked to general poverty. Strategy aimed at leading to the eradication of fuel poverty in Kent.	Local Plan documents should take into account their role in providing local communities with more opportunities to improve their health and wellbeing
Active Lives: 2007-2016, Kent Adult Social Services	A picture of how Kent Adult Social Services will look in 10 years' time.	and reduced inequality. The SA framework should include objectives/indicators which consider a range of social and environmental matters, including health and wellbeing and affordable warmth.
Kent Downs AONB management plan (2009-2014)	The ultimate goal of the Management Plan is to ensure that the natural beauty and special character of the landscape and vitality of the communities are recognised, maintained and strengthened well into the future	Local Plan should take account of the special qualities of the Kent Downs AONB and ensure that its policies are compatible with those outlined within the management plan. The SA framework should include objectives/indicators which consider landscape and ecological matters.
Strategic Housing Market Assessment for the East Kent Sub-region (SHMAA) (2009)	The study has identified twenty-one local housing markets, some of which straddle district boundaries, and some of which cross into areas administered by other local authorities. The proximity of East Kent to Kent Thames Gateway (which includes part of Swale), Ashford, and the London housing markets all exert influence on the housing and employment markets in the sub-region. There are different degrees of isolation and interaction with, for example, the Thanet markets being self-contained, while others, such as local markets based within Swale and Canterbury, exhibiting broader horizons. All told, however, compared to the rest of Kent and the rest of the South East, East Kent	The Shepway Places and Policies Local Plan should provide sites for high quality, affordable homes with an appropriate range of tenures, layouts and designs and encourage the refurbishment of empty homes in the District. SA objectives should improve access to good quality and affordable housing.

Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Shepway District Council Local Plan
	is relatively isolated and self-contained.	
East Kent Homelessness Strategy (2010- 2013) Action Plan	Major considerations include homelessness prevention, temporary accommodation and long-term housing solutions	The Shepway Places and Policies Local Plan should take into account its role in supplying and safeguarding accommodation for the homeless.
		SA should consider use of district wide homelessness data as an indicator.
LOCAL		
Shepway Rural Services Study (2011)	 This study aims to review the current position of rural areas within Shepway by combining existing data sources and officer field studies to aid in the assessment of Local Plan policies and inform the direction of future policy. 	The Shepway Places and Policies Local Plan should take into account the needs and opportunities of the Districts rural economy.
		The SA framework should consider the needs and opportunities of the District's rural economy and communities.
Shepway District Local Brownfield Strategy (2011)	The key aim of Shepway's Brownfield Land Strategy is to develop an understanding of the brownfield land in the area and to establish how this can be brought back into productive and beneficial use.	The Shepway Places and Policies Local Plan should maximise the use of brownfield before allocating land on greenfield sites.
		The SA framework should consider the need to maximise the efficiency of land use in the District by using brownfield land before greenfield land.
Population Forecasts 2006 - 2026	Forecasts/ projections have been produced for the district as a whole and for individual wards within the district.	The Shepway Places and Policies Local Plan should take into account its role in supplying accommodation and employment opportunities for its growing population.
		SA should consider the use of accurate and up-to-date population data as an indicator.
Shepway Employment Land Review (2011)	Employment land review to inform the preparation of the District's planning policies.	The Shepway Places and Policies Local Plan should provide sites for a range of high quality employment sites with an appropriate range of use classes.
		SA objectives should improve access to good quality, easily accessible employment opportunities.

Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Shepway District Council Local Plan
Retail Need Assessment Study (2010 Update)	 The study identifies a lower expenditure growth to 2026 compared with the 2007 study, and consequently identifies lower need for retail floor space compared to figures given in the 2008 update. This reflects the impact of the current recession on retail expenditure growth forecasts for the next ten year period. 	The Shepway Places and Policies Local Plan should provide sites for a range of retail sites. SA objectives should improve access to good quality and a good range of easily accessible retail services.
Folkestone Town Centre Spatial Strategy (2011)	Key objective of the study is to improve the quality and functionality of the public realm through identifying:	The Shepway Places and policies Local Plan should take into account the existing visions for Shepway's town centres and contribute to the regeneration of Folkestone town centre. The SA framework should consider regeneration of key areas within Shepway District.
Windfalls, Housing Supply and Policy Update (2012)	Evidence supporting modifications put forward by Shepway District Council to its Core Strategy Local Plan [G15] in October 2012.	The Shepway Places and Policies Local Plan should provide high quality, affordable homes with an appropriate range of tenures, layouts and designs and encourage the refurbishment of empty homes in the District. SA objectives should improve access to good quality
Economic Viability Assessment (2011)	A district-wide affordable housing viability assessment for housing delivery over the lifetime of the Core Strategy.	and affordable housing. The Shepway Places and Policies Local Plan should provide high quality, affordable homes and encourage the refurbishment of empty homes in the District. SA objectives should improve access to good quality and affordable housing.
Strategic Housing Land Availability Assessment (SHLAA) (2009-2010) & Update (2011-2012)	The Shepway SHLAA has produced a very large amount of information. However the conclusions are clear: the identified pool of possible housing sites is more than sufficient to allow a genuine range of strategic options to be considered.	The Shepway Places and Policies Local Plan should provide sites for high quality, affordable homes with an appropriate range of tenures, layouts and designs and encourage the refurbishment of empty homes in the District.

Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Shepway District Council Local Plan
		SA objectives should improve access to good quality and affordable housing.
Open Spaces, Sports and Recreation Study (2011)	The purpose of this report is to inform the Shepway planning policies for planning, especially the Core Strategy. It does this by bringing together findings of two primary research studies undertaken by Shepway District Council on open space topics; and is complemented by other evidence base studies.	The Shepway Places and Polices Local Plan should take into account its role in protecting formal playing pitches from inappropriate development and ensuring the supply of formal playing pitches meets the demand.
		Include a sustainability objective relating to the protection, enhancement, increasing provision of, increasing participation in and improving access to the District's sports pitches and facilities.
Shepway Green Infrastructure Report (2011)	This report comprises the evidence base in respect of Green Infrastructure (GI), which is essentially the network of multi-functional green space which supports natural and ecological processes and is integral to the health and quality of life of sustainable communities.	The Shepway Places and Policies Local Plan should take into account its role in promoting the green network across the area.
		The SA framework should include objectives/indicators which seek to maintain and enhance the green network.
Shepway Strategic Flood Risk Assessment (SFRA) (2009) – to be updated	This study provides an analysis of the main sources of flood risk to the District, together with a detailed means of appraising development allocations and existing planning policies against the risks posed by coastal flooding over this coming century.	Policies within the Local Plan should reflect the actions identified within the assessment where relevant.
		Include SA objective which seeks to promote flood risk management.
Shepway Water Cycle Study (2011)	This report examines the issues relating to water within the context of the district and the physical characteristics of its hydrology. One of the primary reasons for producing this report was to investigate the potential impact of new growth proposed under the Core Strategy. The	Policies within the Local Plan should reflect the actions identified within the study where relevant. Include SA objective which seeks to promote water
	report provides a simple analysis of the hydrology of the district in the context of the South East of England, a résumé of existing planning legislation and an overview of the Water Framework Directive, the primary piece of legislation that exists to protect the quantity and quality of water in the natural environment.	management and efficiency.
Shepway Transport Strategy (2011)	The remit of the Transport Strategy is to include and consider both transport matters which relate to the existing district area, as well as	The Shepway Places and polices Local Plan should consider transport matters relating to its strategic

Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Shepway District Council Local Plan
Appendices and <u>Update Highways Impact</u> Report (2012) – to be updated.	those relating to the potential Strategic Site allocations which have been made for future development.	site allocations for future domestic, economic and mixed-use developments.
		SA objectives/indicators should seek to improve access to sustainable high quality modes of transport, ensure safety on the network is enhanced and reduce congestion.
Shepway Economic Development Strategy (2012-2017)	This strategy provides a framework for the economic development of Shepway over the coming years and followed the Council's Corporate Plan 2012-2017 which sets out to support the growth and sustainability of the economy to increase prosperity.	The Shepway Places and Policies Local Plan should seek to promote economic growth through an appropriate allocation of mixed-use developments and town centre regeneration in line with the vision and priorities set out in the strategy.
		The SA framework should include objectives/indicators which consider a range of social, economic and environmental matters.
Shepway Housing Strategy 2011-2016	There are approximately 48,200 residential dwellings in the Shepway District. Overall the housing market within Shepway is essentially similar to other district housing markets across South East England. Owner-occupation is the dominant form of tenure. The key differences for the Shepway District are the relatively high proportion of private	The Shepway Places and Policies Local Plan should provide high quality, affordable homes and encourage the refurbishment of empty homes in the District.
	rented accommodation and the relatively low proportion of council and housing association rented accommodation.	SA objectives should improve access to good quality and affordable housing.
Shepway Core Strategy (2013)	Key part of the Local Plan, containing the spatial strategy for the area and strategic planning policies.	The Shepway Places and Policies Local Plan should build on the spatial and strategic planning policies outlined in the Shepway Core Strategy.
		The SA framework should include objectives/indicators which consider a range spatial and strategic policies coving the spectrum of sustainable development issues.
Shepway Crime and Disorder Reduction Strategy (2005-2008)	Aims to build safer communities by addressing key causal factors of crime by fostering good partnerships between the voluntary, private and public sectors and the local community.	The Shepway Places and Policies Local Plan should ensure measures are secured which enhance community safety and reduce the fear of crime.
		Include a sustainability objective which seeks to

Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Shepway District Council Local Plan
		make Shepway a safer place.
Shepway Contaminated Land Strategy (2002)	 Requirement of Environmental Protection Act 1990. Sets out the approach to identification of contaminated land across Shepway and how certain sites will be designated special sites. 	The Shepway Places and Policies Local Plan should ensure that contaminated land is taken into account when selecting sites for development and in consideration of appropriate mitigation.
		The SA framework should include an objective/indicator which considers soils, including the potential for pollution of soils (e.g. from sources of contaminated land).
		The SA framework should include an objective/indicator which considers the benefits of sport and recreation facilities (particularly open space) in improving the health and wellbeing of the District's residents.
Shepway Sports and Physical Activity Strategy (2004)	 Encourage residents to participate in sporting activity, to improve the health and well-being of local residents in line with key national targets/ initiatives, to ensure access to sports facilities for all and develop a wide variety of sport in Shepway. 	The Shepway Places and Policies Local Plan should ensure new developments provide or enhance an appropriate sport and recreation facilities in close proximity.
Shepway Playing Pitch Strategy (2004)	Ensuring future provision of pitches is balanced, meets the needs of the community and is protected for future generations.	The Shepway Places and Policies Local Plan should take into account its role in protecting formal playing pitches from inappropriate development and ensuring the supply of formal playing pitches meets the demand.
		Include a sustainability objective relating to the protection, enhancement, increasing provision of, increasing participation in and improving access to the District's sports pitches and facilities.
Beachy Head to south Foreland SMP (2006)	Coastal defence management plan for Beachy Head to south Foreland to provide a 'route map' for decision makers to move from the present situation towards a more sustainable future.	Policies within the Local Plan should reflect the actions identified within the management plan.
Folkestone to Cliff End Flood and Erosion Management Plan	The Folkestone to Cliff End Flood and Erosion Management Strategy sets out our plan to manage flood and erosion risks along this coastline.	Include SA objective which seeks to promote flood and erosion risk management.

Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Shepway District Council Local Plan
Commissioned Reports Pending Public	ation	
Call for Sites Consultation (recently completed but report not yet reviewed)	 Including allocations for residential, employment and open space/community sites and gypsies and travellers. 	To be established post publication.
Strategic Housing Land Availability Assessment (SHLAA) Update	Subject to an annual update in line with NPPF requirements.	To be established post publication.
Town Centre Study	To focus on sites in Folkestone, Hythe and New Romney Town Centres, but will also cover other centres.	To be established post publication.
Strategic Flood Risk Assessment (SFRA) Update	On hold pending EA's re-modelling of flood risk on Romney Marsh.	To be established post publication.
Shepway Energy Study	Energy Capacity, renewable and low carbon energy opportunities and constraints, energy efficiency of building stock.	To be established post publication.
Shepway Heritage Study	Discussing scope and nature of required evidence base with English Heritage.	To be established post publication.
Shepway Transport Study	Update almost completed which identifies road junctions requiring improvement, for example Shorncliffe Garrison.	To be established post publication.
Shepway Air Quality Study	 Air quality across the district is usually quite good and there is no need to take action in respect of introducing any air quality management areas (AQMAs) although potential air quality issues may arise in proximity to the A20 and M20. 	To be established post publication.
Shepway Employment Study	• Significant over-supply of employment land in the District and a need to rationalise this and identify which sites are suitable for mixed use.	To be established post publication.
Shepway Local Retail Centres Study	Evidence has been gathered to support policy protection of local parades of shops.	To be established post publication.
Shepway CIL and Local Plan Viability Study	Analyses what level of requirements the Local Plan can place on developers (e.g. for sustainable building design) without threatening financial viability.	To be established post publication.
Shepway Socio-economic Study	Particularly focuses on the Romney Marsh Area and impacts of loss of employment associated with closure of Dungeness Nuclear Power Station	To be established post publication.
Shepway Sustainable Access Strategy (possible SPD)	Surveys of Dungeness and Romney Marsh have been confirmed.	To be established post publication.

Appendix 3

Detailed assumptions for SA of site allocations

Assumptions for SA of site allocations

The SA of development management policies is qualitative and has been carried out by reference to the previously described SA framework and supporting appraisal questions. The SA will, however, make more detailed assumptions in relation to the performance of site allocations against individual SA objectives because the assessment of these will be based heavily on spatial analysis within a Geographical Information System (GIS).

Appendix 3 sets out the detailed assumptions that will be made in assessing the significance of the effect of the reasonable alternative site options for housing and for employment / retail developments. Further assumptions may be developed during the SA process in relation to other land uses once the inclusion of these within the Places and Policies Local Plan is known with certainty. The assumptions draw on relevant baseline data and reference documents where available.

We have assumed that most of the land area of each allocated site is likely to be developed, giving limited scope to avoid constraints. Accordingly, we have assumed that where 25% (typically) or more of an allocated site overlies a constraint, a significant effect is deemed likely to occur.

Reference is made to 'easy walking distance' in the appraisal assumptions. There are a number of pieces of research that give a variety of recommended guidance distances for walking. For example, the Institute of Highways and Transportation found that the average length of a walk journey is one kilometre. The Institute of Highways and Transportation categorises distances depending upon location and purpose of the trip, and 'desirable', 'acceptable', and 'preferred maximum':

	Town centres (m)	Commuting/School/ Sight-seeing (m)	Elsewhere (m)
Desirable	200	500	400
Acceptable	400	1,000	800
Preferred maximum	800	2,000	1,200

For the purposes of the appraisal, a standard convenient 'walking distance' of 800 m will be assumed, taking into account that distances in the appraisal will be measured as the straight line distance from the edge of the site option to existing services and facilities, and therefore actual walking distances are likely to be greater (depending on the house location within a larger site and the availability of a direct route). Professional judgement will be used when determining appropriate walking distances to the range of services and facilities considered by the detailed appraisal assumptions in Appendix 3, for example the standard distance of 800 m has been used for rail stations but a shorter distance of 400 m has been used for bus stops, reflecting the fact that individuals are likely to be prepared to walk greater distances to larger scale facilities. Increasing cycling is also an important sustainability objective for the District and positive sustainability scores relating to development allocations being within convenient walking distance of services and facilities also reflect the fact that such allocations are also likely to increase the proportion of trips made by bike.

The SA assumptions include analysis of the proximity of residential areas to areas of employment. Major employment opportunities will be located throughout the District, not only in the areas allocated for employment, but also in the Town Centres, retail parks, hospitals, and in small scale premises around the towns as well as large scale businesses concentrated at the employment areas. Although there is no guarantee that people will find jobs at the employment areas closest to them, it is considered that provision of homes close to major sources of employment would support people in making shorter journeys to work.

The assessments of site allocations will only consider the direct sustainability effects of those allocations i.e. factors which vary according to the size and location of the allocated site. Effects of development which have already been assessed at a higher level in the hierarchy of Local Plan documents are not re-assessed here. For example, although all housing development is likely to give rise to positive effects on SA objective 5 in relation to meeting housing need, the scale of housing provision has already been fixed by the Shepway Core Strategy and is not the subject of the Places and Policies Local Plan. The SA of site allocations does not, therefore, set out the effects of providing housing per se. Instead, it restricts itself to assessing the sustainability implications of allocating housing at a particular location and particular size of site. The type and tenure of housing to be provided, including housing to meets the needs of the elderly, will be considered in the SA of development management policies. Similarly, the positive effects of employment provision across the Plan area as a whole on SA objective 6 are not dependent on the locations of the particular sites chosen and are therefore more appropriately assessed within the SA of the Core Strategy whose policies determine the scale of employment development; they do not form part of the SA of the Site Allocations.

SA Objective	Appraisal questions. Will the	Assumptions for SA of housing site options	Assumptions for SA of employment and retail
	plan/option lead to?		site options
1: Reduce the risk of flooding, taking into account the effects of climate change.	Development which supports and corresponds with the Water Framework Directive, the NPPF, Technical Guidance to the NPPF and the flood risk management policies of the EA? Development which has regard to the Shepway Strategic Flood Risk Assessment? Development which incorporates SuDS (including their long-term maintenance) to reduce the rate of run-off and reduce the risk of surface water flooding and combined sewer overflows?	 Development on sites that are within areas of high flood risk may have negative effects on this SA objective: Sites having a significant proportion of land (>=25%) within flood zones 3a or 3b, have an 'extreme' flood hazard rating in the SFRA, and/or include flood storage areas are assumed to have a significant negative () effect. Sites having as significant proportion of land (>=25%) within flood zone 2 or that are 5-25% within flood zone 3 are assumed to have a minor negative (-) effect. Sites that include a very small part of a flood storage area would also have a minor negative effect. Sites with less than 5% of their land within flood zone 3, less than 25% of their land within flood zone 2 and do not include flood storage areas are assumed to have a negligible (0) effect. The opportunity to incorporate SuDS to mitigate the risks of surface water flooding and surface water contamination is a design issue and does not form part of the SA of Site Allocations. (Sources required: EA flood zones; SFRA; flood storage areas) 	As for housing sites.
2. Increase energy efficiency in the built environment, the proportion of energy use from renewable sources and resilience to a changing climate and extreme weather.	Developments that are energy efficient in their design and construction and which provide opportunities for combined heat and power? Greater consideration of climate change adaptation within planning and design? An increase in the number of large scale renewable energy schemes An increase in the local/on-site renewable energy generating	While any additional development is likely to increase total energy consumption in the District, it is likely to be built to a higher energy efficiency standard than existing housing stock as a result of increasingly stringent Building Regulations requirements and the Government's 2016 zero carbon target for new dwellings, thereby helping to improve energy efficiency. It may also offer opportunities for incorporating local renewable energy generation. However, these issues will not be determined by the location of the development and will, instead, be determined though the detailed proposals for each site. Therefore, this aspect of the SA objective is not assessed in the SA of the Site Allocations. Sites within convenient walking distance of a rail	As for housing sites.

SA Objective	Appraisal questions. Will the plan/option lead to?	Assumptions for SA of housing site options	Assumptions for SA of employment and retail site options
	capacity? A decrease in fossil fuel consumption? Opportunities for modal shift away from private motor vehicles?	station (800 m) or a bus stop on a route providing a seven day a week service (400 m) are likely to have a minor positive effect on reducing dependence on car use and related greenhouse gas emissions but this will be uncertain (+?) as the frequency and reliability of bus services and suitability of routes for the housing site's residents will not be known and existing services may change in response to new demand from the development. Other housing sites will be assessed as having a negligible (0) effect on this objective. (Sources required: GIS mapping of train stations and of bus stops on routes providing a seven day a week service)	site options
3. Promote community vibrancy, provide opportunities to access services, facilities and environmental assets for all and avoid creating inequalities of opportunity for access.	Well-designed, compact communities which are of a sufficient critical mass or density to support local services and public transport provision? Opportunities to improve educational attainment, qualification levels and participation in education and training through access to existing or the provision of new educational infrastructure in relation to new residential developments? Provision of new or enhancement of existing leisure facilities for young people at the neighbourhood level, where thresholds/standards require these? Opportunities to lead healthier lifestyles, including development that enhances existing and /or makes provision for and maintenance towards sports and recreational facilities e.g. publicly available pitches, allotments, swimming pools, courts, etc.?	Sites that are within convenient walking distance (800 m) of three or more different types of the following service/facility/asset: • a GP surgery or a hospital; • a sports/recreation facility or an area of open space; • a convenience store or post office; • a primary or secondary school; • a Major Employment Site, Town Centre or parade of shops are assumed to have a minor positive (+) effect on this aspect of the SA objective because of the potential to use these facilities. Allocations which are also located in an area within one of the 20% most deprived areas within the District ('access to services' domain of English Indices of Deprivation) are assessed as having a significant positive (++) effect on this aspect of the objective. Other allocations are assessed as having a negligible (0) effect. (Sources required: GIS mapping of GP surgeries, hospitals, sports/recreation facilities, open spaces, post offices, convenience stores, primary schools, secondary schools, Major Employment Sites, Town Centres, shop frontages; English Indices of Deprivation)	Employment site allocations are not relevant to this SA objective which has therefore been screened out of the SA of employment sites. (Sources required: none)

SA Objective	Appraisal questions. Will the	Assumptions for SA of housing site options	Assumptions for SA of employment and retail
	plan/option lead to?		site options
	Adequate provision of health services to support new communities through the enhancement of existing facilities or through the creation of new?		
	Developments, especially in deprived communities, which reduce car dependence by ensuring employment opportunities, health services, educational facilities, shops and recreational opportunities are accessible by foot, cycle or public transport?		
	Improvements to local public transport infrastructure, especially in deprived communities?		
	Reintegration of physically divided or highly linear villages or neighbourhoods through, for example, provision of central social infrastructure?		
4. Reduce crime and the fear of crime.	Reduced levels of crime, antisocial behaviour and the fear of crime through design i.e. improvements to the environment, street layout, public space provision, passive surveillance, lighting etc.?	The effects of new development on safety, crime and fear of crime will depend on design proposals for the allocated sites and factors such as the inclusion of open spaces that are overlooked by buildings to improve safety and security and sufficient lighting. Generally, these issues will not be influenced by the location of development and will instead be determined though the detailed proposals for each site. This SA objective does not, therefore, form part of the SA of Site Allocations.	Screen out SA objective as for housing sites.
		(Sources required: none)	
5. Improve the provision of homes, including affordable housing, having regard to the needs of all sections of society, including the elderly.	Sufficient amounts of housing to meet the needs of the community and local economy? Development which delivers an appropriate mix of housing, including affordable housing and dwellings for older people?	Affordable housing Core Strategy policy CSD1 requires that, subject to viability, development proposing 15 or more dwellings or land with an area of 0.5 ha or more should provide 30% affordable dwellings. Sites of this size are assessed as having a significant positive (++) effect on this aspect of the SA objective. Sites capable of accommodating 5-14 dwellings are required by CSD1	Employment site allocations are not relevant to this SA objective which has therefore been screened out of the SA of employment sites. (Sources required: none)

SA Objective	Appraisal questions. Will the plan/option lead to?	Assumptions for SA of housing site options	Assumptions for SA of employment and retail site options
	plan, option lead tom.	to provide 1-2 affordable dwellings. Assuming a development density of 30 dwellings per hectare (dph) as above, this equates to sites of 0.167-0.5 ha so allocated sites in this range will be assessed as having a minor positive (+) effect. Smaller sites will be assessed as having a negligible (0) effect.	Site options
		Dwellings for older people	
		Core Strategy policy CSD2 requires that, subject to viability and design restrictions, development proposing 10 or more dwellings should include 20% of market dwellings meeting Lifetime Homes standards. Assuming a development density of 30 dwellings per hectare (dph) as above, this equates to sites of >=0.33 ha so allocated sites of this size will therefore be assessed as having a significant positive (++) effect on this aspect of the SA objective. Smaller sites will be assessed as having a negligible (0) effect.	
		(Sources required: none)	
6. Support the creation of high quality and diverse employment opportunities.	An adequate supply of land, skills and infrastructure (such as ICT) to meet the requirements of sectors targeted for economic growth and diversification, including those set out in the Shepway Economic Strategy? Improved access to jobs for local people from all sectors of the community? Enhanced vitality and vibrancy of town centres? Expansion or upgrading of key visitor attractions?	Sites allocated for both housing and employment use or housing-only sites within convenient walking distance (800 m) of a Major Employment Site, Town Centre or shopping parade are assumed to have a significant positive (++) effect on this SA objective by minimising travel distances and enabling easier access to employment opportunities. Where an allocation is within 800 m of a District Centre a minor positive (+) effect is assumed. Where a site is within walking distance of a site or centre but there are potential barriers to access for all ages and abilities (e.g. topography, major road), the score is downgraded to the next lowest score (e.g. ++ score becomes + or + becomes 0). Other allocations are assessed as having a negligible effect. It is recognised that broadband access could have an	Access to jobs for all Employment allocations within convenient walking distance (800 m) of a Sub-Regional Town or Strategic Town are assumed to have a significant positive (++) effect on this SA objective by minimising travel distances and enabling easier access to employment opportunities. Where an allocation is within 800 m of a Service Centre a minor positive (+) effect is assumed. Where a site is within walking distance of a settlement but there are potential barriers to access for all ages and abilities (e.g. topography, major road), the score is downgraded to the next lowest score (e.g. ++ score becomes + or + becomes 0). Other allocations are assessed as having a negligible effect.
	Employment opportunities which address the economic consequences of the decommissioning of Dungeness nuclear power station? Provision of high quality employment sites and associated infrastructure suitable for the	influence on people's ability to work flexibly and from home. However, this is not something that can be assessed at this stage on the basis of the location of housing allocations. Information about current levels of broadband provision at the different towns is not readily available, and access will also depend heavily on the incorporation of broadband infrastructure into the new developments. Therefore, broadband access	Allocations beyond walking distance of the settlement types above but within convenient walking distance of a rail station (800 m) or bus stop on a route providing a seven day a week service (400 m) are assumed to have a minor positive effect on improving access to employment opportunities but this will be uncertain (+?) as the frequency and reliability of bus services and suitability of routes for the employment site's

SA Objective	Appraisal questions. Will the plan/option lead to?	Assumptions for SA of housing site options	Assumptions for SA of employment and retail site options
	likely continuation in a shift from	has not been taken into account in the SA.	employees will not be known and existing services
	manufacturing to higher skill, service industries.	(Sources required: GIS mapping of Major Employment Sites, shop frontages, Town Centres and District	may change in response to the development provided for.
		Centres)	Reducing inequality in access to jobs
			Allocations which are within convenient walking distance (800 m) of one of the 20% most deprived areas within the District ('employment' domain of English Indices of Deprivation) are assessed as having a significant positive (++) effect on this aspect of the objective. Other allocations are assessed as having a negligible (0) effect.
			Economic consequences of closure of Dungeness nuclear power station
			Allocations which are within Romney Marsh are assessed as having a significant positive (++) effect on this aspect of the objective. Other allocations are assessed as having a minor positive (+) effect.
			(Sources required: GIS mapping of settlement boundaries; train stations; and bus stops on routes providing a seven day a week service; English Indices of Deprivation employment domain)
7. Conserve and enhance	Development that avoids negative	English Heritage bases its definition of the setting of a	As for housing sites.
the fabric and setting of historic assets.	effects on listed buildings, conservation areas, scheduled	heritage asset on the previous national Planning Policy Statement 5, as "the surroundings in which [the asset]	
HISTORIC assets.	monuments, registered historic	is experienced. Its extent is not fixed and may change	
	parks and gardens, and	as the asset and its surroundings evolve. Elements of	
	registered battlefields and their settings?	a setting may make a positive or negative contribution	
		to the significance of an asset, may affect the ability to appreciate that significance, or may be neutral ⁹⁶ .	
	Development that is well related to the natural environment and	Therefore, it is not possible to precisely determine	
	characteristic scale, form	effects on the setting of heritage assets during a desk-	
	materials and detailing of the	based strategic SA exercise such as this.	
	settlement and contributes to a sense of place?	As an indication of potential effects on heritage assets from housing development, the following is assumed:	
	Promotes the enhancement of	A significant negative effect (?) may occur	
	historic assets and other aspects of heritage, such as, parks and	where the development location is adjacent to	
	or heritage, such as, parks allu	or includes a designated heritage asset (e.g.	

 $^{^{96}}$ English Heritage. The Setting of Heritage Assets REVISION NOTE June 2012.

SA Objective	Appraisal questions. Will the plan/option lead to?	Assumptions for SA of housing site options	Assumptions for SA of employment and retail site options
	open spaces, and areas with a particular historical or cultural association?	listed building, Scheduled Monument, Registered Park and Garden or Conservation Area).	
		 Where development is between 250 m and 1 km from heritage assets, a minor negative (- ?) effect may occur. 	
		 Where sites are more than 1 km from any heritage designations, a negligible (0) effect on this objective is assumed. 	
		All potential negative effects are assumed to be uncertain as the actual effects on historic assets will depend on the exact scale, design and layout of the new development and opportunities may exist to enhance the setting of heritage features (e.g. where sympathetic development replaces a derelict brownfield site which is currently having an adverse effect). Scores may therefore need to be moderated depending on local circumstances.	
		 Development locations that will bring 'at risk' heritage assets (e.g. listed buildings) back into productive use will be assumed to have a significant positive effect (++?) on the basis that the fabric of the asset will therefore be restored and maintained but with uncertainty relating to whether the restoration/maintenance will be sympathetic to the asset's historic significance. 	
		(Sources required: GIS mapping of listed buildings, Scheduled Monuments, Registered Parks and Gardens and Conservation Areas, 'at risk' heritage assets to be brought back into use)	
8. Conserve, and where	Areas of the highest landscape	Landscape	As for housing sites.
relevant enhance, the quality, character and local distinctiveness of the landscape and townscape.	sensitivity being provided with the highest level of policy protection? Development which considers the existing character, form and	It is not possible to precisely determine effects on the landscape during a desk-based strategic SA exercise such as this in the absence of a District-wide landscape sensitivity and capacity study. An indication of potential effects on landscape features and character	
	pattern of the landscape, buildings and settlements? The protection and enhancement	will be based on the following assumptions: Sites that are within the Kent Downs AONB will be assessed as having a potential	

SA Objective	Appraisal questions. Will the plan/option lead to?	Assumptions for SA of housing site options	Assumptions for SA of employment and retail site options
	of local distinctiveness and contribution to a sense of place?	significant negative (?) effect on landscape character and features.	Site options
	The provision of and maintenance towards green infrastructure assets and networks (including green open space and river/canal corridors) and ensure that this is linked into new and existing developments, to improve the connectivity of green spaces and green networks?	 Sites that are outside, but within the setting of the Kent Downs AONB, assumed to be within 1 km of the AONB boundary, will be assessed as having a potential minor negative (-?) effect on landscape character and features. All other sites will be assessed as having an uncertain (?) effect on landscape character and features. In all cases, potential effects will be uncertain as the exact impacts on the landscape will depend on factors relating to the specific design and layout of the new 	
		development. Settlement character: coalescence	
		In addition to the above, sites that are judged to significantly add to the risk of future coalescence of neighbouring settlements are assumed to have a minor negative (-) effect on settlement character. Other sites are assumed to have a negligible (0) effect on settlement character.	
		Townscape: regeneration	
		In addition to the above, if the Council's internal site assessment process (SHLAA site assessment criterion L10) identifies the site as previously developed land or that its redevelopment would be consistent with regeneration objectives (e.g. due to poor current condition) a significant positive effect on townscape (++?) will be assumed but with uncertainty relating to the appropriateness of the design of the development. This aspect will not be assessed if this information is not recorded on the Council's site assessments.	
		Other townscape, design and green infrastructure aspects of this SA objective are not relevant to SA of the location of housing site allocations.	
		(Sources required: AONB boundary; settlement boundaries; SHLAA site assessment criterion L10)	
9. Conserve and enhance	Avoidance of net loss, damage to, or fragmentation of designated	Similar to heritage assets, there is not a fixed distance at which biodiversity sites may be affected by new	As for housing sites.

SA Objective	Appraisal questions. Will the plan/option lead to?	Assumptions for SA of housing site options	Assumptions for SA of employment and retail site options
biodiversity.	and non-designated wildlife sites and habitats? Opportunities to enhance habitats for protected species and priority species identified in the Kent BAP? Opportunities for people to come into contact with robust wildlife places whilst encouraging respect for and raising awareness of the sensitivity of these sites? Development which includes the integration of ecological conditions and contributes to improvement in ecological connectivity in rural and urban areas? The maintenance and enhancement of the four large scale ecological networks in the District?	development, as the habitats and species for which biodiversity sites are designated are different, and different types of effects can be transmitted across different distances (e.g. air or water pollution may travel much further than noise or disturbance from physical presence of humans or dogs). Therefore, it is not possible to determine actual effects on the structure and function of habitats and populations of species during a desk-based strategic SA exercise such as this. As an indication of potential effects on biodiversity assets from housing site allocations, the following assumptions are made: Where allocated sites have a significant proportion of land (>=25%) within an internationally (SAC, SPA, Ramsar), nationally (SSSI, NNR) or locally (Local Wildlife Site, Local Nature Reserve) designated wildlife site or area of Ancient Woodland, significant adverse () effects are assumed. Where a smaller part (<25%) of an allocated site is within one of these designations the effect on the SA objective is assessed as significant negative (?) but with uncertainty relating to whether layout within the site boundary and detailed design will allow adverse effects to be avoided. Where allocated sites have a significant proportion of	
		land (>=25%) within: • one of the four Biodiversity Opportunity Areas identified in Shepway, and/or	
		 an undesignated brownfield site known to have biodiversity interest 	
		a potential minor negative (-?) effect is assumed with uncertainty relating to whether the development can be accommodated without adverse effects on the biodiversity interest.	
		Where allocated sites have a significant proportion of undesignated greenfield land (>=25%) an uncertain(?) effect is assumed due to the potential for impacts on undesignated biodiversity interest.	
		Where sites are within the remainder of the Plan area, the effect on this SA objective is assessed as negligible	

SA Objective	Appraisal questions. Will the	Assumptions for SA of housing site options	Assumptions for SA of employment and retail site options
10. Reduce the need to travel; increase opportunities to choose sustainable transport modes and avoid development that will result in significant traffic congestion.	Appraisal questions. Will the plan/option lead to? A complementary mix of land uses within compact communities that minimises the length of journeys to services and employment, increases the proportion of journeys made on foot or by cycle, and are of a sufficient density to support local services and public transport provision?	(0). (Sources required: boundaries of designated wildlife sites and large scale ecological networks identified in 'A Living Landscape for the South East') Reduce the need to travel The need to travel is dependent on a wide variety of factors which are not readily assessed by a desk-based strategic SA exercise such as this. As an indication of effects on this aspect of the SA objective, the following is assumed: • Where an allocation is within convenient walking distance (800 m) of a Major Employment Site, Town Centre or shopping	Reduce the need to travel Employment allocations within convenient walking distance (800 m) of a Sub-Regional Town or Strategic Town are assumed to have a significant positive (++) effect on this aspect of the SA objective by minimising commuting distances. Where an allocation is within 800 m of a Service Centre a minor positive (+) effect is assumed. Where a site is within walking distance of a settlement but there are potential barriers to access for all ages and abilities (e.g. topography, major
	Development in locations well served by public transport, cycle paths and walking routes? Support for the objectives of the Shepway Cycling Plan?	parade there is a significant positive (++) effect on this aspect of the SA objective due to minimising travel distances and enabling easier access to employment opportunities. • Where an allocation is within 800 m of a District Centre a minor positive (+) effect is assumed. • Where a site is within walking distance of a site or centre but there are potential barriers to access for all ages and abilities (e.g. topography, major road), the score is downgraded to the next lowest score (e.g. ++ score becomes + or + becomes 0). • Other allocations are assessed as having a negligible effect. Increase opportunities to choose sustainable transport modes Sites within walking distance of a rail station (800 m) or bus stop on a route providing a seven day a week	road), the score is downgraded to the next lowest score (e.g. ++ score becomes + or + becomes 0). Other allocations are assessed as having a negligible effect. Increase opportunities to choose sustainable transport modes Allocations beyond walking distance of the settlement types above but within walking distance of a rail station (800 m) or bus stop on a route providing a seven day a week service (400 m) are assumed to have a minor positive effect on this aspect of the SA objective but this will be uncertain (+?) as the frequency and reliability of bus services and suitability of routes for the employment site's employees will not be known and existing services may change in response to new demand from the development. Increasing cycling is an important sustainability objective for Shepway and positive sustainability scores relating to development allocations being within convenient walking distance of services and
		service (400 m) are assumed to have a significant positive (++) effect on this aspect of the SA objective. Other housing sites will be assessed as having a negligible (0) effect on this aspect. Increasing cycling is an important sustainability objective for Shepway and positive sustainability scores relating to development allocations being within	facilities also reflect the fact that such allocations are also likely to increase the proportion of trips made by bike. (Sources required: GIS mapping of settlement boundaries; train stations; and bus stops on routes providing a seven day a week service)

SA Objective	Appraisal questions. Will the plan/option lead to?	Assumptions for SA of housing site options	Assumptions for SA of employment and retail site options
		convenient walking distance of services and facilities also reflect the fact that such allocations are also likely to increase the proportion of trips made by bike.	
		(Sources required: GIS mapping of Major Employment Sites, Town Centres and District Centres, shop frontages; train stations; train stations; bus stops on routes providing a seven day a week service)	
11. Use land efficiently and safeguard soils, geology and economic mineral reserves.	Development that avoids high quality agricultural land? The remediation of contaminated sites? Development on brownfield sites? Development that protects soil processes and functions? Development that protects sites valued for their geological characteristics? Development that avoids sterilising economic mineral reserves?	 Soil quality and quantity Where allocated sites are on high quality (grade 1, 2 or 3) agricultural land there is assumed to be a negative effect on preserving soil quality: • Sites with a significant proportion (=>25%) of grade 1 or 2 agricultural land are assumed to have a significant negative () effect. • Sites with a significant proportion (>=25%) of grade 3 agricultural land are assumed to have a minor negative (-) effect. • Sites that are <25% on grade 1, 2 or 3 agricultural land are assumed to have a negligible (0) effect. In addition: • Sites with a significant proportion (>=25%) of brownfield land are assumed to have a minor positive effect (+). • Sites with a significant proportion (>=25%) of greenfield land are assumed to have a minor negative (-) effect. resulting in overall mixed effects when taken together with effects on agricultural land. Land contamination If the site is known to be contaminated and remediation would be a condition of housing development then assess as having a significant 	As for housing sites.
		positive effects on this aspect of the objective (++); if contamination status is unknown assess effect as uncertain (?); if site is not thought to be contaminated assess effect as negligible (0).	

SA Objective	Appraisal questions. Will the plan/option lead to?	Assumptions for SA of housing site options	Assumptions for SA of employment and retail site options
		Geological quality and quantity	
		Local Geological Sites are selected for their educational, historical and/or aesthetic value. The Council has confirmed that no such sites exist within the District.	
		Minerals safeguarding	
		Some areas of Kent have been delineated as potential Minerals Safeguarding Areas by the County Council in topic papers to inform the production of the new Kent Minerals and Waste Plan 2013-2030 ⁹⁷ . These are locations of specific minerals resources that may need to be safeguarded from sterilisation by non-mineral development. This does not mean that development could not occur in these locations, but that the County Council would need to be consulted to determine whether prior extraction of the mineral resource was required before development. Since the outcome of this consultation will be unknown at the time the site is allocated, an uncertain effect is identified on this SA objective. • Sites that overlap a Minerals Safeguarding Area are assumed to have an uncertain effect (?).	
		(Sources required: GIS mapping of agricultural land classifications, Minerals Safeguarding Areas, and brownfield land)	
12. Maintain and improve the quality of groundwater, surface waters and coastal waters.	Development that will not lead to the deterioration of the quality of groundwater, surface waters or coastal waters or deterioration of Water Framework Directive status? Development where adequate foul drainage, sewage treatment facilities and surface water drainage are available?	The location of housing allocations may affect water quality due to spatial variations in the capacity of existing WwTWs and the foul and combined sewer network to accommodate additional demand from new development as well as variations in the sensitivity of groundwater and surface water receptors. In relation to wastewater treatment capacity, the Water Cycle Study ⁹⁸ did not identify significant constraints to planned development.	As for housing allocations except that the potential risk to groundwater from employment premises is judged to be higher than that from dwellings. Employment allocations within Source Protection Zones are assessed as having a potential significant adverse effect on the SA objective, with uncertainty (?) relating to the nature of operations carried out and the effectiveness of mitigation.

http://www.kent.gov.uk/environment and planning/planning in kent/minerals and waste/evidence base/mineral safeguarding.aspx
 Shepway District Council (2011) Shepway Water Cycle Study

SA Objective	Appraisal questions. Will the plan/option lead to?	Assumptions for SA of housing site options	Assumptions for SA of employment and retail site options
	Development which incorporates SuDS (including their long-term maintenance) to reduce and the risk of combined sewer overflows and to trap and break down pollutants?	In relation to the capacity of the foul and combined sewer network to accommodate additional development, the Water Cycle Study identifies a potential capacity issue in the strategic wastewater link between the Westenhanger and Lympne area and Sellindge WwTW. Development in this area could therefore increase the risk of wastewater overflows, with adverse effects on water quality but the risk is judged minor due to the regulatory requirement for the water undertaker to provide a connection to wastewater treatment facilities at some point. It is therefore assumed that residential allocations in the parishes of Lympne, Stanford or Hooks Norton have the potential for minor adverse effects on this SA objective (-?) with uncertainty relating to whether the development is of sufficient size to require a new link to Sellindge WwTW or whether such a link will be secured, e.g. via developer contributions.	
		Shepway contains groundwater Source Protection Zones within which there is a risk of contamination of groundwater resources from certain activities. Housing construction within these zones is assessed as having a minor adverse effect on the SA objective but with uncertainty (-?) relating to the construction activities (e.g. dewatering) and mitigation that would be employed.	
		Pollution risks to surface waters from construction of housing are assumed to be fully addressed by compliance with Environment Agency pollution prevention guidance and do not form part of the SA of Site Allocations.	
		The potential benefits to water quality of incorporating SuDS are dealt with in the SA of DM policies and do not form part of the SA of site allocations.	
		(Sources required: parish boundaries; groundwater Source Protection Zones)	
13. Use water resources efficiently.	Development where adequate water supply is available? Water efficient design and reduction in water consumption (e.g. rainwater recycling/grey	Development standards in relation to water efficiency are not related to site location therefore the SA of site allocations does not assess this; potential effects of water efficient design are instead dealt with in the SA of DM policies.	As for housing sites.

SA Objective	Appraisal questions. Will the plan/option lead to?	Assumptions for SA of housing site options	Assumptions for SA of employment and retail site options
	water reuse and BREEAM/ EcoHomes Excellent Standard)?	(Sources required: EA none)	
14. Protect and enhance open space and ensure that it meets local needs.	The provision of and maintenance towards green infrastructure assets and networks (including green open space and river/canal corridors) and ensure that this is linked into new and existing developments, to improve the connectivity of green spaces and green networks?	Where a significant proportion (>=25%) of an allocated site is within an existing area of open space a significant adverse (?) effect is assumed. Where a smaller part (5-25%) of an allocated site is within an existing open space a minor negative (-?) effect is assumed. In both cases uncertainty relates to the extent to which the development will contribute to alternative provision of open space that is lost to development. Site that are <5% open space are assumed to have a negligible (0) effect. (Sources required: open space boundaries)	As for housing sites.

Appendix 4

Representations on the SA and LUC's responses

Comment received	SA Scoping Report reference	LUC response
REPRESENTATIONS ON 2014 SA SCOPING REPORT		
Natural England comments		
Para 3.11 indicates that the "sensitivity of the natural environment in Shepway may limit the number of acceptable locations for further large scale renewable energy developments". Some evidence of the limited capacity of the area may prove a robust tool for considering windfall development proposals.	Para 3.11	Site allocations in the PPLP do not cover windfall development. Development management policies in the PPLP are assessed against SA objectives in relation to protection and enhancement of landscape (SA8) and biodiversity (SA9). No change is proposed to the SA methodology but the Council's attention is drawn to the need to consider the capacity of the natural environment when assessing windfall development.
Para 3.12 – climate change is also likely to impact upon habitats and thereby biodiversity.	Para 3.12	New bullet point added to climate change adaptation section of Chapter 4.
The sensitivities of these networks should be reflected in the GI Strategy and in the plan's commitment to protect and enhance habitat networks.		SA objective 9 revised to read: "Conserve and enhance biodiversity, taking into account the effects of climate change. Note added to appraisal questions stating that achievement of the listed biodiversity enhancements should help to enhance the ability of wildlife to adapt to a changing climate.
Para 3.73 – we agree that "Without the Local Plan there is less opportunity to adopt a coordinated approach to the development of green networks for wildlife and natural green spaces designed to steer recreational pressure away from sensitive wildlife sites". The network and spaces need to be fully reflected in the GI Strategy to provide a framework for the consideration of development proposal, and for avoiding harm and gaining enhancements where appropriate.	Para 3.73	Added text to biodiversity issues section of Chapter 4 to reflect this.
Para 3.75 notes that there are no AQMA, however there does not appear to be any screening of issues relating to the natural environment (current and forecast levels and loads on more sensitive sites).	Para 3.75	Air quality monitoring for health purposes indicates that air pollution trends are stable or decreasing and no evidence has been found that air pollution is currently an issue at biodiversity sites in Shepway. This issue will be considered in more detail for internationally designated sites through the HRA at a later stage in the plan making process.
Para 3.81 – we welcome the comments on the protection of the best and most versatile agricultural land and the potential value of brownfield sites.	Para 3.81	Noted.
The SA Objectives are generally supported.	Table 4.1	Noted.
In Objective SA2 – the scope of the word "resilience" should be defined and consideration of the implications for habitats and biodiversity would be helpful.	Table 4.1	Note added to appraisal questions for SA2 explaining that the implications of climate change for biodiversity are dealt with under SA9. As described above, SA9 and related appraisal questions have been amended to explicitly consider climate change.
The key national objective of "Agriculture and forestry take opportunities from climate change,	Table 4.1	The Local Plan has limited scope to influence agricultural or forestry practice.
are resilient to its threats and contribute to the resilience of the natural environment by helping to maintain ecosystem services" and "The natural environment is resilient to climate change, able to accommodate change and		Climate change resilience of the natural environment is addressed via changes to SA9 and related appraisal questions, as

Comment received	SA Scoping Report reference	LUC response
valued for the adaptation services it provides"		described above.
are helpful but they do not seem to be carried through to table 4.2 or the rest of the document.		Recognition of the potential for the natural environment to deliver climate change adaptation services recognised by new appraisal question for SA2.
The recognition of the importance of SA Objectives 8 and 9 to the "Economy and labour market" (page 38) is welcomed, as are the objectives in themselves.	Table 4.1	Noted.
The comments on biodiversity in the first column on page 39, raise a number of questions, notably - have the key habitats have been mapped to provide a framework for planning decisions and does the local BAP respond to the issues raised?	Table 4.1	BAP Priority Habitats have been mapped by a third party organisation. The Council is able to view the data when considering individual planning applications but does not currently hold the necessary licence to make this available to LUC in a suitable format for the SA of specific site allocations. The Council is investigating whether the licence can be obtained. If not, consideration of the potential impacts of individual allocations will be limited to potential impacts on designated sites.
The definition of the term "Open Space" in SA Objective 14 should be clarified to ensure links with ANGS and other components of GI.	Table 4.1	The term "open space" in SA14 has been replaced with "green infrastructure" and a note added to appraisal questions for SA14 to define the GI typology.
Some of the assumptions for SA of housing site options are simple and acceptable only in the very short term – for example - sites within 1 km of the boundary AONB, will be assessed as having a minor negative effect. As the development options become clear they should be assessed using methodologies such as LVIA, and the SA scoring revised accordingly.	Appendix 1	The detailed SA assumptions in Appendix 3 acknowledge the limitations of a desk-based approach to SA of site allocations but the proximity basis presented is judged to be appropriate for the content and level of detail in the Local Plan, as opposed to individual planning applications, and sufficient to identify significant effects. Should additional evidence become available later in the plan making process, for example a landscape sensitivity study, appropriate reference will be made to this to supplement the GIS analysis.
There are similarly concerns regarding potential	Appendix 1	See response above.
effects on biodiversity assets from housing allocations. It seems unlikely that housing development within or adjoin an internationally or nationally important designated wildlife site could be considered sustainable, and it seems unlikely that there would be no better alternatives.		Also note that as per the assumptions in Appendix 3, where allocated housing sites have a significant proportion of land within an internationally, nationally or locally designated wildlife site or area of Ancient Woodland, significant adverse effects are assumed.
Environment Agency comments		
We have no major issues with the document from a flood risk or water resources or groundwater and contaminated land perspective.	N/A	Noted.
Biodiversity: The report makes reference to Biodiversity Action Plan targets. Perhaps it should now also include reference to targets for the England Biodiversity Strategy 2020?	Table 4.1	Reference to England Biodiversity Strategy 2020 added to list of policy objectives in Appendix 5 and appraisal questions for SA9.
Fisheries: The Proposed SA objective 12 is to Maintain and improve the quality of groundwater, surface waters and coastal waters. While quality of water is critical both for	Table 4.1	SA12 and associated appraisal questions amended to reflect this point.

Comment received	SA Scoping Report reference	LUC response
its roles in the environment and as a resource used by people in Shepway, it would be useful to include reference to the hydromorphological – physical – quality of rivers and coastal waters as well. This will ensure that not only will there be effort to maintain and improve water chemistry but also the physical form of rivers and coasts. This is clearly linked to SA14 which suggests that green infrastructure assets and networks including river /canal corridors should be protected and enhanced to meet local needs.		
English Heritage comments		
None received	N/A	N/A
Other comments		
SA2 should also refer to reducing waste generation and promoting sustainable management of waste. (representation from member of the public)	Table 4.1	Whilst this is an important sustainability objective it is judged that the Local Plan has limited scope to affect it (the County Council Waste Local Plan and Waste Management Strategy are more likely to influence significantly the issue of waste). No change made to SA objectives.
SA3 should refer to reducing inequalities more generally rather than just avoiding inequalities of opportunity for access. (representation from member of the public)	Table 4.1	Whilst it is acknowledged that reducing inequalities generally is an important sustainability objective, it is judged that the scope of the Local Plan is such that it is only likely to be capable of influencing inequalities in opportunities to access services/facilities.

Appendix 5

SA objectives and links to sustainability issues, policy objectives and SEA Directive topics

N.B. Some SA objectives set out here address multiple issues and are therefore repeated in several rows of the table. The sequential numbering of these objectives is defined by Table 2.1.

Key sustainability issues (Chapter Error! Reference source not found.)	Key policy objectives (Appendix 2)	SEA Directive topics	SA objectives
Flood risk	National	Climatic factors; human health;	SA1: Reduce the risk of flooding, taking into account the effects of
Risk of flooding is a major concern in Shepway with 55% of the District at or below sea level.	Plan for the effects of climate change in terms of flood risk.	material assets; biodiversity	climate change.
The expected magnitude and probability of significant fluvial, tidal, ground and surface water flooding is increasing in the District due to climate change.	Improve effectiveness of surface water drainage.	bloatversity	
Coastal erosion and the associated flood risks are a considerable spatial constraint on new development in the District.			
Climatic factors and energy	International	Climatic factors;	SA2: Increase energy efficiency in
The need to meet national carbon reduction targets (such as all new residential	Recognise and respond to the challenges posed by climate change.	human health; landscape	the built environment, the proportion of energy use from renewable sources and resilience to
development being zero carbon by 2016). The sensitivity of the natural environment in	Reduce greenhouse gas emissions by 34% by 2020 of 1990 levels.		a changing climate and extreme weather.
Shepway may limit the number of acceptable locations for further large scale renewable	Mitigate the effects of increased extreme weather events.		
energy developments. Hotter, drier summers expected under climate	Promote generation and use of renewable energy, alongside energy efficiency.		
change have the potential for adverse effects on human health.	Improve energy efficiency of buildings.		
on numan nearm.	Share of renewables to be 15% of final energy demand by 2020.		
	Minimum target of 10% bio-fuels in transport by 2020.		
	National		
	Improve the energy efficiency of buildings and reduce their carbon emissions.		
	Reduce CO_2 emissions by 34% by 2020 and by 80% by 2050 below 1990 levels.		
	Ensure that all new homes are carbon neutral by 2016.		
	Conform to the Code for Sustainable Homes / building regulations (or corresponding sustainability requirements in the Building Regulations).		

Key sustainability issues (Chapter Error! Reference source not found.)	Key policy objectives (Appendix 2)	SEA Directive topics	SA objectives
	Promote renewable energy generation both at national and local levels.		
	Generate 20% of energy from renewable energy sources by 2020.		
	Reduce the number of households living in fuel poverty.		
	Buildings and infrastructure are resilient to a changing climate and extreme weather.		
	Health services, social care system and communities are resilient and adapted to a changing climate and severe weather events.		
	Agriculture and forestry take opportunities from climate change, are resilient to its threats and contribute to the resilience of the natural environment by helping to maintain ecosystem services.		
	The natural Environment is resilient to climate change, able to accommodate change and valued for the adaptation services it provides.		
	Businesses are resilient to extreme weather and prepared for future risks and opportunities from climate change.		
	Local government plays a central in leading and supporting local places to become more resilient to a range of future risk and to be prepared for the opportunities from a changing climate.		
	Local		
	Promote domestic energy efficiency.		
Population and human health	International	Population; human	SA3. Promote community vibrancy,
Shepway as a whole suffers from considerable	Eradicate poverty.	health	provide opportunities to access services, facilities and
deprivation relative to the national average and there is also significant inequality within the	Fight disease and reduce threats to public health.		environmental assets for all and avoid creating inequalities of
District with deprivation concentrated in the urbanised coastal areas and the rural South.	Achieve gender and racial equality.		opportunity for access.
Rural areas have poorer access to services and	Secure adequate housing.		SA4. Reduce crime and the fear of
facilities.	Increase employment opportunities.		crime.
Shepway suffers from high levels of disability / long term illness, reflecting, in part, the	National		
relatively high proportion of older people living	Plan for the effects of climate change in terms of flood risk,		

Key sustainability issues (Chapter Error! Reference source not found.)	Key policy objectives (Appendix 2)	SEA Directive topics	SA objectives
in the District.	agricultural output and public health.		
Population growth, household growth and	Provide a high quality of life for all by:		
demographic change will place additional and changing demands on key services and facilities such as housing, health, education and social	 Reducing health inequalities and improving health services. 		
care.	Pursuing social improvements.		
There are some areas of Shepway where crime is likely to have a significant effect on the health and well-being of individuals and	 Valuing open spaces, sport and recreation facilities for, amongst other things, their contribution to healthy lifestyles. 		
communities, as well as the potential for economic growth and diversification.	 Improving skills and educational attainment levels and standards. 		
	Improving community safety and reducing crime rates.		
	Ensure that communities are serviced with necessary utilities and communications networks.		
	Sustain, enhance and revitalise villages.		
	Ensure development supports existing communities.		
	Improve the quality of the public realm through good design.		
	Recognise that a network of green infrastructure makes a contribution to quality of life.		
	Ensure communities are secure and protected from hazardous development such as high pressure pipe lines and gas compounds.		
	Local		
	Achieve an overall improvement in Quality of Life for all residents.		
	Create a District which is and feels safe.		
	Improve access to health and social care services.		
	Enhance the health of people living in the District.		
	Provide quality education and training opportunities to all.		
	Secure a fairer and cohesive society, regardless of ethnicity, racial, or national origin.		
	Promote the development of, improve access to and increase the enjoyment of social, community, leisure and cultural		

Key sustainability issues (Chapter Error! Reference source not found.)	Key policy objectives (Appendix 2)	SEA Directive topics	SA objectives
	facilities.		
Housing	National	Population; material	SA5. Improve the provision of
Lack of affordability of housing is a growing	Provide better quality housing.	assets; human health	homes, including affordable housing, having regard to the needs
issue in the District.	Increase the number of homes built.		of all sections of society, including the elderly.
	Significantly increase affordable housing provision.		the elderry.
	Conform to the Code for Sustainable Homes.		
	Local		
	Improve the quality of the District's housing		
	Improve the provision of homes, including affordable housing, having regard to housing needs and homelessness		
Economy and labour market	National	Population; material	SA3. Promote community vibrancy,
Shepway's economic growth is relatively poor. It has suffered from a decline in manufacturing,	Increase and widen employment opportunities to meet the needs of all.	health services, fa environmer avoid creati opportunity SA6. Supportunity and	provide opportunities to access services, facilities and environmental assets for all and avoid creating inequalities of opportunity for access.
a dependence on relatively low paid and seasonal tourism jobs and on nuclear power generation at Dungeness.	Regenerate town centres by making them the focus for mixed- use development in order to ensure they are vibrant places to		
Unemployment in general and youth	live, work and visit.		SA6. Support the creation of high quality and diverse employment
unemployment in particular are high in Shepway and many of the jobs available are	Improve access to jobs.		opportunities.
relatively low paid.	Provide a supply of land suitable for the needs of different businesses.		SA7. Conserve and enhance the
Shepway has relatively low levels of	Local		fabric and setting of historic assets.
educational attainment and skills which could hinder economic growth in the District.	Provide quality education and training opportunities to all.		SA8. Conserve, and where relevant enhance, the quality, character and
Parts of Folkestone, notably several areas of the 'secondary frontage' suffer from high	Enhance the vitality and vibrancy of the District's town centres through regeneration.		local distinctiveness of the landscape and townscape. SA9. Conserve and enhance biodiversity, taking into account the effects of climate change.
vacancy rates of retail premises.	Improve the economic stability of the District and diversify the employment base and skills development opportunities.		
	Deliver major social, physical and economic regeneration projects.		crects of climate change.
Historic environment	International	Cultural heritage	SA7. Conserve and enhance the
There are many sites, features and areas of	Conserve and enhance cultural heritage.		fabric and setting of historic assets.
historical and cultural interest in the District, a number of which are at risk, and which could	National		

Key sustainability issues (Chapter Error! Reference source not found.)	Key policy objectives (Appendix 2)	SEA Directive topics	SA objectives
be adversely affected by poorly planned development.	Provide effective protection to all aspects of the historic environment.		
Landscape and townscape	International	Landscape; material	SA8. Conserve, and where relevant
The District contains a number of distinct rural	Conserve and enhance landscape diversity.	assets	enhance, the quality, character and local distinctiveness of the
landscapes as well as those more influenced by human development which could be harmed by	Protect, manage and enhance landscapes.		landscape and townscape.
inappropriate development.	National		
	Protect and enhance the quality and character of urban and rural settlements with distinctive qualities.		
	Protect and enhance rural and urban landscapes of particular value.		
Dia diversity	International	Farma flore	CAO Canaanya and anhanaa
Biodiversity Shepway contains a significant resource of designated biodiversity sites, a number of which are in unfavourable condition. It also	Protect and enhance biodiversity and the natural environment, particularly in respect of habitats/species of International and European importance.	bio	SA9. Conserve and enhance biodiversity, taking into account the effects of climate change.
contains a significant but fragmented resource of Ancient Woodland. Shepway's landscape	National		
outside of designated sites contains important habitats, including a number which have the potential to contribute to large scale ecological networks. All of these biodiversity assets could	Protect, conserve and enhance biodiversity, including habitats that support it, of International, European, national and local importance.		
be harmed by inappropriate development.	Protect, conserve and enhance geodiversity of European, national and local importance.		
	Target action on Priority Species and Habitats and priority actions from the England Biodiversity Strategy 2020.		
	Ensure value of ecosystem services are fully reflected in decision-making.		
	Local		
	Protect and enhance the quality of the local environment and biodiversity.		
Air pollution	International	Air	SA10. Reduce the need to travel;
Air quality is not currently judged to be a	Control and reduce air / noise pollution.		increase opportunities to choose sustainable transport modes and
significant issue in the District. However, locations targeted for large scale development	National		avoid development that will result

Key sustainability issues (Chapter Error! Reference source not found.)	Key policy objectives (Appendix 2)	SEA Directive topics	SA objectives
could experience significant increases in road traffic from residents and/or employees, resulting in localised adverse effects, in urban areas such as Folkestone and along major roads such as the A20.	Reduce, control and mitigate air and noise pollution.		in significant traffic congestion.
	Reduce and manage exposure to air and noise pollution.		
	Local		
	Reduce, limit and mitigate air pollution.		
Soil	International	Soil	SA11. Use land efficiently and safeguard soils, geology and economic mineral reserves.
Shepway contains some of the most productive agricultural land in the South East but this could be lost to development.	Prevent pollution of, and improve the quality of the soil.		
	National		
Shepway contains areas of historically contaminated land which could pose a risk to human health or which could be remediated and brought into appropriate use.	Take into account the benefits of the best and most versatile agricultural land and, where developed, use areas of poorer quality.		
	Minimise and mitigate the contamination of soil.		
	Improve land, soil and water quality.		
	Use natural resources, particularly land, prudently.		
	Encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value.		
	Local		
	Minimise and mitigate the contamination of land.		
Water quality	International	Water	SA12. Maintain and improve the quality of groundwater, surface waters and coastal waters and the hydromorphological (physical) quality of rivers and coastal waters.
Surface water and groundwater quality are a significant issue in the District. There is the potential for direct impacts from development on water quality and from increased discharges of treated wastewater.	Prevent pollution of, and improve the quality of water resources.		
	National		
	Minimise and mitigate the pollution of water courses.		
	Improve land, soil and water quality.		
Water resources	International	Water	SA13. Use water resources
Drinking water is a scarce resource in the District and population and household growth will place further pressure on this resource.	Ensure water is used in a sustainable way.		efficiently.
	National		
	Reduce water usage to 120-130 litres, per person, per day, by 2030.		

Key sustainability issues (Chapter Error! Reference source not found.)	Key policy objectives (Appendix 2)	SEA Directive topics	SA objectives
	Improve water efficiency in new buildings.		
	Ensure appropriate resources are available to deliver the development-related infrastructure needed to create sustainable communities.		
Open space There is demand for more conveniently located parks and greenspace in a number of existing communities, including in the rural areas. Recent development has resulted in some open spaces in the District being lost with no net gains. Future development could lead to further losses and greater demand.	National Protect and enhance open space and ensure that recreational facilities meet the needs of the community. Recognise that a network of green infrastructure makes a contribution to quality of life.	Material assets, flora, fauna, climatic factors, biodiversity, human health	SA14. Protect and enhance green infrastructure and ensure that it meets local needs.
	International Promote sustainable transport modes. National Direct development to sustainable locations. Reduce the need to travel. Promote more sustainable modes of transport, reduce the reliance on motor cars, and improve public transport. Ensure appropriate resources are available to deliver the development-related infrastructure needed to create sustainable communities. Local	Material assets, climatic factors, population, human health	SA10. Reduce the need to travel; increase opportunities to choose sustainable transport modes and avoid development that will result in significant traffic congestion.
congestion and increasing emissions of greenhouse gases and air pollutants.	sustainable communities.		