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# **Shepway District Council's Places and Policies Local Plan**

## **Proposed Submission Sustainability Appraisal Report**

### **Non-Technical Summary**

Prepared by LUC  
January 2018



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## Introduction

- 1.1 Shepway District Council (SDC) commissioned LUC in January 2014 to carry out Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) of the Places and Policies Local Plan (PPLP).
- 1.2 Plans and strategies such as the PPLP are subject to Sustainability Appraisal at each stage of their development to assess their likely effects on social, economic and environmental issues. There have been three iterations of the PPLP published for consultation in line with requirements of the SEA Directive and Regulations:
  - an Issues and Options version published in January 2015;
  - a Preferred Options version published in October 2016; and finally
  - a proposed Submission Draft version published in January 2018.
- 1.3 Each iteration of the plan has been accompanied by an SA Report. This Non-Technical Summary represents a summary of the contents of the full SA Report accompanying the proposed Submission Draft version of the PPLP.
- 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. In addition to the positive and negative sustainability effects of each option, public opinion, the deliverability of each option, and conformity with national policy have also been taken into account by SDC.

## Sustainability Appraisal and Strategic Environmental Assessment

- 1.1 Under the Planning and Compulsory Purchase Act 2004, SA is mandatory for Development Plan Documents. For these documents, it is also necessary to conduct an environmental assessment in accordance with the requirements of the Strategic Environmental Assessment (SEA) Directive (European Directive 2001/42/EC). Therefore, it is a legal requirement for the PPLP to be subject to SA and SEA throughout its preparation.
- 1.2 The requirements to carry out SA and SEA are distinct, although it is possible to satisfy both using a single appraisal process (as advocated in the National Planning Practice Guidance<sup>1</sup>), whereby users can comply with the requirements of the SEA Directive through a single integrated SA process. From here on, the term 'SA' should therefore be taken to mean 'SA incorporating the requirements of the SEA Directive'.

### Habitats Regulations Assessment

- 1.3 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 Development Plan Documents, 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.
- 1.4 The following European sites fall within 10km of Shepway District:
  - Dungeness, Romney Marsh and Rye Bay Ramsar.
  - Dungeness, Romney Marsh and Rye Bay SPA.
  - Dungeness SAC.
  - Wye and Crundale Downs SAC.

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<sup>1</sup> <http://planningguidance.planningportal.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/strategic-environmental-assessment-and-sustainability-appraisal-and-how-does-it-relate-to-strategic-environmental-assessment/>

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

1.5 The HRA Report of the proposed Submission Draft PPLP concluded that the PPLP will not have any significant adverse effects on the integrity of European sites, either alone or in-combination with other plans or projects. The HRA made the following recommendations to ensure that the PPLP protects the integrity of the Folkestone to Etchinghill Escarpment SAC:

- **Air pollution:** For the A20 in particular the PPLP should include a commitment to monitoring roadside NOx at regular intervals over the plan period in order to track the projected improvements in air quality. This would also enable the introduction of any specific local measures if an improving trend is not recorded in practice. Reporting on this metric could be tied to the planned cycle of 5-year reviews of the PPLP.
- **Recreation:**
  - **Visitor Study** – it is recommended that a visitor study of the Folkestone to Etchinghill Escarpment SAC is completed. This would provide a detailed baseline of recreation at the site, against which future successes or failures could be measured and depending on the findings, should be repeated during the implementation of the PPLP. This would ensure that the Council adopts a proactive and flexible approach to managing the potential effects of recreation, and would provide a means of recognising potential adverse effects at the earliest opportunity, enabling changes in site management or provisional of additional mitigation measures to be implemented as appropriate, before significant effects on the SAC are realised.
  - **Monitoring** – as specified by Natural England in their response to the Core Strategy HRA, a monitoring programme should be put in place, which repeats the method of the Visitor Study, to identify whether the mitigation measures provided remain effective, and to identify where future modifications to management or provision of additional mitigation is required to avoid significant effects on the SAC. It is recommended that the appropriate frequency of monitoring is agreed via consultation with Natural England, and informed as an ongoing iterative process in line with the latest survey findings.
  - **Project Level Assessment** – site specific planning applications, especially larger ones in proximity to the SAC, will need to consider the requirement to undertake project level HRA, and where appropriate would be expected to incorporate necessary safeguards in line with the policy safeguards included within the PPLP.
  - **Green Infrastructure Plan** – the proposed updated Green Infrastructure Plan will identify areas such as Biodiversity Opportunity Areas (BOAs) where enhancements to biodiversity can be targeted. It is recommended that this study recognises and promotes opportunities for provision of strategic high quality alternative open space as this may help to future-proof future development by focusing recreational activities away from Folkestone to Etchinghill Escarpment SAC.

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

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

## Shepway Places and Policies Local Plan

- 1.7 The Shepway PPLP is a planning document that will form part of the statutory Development Plan for the District. It sets out a framework that provides clear and firm guidance to ensure that the Council's main issues relating to planning and land use in the District are achieved. The Development Plan currently includes the adopted 2013 Shepway Core Strategy Local Plan<sup>2</sup> and saved policies from the 2006 Shepway District Local Plan.
- 1.8 The Core Strategy Local Plan is the overarching planning policy document for the District and sets out the long term vision until 2031. It identifies the overall economic, social and environmental aims for the District and the amount, type and strategic development locations that are needed to fulfil those aims. There are three aims:
1. To improve employment, educational attainment and economic performance in Shepway;
  2. To enhance the management and maintenance of the rich natural and historic assets in Shepway; and
  3. To improve the quality of life and sense of place, vibrancy and social mix in neighbourhoods, particularly where this minimises disparities in Shepway.
- 1.9 The PPLP will sit below the Core Strategy and has two functions. The first is to allocate smaller site allocations (i.e. non-strategic sites) to meet the requirements set out in the Core Strategy for residential, employment and community developments. The second is to set out development management policies that will be used to assess planning applications and guide future development (and will replace the Saved 2006 Local Plan policies).
- 1.10 The PPLP will, therefore, play an important role in shaping the future of the District and ensuring that the Council's aims set out in the Core Strategy Local Plan are met. The policies in the PPLP will ensure that new developments will be sustainable, the natural and historic environment will be maintained and that new developments through their design will improve the quality of life of residents and help to foster healthy lifestyles.
- 1.11 When adopted the PPLP will replace the remaining saved policies in the 2006 Shepway District Local Plan.

### Other relevant policies, plans and programmes

- 1.12 Schedule 2 of the SEA Regulations requires:
- (1) "an outline of the...relationship with other relevant plans or programmes"; and*
- (5) "the environmental protection objectives established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation"*
- 1.13 **Chapter 3** and **Appendix 2** in the full SA Report set out the environmental, social and economic objectives contained within international, national, regional and local policies, plans and strategies that are of relevance to the PPLP.

## Baseline Information, Key Sustainability Issues and their Likely Evolution without the PPLP

- 1.14 Schedule 2 (2, 3 and 4) of the SEA Regulations requires information to be provided on:
- "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"*

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<sup>2</sup> A Review of the District's adopted Core Strategy (2013) is currently underway to plan for development and growth to at least 2036. New strategic allocations will be included within this Review to meet the growth needs of the District. Work on the Core Strategy Review will be consulted upon and appraised separately from the Council's Places and Policies Local Plan.

*"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."*

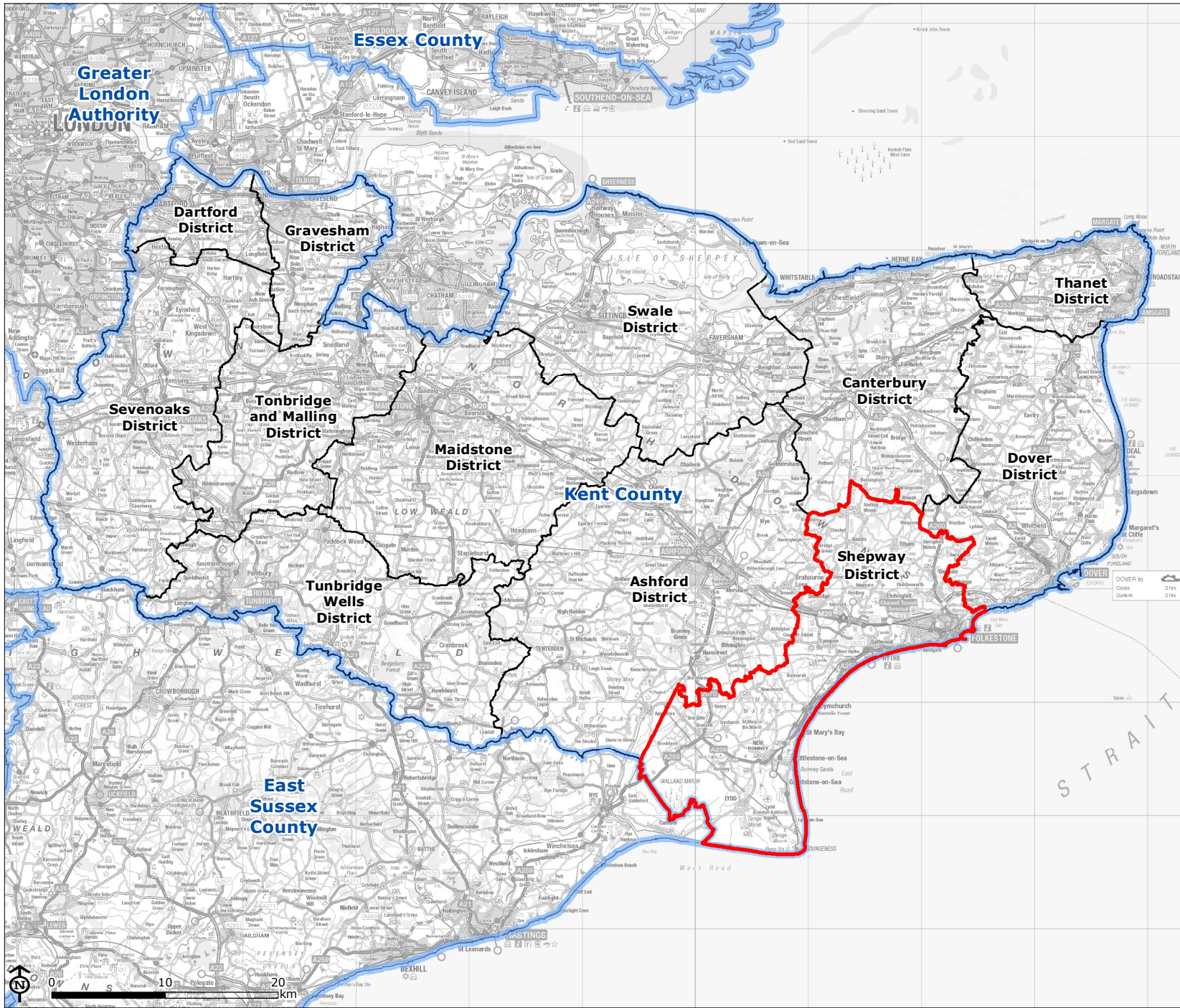
- 1.15 **Chapter 4** of the full SA Report sets out a detailed environmental, social and economic baseline for Shepway District Council. **Figures 1 to 7** illustrate the location as well as the key socioeconomic and environmental assets and constraints of the District.



**Shepway Places and Policies Local Plan Sustainability Appraisal**

**Figure 1: Location of Shepway District**

- Shepway District
- County boundary
- District boundary







Source: OS

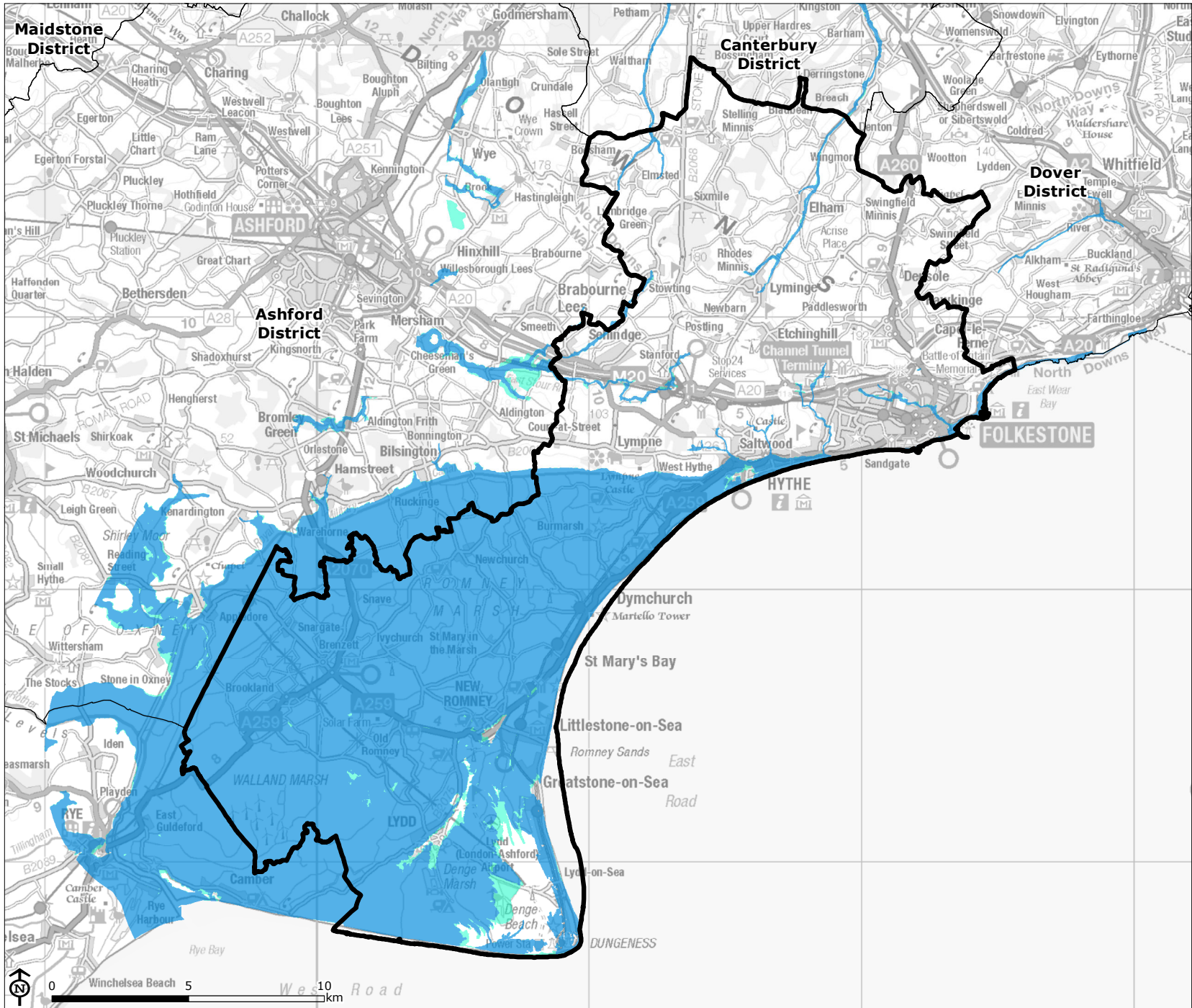
Map Scale @ A4: 1:480,000

**LUC** Folkestone  
 Hyke & Romney Marsh  
 Shepway District Council  


**Shepway Places and Policies Local Plan Sustainability Appraisal**

**Figure 2: Flood Risk**

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



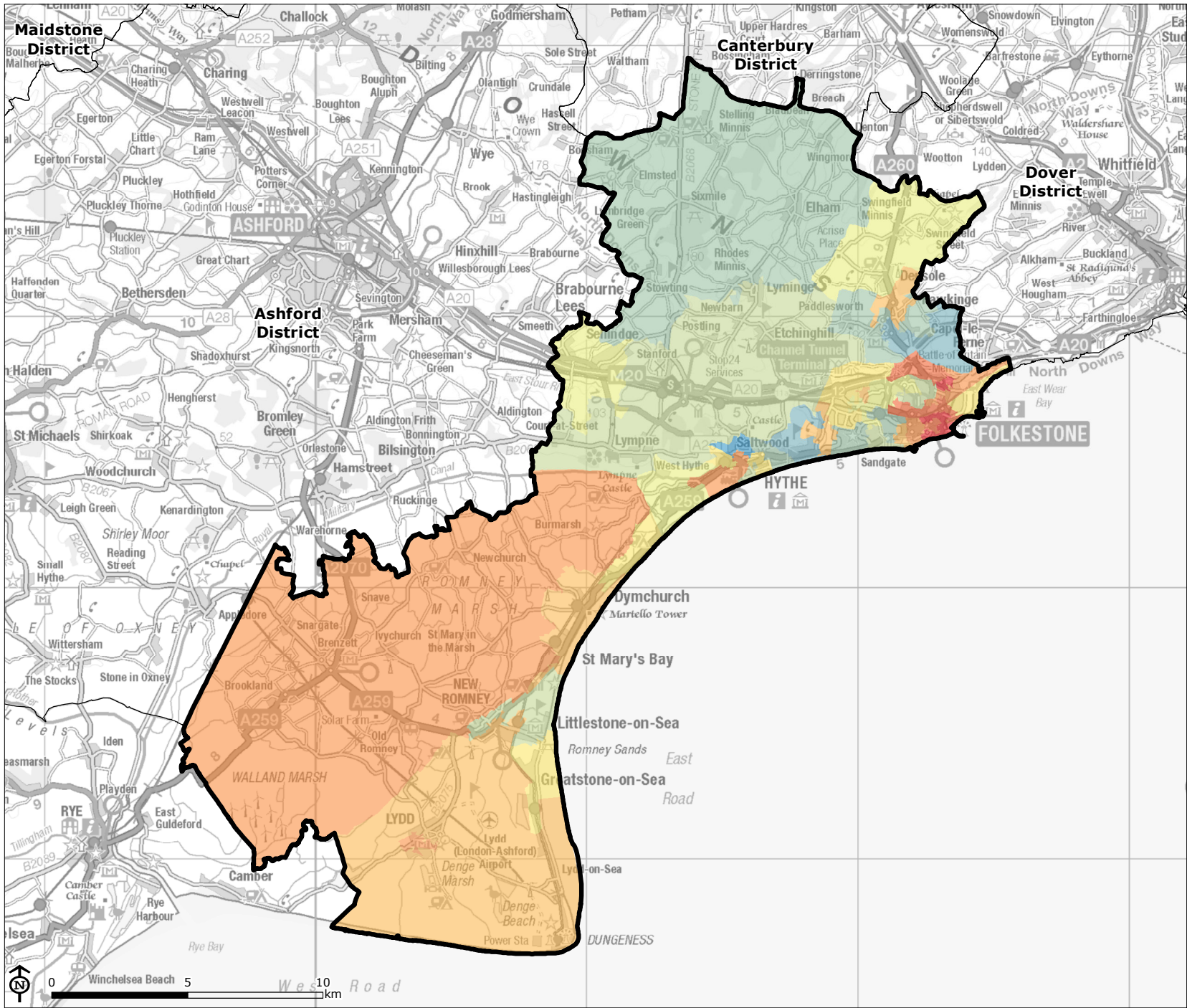
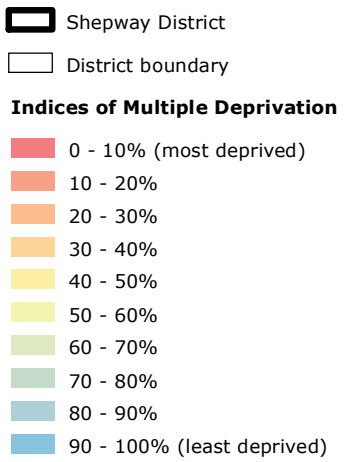
Source: OS, Shepway District Council,

**Map Scale @ A4: 1:200,000**



**Shepway Places and Policies Local Plan Sustainability Appraisal**

**Figure 3: Indices of Multiple Deprivation**









Source: OS, DCLG

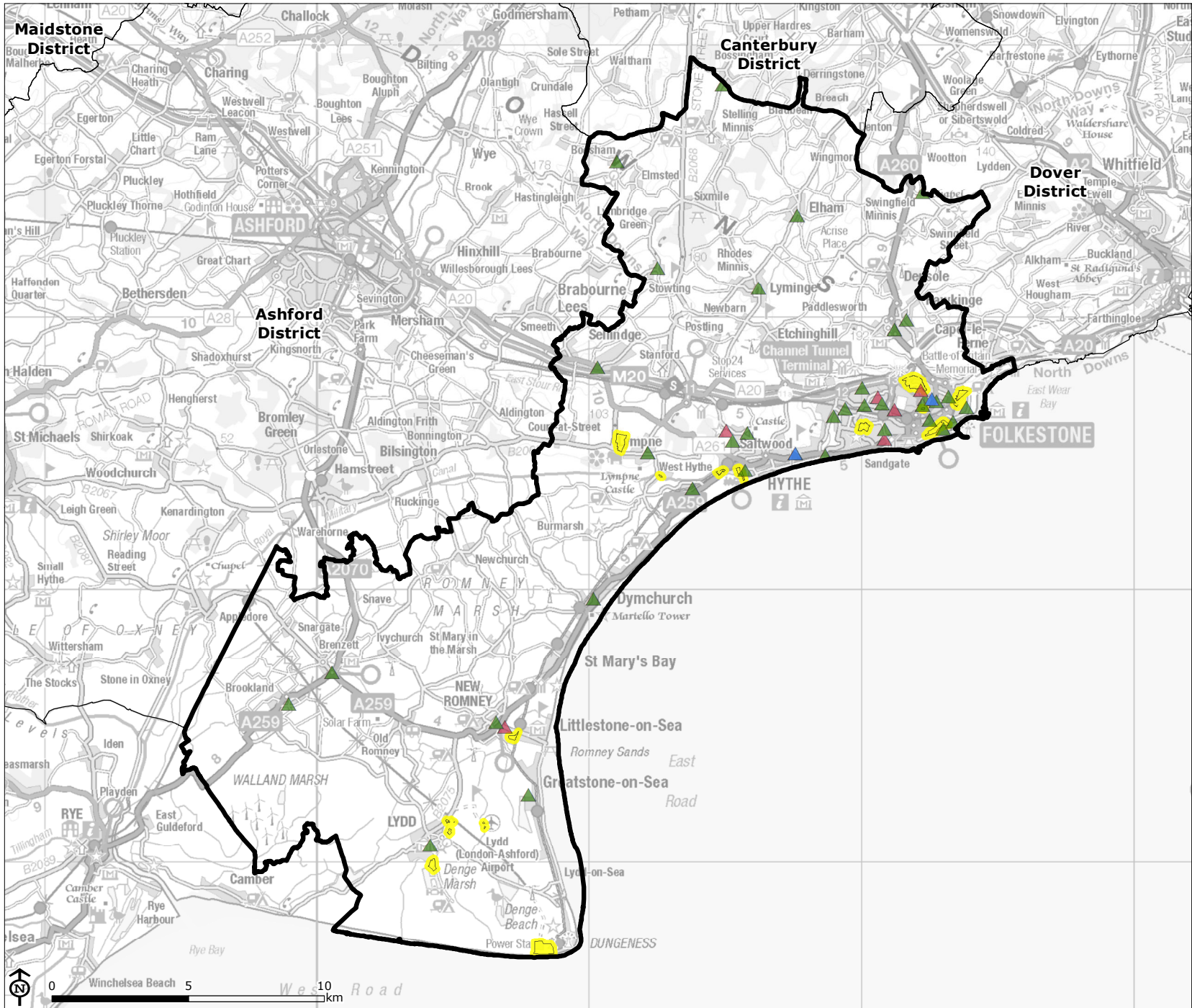
Map Scale @ A4: 1:200,000



**Shepway Places and Policies Local Plan Sustainability Appraisal**

**Figure 4: Employment Areas and Educational Facilities**

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











Source: OS, Shepway District Council

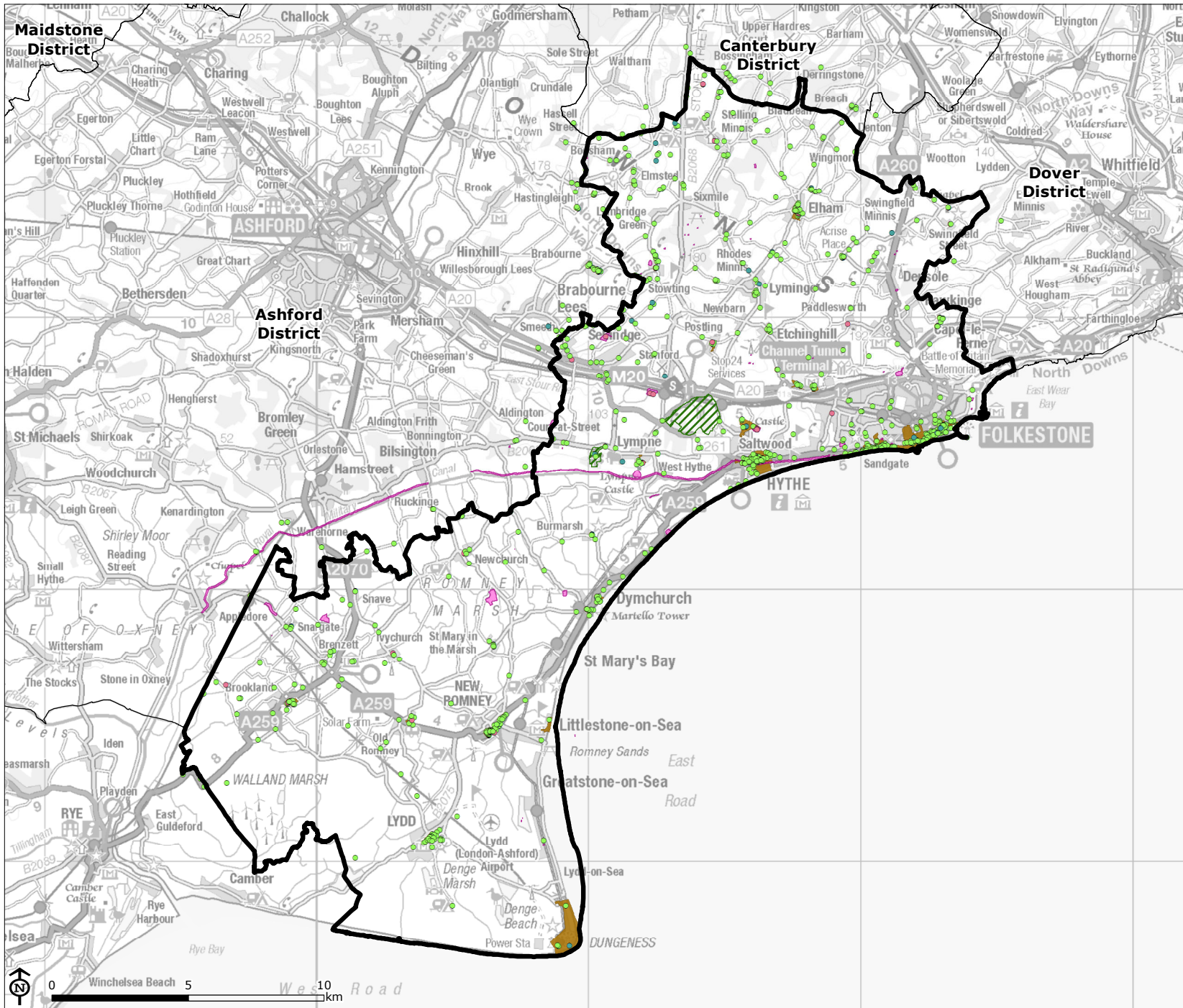
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**Shepway Places and Policies Local Plan Sustainability Appraisal**

**Figure 5: Heritage Assets**

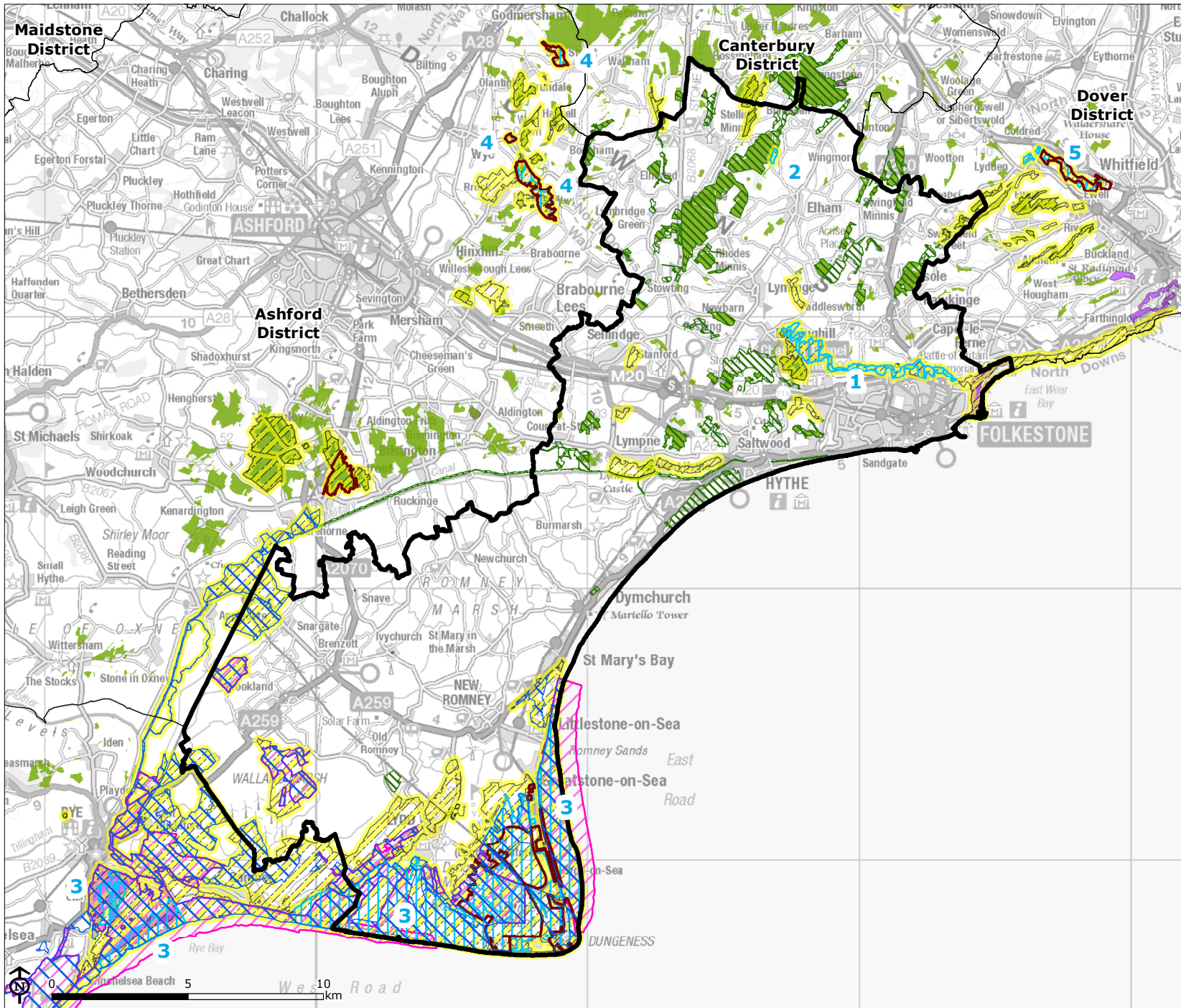
-  Shepway District
-  District boundary
-  Grade I Listed Building
-  Grade II Listed Building
-  Grade II\* Listed Building
-  Scheduled Monument
-  Registered Park & Garden
-  Conservation Area



Source: OS, Shepway District Council, Historic England

Map Scale @ A4: 1:200,000





**Shepway Places and Policies Local Plan Sustainability Appraisal**

**Figure 6: Ecological Assets**

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

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












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

**Map Scale @ A4: 1:200,000**



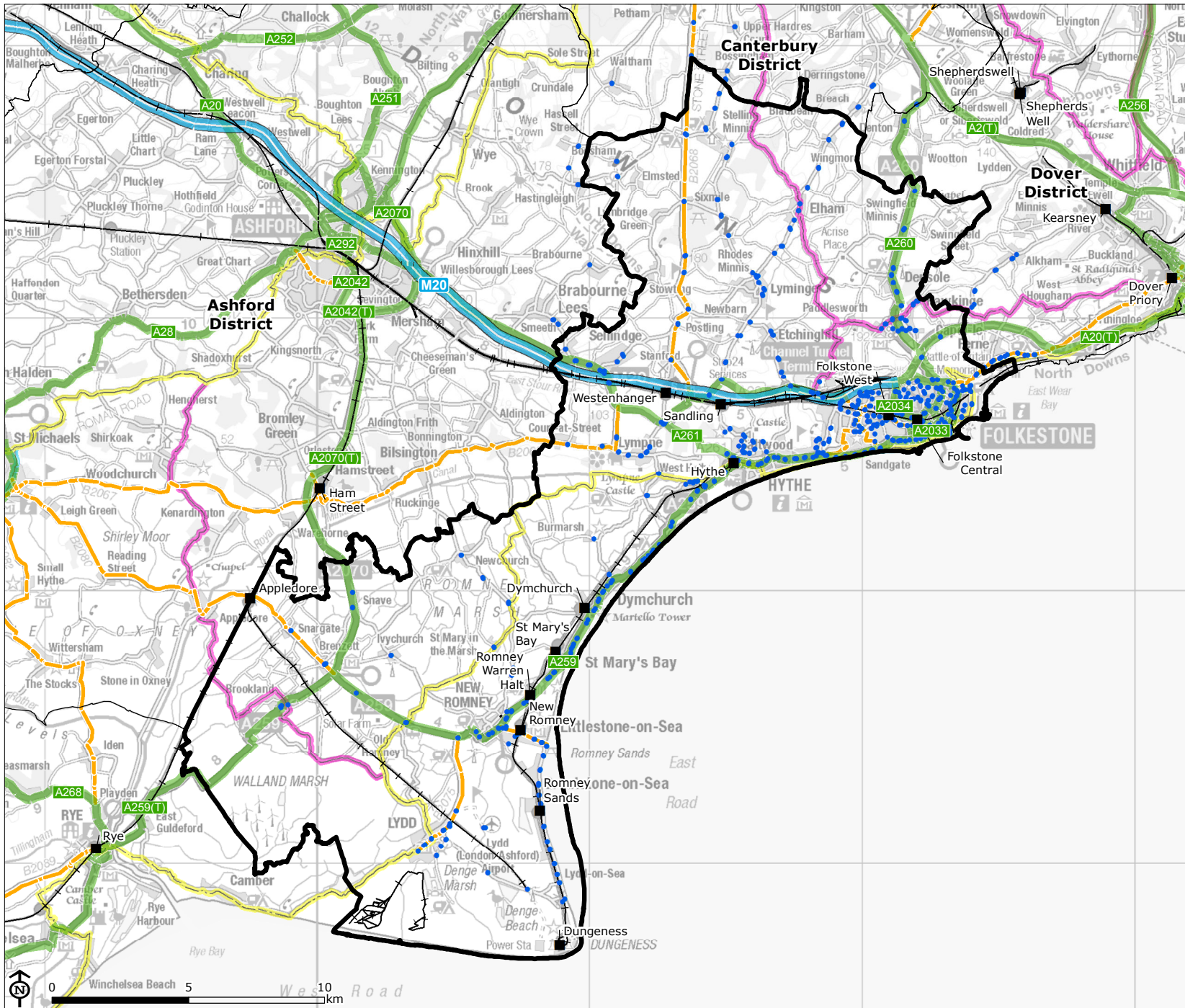
**Shepway Places and Policies Local Plan Sustainability Appraisal**

**Figure 7: Transport Network**

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

Source: OS, Shepway District Council, Sustrans

Map Scale @ A4: 1:200,000



## District Location

- 1.16 Shepway is located in the south east of England on the southern coast of the County of Kent. It is a coastal District with over 20 miles of coastline, a section of which is designated as Heritage Coast. 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, including the HS1 railway line to London.

## Social Context

- 1.17 The latest data<sup>3</sup> shows that in 2015 the population of Shepway was 110,000 people (an increase of 1.7% between 2011 and 2015) which is predicted to increase to 125,300 people in 2037<sup>4</sup>. The majority of residents in Shepway live in urban areas (60.6%), while the remainder live in rural areas<sup>5</sup>. 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 most sparsely populated area in the District.
- 1.18 The housing stock in the District is relatively old, with almost 80% constructed prior to 1980, 42% prior to 1945 and 32% prior to 1919. The worst housing conditions are focused in the older housing stock. There are currently around 450 long-term empty homes in the District. Despite this, homelessness in Shepway is a growing issue.
- 1.19 Access to the local housing market in the District is an issue as the average house price is more than six times the average household income. There is a high demand for affordable homes in Shepway. In 2014, there were approximately 2,700 households registered on the District's Housing List with only 350-470 affordable homes becoming available.<sup>6</sup> Shepway has the lowest average household size in Kent and it continues to decline partly driven by the older age profile of the District.<sup>7</sup>
- 1.20 The average age in Shepway (mid 2015) was 43.5 years (44.6 for females, 42.3 for males) which is slightly higher than the mean age in Kent at 40.8 years and the national average age of 39.7 years<sup>8</sup>. Approximately 23% of the population in Shepway is aged 65 and over. 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).
- 1.21 In 2014, the percentage of Shepway residents with qualifications at NVQ Level 4 and above was 25.7%. Whilst this is falling short of the target set out in the Core Strategy, there has been somewhat of a recovery since 2011, when the attainment level actually dipped to 20.5%, but then increased by 1.5% in 2012 to 21.5% and then increased sharply by 5.3% and 26.8% in 2013<sup>9</sup>.
- 1.22 At 83.4 years, life expectancy from birth in females is 3.7 years higher than males in Shepway (at 79.7 years) in line with the UK figures, although below that of Kent and the South East<sup>10</sup>. Based on death rates over the period 2006-2010, the difference in life expectancy between the most and least deprived members of the population is 9.4 years in males and 6.9 years in females. Over a fifth (21.5%) of children in Shepway live in poverty (defined as children living in families in receipt of out of work benefits), which is higher than most of the areas in Kent<sup>11</sup>.
- 1.23 Shepway is ranked 113th in the IMD out of 326 local authorities nationally, and is the third most deprived authority in Kent. Shepway has moved down in the rankings which indicate that levels

<sup>3</sup> Nomis – Labour Market Profile – Shepway. Accessed 23<sup>rd</sup> May 2017.

<sup>4</sup> Shepway District Council Equality and Diversity Report (2016) Shepway District Council

<sup>5</sup> Kent County Council (2015) 2014 Mid-year population estimates: Ward level population in Kent

<sup>6</sup> Shepway District Council (2014) Shepway Equality & Diversity Profile

<sup>7</sup> Shepway District Council (2011) Shepway Housing Strategy 2011-2016

<sup>8</sup> 2015 Mid-Year Population Estimates: Age and gender profile (2016) Kent County Council

<sup>9</sup> Shepway District Council (2015) Authority Monitoring Report

<sup>10</sup> Shepway District Equality and Diversity Profile (2016) Shepway District Council

<sup>11</sup> Shepway District Equality and Diversity Profile (2016) Shepway District Council



of deprivation have reduced between 2010 and 2015 relative to other local authorities in England. The District has four LSOAs that are in the top 10% most deprived nationally which are to be found in or around the urban area of Folkestone with the most deprived of these having been ranked 572nd out of 32,844 SOAs nationally; Folkestone Harbour (014A), Folkestone Harvey Central (014B), Folkestone East (003C) and Folkestone Harvey Central (014D). While 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<sup>12</sup>.

- 1.24 Compared to other English authorities, Shepway has a high proportion of people with limiting long term illness. Indeed 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.

### **Economic Context**

- 1.25 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.
- 1.26 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.<sup>13</sup>
- 1.27 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 PPLP are designed to address this and are expected to almost maintain the labour supply to 2026.
- 1.28 Unemployment in Shepway has dropped significantly from 6.7% (Jul 13-Jun 14) to 5.3% (Jan 2016-Dec 2016).<sup>14</sup> The most recent figure is higher than the regional and national average (4.0% and 4.8% respectively),<sup>15</sup> as well as the majority of the Districts in Kent (Thanet, Gravesham, Medway and Swale have a higher unemployment rate). Youth unemployment (aged 18-24 years) in the District during April 2017 stood at 6.0%, over the rate than amongst those aged 25-49 (3.4%). Levels of youth unemployment are higher than Kent (208%) and National levels (2.9%).<sup>16</sup>
- 1.29 Shepway has a number of economic strengths, including its good transport links (M20 motorway, High Speed rail links to London, and proximity to the Channel Tunnel), low wage levels and land/building costs relative to the wider South East region, a large working age population and a high quality natural environment. The number of jobs increased by 24% between 2000 and 2012 in the District has - faster than any other comparator area, except for Ashford which has experienced a comparable growth rate.<sup>17</sup>

### **Environmental Context**

- 1.30 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

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<sup>12</sup> The English Index of Multiple Deprivation (IMD 2015) | Headline findings for Kent (2015) Kent County Council

<sup>13</sup> Shepway District Council (2011) Shepway Employment Land Review

<sup>14</sup> Nomis – Labour Market Profile – Shepway. Accessed 23<sup>rd</sup> May 2017

<sup>15</sup> Nomis – Labour Market Profile – Shepway. Accessed 23<sup>rd</sup> May 2017

<sup>16</sup> Kent County Council (2017) District Unemployment Bulletin [http://www.kent.gov.uk/\\_\\_data/assets/pdf\\_file/0019/8182/District-unemployment-bulletin.pdf](http://www.kent.gov.uk/__data/assets/pdf_file/0019/8182/District-unemployment-bulletin.pdf)

<sup>17</sup> Shepway District Council (2015) Shepway Economic Development Strategy 2015-2020

Romney Marsh and also parts of the Sandgate Escarpment and Seabrook Valley, Eaton Lands, Coolinge Lane, Enbrook Valley and Mill Lease Valley.<sup>18</sup>

- 1.31 Due to its high quality natural environment and its visitor attractions (such as Port Lympne Wild Animal Park; Romney, Hythe and Dymchurch Railway; Medieval castles and Roman remains; the Battle of Britain Memorial and Museum) the tourism, leisure and hospitality sector represents a significant proportion of the local economy. Research conducted in 2013 estimated that this sector contributes £235.2 million to the local economy and supports around 4,500 jobs. This equates to approximately 12% of total jobs in the District.<sup>19</sup>
- 1.32 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), Dungeness, Romney Marsh and Rye Bay have been designated as a Special Protection Area (SPA) and Ramsar site, which means they are regarded as being of international importance under the EU Habitats Directive<sup>20</sup>. Dungeness is also a National Nature Reserve.
- 1.33 There are 13 Sites of Special Scientific Interest (SSSIs) in Shepway District of varying condition. Although the status of these SSSIs is monitored by Natural England, the surveys are not carried out every year. The most recent surveys, found that eight of the SSSIs are considered to be broadly in "favourable" condition and three broadly in "unfavourable recovering" condition. One site is classified as "unfavourable no change" and another "unfavourable declining".<sup>21</sup>
- 1.34 There is a significant amount of Ancient Woodland in Shepway, concentrated to the west, north-west and north of Folkestone. 26 of the 40 Ancient Woodlands are considered to be in positive management.<sup>22</sup> The distribution of this woodland is patchy leading to limited ecological connectivity between the areas, although there are some less fragmented areas in the north-west of the District.
- 1.35 The District contains 40 Local Wildlife Sites. Located mainly to the west and north of Shepway these sites are primarily woodland and species-rich grassland sites, in contrast to the District's SSSIs, which are primarily coastal or wetland habitats.
- 1.36 The 2002 Agricultural Land Classification Survey defined approximately 60% of the District's land area as "Excellent" or "Very Good" for agricultural purposes.<sup>23</sup> 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.
- 1.37 The Council monitors air quality across the District. According to the results for 2014/15, air quality pollution levels of NO<sub>2</sub> – Nitrogen Dioxide - have increased in 11 out of 12 monitoring points. However the results are still within the DEFRA air quality objectives levels of below 40µm/m<sup>2</sup> annual mean. Shepway District currently has no Air Quality Management Areas<sup>24</sup>.
- 1.38 There is a long history of flooding within Shepway including over 101 flooding events in the last decade.<sup>25</sup> Over half of homes in the District are at risk of flooding from either coastal or fluvial sources.<sup>26</sup> There are 11 watercourses that have been categorised as main rivers in the District and have been sources of flooding in the past. Additionally, 55% of the District at or below sea level and the majority of Districts 41km coastline lies below the mean high water mark.<sup>27</sup>
- 1.39 Virtually all of the Romney Marsh area is within flood zone 3 due to its topography (see **Figure 4.2**). However, the degree of risk varies significantly within the area, being dependent on factors such as topography, hydrological features and position in relation to flood defences.

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<sup>18</sup> Shepway District Council (2013) Annual Monitoring Report

<sup>19</sup> Cool Tourism (2015) The Economic Impact of the Kent Visitor Economy 2013

<sup>20</sup> Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Fauna and Flora

<sup>21</sup> Natural England (2014) Condition of SSSI units [online] available at: <http://www.sssi.naturalengland.org.uk/special/ssi/report.cfm?category=R,RF>

<sup>22</sup> Shepway District Council (2011) Annual Monitoring Report

<sup>23</sup> Shepway District Council (2011) Shepway Rural Services Study

<sup>24</sup> Defra, Air Quality Management Areas [online] available at: <http://aqma.defra.gov.uk/aqma/home.html> Accessed 23rd January 2016

<sup>25</sup> Herrington Consulting Ltd (2015) Strategic Flood Risk Assessment Shepway District Council

<sup>26</sup> Shepway District Council (2016) Flooding <http://www.shepway.gov.uk/flooding> Accessed 23rd May 2017

<sup>27</sup> Herrington Consulting Ltd (2015) Strategic Flood Risk Assessment Shepway District Council

- 1.40 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. A number of Source Protection Zones have been established, mainly in the north of the District, to protect groundwater quality in sensitive areas.<sup>28</sup>
- 1.41 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. 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 Lymgne 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.<sup>29</sup>
- 1.42 As Shepway falls within a designated Water Scarcity Status Area, water efficiency measures are appropriate in new development and supported by the Environment Agency.<sup>30</sup>

### Key Sustainability Issues and their Likely Evolution without the PPLP

- 1.43 The SEA Regulations (Schedule 2) require that the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme are described. **Table 1** distils the baseline into the key sustainability considerations of the plan area and describes the likely evolution of each key sustainability issue if the Shepway PPLP were it not to be adopted.

**Table 1: Summary table of key sustainability issues**

Key sustainability issues	Likely evolution of the issues without the Shepway PPLP
<p><b>Climatic factors and energy</b></p> <p>The need to meet national carbon reduction targets.</p> <p>The sensitivity of the natural environment in Shepway may limit the number of acceptable locations for further large scale renewable energy developments.</p> <p>Hotter, drier summers expected under climate change have the potential for adverse effects on human health.</p>	<p>Continued population growth and economic growth are likely to continue to increase energy consumption and associated CO<sub>2</sub> emissions.</p> <p>In the absence of the PPLP, 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 even tighter energy efficiency and carbon reduction requirements for new buildings. However, without a planned approach to development through a Local Plan, there is less opportunity to adopt a co-ordinated, spatial approach that would help to manage health and environmental risks.</p> <p>The PPLP can contribute to energy efficiency and climate change mitigation through policies which require higher energy efficiency standards (e.g. for larger allocations); provide a positive policy approach to the consideration of renewable energy applications; implement climate change adaptation through appropriate building design and the identification of less vulnerable locations; and ensure that less environmentally sensitive locations are chosen, thereby reducing development pressure on wildlife which may already be under pressure from climate change.</p>
<p><b>Flood risk</b></p> <p>Risk of flooding is a major concern in Shepway with</p>	<p>The severity and likelihood of flooding is likely to increase with current trends of climate change.</p>

<sup>28</sup> Shepway District Council (2011) Shepway Water Cycle Study

<sup>29</sup> Shepway District Council (2011) Shepway Water Cycle Study

<sup>30</sup> Shepway District Council (2013) Shepway Core Strategy, Policy SS6

Key sustainability issues	Likely evolution of the issues without the Shepway PPLP
<p>55% of the District at or below sea level.</p> <p>The expected magnitude and probability of significant fluvial, tidal, ground and surface water flooding is increasing in the District due to climate change.</p> <p>Coastal erosion and the associated flood risks are a considerable spatial constraint on new development in the District.</p>	<p>Without the PPLP, 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 <i>"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"</i> (Para 100).</p>
<p><b>Population and human health</b></p> <p>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.</p> <p>Shepway suffers from high levels of disability / long term illness, reflecting, in part, the relatively high proportion of older people living in the District.</p> <p>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.</p> <p>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.</p>	<p>The issues described to the left are likely to continue without appropriate policy responses.</p> <p>The NPPF states that <i>"local planning authorities should work with public health leads and health organisations to understand and take account of the health status and needs of the local population (such as for sports recreation and places of worship), including expected future changes, and any information about relevant barriers to improving health and well-being"</i> (Para 171). Despite this, the spatial distribution of deprivation and social exclusion in Shepway 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.</p>
<p><b>Housing</b></p> <p>There are key challenges to housing delivery including the development restrictions posed by the Kent Downs AONB and a lack of large sites, which limits the potential to deliver affordable housing.</p> <p>Lack of affordability of housing is a growing issue in the District.</p>	<p>The on-going lack of affordable housing is likely to lead to many people being priced out of the market.</p> <p>Although the NPPF states that local authorities should <i>"plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes)"</i> (Para 50), 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. 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.</p>
<p><b>Economy and labour market</b></p> <p>Shepway's economic growth is relatively poor. It has suffered from a decline in manufacturing, a dependence on relatively low paid and seasonal tourism jobs and on nuclear power generation at Dungeness.</p> <p>Unemployment in general and youth unemployment in particular are high in Shepway and many of the jobs available are relatively low paid.</p> <p>Shepway has relatively low levels of educational attainment and skills which could hinder economic growth in the District.</p> <p>Parts of Folkestone, notably several areas of the 'secondary frontage' suffer from high vacancy rates</p>	<p>Shepway's economy is lagging behind that of others in the South East.</p> <p>The NPPF states <i>"the Government is committed to securing economic growth in order to create jobs and prosperity, building on the country's inherent strengths, and to meeting the twin challenges of global competition and of a low carbon future"</i> (Para 18). Therefore, without the Local Plan this issue is being addressed to some extent by other policy.</p> <p>Despite this, Shepway's economy is likely to continue to lag behind others without coordinated action from the PPLP to promote regeneration of its town, provision of appropriate employment space and access to education and training.</p>

Key sustainability issues	Likely evolution of the issues without the Shepway PPLP
of retail premises.	
<p><b>Open space</b></p> <p>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.</p>	<p>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.</p> <p>Without a 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.</p>
<p><b>Historic environment</b></p> <p>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.</p>	<p>Continued development pressure means that the risk of harm to heritage assets would be likely to continue and may be exacerbated without a planned local approach to development.</p> <p>In the absence of a Local Plan, issues are likely to continue to 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.</p>
<p><b>Landscape and townscape</b></p> <p>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.</p>	<p>Pressures on local landscapes are likely to increase with the rising population of the District, new development and climate change.</p> <p>Without the Local Plan, there is increased potential for a rise in direct pressures on wildlife as well as less opportunity to adopt a co-ordinated, spatial approach to the development of open green spaces/green networks for recreation, walking and cycling networks, and wildlife.</p>
<p><b>Biodiversity</b></p> <p>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.</p>	<p>With the population of the District increasing, pressure on recreation and wildlife areas is likely to be exacerbated.</p> <p>Paragraph 109 of the NPPF seeks to minimise impacts on biodiversity and provide net gains in biodiversity where possible, which may afford some protection to the SSSIs and local designations in the District. Furthermore Paragraph 118 of the NPPF requires that to conserve wildlife and cultural heritage in designated areas (National Parks, the Broads and Areas of Outstanding Natural Beauty) permission should be refused for major developments except in exceptional circumstances and where it can be demonstrated to be in the public interest. The Habitats and Birds Directives provide protection to the internationally designated biodiversity sites and certain species in proximity to the District.</p> <p>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 designated to steer recreational pressures 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. 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.</p> <p>The severity and likelihood of adverse impacts on local ecosystems is also likely to increase with predicted climate change. Without an up-to-date</p>

Key sustainability issues	Likely evolution of the issues without the Shepway PPLP
	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.
<p><b>Air pollution</b></p> <p>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.</p>	<p>The need to travel by unsustainable modes and associated emission of air pollutants is likely to increase without action from a Local Plan to direct development to sustainable locations and to increase provision of sustainable transport infrastructure.</p> <p>However, 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 Plan has a lead role to play in managing transport related issues and its objective 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.</p>
<p><b>Soil</b></p> <p>Shepway contains some of the most productive agricultural land in the South East but this could be lost to development.</p> <p>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.</p> <p>Shepway contains valuable sand and gravel reserves which could be sterilised by development.</p>	<p>The NPPF requires local planning authorities to take into account the benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be used in preference to those of a higher quality.</p> <p>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.</p> <p>In relation to minerals, the NPPF requires local planning authorities to avoid needlessly sterilising known locations of minerals resources of local and national importance by non-mineral development. The Kent Minerals and Waste Local Plan<sup>31</sup> 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.</p>
<p><b>Water quality</b></p> <p>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.</p>	<p>Population growth, together with the hotter, drier summers expected under climate change, are likely to put ever greater pressure on the District's water resources.</p> <p>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.</p>
<p><b>Water resources</b></p> <p>There is potentially insufficient capacity in the strategic link wastewater connection between the Wastenhanger and Lympe area and the Sellindge WwTW.</p> <p>Drinking water is a scarce resource in the District and population and household growth will place further pressure on this resource.</p>	

<sup>31</sup> Kent County Council (2016) Kent Minerals and Waste Local Plan 2013-30

Key sustainability issues	Likely evolution of the issues without the Shepway PPLP
<p><b>Transport</b></p> <p>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.</p> <p>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.</p>	<p>The need to travel is likely to increase and car dependence is likely to continue without action from the Local Plan to direct development to sustainable locations and increase provision of sustainable transport infrastructure.</p>

## Sustainability Appraisal Framework

- 1.44 Schedule 2(6) of the SEA Regulations 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).*
- 1.45 The development of a set of SA objectives is a recognised way in which the likely environmental and other sustainability effects of a plan can be described, analysed and compared. The SA has therefore taken an 'objectives-led' approach to the assessment i.e. the Shepway PPLP policies and allocations have been assessed in relation to a framework of sustainability objectives and supporting assessment criteria (known as the 'SA framework').
- 1.46 The SA framework that was developed for the SA of the Shepway Core Strategy has been used as the starting point for the SA framework for the PPLP. It has been amended to reflect an up to date assessment of sustainability issues facing the District as well as the different scope of the PPLP (i.e. containing site allocations and development management policies rather than strategic policies and allocations). The objectives were consulted on during the SA Scoping stage and the representations received were considered when deciding whether any amendments were required to the SA objectives, supporting assessment criteria and detailed assumptions for SA of site allocations. LUC's response to each of the consultation comments is documented in **Appendix 3** of the full SA Report.
- 1.47 The framework of SA objectives is set out in **Table 2**. The SA framework also provides indicative appraisal questions to illustrate the types of consideration that were relevant when assessing Plan policies and allocations against them. A few minor changes were made to the SA framework following the consultation on the SA Scoping Report in 2014. These minor changes are described in **Appendix 3** of the full SA Report.

**Table 2: SA Framework objectives and appraisal questions**

SA Objective Reference	SA Objective	Appraisal questions: will the Plan/option lead to...?
SA1	Reduce the risk of flooding, taking into account the effects of climate change.	<p>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?</p> <p>Development which has regard to the Shepway Strategic Flood Risk Assessment?</p> <p>Development which incorporates SuDS (including their long-term maintenance) to reduce the rate of run-off and reduce the risk of</p>

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



SA Objective Reference	SA Objective	Appraisal questions: will the Plan/option lead to...?
		<p>community?</p> <p>Enhanced vitality and vibrancy of town centres?</p> <p>Expansion or upgrading of key visitor attractions?</p> <p>Employment opportunities which address the economic consequences of the de-commissioning of Dungeness nuclear power station?<sup>32</sup></p> <p>Provision of high quality employment sites and associated infrastructure suitable for the likely continuation in a shift from manufacturing to higher skill, service industries.</p>
SA7	Conserve and enhance the fabric and setting of historic assets.	<p>Development that avoids negative effects on listed buildings, conservation areas, scheduled ancient monuments, registered historic parks and gardens, and registered battlefields and their settings)?</p> <p>Development that is well related to the natural environment and characteristic scale, form materials and detailing of the settlement and contributes to a sense of place?</p> <p>Promotes the enhancement of the archaeological resource and other aspects of heritage, such as, parks and open spaces, and areas with a particular historical or cultural association?</p> <p>Opportunities for the enhancement of historic assets, townscapes and landscapes?</p>
SA8	Conserve, and where relevant enhance, the quality, character and local distinctiveness of the landscape and townscape.	<p>Areas of the highest landscape sensitivity being provided with the highest level of policy protection?</p> <p>Development which considers the existing character, form and pattern of the landscape, buildings and settlements?</p> <p>The protection and enhancement of local distinctiveness and contribution to a sense of place?</p> <p>The provision of and maintenance towards green infrastructure assets and networks (including green open space and river/canal corridors) and ensure that this is linked into new and existing developments, to improve the connectivity of green spaces and green networks?</p>
SA9	Conserve and enhance biodiversity, taking into account the effects of climate change.	<p>Avoidance of net loss, damage to, or fragmentation of designated and non-designated wildlife sites and habitats?</p> <p>Opportunities to enhance habitats for protected species and priority species identified in the Kent BAP or the England Biodiversity Strategy 2020?</p> <p>Opportunities for people to come into contact with robust wildlife places whilst encouraging respect for and raising awareness of the sensitivity of these sites?</p> <p>Development which includes the integration of ecological conditions and contributes to improvement in ecological connectivity in rural and urban areas?</p> <p>The maintenance and enhancement of the four large scale ecological networks in the District?</p> <p>N.B. Climate change is likely to impact upon habitats and thereby biodiversity. Plan policies which achieve the goals listed above should all help to enhance the ability of wildlife to adapt to a changing climate.</p>
SA10	Reduce the need to travel; increase opportunities to choose sustainable transport modes and avoid development that	<p>A complementary mix of land uses within compact communities that minimises the length of journeys to services and employment, increases the proportion of journeys made on foot or by cycle, and are of a sufficient density to support local services and public transport provision?</p> <p>Development in locations well served by public transport, cycle paths</p>

<sup>32</sup> Power generation at Dungeness 'A' finished in 2006; that at Dungeness 'B' is currently scheduled for 2018 but EDF has applied to extend this to 2028; employment levels at the site are typically maintained for several years after operation ceases to carry out de-commissioning.

SA Objective Reference	SA Objective	Appraisal questions: will the Plan/option lead to...?
	will result in significant traffic congestion.	and walking routes? Support for the objectives of the Shepway Cycling Plan?
SA11	Use land efficiently and safeguard soils, geology and economic mineral reserves.	Development that avoids high quality agricultural land? The remediation of contaminated sites? Development on brownfield sites? Development that protects soil processes and functions? Development that protects sites valued for their geological characteristics? Development that avoids sterilising economic mineral reserves?
SA12	Maintain and improve the quality of groundwater, surface waters and coastal waters and the hydromorphological (physical) quality of rivers and coastal waters.	Development that will not lead to the deterioration of: the quality of groundwater, surface waters or coastal waters; the physical quality of rivers and coastal waters; Water Framework Directive status? Development where adequate foul drainage, sewage treatment facilities and surface water drainage are available? Development which incorporates SuDS (including their long-term maintenance) to reduce and the risk of combined sewer overflows and to trap and break down pollutants?
SA13	Use water resources efficiently.	Development where adequate water supply is available? Water efficient design and reduction in water consumption (e.g. rainwater recycling/grey water reuse and BREEAM/ EcoHomes Excellent Standard)?
SA14	Protect and enhance green infrastructure and ensure that it meets local needs.	The provision and maintenance of green infrastructure assets and networks (including green open space and river/canal corridors) and ensure that this is linked into new and existing developments, to improve the connectivity of green spaces and green networks? N.B. The East Kent Green Infrastructure (GI) Working Group has identified an East Kent GI Typology which encompasses the following GI types:- <ul style="list-style-type: none"> <li>• Biodiversity e.g. Natura 2000 sites, SSSIs, LNRs, Local Wildlife Sites</li> <li>• Civic Amenity e.g. parks, allotments, cemeteries</li> <li>• Linear features e.g. the Royal Military Canal, railway corridors.</li> </ul> The full list of GI components of this typology is available from the Shepway GI Report, 2011.

- 1.48 The findings of the development site alternatives, site allocations and development management policies of the Preferred Options version of the PPLP (as well as the SA of the policy options in the Issues and Options version of the PPLP,) are presented in SA matrices, which include a colour coded symbol showing the score for the site against each of the SA objectives along with a concise justification for the score given. The detailed SA matrices are presented in **Appendices 6, 7 and 8**.

### Determining Significance

- 1.49 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.
- 1.50 The first 'Issues and Options' draft of the PPLP contained initial, high level options for policy direction and did not identify reasonable alternative site allocations. As such it was judged inappropriate to attempt to distinguish between minor and significant sustainability effects. Instead, commentary was provided on the likely type and direction (positive or negative) of effects on the baseline in relation to sustainability objectives. However, the 'Preferred Options'

and 'proposed Submission' versions of the PPLP contained more fully defined development management policies and site allocations, including reasonable alternatives.

- 1.51 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.
- 1.52 When applying the SA framework to potential allocations a series of assumptions were set out for each SA objective to show how the effects were identified and evaluated for each site option appraised. These were also consulted upon at the SA Scoping Stage and consultees' responses taken into account in making refinements to the assumptions. The use of assumptions to evaluate significance is a recognised technique in SA and ensures consistency in the SA of each potential site allocation. The SA assumptions are presented in Appendix 1 of the full SA Report.
- 1.53 While the SA objectives and appraisal questions remained the same, the detailed assumptions for the SA of the preferred site allocations and their reasonable alternatives were updated in 2016 to ensure that they were fit for purpose for the appraisal of more detailed preferred and alternative site allocations. The updated assumptions draw on relevant baseline data, available GIS data and reference documents where available, for example the latest guidance from Historic England. The same assumptions used in 2016 have been used to appraise the site options tested to inform the preparation of the proposed Submission Draft PPLP.
- 1.54 The use of colour coding in the matrices allows for likely significant effects (both positive and negative) to be easily identified, as shown in the key below. Mixed effects are recorded for an SA objective where there is potential for both positive and negative effects.

#### Key to symbols of effects used in the SA of the Shepway PPLP

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

#### Data limitations and difficulties encountered

- 1.55 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)).
- 1.56 The first 'Issues and Options' draft of the Shepway PPLP sought to gather early opinions on issues facing the District and on possible ways in which the Plan might address these. As such, the first draft lacked details and contained few concrete proposals which could be subject to SA.
- 1.57 There were no significant technical difficulties encountered during the preparation of the SA of the Preferred Options PPLP and proposed Submission Draft PPLP. Certain data limitations did arise during the course of the SA, notably:
- The sheer number of strategies, plans, programmes, policy documents, advice and guidance produced by a range of statutory and non-statutory bodies means that it has been impossible within the resources available to prepare the Scoping Report to consider every potentially

relevant document in detail. However, every effort has been made to draw out the key generic messages relevant to the preparation of the Local Plan and the SA.

- The actual impacts of policies will depend very much upon how they are applied in specific locations. Professional judgement has therefore had to be applied to identify likely effects of implementing strategic policies. For sites, a series of assumptions have been used as a guide to ensure consistency in the identification of the nature of the effects on each SA objective (see **Appendix 1**).
- The appraisal process included a considerable amount of liaison between LUC as the SA consultants and the officers at Shepway District Council, particularly with respect to the appraisals of the site allocations and reasonable alternatives. There have been a number of alterations to the number of sites, and also the site boundaries, as well as the development proposed for each site, and the policy criteria applying to them. This has happened throughout the SA process. All reasonable effort has been made to ensure that the final version of this SA Report reflects the final version of the proposed Submission Local Plan in order to reduce the likelihood of errors being reported.
- Similarly, the evidence base upon which effects have been identified has continued to evolve and was often updated throughout the plan preparation process. All reasonable effort has been made to ensure that the final version of this SA Report reflects the latest evidence base.

## SA Findings for the Issues and Options Version of the Plan

- 1.58 The first 'Issues and Options' draft of the PPLP contained initial, high level options for policy direction, for example general new housing and infrastructure distribution and development management policy topics, and did not identify reasonable alternatives. Therefore, minor and significant sustainability effects were not identified. Instead, commentary was provided on the likely type and direction (positive or negative) of effects on the baseline in relation to sustainability objectives.
- 1.59 LUC identified a number of opportunities to clarify the policy options, to strengthen their potential positive sustainability effects or to avoid or mitigate their potential negative sustainability effects. These recommendations are presented in Appendix 1 of the SA Report which accompanied the Issues and Option version of the PPLP.
- 1.60 The SA findings for the first 'Issues and Options' draft PPLP are summarised in **Chapter 6** of the full SA Report, including an assessment of the potential cumulative impacts of the PPLP options when taken together. A detailed appraisal of the options is included in **Appendix 6**.

## SA Findings for the Development Site Alternatives

- 1.61 **Chapter 7** of the SA Report sets out the findings of the SA of preferred and reasonable alternative site allocations (policy-off) considered to date, including reasonable site options proposed before and after the consultation on the Preferred Options version of the PPLP.
- 1.62 LUC appraised all preferred allocations and reasonable alternatives for development in the PPLP before the Council had drafted detailed preferred allocation policies for inclusion in the Preferred Options version of the PPLP published for consultation in October 2016. A policy-off approach to the appraisal was taken, i.e. the principle of housing development on each site was appraised without consideration of the measures that might be implemented at each site to mitigate adverse effects or enhance positive effects.<sup>33</sup> The aim of these policy-off appraisals was to objectively assess the effects of the principle of development of each site on a consistent basis so that each could be given due consideration for allocation prior to consideration of policy measures and the identification of preferred allocations.

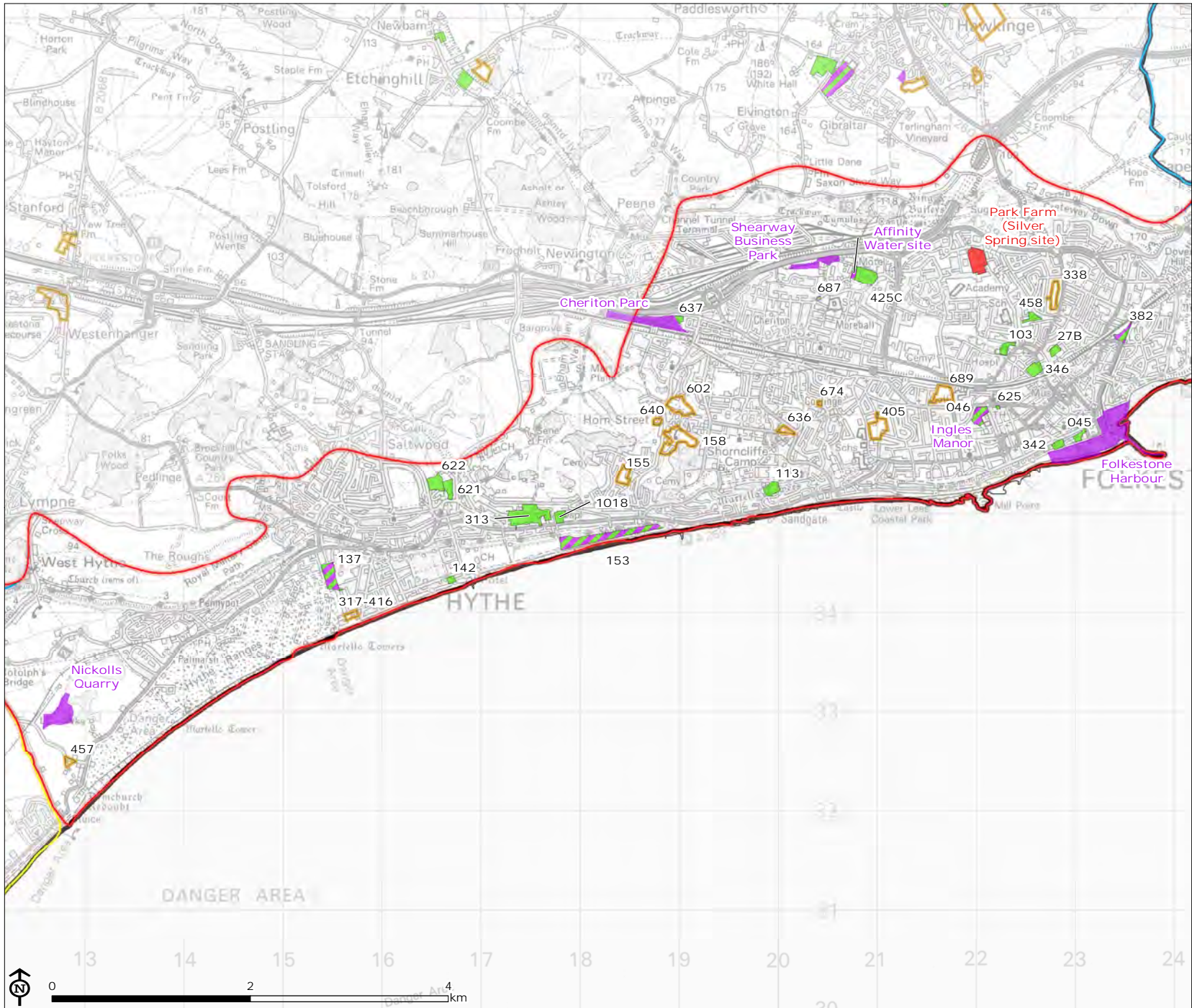
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<sup>33</sup> Adopted Core Strategy Policies were taken into consideration where appropriate, e.g. effects of affordable housing and Lifetime Homes policies were taken into account in appraising sites for effects in relation to SA5.

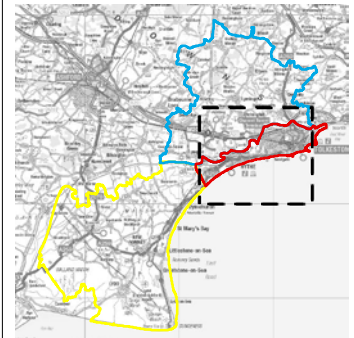
- 1.63 All sites were appraised to the same level of detail using the SA site assumptions outlined in **Appendix 1** of the full SA Report. Where significant adverse effects were identified, appropriate recommendations were made on how these might be mitigated at each site. Individual appraisal matrices for each site can be found in **Appendix 7** of the full SA Report.
- 1.64 The policy-off site appraisals were used by SDC to inform the selection and definition of the preferred site allocation policies published within the Preferred Options version of the PPLP and subsequently, following consultation in late 2016, to define the site allocation policies in the Proposed Submission version of the PPLP. **Figures 8, 9 and 10** illustrate the location of the site options that have been selected for allocation in the proposed Submission PPLP and the reasonable alternatives that were appraised alongside them.
- 1.65 The significant effects of the tested site options are set out below and summarised in **Table 3**. Some of the SA objectives have been broken down into multiple sub objectives with separate scores to draw out variations in effects associated with different environmental constraints. The two far right hand columns of the table count the number of significant negative and positive effects scored by each site to help make it easier to compare the performance of the sites selected for allocation in the proposed Submission Draft PPLP and the sites that were not selected for allocation. These are a useful indication of which sites perform most positively against the SA objectives and criteria, but care should be applied in using them as they are heavily weighted towards environmental topics in terms of the number of objectives and criteria, as opposed to social and economic.

# Shepway Places and Policies Local Plan Sustainability Appraisal

Figure 8: Proposed Submission Allocations and Reasonable Alternatives



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



Source: OS, Shepway District Council,

Map Scale @ A4: 1:55,000



Shepway Places and Policies Local Plan Sustainability Appraisal

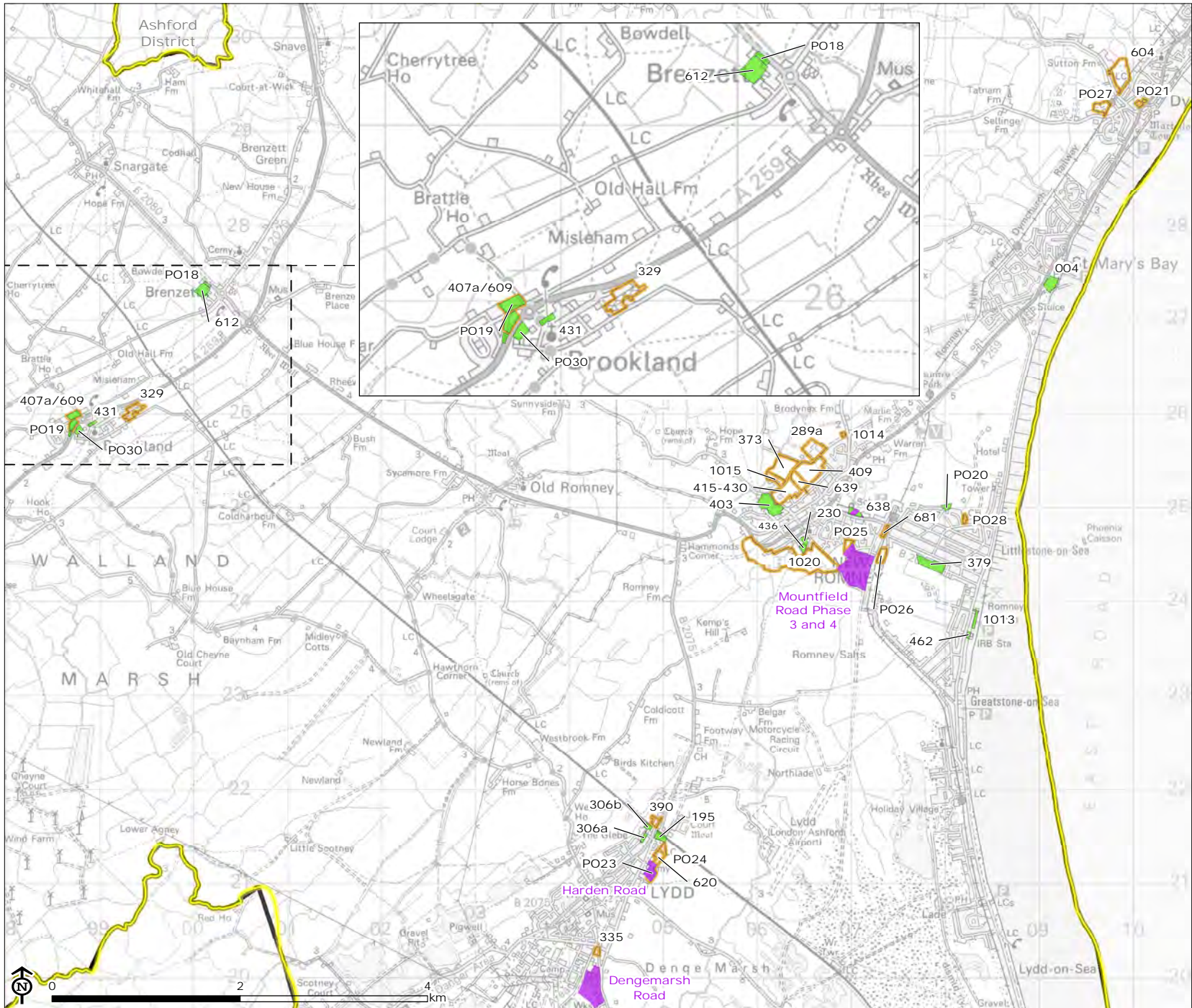
Figure 9: Proposed Submission Allocations and Reasonable Alternatives

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



Source: OS, Shepway District Council,

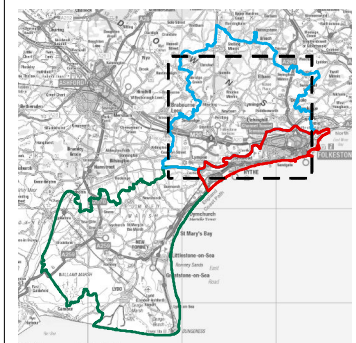
Map Scale @ A4: 1:58,000



# Shepway Places and Policies Local Plan Sustainability Appraisal

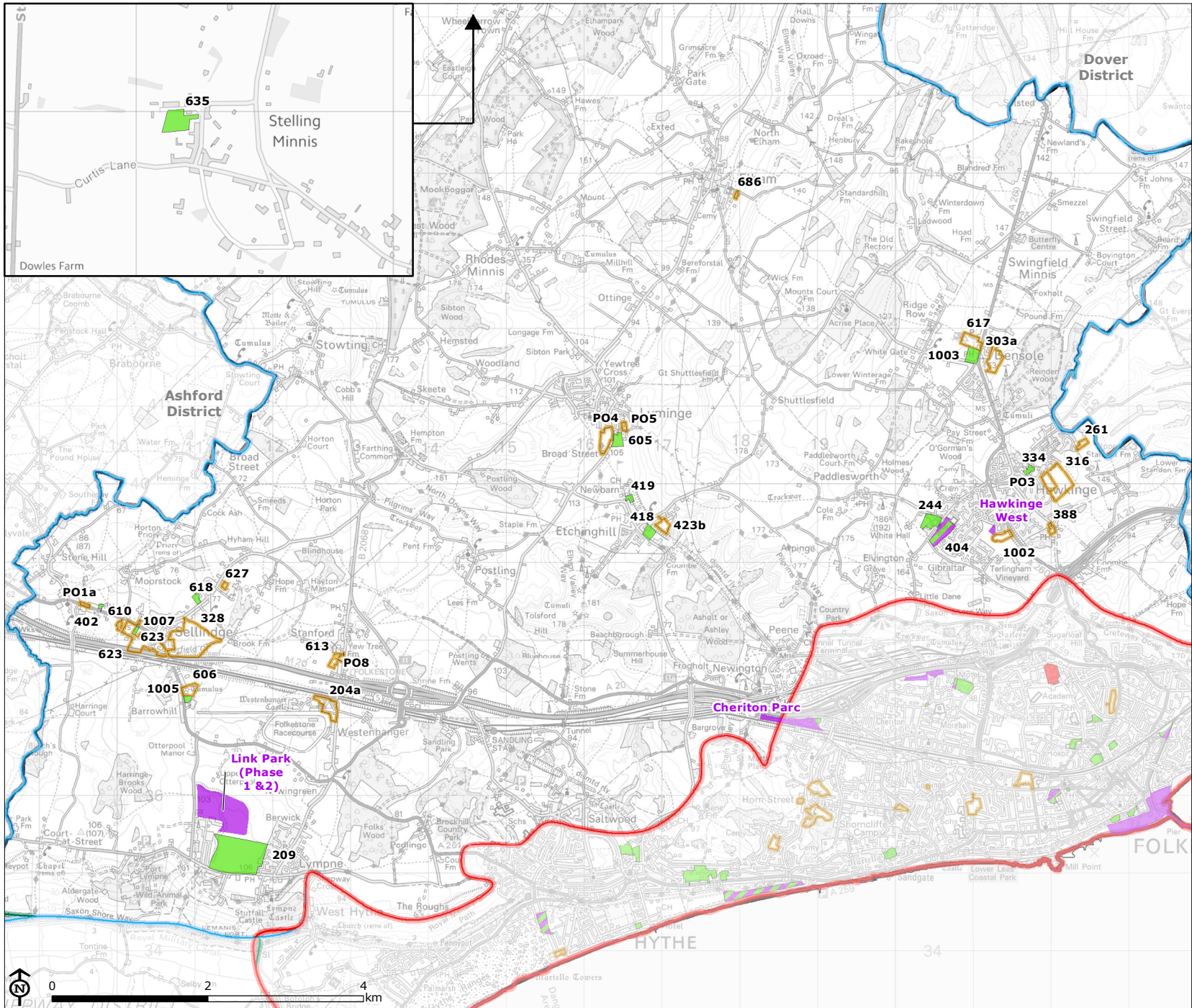
**Figure 10: Proposed Submission Allocations and Reasonable Alternatives**

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



Source: OS, Shepway District Council,

**Map Scale @ A4: 1:70,000**





**Table 3: Summary table illustrating policy-off SA scores of development site alternatives**

Sites	SA 1: Flood Risk	SA 2: Climate Change Mitigation	SA 3: Community vibrancy, services and facilities	SA 4: Crime Reduction	SA 5(a) : Affordable Housing	SA 5(b) : Housing for Older People	SA 6: Employment Opportunities	SA 7: Historic Environment	SA 8(a) : Landscape Character	SA 8(b) : Settlement Coalescence	SA 8(c) : Townscape Regeneration	SA 9: Biodiversity	SA 10(a): Reduce the Need to Travel	SA 10(b): Sustainable Transport Modes	SA 11(a): Efficient Use of Land	SA 11(b): Soil Quality	SA 11(c): Land Contamination	SA 11(d): Minerals and Geology Safeguarding	SA 12: Water Quality	SA 13: Water Efficiency	SA 14: Open Space	No. of significant positive effects (++)	No. of significant negative effects (--)
<b>Proposed Submission Draft Allocation Sites<sup>34</sup></b>																							
004	--	0	0	0	++	++	0	-?	0	0	++?	--	0	++	+	0	0	?	0	0	0	4	2
27B	0	0	++	0	++	++	++	-?	0	0	0	0	++	++	-	0	0	0	0	0	--?	6	1
045 <sup>35</sup>	0	0	++	0	++	++	++	--?	0	0	++?	0	++	++	+	0	0	?	0	0	0	7	1
046	0	0	+	0	++	++	++	--?	0	0	++?	0	++	++	+	0	0	0	0	0	0	6	1
103	-	0	+	0	++	++	++	0	0	0	++?	--	++	++	+	0	++	0	0	0	0	7	1
113	0	0	0	0	++	++	++	-?	0	0	++?	--	++	++	+	0	0	0	0	0	0	6	1
137	--	0	+	0	++	++	++	-?	0	0	++?	-?	++	++	+	0	++	?	0	0	0	7	1
142	--	0	+	0	++	++	+	0	0	0	++?	0	+	0	+	0	0	0	0	0	0	3	1
153	--	0	0	0	++	++	0	--?	-?	0	++?	--	0	++	+	0	++	?	0	0	--?	5	4
195	0	0	0	0	++	++	++	--	0	0	++?	-?	++	++	+	0	0	?	0	0	0	6	1
209	0	0	+	0	++	++	++	--?	-?	--?	0	-?	++	++	0	0	++	?	-?	0	0	6	2
244	0	0	0	0	++	++	0	-?	--?	0	++?	0	0	++	+	-	0	?	-?	0	0	4	1
306a	0	0	0	0	+	++	++	-?	0	0	0	-?	++	++	-	0	0	0	0	0	0	4	0
313 <sup>36</sup>	0	0	0	0	++	++	+	-?	-?	0	0	--	+	++	+	0	0	?	0	0	0	3	1
334	0	0	+	0	++	++	0	-?	-?	0	0	0	0	++	-	-	0	0	-?	0	0	3	0
342 <sup>37</sup>	0	0	++	0	++	++	++	--?	0	0	++?	--	++	++	+	0	0	0	0	0	--?	7	3

<sup>34</sup> This section lists the SHLAA sites selected for inclusion within site allocation policies within the proposed Submission Draft PPLP.

<sup>35</sup> SHLAA Sites 045 and 342 were merged into preferred site allocation UA7.

<sup>36</sup> SHLAA Sites 313 and 1018 were merged into preferred site allocation UA24

Sites	SA 1: Flood Risk	SA 2: Climate Change Mitigation	SA 3: Community vibrancy, services and facilities	SA 4: Crime Reduction	SA 5(a) : Affordable Housing	SA 5(b) : Housing for Older People	SA 6: Employment Opportunities	SA 7: Historic Environment	SA 8(a) : Landscape Character	SA 8(b): Settlement Coalescence	SA 8(c) : Townscape Regeneration	SA 9: Biodiversity	SA 10(a): Reduce the Need to Travel	SA 10(b): Sustainable Transport Modes	SA 11(a): Efficient Use of Land	SA 11(b): Soil Quality	SA 11(c): Land Contamination	SA 11(d): Minerals and Geology Safeguarding	SA 12: Water Quality	SA 13: Water Efficiency	SA 14: Open Space	No. of significant positive effects (++)	No. of significant negative effects (--)
346	-	0	++	0	++	++	++	-?	0	0	+++?	0	++	++	+	0	?	0	0	0	0	7	0
379 <sup>38</sup>	--	0	0	0	++	++	++	-?	0	0	0	-?	++	++	-	0	0	?	0	0	0	5	1
382	0	0	+	0	++	++	++	-?	0	0	+++?	0	++	++	+	0	++	0	0	0	0	7	0
402 <sup>39</sup>	0	0	0	0	+	0	0	-?	0	0	+++?	-?	0	++	+	--	0	?	0	0	0	2	1
403	--	0	+	0	++	++	+	-?	0	0	0	0	+	++	-	0	0	0	0	0	0	3	1
404	0	0	0	0	++	++	0	--?	--?	0	+++?	0	0	++	+	-	+++?	0	-?	0	0	5	2
418	0	0	0	0	++	++	0	-?	--?	0	0	-?	0	++	-	0	0	0	0	0	0	3	1
419	0	0	0	0	++	++	0	-?	-?	0	0	0	0	++	-	-	0	0	-?	0	0	3	0
425C	0	0	+	0	++	++	++	-?	0	0	+++?	0	++	++	+	-	0	0	-?	0	0	6	0
431	--	0	0	0	+	0	0	--?	0	0	+++?	0	0	++	+	--	0	0	0	0	0	2	3
436/230 <sup>40</sup>	0	0	+	0	+	++	++	-?	0	0	0	0	++	++	-	0	0	0	0	0	0	4	0
451b/306b	0	0	0	0	+	++	++	-?	0	0	0	-	++	++	-	0	0	0	0	0	0	4	0
458	0	0	+	0	++	++	++	-?	0	0	+++?	0	++	++	+	0	0	0	0	0	0	6	0
462	--	0	0	0	+	0	0	-?	0	0	0	--	0	++	-	0	0	0	0	0	0	1	2
605	0	0	+	0	++	++	0	--?	--?	-?	0	0	0	++	-	-	0	0	-?	0	0	3	2
612	--	0	+	0	++	++	0	-?	0	0	0	0	0	++	-	--	0	0	0	0	0	3	2
618 <sup>41</sup>	0	0	0	0	++	++	0	-?	0	0	0	0	0	++	-	--	0	0	0	0	0	3	1

<sup>37</sup> SHLAA Sites 045 and 342 were merged into preferred site allocation UA7.

<sup>38</sup> SHLAA Site 379 has reduced in size into preferred site allocation RM2.

<sup>39</sup> SHLAA Sites 402, 618, 627, 1005 and 1007 were merged into preferred site allocation ND6.

<sup>40</sup> SHLAA Site 436 was expanded to include SHLAA site 230 as preferred site allocation RM3.

Sites	SA 1: Flood Risk	SA 2: Climate Change Mitigation	SA 3: Community vibrancy, services and facilities	SA 4: Crime Reduction	SA 5(a) : Affordable Housing	SA 5(b) : Housing for Older People	SA 6: Employment Opportunities	SA 7: Historic Environment	SA 8(a) : Landscape Character	SA 8(b): Settlement Coalescence	SA 8(c) : Townscape Regeneration	SA 9: Biodiversity	SA 10(a): Reduce the Need to Travel	SA 10(b): Sustainable Transport Modes	SA 11(a): Efficient Use of Land	SA 11(b): Soil Quality	SA 11(c): Land Contamination	SA 11(d): Minerals and Geology Safeguarding	SA 12: Water Quality	SA 13: Water Efficiency	SA 14: Open Space	No. of significant positive effects (++)	No. of significant negative effects (--)
621	0	0	+	0	++	++	+	-?	0	0	0	0	+	++	-	0	0	0	0	0	0	3	0
622 <sup>42</sup>	0	0	+	0	++	++	+	-?	-?	0	0	--	+	++	-	0	0	?	0	0	0	3	1
625	0	0	+	0	++	++	++	-?	0	0	+++?	0	++	++	+	0	0	0	0	0	0	6	0
635	0	0	0	0	+	0	0	-?	--?	0	0	-?	0	++	-	-	0	?	0	0	0	1	1
637	0	0	0	0	++	++	0	-?	0	0	+++?	0	0	++	+	0	0	0	0	0	0	4	0
638	--	0	+	0	++	++	++	0	0	0	+++?	0	++	++	+	0	0	0	0	0	0	6	1
656	0	0	+	0	++	++	++	0	0	0	+++?	-?	++	++	+	0	++	0	0	0	0	7	0
687	0	0	+	0	++	++	+	-?	0	0	+++?	0	+	++	+	0	0	0	-?	0	0	4	0
1003/ 385 <sup>43</sup>	0	0	0	0	++	++	0	-?	--?	0	0	0	0	++	-	-	0	0	-?	0	0	3	1
1005 <sup>44</sup>	0	0	0	0	++	++	0	-?	0	0	0	0	0	++	-	--	0	?	0	0	0	3	1
1007 <sup>45</sup>	0	0	0	0	+	0	0	-?	0	0	0	0	0	++	+	--	0	?	0	0	0	1	1
1013	--	0	0	0	++	++	0	-?	0	0	+++?	--	0	++	+	0	0	?	0	0	0	4	2
1018 <sup>46</sup>	0	0	0	0	++	++	0	-?	0	0	+++?	-?	0	++	+	0	0	?	0	0	0	4	0
PO18	--	0	+	0	+	0	0	-?	0	0	0	0	0	++	-	--	0	0	0	0	0	1	2
PO19	--	0	0	0	++	++	0	-?	0	0	0	0	0	++	-	--	0	0	0	0	0	3	2
PO20	--	0	0	0	+	++	++	-?	0	0	0	-?	++	++	-	-	0	0	0	0	0	5	1
PO30	--	0	0	0	+	++	0	-?	0	0	0	0	0	++	-	--	0	0	0	0	0	2	2

<sup>41</sup> SHLAA Sites 402, 618, 627, 1005 and 1007 were merged into preferred site allocation ND6.

<sup>42</sup> SHLAA Site 622 was expanded into preferred site allocation UA23.

<sup>43</sup> SHLAA Site 1003 was reduced in size into preferred site allocation ND11.

<sup>44</sup> SHLAA Sites 402, 618, 627, 1005 and 1007 were merged into preferred site allocation ND6.

<sup>45</sup> SHLAA Sites 402, 618, 627, 1005 and 1007 were merged into preferred site allocation ND6.

<sup>46</sup> SHLAA Sites 313 and 1018 were merged into preferred site allocation UA24.

Sites	SA 1: Flood Risk	SA 2: Climate Change Mitigation	SA 3: Community vibrancy, services and facilities	SA 4: Crime Reduction	SA 5(a) : Affordable Housing	SA 5(b) : Housing for Older People	SA 6: Employment Opportunities	SA 7: Historic Environment	SA 8(a) : Landscape Character	SA 8(b) : Settlement Coalescence	SA 8(c) : Townscape Regeneration	SA 9: Biodiversity	SA 10(a): Reduce the Need to Travel	SA 10(b): Sustainable Transport Modes	SA 11(a): Efficient Use of Land	SA 11(b): Soil Quality	SA 11(c): Land Contamination	SA 11(d): Minerals and Geology Safeguarding	SA 12: Water Quality	SA 13: Water Efficiency	SA 14: Open Space	No. of significant positive effects (++)	No. of significant negative effects (--)
Reasonable Alternative Sites <sup>47</sup>																							
155	0	0	0	0	++	++	0	-?	0	0	0	-?	0	++	-	0	0	?	0	0	-?	3	0
158	-	0	0	0	++	++	0	-?	0	--?	0	--	0	++	-	0	++	?	0	0	0	4	2
204A	0	0	0	0	++	++	0	--?	-?	0	0	0	0	++	+	--	0	?	-?	0	0	3	2
261	0	0	0	0	+	0	0	-?	--?	0	0	0	0	++	-	-	0	0	-?	0	0	1	1
289A	--	0	+	0	++	++	+	-?	0	0	+++?	0	+	++	+	0	0	?	0	0	0	4	1
303A	0	0	0	0	++	++	0	-?	--?	0	0	-?	0	++	-	--	0	?	-?	0	0	3	2
316	0	0	+	0	++	++	0	-?	--?	0	0	-?	0	++	-	-	0	?	-?	0	0	3	1
328	0	0	0	0	++	++	0	--?	0	--?	0	-?	0	++	-	--	0	?	0	0	0	3	3
329	--	0	0	0	++	++	0	-?	0	0	0	0	0	++	+	--	++	0	0	0	0	4	2
335	--	0	+	0	+	0	++	-?	0	0	0	--	++	++	-	0	0	?	0	0	0	3	2
338	0	0	+	0	++	++	++	-?	0	0	0	0	++	++	-	0	0	0	0	0	--?	5	1
373	--	0	+	0	++	++	+	-?	0	0	0	0	+	0	-	--	0	0	0	0	0	2	2
388	0	0	+	0	++	++	0	-?	--?	0	0	-?	0	++	0	-	0	0	-?	0	0	3	1
390	-	0	0	0	+	++	++	-?	0	0	+++?	-?	++	++	+	0	++	?	0	0	0	6	0
405	0	0	+	0	++	++	++	-?	0	0	0	0	++	++	-	0	0	0	0	0	--?	5	1
407a/ 609 <sup>48</sup>	--	0	0	0	++	++	0	-?	0	0	0	0	0	++	-	--	0	0	0	0	0	3	2
409	--	0	+	0	++	++	++	--?	0	0	0	0	++	++	-	0	0	?	0	0	0	5	2
415/4	--	0	+	0	++	++	++	-?	0	0	0	0	++	++	-	0	0	0	0	0	0	5	1

<sup>47</sup> This section lists the SHLAA sites not selected for inclusion within site allocation policies within the proposed Submission Draft PPLP.

<sup>48</sup> SHLAA Site 407a was expanded in size to include site 609 in preferred site allocation RM12.

Sites	SA 1: Flood Risk	SA 2: Climate Change Mitigation	SA 3: Community vibrancy, services and facilities	SA 4: Crime Reduction	SA 5(a) : Affordable Housing	SA 5(b) : Housing for Older People	SA 6: Employment Opportunities	SA 7: Historic Environment	SA 8(a) : Landscape Character	SA 8(b): Settlement Coalescence	SA 8(c) : Townscape Regeneration	SA 9: Biodiversity	SA 10(a): Reduce the Need to Travel	SA 10(b): Sustainable Transport Modes	SA 11(a): Efficient Use of Land	SA 11(b): Soil Quality	SA 11(c): Land Contamination	SA 11(d): Minerals and Geology Safeguarding	SA 12: Water Quality	SA 13: Water Efficiency	SA 14: Open Space	No. of significant positive effects (++)	No. of significant negative effects (--)
30																							
416	0	0	+	0	++	++	++	--?	0	0	+++?	--	++	0	+	0	++	?	0	0	0	6	2
423b	0	0	0	0	++	++	0	-?	-?	0	0	-?	0	++	-	0	0	0	0	0	0	3	0
457	--	0	0	0	+	++	0	--?	0	-?	0	--	0	++	-	0	++	?	-?	0	0	3	3
602	0	0	0	0	++	++	0	-?	0	--?	0	-?	0	++	-	0	0	?	0	0	0	3	1
604	--	0	+	0	++	++	0	-?	0	0	0	-?	0	++	-	--	0	0	0	0	0	3	2
606	0	0	0	0	++	++	0	--?	0	0	0	0	0	++	-	--	0	?	0	0	0	3	2
610	0	0	0	0	++	++	0	-?	0	-?	0	0	0	++	-	--	0	?	0	0	0	3	1
613	0	0	0	0	++	0	0	-?	0	0	+++?	0	0	++	+	-	0	?	-?	0	0	3	0
617	0	0	0	0	++	++	0	-?	--?	0	0	0	0	++	-	-	0	0	-?	0	0	3	1
620	-	0	0	0	++	++	++	-?	0	0	0	-?	++	++	-	0	0	?	0	0	0	5	0
623	0	0	0	0	++	++	0	--?	0	--?	0	0	0	++	-	--	0	?	0	0	0	3	3
627 <sup>49</sup>	0	0	0	0	+	0	0	-?	-?	0	0	-?	0	++	-	--	0	?	0	0	0	1	1
636	0	0	+	0	++	++	++	--?	0	0	+++?	0	++	++	+	0	0	0	0	0	0	6	1
639	--	0	+	0	++	++	++	--?	0	0	0	0	++	++	-	0	0	?	0	0	0	5	1
640	0	0	+	0	+	0	0	-?	-?	0	0	--	0	++	-	0	0	?	0	0	0	1	1
674	0	0	+	0	+	0	++	0	0	0	0	0	++	++	+	0	0	0	0	0	0	3	0
681	-	0	+	0	+	0	++	-?	0	0	+++?	0	++	++	+	0	++	0	0	0	0	5	0
686/1004	0	0	+	0	+	0	0	-?	--?	0	0	0	0	++	-	-	0	?	-?	0	0	1	1

<sup>49</sup> SHLAA Sites 402, 618, 627, 1005 and 1007 were merged into preferred site allocation ND6.

Sites	SA 1: Flood Risk	SA 2: Climate Change Mitigation	SA 3: Community vibrancy, services and facilities	SA 4: Crime Reduction	SA 5(a) : Affordable Housing	SA 5(b) : Housing for Older People	SA 6: Employment Opportunities	SA 7: Historic Environment	SA 8(a) : Landscape Character	SA 8(b): Settlement Coalescence	SA 8(c) : Townscape Regeneration	SA 9: Biodiversity	SA 10(a): Reduce the Need to Travel	SA 10(b): Sustainable Transport Modes	SA 11(a): Efficient Use of Land	SA 11(b): Soil Quality	SA 11(c): Land Contamination	SA 11(d): Minerals and Geology Safeguarding	SA 12: Water Quality	SA 13: Water Efficiency	SA 14: Open Space	No. of significant positive effects (++)	No. of significant negative effects (--)
689	0	0	+	0	++	++	++	-?	0	0	0	0	++	++	-	0	0	0	0	0	0	5	0
1002	0	0	+	0	++	++	0	-?	--?	0	0	-?	0	++	-	-	++	0	-?	0	0	4	1
1014	--	0	0	0	0	0	0	-?	0	0	0	0	0	++	-	0	0	0	0	0	0	1	1
1015	--	0	+	0	++	++	+	-?	0	0	0	0	+	0	-	0	0	0	0	0	0	2	1
1020	--	0	+	0	++	++	++	--?	0	0	0	0	++	++	-	--	0	0	0	0	0	5	3
PO1a	0	0	0	0	+	++	0	-?	0	0	0	0	0	++	-	--	0	?	0	0	0	2	1
PO3	0	0	+	0	++	++	0	-?	--?	0	0	0	0	++	-	-	0	?	-?	0	0	3	1
PO4	0	0	+	0	++	++	0	--?	--?	-?	0	0	0	++	-	--	0	0	-?	0	0	3	3
PO5	0	0	+	0	+	0	0	--?	--?	0	0	0	0	++	-	-	?	0	-?	0	0	1	2
PO8	0	0	0	0	++	++	0	-?	0	0	0	0	0	++	+	-	0	?	-?	0	0	3	0
PO21	--	0	+	0	+	0	0	-?	0	0	+++?	0	0	++	+	0	0	0	0	0	0	2	1
PO23	-	0	+	0	++	++	++	-?	0	0	+++?	-?	++	++	+	0	?	?	0	0	0	6	0
PO24	-	0	0	0	++	++	++	-?	0	0	+++?	-?	++	++	+	0	0	?	0	0	0	6	0
PO25	--	0	+	0	++	++	++	-?	0	0	0	--	++	++	-	-	0	0	0	0	0	5	2
PO26	--	0	+	0	++	++	++	-?	0	0	+++?	--	++	++	+	-	?	0	0	0	0	6	2
PO27	--	0	+	0	+	++	0	-?	0	0	+++?	-?	++	++	-	0	0	0	0	0	--?	4	2
PO28	--	0	+	0	++	++	++	-?	0	0	+++?	-	++	++	+	0	0	?	0	0	0	6	1

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

*Proposed Submission Draft PPLP sites*

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

*Reasonable alternative sites*

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

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

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

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

*Proposed Submission Draft PPLP sites*

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

*Reasonable alternative sites*

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

### **SA4: Reduce crime and the fear of crime**

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

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

#### **5(a) Affordable housing**

*Proposed Submission Draft PPLP sites*

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

*Reasonable alternative sites*

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

## **5(b) Dwellings for older people**

### *Proposed Submission Draft PPLP sites*

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

### *Reasonable alternative sites*

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

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

### *Proposed Submission Draft PPLP sites*

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

### *Reasonable alternative sites*

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

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

### *Proposed Submission Draft PPLP sites*

- 1.78 Approximately three quarters of the sites scored a minor negative but uncertain effect due to their scoring a 3 or 4<sup>50</sup> in KCC's heritage assessment. A lot of these sites are located within areas of general archaeological potential. Approximately one quarter of the sites scored a significant negative but uncertain effect due to their scoring a 1 or 2<sup>51</sup> in KCC's heritage assessment. A negligible effect was expected for the remaining sites.

### *Reasonable alternative sites*

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

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

## **8(a) Landscape**

### *Proposed Submission Draft PPLP sites*

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

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<sup>50</sup> Development of the proposed site is likely to have some impact on an asset or the setting of an asset which can be addressed through mitigation secured on any planning permission. And/or development of the proposed site is likely to have some minor impact on an asset or the setting of an asset which can be addressed through mitigation secured on any planning permission.

<sup>51</sup> Proposed site includes a significant asset and development is likely to have a major impact which should be avoided. And/or proposed site includes a significant asset and development is likely to have a significant impact or is very close to an asset and likely to significantly affect its setting – further more detailed assessment is needed prior to a decision.



*Reasonable alternative sites*

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

**8(b) Settlement character: coalescence**

*Proposed Submission Draft PPLP sites*

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

*Reasonable alternative sites*

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

**8(c) Townscape: regeneration**

*Proposed Submission Draft PPLP sites*

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

*Reasonable alternative sites*

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

**SA9: Conserve and enhance biodiversity**

*Proposed Submission Draft PPLP sites*

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

*Reasonable alternative sites*

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

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

**10(a) Reduce the need to travel**

*Proposed Submission Draft PPLP sites*

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

*Reasonable alternative sites*

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

**10(b) Increase opportunities to choose sustainable transport modes**

*Proposed Submission Draft PPLP sites*

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

*Reasonable alternative sites*

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

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

**11(a) Efficient use of land**

*Proposed Submission Draft PPLP sites*

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

*Reasonable alternative sites*

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

**11(b) Soil quality and quantity**

*Proposed Submission Draft PPLP sites*

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

*Reasonable alternative sites*

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

**11(c) Land contamination**

*Proposed Submission Draft PPLP sites*

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

*Reasonable alternative sites*

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

### **11(d) Minerals safeguarding**

#### *Proposed Submission Draft PPLP sites*

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

#### *Reasonable alternative sites*

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

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

#### *Proposed Submission Draft PPLP sites*

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

#### *Reasonable alternative sites*

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

### **SA13: Use water resources efficiently**

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

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

#### *Proposed Submission Draft PPLP sites*

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

#### *Reasonable alternative sites*

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

### **Recommendations**

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

draft was consulted on in October-November 2016. In general, the proposed Submission PPLP is largely in line with the approach put forward at Issues & Options stage.

### Reasons for selecting sites

- 1.106 The reasonable alternative sites generally performed less well against the SA objectives than the proposed Submission Draft PPLP sites. **Appendix 5** of the full SA Report explains the reasoning behind the selection and non-selection of each site option appraised.

## SA Findings for the Proposed Submission Plan







- 1.107 **Chapter 8** in the full SA Report sets out the findings of the SA of the site allocation and development management policies outlined in the proposed Submission version of the PPLP published for consultation in January 2018. The detailed findings of the SA of the preferred site allocation and development management policies outlined in the Preferred Options version of the PPLP published for consultation in October 2016 are set out in the previous iteration of SA Report published alongside the Preferred Options PPLP in October 2016.
- 1.108 LUC appraised all preferred policies set out in the Preferred Options version of the PPLP published for consultation in October 2016. The significant effects and recommendations identified through the appraisal of the preferred policies informed the development of the policies within the Proposed Submission version of the PPLP. For example, the SA raises concern that in some site allocation policies, no site-based mitigation measures have been included to reduce the risk of flooding. Consequently, several of the site allocations within the proposed Submission Draft of the PPLP were modified to include additional flood resistant and resilient construction measures.
- 1.109 The SA Report that supported the Preferred Options version of the PPLP published for consultation in October 2016 contained detailed appraisals in Appendix 7, which are summarised in Chapter 7 of that report. The 'policy-off' effects of these SHLAA sites have been reviewed by Shepway Council to inform the selection of Proposed Submission site allocations and the definition of proposed Submission Draft site allocation policies. The appraisals have now been updated to reflect the changes made to the most recent in the Submission Draft version of the PPLP, and are presented in **Appendix 7** and **Chapter 8** of the full SA Report. The effects of each Proposed Submission site allocation policy, including mitigation and enhancement measures outlined within each policy, have been appraised to assess the overall effects of development against each SA objective. These overall, 'policy-on', scores are summarised in **Table 4** below.
- 1.110 The Proposed Submission site allocation policies have been appraised using the SA site assumptions outlined in **Appendix 1** of the full SA Report. **Figures 11, 12** and **13** illustrate the location of the proposed Submission Draft site allocations across the District.
- 1.111 Like the Preferred Options policies appraised in 2016, the development management policies set out in the Proposed Submission were appraised against each sustainability objective. Individual appraisal matrices for each Proposed Submission development management policy can be found in **Appendix 8** of the full SA Report. The findings are summarised below, and in **Table 5**.
- 1.112 LUC appraised all preferred policies set out in the Preferred Options version of the PPLP published for consultation in October 2016. The significant effects and recommendations identified through the appraisal of the preferred policies informed the development of the policies within the Proposed Submission version of the PPLP.

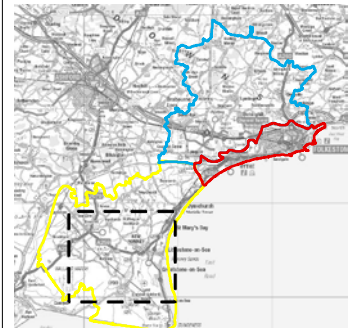
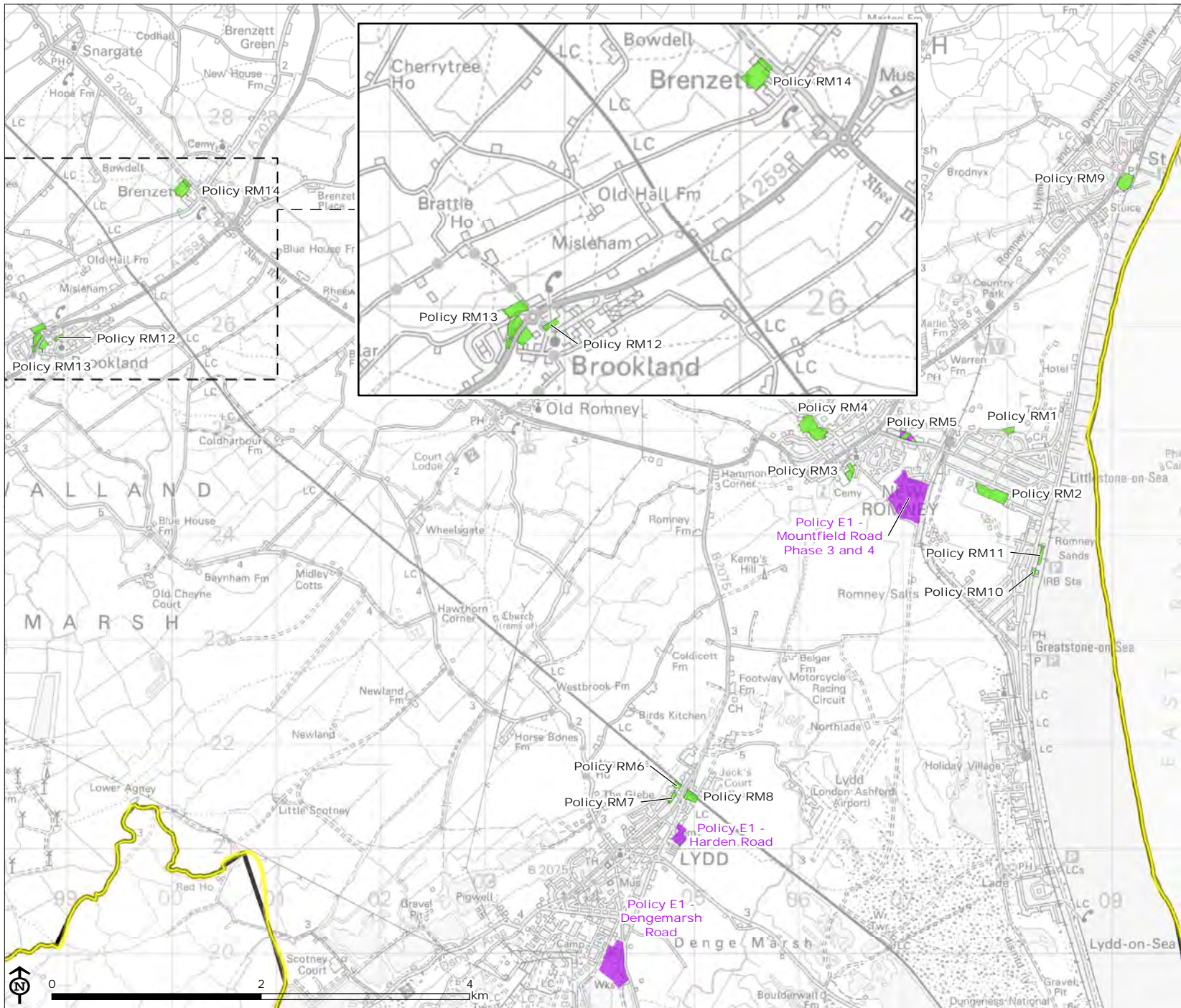
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Shepway Places and Policies Local Plan Sustainability Appraisal

Figure 12: Preferred Allocation Policies

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



Source: OS, Shepway District Council,




Map Scale @ A4: 1:52,000

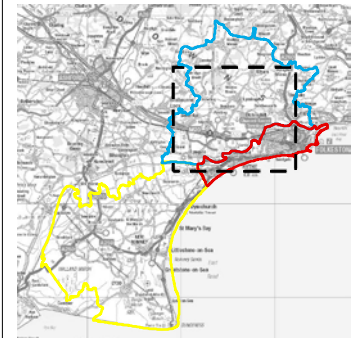
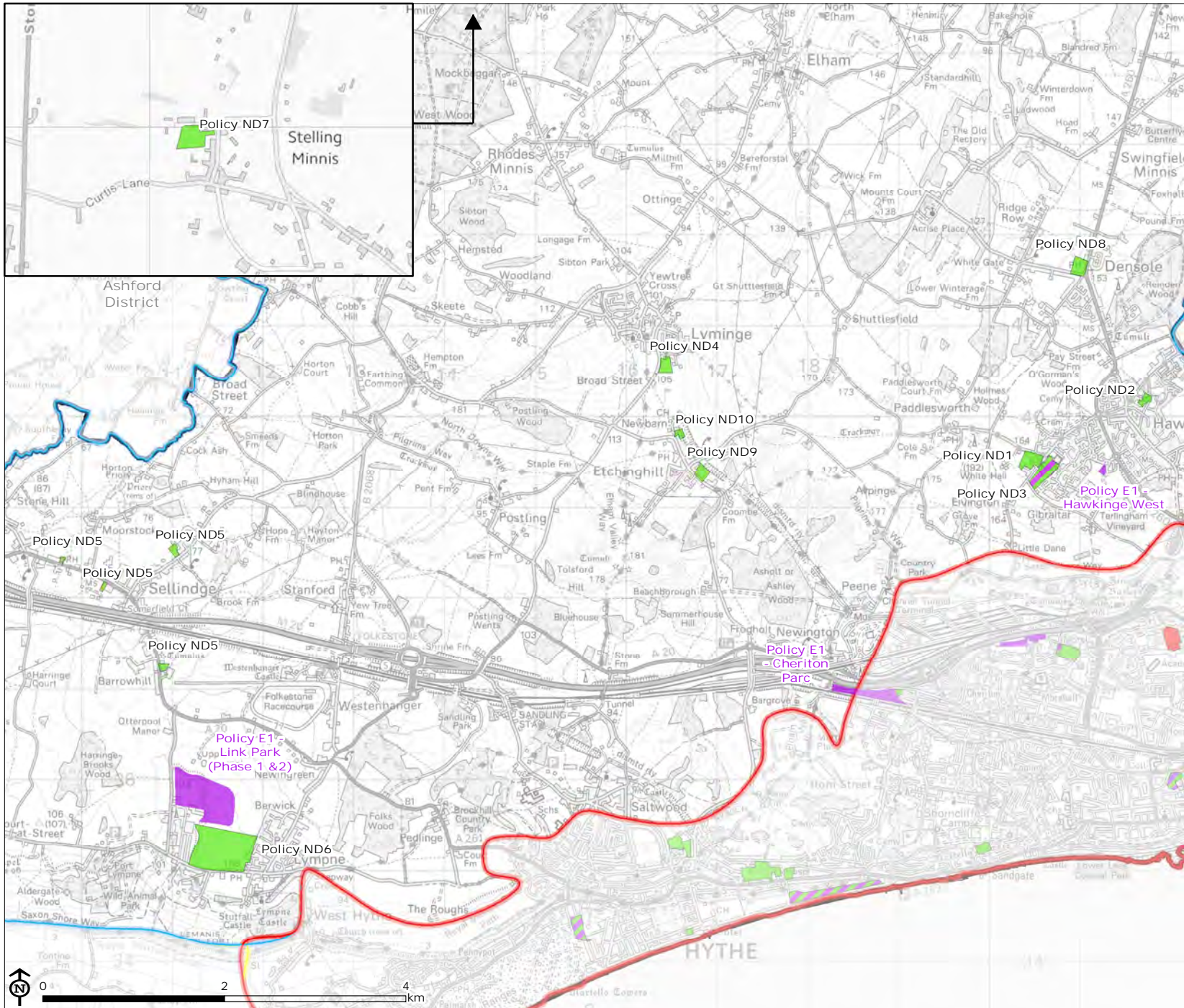


# Shepway Places and Policies Local Plan Sustainability Appraisal

Figure 13: Preferred Allocation Policies

## North Downs Area

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



Source: OS, Shepway District Council,

Map Scale @ A4: 1:60,000



**Table 4: Summary table illustrating SA scores of the proposed Submission Draft PPLP site allocation policies**

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



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

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

**Table 5: Summary table illustrating SA scores of the proposed Submission Draft PPLP development management policies**

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

Development Management Policies	SA 1: Flood Risk	SA 2: Climate Change Mitigation	SA 3: Community Vibrancy, Services and Facilities	SA 4: Crime Reduction	SA 5: Housing	SA 6: Employment Opportunities	SA 7: Historic Environment	SA 8: Landscapes and Townscapes	SA 9: Biodiversity	SA 10: Transport Infrastructure	SA 11: Efficient Use of Land and Resources	SA 12: Water Quality	SA 13: Water Efficiency	SA 14: Open Space
Policy E7	0	0	0	0	+	++	+	+	0	0	+	0	0	0
Policy E8	0	0	++	0	0	++	0	0	0	0	0	0	0	0
<b>Retail and Leisure</b>														
Policy RL1	0	0	++	0	0	++	0	0	0	0	0	0	0	0
Policy RL2	0	0	++	+	++	++	0	+	0	0	0	0	0	0
Policy RL3	0	0	++	+	0	+	0	+	0	0	0	0	0	0
Policy RL4	0	0	++	+	0	+	0	+	0	0	0	0	0	0
Policy RL5	0	0	++	+	+	+	0	+	0	0	0	0	0	0
Policy RL6	0	0	++	+	+	+	0	+	0	0	0	0	0	0
Policy RL7	0	0	++	0	+	+	0	0	0	0	0	0	0	0
Policy RL8	0	0	++	0	0	0	0	+	0	+	0	0	0	0
Policy RL9	0	0	0	0	0	0	0	+	0	0	0	0	0	0
Policy RL10	0	0	0	0	0	0	++	+	0	0	0	0	0	0
Policy RL12	0	++	++	0	0	+	0	0	0	++	0	0	0	0
<b>Community</b>														
Policy C1	0	0	++	+	+	+	+	++	0	0	0	0	0	0
Policy C2	0	0	++	0	0	0	0	0	0	0	+	0	0	0
Policy C3	+	0	++	0	0	0	0	0	+	0	0	0	0	++
Policy C4	0	0	++	0	0	0	0	0	0	0	0	0	0	++
<b>Transport</b>														
Policy T1	0	0	+	++	0	+	0	0	0	++	0	0	0	0
Policy T2	0	+	0	0	0	0	0	+	0	+/-	0	0	0	0
Policy T3	0	0	0	0	0	0	0	+	0	+/-	0	0	0	0

Development Management Policies	SA 1: Flood Risk	SA 2: Climate Change Mitigation	SA 3: Community Vibrancy, Services and Facilities	SA 4: Crime Reduction	SA 5: Housing	SA 6: Employment Opportunities	SA 7: Historic Environment	SA 8: Landscapes and Townscapes	SA 9: Biodiversity	SA 10: Transport Infrastructure	SA 11: Efficient Use of Land and Resources	SA 12: Water Quality	SA 13: Water Efficiency	SA 14: Open Space
Policy T4	0	0	0	0	0	0	0	+	0	+	0	0	0	0
Policy T5	0	+	0	0	0	0	0	0	0	+	0	0	0	0
<b>Natural Environment</b>														
Policy NE1	0	0	++	0	0	0	0	0	++	0	0	0	0	++
Policy NE2	0	0	+	0	0	0	0	0	++	0	++	0	0	0
Policy NE3	0	0	0	0	0	0	0	++	0	0	0	0	0	0
Policy NE4	0	0	0	0	0	0	0	++	0	0	++	+	0	0
Policy NE5	0	0	0	0	0	0	0	+	+	0	0	0	0	+
Policy NE6	0	0	0	0	0	0	0	0	0	0	++	0	0	0
Policy NE7	0	0	0	0	0	0	+	0	0	0	++	+	0	0
Policy NE8	++	+	+	0	0	+	+	+	+	+	0	+	0	0
Policy NE9	+	0	+	0	0	0	+	+	+	+	+	+	0	0
<b>Climate Change</b>														
Policy CC1	0	++	0	0	+/-	0	0	0	0	0	0	0	0	0
Policy CC2	+	++	+	0	+/-	0	0	0	+	0	0	+?	+	+
Policy CC3	++	++	0	0	+	0	0	0	+?	0	0	+?	+	0
Policy CC4	0	++	0	0	0	0	0	0	0	0	0	0	0	0
Policy CC5	0	++	0	0	0	0	+	+	+	0	0	0	0	0
Policy CC6	0	++	0	0	0	0	+	+	+	0	+	0	0	0
<b>Health and Wellbeing</b>														
Policy HW1	0	0	++	0	0	-	+	0	0	0	0	0	0	0
Policy HW2	0	0	++	0	0	0	0	0	0	0	0	0	0	0
Policy HW3	0	0	++	0	0	0	0	0	+	0	+	0	0	+

Development Management Policies	SA 1: Flood Risk	SA 2: Climate Change Mitigation	SA 3: Community Vibrancy, Services and Facilities	SA 4: Crime Reduction	SA 5: Housing	SA 6: Employment Opportunities	SA 7: Historic Environment	SA 8: Landscapes and Townscapes	SA 9: Biodiversity	SA 10: Transport Infrastructure	SA 11: Efficient Use of Land and Resources	SA 12: Water Quality	SA 13: Water Efficiency	SA 14: Open Space
Policy HW4	0	+	++	0	0	0	0	0	0	++	0	0	0	0
<b>Historic Environment</b>														
Policy HE1	0	0	++	0	0	+	++	0	0	0	+	0	0	0
Policy HE2	0	0	0	0	0	0	++	++	0	0	0	0	0	0
Policy HE3	0	0	0	0	0	0	++	++	0	0	0	0	0	0
Policy HE4	0	0	+	0	0	0	++	++	0	0	0	0	0	0

## Summary of SA findings

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

#### *Development management policies*

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

#### *Site allocation policies*

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

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

#### *Development management policies*

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

#### *Site allocation policies*

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

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

#### *Development management policies*

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

#### *Site allocation policies*

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

#### **SA4: Reduce crime and the fear of crime**

##### *Development management policies*

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

##### *Site allocations policies*

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

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

##### *Development management policies*

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

#### **5(a) Affordable housing**

##### *Site allocations policies*

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

#### **5(b) Dwellings for older people**

##### *Site allocations policies*

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

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

##### *Development management policies*

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

##### *Site allocation policies*

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



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

### *Development management policies*

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

### *Site allocation policies*

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

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

### *Development management policies*

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

### **8(a) Landscape**

#### *Site allocation policies*

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

### **8(b) Settlement character: coalescence**

#### *Site allocation policies*

- 1.131 Almost all the site allocations policies scored a negligible effect against this part of the objective. There was one exception: Policy ND6 scored minor negative effects. Policy ND6 scored a minor negative effect because although it represents the vast majority of open land between the settlement of Lympne to the east and Lympne Industrial Park, text within the policy states that parcel 2 of the site will remain undeveloped so as to retain separation between Lympne and Lympne Industrial Park.

### **8(c) Townscape: regeneration**

#### *Site allocation policies*

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

### **SA9: Conserve and enhance biodiversity**

#### *Development management policies*

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

#### *Site allocation policies*

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

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

#### *Development management policies*

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

### **10(a) Reduce the need to travel**

#### *Site allocation policies*

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

## **10(b) Increase opportunities to choose sustainable transport modes**

### *Site allocation policies*

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

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

### *Development management policies*

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

## **11(a) Efficient use of land**

### *Site allocation policies*

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

## **11(b) Soil quality and quantity**

### *Site allocation policies*

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

## **11(c) Land contamination**

### *Site allocation policies*

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

### **11(d) Minerals safeguarding**

#### *Site allocation policies*

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

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

#### *Development management policies*

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

#### *Site allocation policies*

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

### **SA13: Use water resources efficiently**

#### *Development management policies*

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

#### *Site allocation policies*

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

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

#### *Development management policies*

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

#### *Site allocation policies*

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

### Cumulative effects

- 1.153 Following the appraisal of the individual development management and site allocation policies in the proposed Submission Local Plan, the cumulative effects of all policies were assessed.
- 1.154 The cumulative effects assessment also considered the extent to which the effects identified are likely to be mitigated by strategic or development management policies set out elsewhere in the Local Plan, by national planning policy, or by other regulatory mechanisms.
- 1.155 The proposed Submission Local Plan was found to have significant positive effects against the following SA objectives:
- **SA Objective 5: Improve the provision of homes, including affordable housing, having regard to the needs of all sections of society, including the elderly** – all site allocations estimated to provide over 10-15 dwellings in both the adopted Core Strategy and the Proposed Submission PPLP are likely to ensure that a mixture of housing types are developed, that housing is available to people on lower incomes and that disparities between incomes and house prices are addressed.
  - **SA Objective 6: Support the creation of high quality and diverse employment opportunities** – New employment sites will be developed in accordance with policies relating to standards for design and construction, so it is assumed that they will be high quality, increasing their attractiveness to investors.
  - **SA Objective 8: Conserve, and where relevant enhance, the quality, character and local distinctiveness of the landscape and townscape** scored a mixed significant positive and minor negative effect – The Core Strategy and PPLP contain policies for mitigating the potential landscape-related impacts of new development, promoting high quality design that is sympathetic to the landscape and coastal character of areas.
  - **SA Objective 10: Reduce the need to travel; increase opportunities to choose sustainable transport modes and avoid development that will result in significant traffic congestion** – The Core Strategy and PPLP contain policies that make provision for improvements to the sustainable transport network. Furthermore, most new housing and employment sites are located within Folkestone and Hythe, which will reduce journey times and encourage more sustainable transport modes.
  - **SA Objective 14: Protect and enhance open space and ensure that it meets local needs** – The provision of improved green infrastructure, open space and sports facilities through the adopted Core Strategy and PPLP will contribute to increasing biodiversity in the District at the same time as encouraging and enabling people to engage in active recreation.
- 1.156 The proposed Submission Local Plan was found to have mixed significant positive and significant negative effects:
- **SA Objective 11: Use land efficiently and safeguard soils, geology and economic mineral reserves** – Policy SS2 of the adopted Core Strategy sets a target for at least 65% of dwellings to be provided on previously developed/brownfield land by the end of 2030/2031 despite the fact that the Core Strategy and Proposed Submission PPLP propose development on a significant area of greenfield land, resulting in the loss of undeveloped land. Despite this, the majority of development sites are located on previously developed land, some of which are contaminated and will require remediation.

### Habitats Regulations Assessment Findings

- 1.157 It should also be noted that the HRA Report of the proposed Submission Draft PPLP and the adopted Core Strategy concluded that the PPLP does not significantly influence local and regional effects on the integrity of European sites, either alone or in-combination with other plans or projects. The HRA made a number of recommendations to ensure that the PPLP protects the integrity of the Folkestone to Etchinghill Escarpment SAC and Dungeness, Romney Marsh and Rye Bay SPA, SAC and Ramsar.

### Cross-boundary Cumulative effects

- 1.158 Shepway District is bordered by four neighbouring Districts (Ashford, Canterbury, Dover and Rother). Developments within these neighbouring Districts close to the administrative boundary of Shepway have the potential to generate cumulative **significant negative effects** through increased urbanisation, particularly in relation to SA objectives:
- SA Objective 1: Reduce the risk of flooding, taking into account the effects of climate change
  - SA Objective 8: Conserve, and where relevant enhance, the quality, character and local distinctiveness of the landscape and townscape.
  - SA Objective 9: Conserve and enhance biodiversity, taking into account the effects of climate change.
  - SA Objective 11: Use land efficiently and safeguard soils, geology and economic mineral reserves.
- 1.159 Furthermore, strategic employment and retail allocations along the region's main transport links could attract Shepway residents which has the potential to generate significant adverse effects of the viability of Shepway District's employment sites and town centres, with the potential for **significant negative effects** in relation to SA objectives:
- SA3: Promote community vibrancy, provide opportunities to access services, facilities and environmental assets for all and avoid creating inequalities of opportunity for access.
  - SA6: Support the creation of high quality and diverse employment opportunities.
- 1.160 There is also the potential for synergistic **significant positive effects** on SA objectives 3 and 6 associated with the combined effects of multiple employment and retail allocations in the region helping East Kent to achieve a critical mass to attract and retain growth industries and higher skilled employees.
- 1.161 The proposed Submission Draft PPLP is likely to generate **significant positive effects** on SA objective 10 (Reduce the need to travel; increase opportunities to choose sustainable transport modes and avoid development that will result in significant traffic congestion). However, it is acknowledged that general growth in the District and in neighbouring authorities will result in an increase in the number of vehicles on the roads and an increased risk of traffic congestion. Work is currently being undertaken by Shepway District Council and neighbouring authorities to determine what the existing and projected future capacity of the highway networks in the area is and is likely to be.
- 1.162 Shepway District Council is working with its neighbouring authorities to mitigate the potential for such cumulative adverse effects and maximise the opportunities for cumulative benefits for the region.

### Recommendations

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

- 1.163 LUC appraised all preferred policies set out in the Preferred Options version of the PPLP alongside reasonable alternatives before they were published for public comments and suggestions in October 2016. The significant effects and recommendations identified through the appraisal of the preferred policies informed the development of the policies within the proposed Submission version of the PPLP.
- 1.164 The following measures were recommended for the Preferred Options version of the PPLP:
- **SA Objective 1: Flood Risk – Policy UA25** made no provision to mitigate flood risk. A site-based policy requirement for adequate flood protection measures could be incorporated within the design of this site to help mitigate this effect.
  - **SA Objective 7: Cultural Heritage – Policy ND13** made no provision to protect the setting of heritage assets. Provision in this policy could be made to minimise effects on the setting of nearby heritage assets, helping mitigate the significance of this effect.
  - **SA Objective 8: Landscape – Policy ND7** outlined requirements for the design, layout and landscaping to reduce adverse effects on the character of the AONB. However, no mention

was made for the need to mitigate the appearance of settlement coalescence. The addition of such a requirement through appropriate landscaping and layout of the development would help mitigate the effects on this part of the objective.

- **SA Objective 11: Efficient Use of Land – Policies RM5, RM12, RM13, ND6 and ND9** resulted in the loss of some of the best and most versatile agricultural land in the District, yet each policy did not make provision for the mitigation of this loss. In deciding whether to allocate each of these sites for development, the significant negative effect on SA Objective 11 should be weighed against other considerations, such as the availability of alternative, less environmentally sensitive sites and the benefits of development.
- **SA Objective 14: Open Space – Policy UA7** the implementation of other policies in the adopted Core Strategy and Places and Policies resulted in the loss of open space. The loss of this open space could be mitigated through requirements for the provision of open space within the preferred policy elsewhere within the immediate vicinity.

#### *Recommendations made following the appraisal of the Proposed Submission version of the PPLP*

1.165 For many of the potential negative effects identified in relation to the PPLP, mitigation will be provided through Local Plan. However, the following measures were recommended for the Proposed Submission version of the PPLP:

- **SA Objective 1: Flood Risk – Policies UA18, UA19, RM12 and E1** make no provision to mitigate flood risk. A site-based policy requirement for adequate flood protection measures could be incorporated within the design of these site to help mitigate this effect.
- **SA Objective 7: Cultural Heritage – Policy E1** comprises employment allocations, two of which contain heritage assets. Yet the policy makes no provision to protect the settings of these heritage assets. Provision should be made in which the design of the development at these sites should seek to minimise effects on the setting of nearby heritage assets.
- **SA Objective 8: Landscape – Policy E1** comprises employment allocations, one of which contains open land between the settlement of Lypne to the east and Lypne Industrial Park. Yet the policy does not mention the need to mitigate the appearance of settlement coalescence. The addition of such a requirement through appropriate landscaping and layout of the development would help mitigate the effects on this part of the objective.
- **SA Objective 9: Biodiversity – Policy E1** comprises employment allocations, two of which contain National BAP Priority Habitats. One of these sites also contains a Local BAP Priority Habitat. Despite this, the policy makes no provision for the conservation and enhancement of these protected habitats and species. The addition of such a requirement would help to mitigate the effects of this objective.
- **SA Objective 11: Efficient Use of Land – Policies RM12, RM13, RM14, ND5 and E1** will result in the loss of some of the best and most versatile agricultural land in the District, yet each policy does not make provision for the mitigation of this loss. In deciding whether to allocate each of these sites for development, the significant negative effect on SA Objective 11 should be weighed against other considerations, such as the availability of alternative, less environmentally sensitive sites and the benefits of development.
- **SA Objective 14: Open Space – Policy UA2** will result in the loss of open space. The loss of this open space could be mitigated through requirements for the provision of open space within the preferred policy elsewhere within the immediate vicinity.

1.166 Some of these are recommendations carried forward from the SA of the Preferred Options version of the PPLP have not been clearly addressed in the proposed Submission draft of the PPLP.

## Monitoring

1.167 Regulation 17 of the SEA Regulations states that:

*(1) "the responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action"; and*

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

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

"a description of the measures envisaged concerning monitoring"

1.169 Although National Planning Practice Guidance states that monitoring should be focused on the significant environmental effects if implementing the Local Plan, the reasons for this are to enable local planning authorities to identify unforeseen adverse effects at an early stage and to enable appropriate remedial actions. Since effects which the SA expects to be minor may become significant and vice versa, monitoring measures have been proposed in the full SA Report as well as this NTS, in relation to all of the SA objectives in the SA framework. As the Local Plan is implemented and the likely significant effects become more certain, the Council may wish to narrow down the monitoring framework to focus on those effects of the Local Plan likely to be significantly adverse.

1.170 **Table 6** sets out a number of suggested indicators for monitoring the effects of implementing the PPLP. Monitoring indicators are suggested for all of the objectives in the SA framework.

**Table 6: Indicators for monitoring effects of implementing the PPLP**

Ref.		Proposed monitoring indicators
SA1	Reduce the risk of flooding, taking into account the effects of climate change.	<ul style="list-style-type: none"> <li>• Number of properties built in areas of flood zones 2 and 3</li> <li>• Number of planning permissions granted contrary to EA advice</li> <li>• Number of new developments incorporating SUDS</li> </ul>
SA2	Increase energy efficiency in the built environment, the proportion of energy use from renewable sources and resilience to a changing climate and extreme weather.	<ul style="list-style-type: none"> <li>• Number of new developments incorporating low carbon technologies</li> <li>• Installed renewable energy capacity</li> <li>• Number of Air Quality Management Areas declared</li> </ul>
SA3	Promote community vibrancy, provide opportunities to access services, facilities and environmental assets for all and avoid creating inequalities of opportunity for access.	<ul style="list-style-type: none"> <li>• New education and/or training facilities permitted (sqm)</li> <li>• Extent of new and loss of community facilities (sqm)</li> <li>• Amount of additional 'town centre use' floorspace provided in Folkestone and Hythe town centres</li> <li>• Amount of open space and sport and recreation facilities</li> <li>• Percentage of people living in fuel poverty</li> <li>• Number of people claiming Jobseekers' Allowance</li> <li>• Affordable home completions</li> </ul>
SA4	Reduce crime and the fear of crime.	<ul style="list-style-type: none"> <li>• Number of crimes committed</li> </ul>
SA5	Improve the provision of homes, including affordable housing, having regard to the needs of all sections of society, including the elderly.	<ul style="list-style-type: none"> <li>• Affordable housing completions</li> <li>• Average house prices</li> <li>• Number of people in housing need (SHMA)</li> <li>• Annual housing completions –total houses built, types, sizes and tenures</li> <li>• Total vacant dwellings</li> <li>• Number of permanent Gypsy and Traveller Pitches delivered</li> <li>• Number of statutory homeless people</li> <li>• Number or proportion of local authority homes meeting Lifetime Homes/Decent Homes Standards</li> </ul>



Ref.		Proposed monitoring indicators
SA6	Support the creation of high quality and diverse employment opportunities.	<ul style="list-style-type: none"> <li>Amount of new employment land delivered</li> <li>Extent of employment land lost to residential development</li> <li>Number of people claiming Jobseekers' Allowance</li> <li>Qualifications of the working age population</li> <li>Extent and speed of broadband coverage</li> </ul>
SA7	Conserve and enhance the fabric and setting of historic assets.	<ul style="list-style-type: none"> <li>Number of entries on the Heritage at Risk Register</li> </ul>
SA8	Conserve, and where relevant enhance, the quality, character and local distinctiveness of the landscape and townscape.	<ul style="list-style-type: none"> <li>Percentage of new development taking place on brownfield/previously developed land</li> <li>Number of new proposals in the AONB and other 'sensitive landscape areas'</li> </ul>
SA9	Conserve and enhance biodiversity, taking into account the effects of climate change.	<ul style="list-style-type: none"> <li>Amount of greenfield land lost to development</li> <li>Change in condition of SSSIs</li> <li>Number of Local Wildlife Sites</li> <li>Amount of development that takes place on Local Green Spaces, open spaces and other outdoor sports facilities.</li> </ul>
SA10	Reduce the need to travel; increase opportunities to choose sustainable transport modes and avoid development that will result in significant traffic congestion.	<ul style="list-style-type: none"> <li>Proportion of people who travel to work by public transport</li> <li>Railway Station footfall</li> <li>Bus patronage levels</li> <li>Number of Travel Plans implemented with new development</li> <li>Number of users of cycle paths</li> <li>Number of junctions at or exceeding capacity</li> </ul>
SA11	Use land efficiently and safeguard soils, geology and economic mineral reserves.	<ul style="list-style-type: none"> <li>Percentage of development taking place on brownfield/previously developed land</li> <li>Number of planning applications approved within a Minerals Consultation Area or Mineral Safeguarding Area</li> <li>Amount of development that takes place on best and most versatile agricultural land</li> <li>Proportion of household waste recycled</li> <li>Proportion of commercial waste recycled</li> <li>Proportion of waste sent to landfill</li> </ul>
SA12	Maintain and improve the quality of groundwater, surface waters and coastal waters and the hydromorphological (physical) quality of rivers and coastal waters.	<i>No likely significant effects identified through the SA.</i>
SA13	Use water resources efficiently.	<i>No likely significant effects identified through the SA.</i>
SA14	Protect and enhance green infrastructure and ensure that it meets local needs.	<ul style="list-style-type: none"> <li>Extent of new or loss of new Local Green Spaces</li> <li>Amount of development that takes place on Local Green Spaces</li> <li>Extent of new and loss of open space and sport and recreation facilities</li> </ul>

## Conclusions

1.171 For each iteration of the PPLP, the SA/SEA process has tested the significant effects of a range of site allocation and development management policy options. Informed by the SA/SEA, preferred options were defined and consulted upon in the Preferred Options version of the PPLP published in October 2016. Following the consultation in October 2016, these options were revised and reappraised alongside new alternatives to inform the latest set of site allocations and

development management policies set out in the proposed Submission Draft version of the PPLP published alongside this SA Report.

- 1.172 In general, the policy approaches and site options that have been taken forward in the Local Plan are those that perform more positively or at least as well against the SA objectives than the rejected options, although in a small number of cases other planning considerations have determined that other options should be taken forward. As described in this SA report, the PPLP includes a number of policies that help to mitigate the potential significant negative environmental effects of proposals within the PPLP, although some significant effects are likely to remain where mitigation is not possible or difficult, such as the loss of best and most versatile agricultural land.
- 1.173 The fact that the adopted Core Strategy and the proposed Submission Draft PPLP direct most new development to the urban areas of Folkestone and Hythe will have a range of mainly social and economic benefits since these urban areas have the greatest range of jobs and service provision in the District and are in need of regeneration. In addition, the PPLP allocates a range of sites in the rural areas of the District which will help to maintain the vibrancy of rural communities. The PPLP's support for the District's sustainable transport network will enable more people to access local jobs, services and facilities whilst minimising environmental harm.

## Mitigation

- 1.174 It is a requirement of the SEA Regulations that consideration is given to "the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme". For many of the potential negative effects identified in relation to the PPLP, mitigation will be provided through the implementation of other policies in the adopted Core Strategy and the proposed Submission Draft PPLP itself.
- 1.175 Table 7 below identifies the strategic policies set out in the adopted Core Strategy (2013) and the development management policies in the proposed Submission Draft PPLP that are expected to provide mitigation for the potential significant negative effects of other proposed Submission Draft PPLP policies.

**Table 7: Mitigation for potential significant negative effects identified**

SA objectives for which potential significant negative effects have been identified	Other Local Plan policies providing possible mitigation	
	Core Strategy	PPLP
SA1. Reduce the risk of flooding, taking into account the effects of climate change	<b>SS3: Place-Shaping and Sustainable Settlements Strategy</b> , clause C, seeks to prevent development in areas at risk of flooding.	<b>CC3: Sustainable Drainage Systems (SuDS)</b> promotes the use of SuDS in new development which will help to mitigate the potential effects of development on greenfield land in relation to reduced infiltration. <b>NE1: Enhancing and Managing Access to the Natural Environment, NE2: Biodiversity</b> and <b>CC2: Sustainable Design and Construction</b> directly and indirectly promote improvements to the District's green infrastructure network, which will help to reduce flood risk and alleviate the effects of climate change.
SA7. Conserve and enhance the fabric and setting of historic assets	<b>SS3: Place-Shaping and Sustainable Settlements Strategy</b> , clause e, seeks to respect and enhance key historic features of conservation interest in the District.	<b>HE1: Heritage Assets, HE2: Archaeology, HE3: Local List of Heritage Assets</b> and <b>HE4: Folkestone's Historic Gardens</b> seek to protect and enhance heritage assets in the Borough and will apply to all new

SA objectives for which potential significant negative effects have been identified	Other Local Plan policies providing possible mitigation	
	Core Strategy	PPLP
		development including at the allocated sites.
SA8. Conserve, and where relevant enhance, the quality, character and local distinctiveness of the landscape and townscape.	<b>SS1: District Spatial Strategy</b> identifies three character areas and the development considered appropriate to each. <b>CSD3: Rural and Tourism Development of Shepway</b> states that building can only be converted if they will contribute to the character of their location.	<b>NE3: Protecting the District's Landscapes and Countryside</b> seeks to ensure that the quality and character of Shepway's landscapes are protected and enhanced and will apply to all new development including at the allocated sites.  <b>NE1: Enhancing and Managing Access to the Natural Environment, NE2: Biodiversity</b> and <b>CC2: Sustainable Design and Construction Spaces</b> directly and indirectly promote improvements to the District's green infrastructure network, which will help to maintain the green spaces and gaps which form an important part of the setting of the District's towns and villages.  <b>CC2: Sustainable Design and Construction</b> also includes specific criteria relating to ensuring that the design and layout of new development is appropriate for the surroundings.
SA9. Conserve and enhance biodiversity.	<b>CDS4: Green Infrastructure of Natural Networks, Open Spaces and Recreation</b> seeks to achieve net gains in biodiversity, at the same time as safeguarding designated biodiversity sites from harm.	<b>NE1: Enhancing and Managing Access to the Natural Environment</b> and <b>NE2: Biodiversity</b> seek to conserve and enhance biodiversity in the District.  <b>NE2: Biodiversity</b> includes specific criteria relating to ensuring that access to protected sites is improved, but also managed in sensitive areas.
SA11. Use land efficiently and safeguard soils, geology and economic mineral reserves.	<b>SS2: Housing and the Economy Growth Strategy</b> sets a target for at least 65% of dwellings to be provided on previously developed land by the end of 2030/31.	<b>NE4: Equestrian Development, CC6: Solar Farms</b> and <b>HW3: Development that supports healthy, fulfilling and active lifestyles</b> require proposals to avoid the loss of high quality agricultural land where possible.
SA14. Protect and enhance green infrastructure and ensure that it meets local needs.	<b>SS1: District Spatial Strategy</b> seeks to secure new accessible public green space. <b>CSD4: Green Infrastructure of Natural Networks, Open Spaces and Recreation</b> directly and indirectly promotes improvements to the District's green infrastructure, as well as the amount of space available.	<b>NE1: Enhancing and Managing access to the Natural Environment, NE2: Biodiversity, CC2: Sustainable Construction</b> and <b>C5: Local Green Spaces</b> directly and indirectly promote improvements to the District's green infrastructure network, which will help to safeguard, maintain and expand access to local green spaces.

SA objectives for which potential significant negative effects have been identified	Other Local Plan policies providing possible mitigation	
	Core Strategy	PPLP
	This will help to safeguard, maintain and expand access to local green spaces.	<p><b>C2: Safeguarding Community Facilitates</b> and <b>C3: Provision of Open Space</b> promotes the safeguarding and new provision of open spaces in the District.</p> <p><b>HW4: Protecting and Enhancing Rights of Way</b> maintains access to the countryside and connects open and green spaces in the District.</p>

## Next Steps

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

LUC

January 2018