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Folkestone & Hythe Places and Policies Local Plan Gypsy and Traveller Sites

Sustainability Appraisal including Strategic Environmental Assessment Addendum

Prepared by LUC
August 2019

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Introduction

- 1.1 In September 2018, Folkestone & Hythe District Council¹ (the 'Council') submitted the Places and Policies Local Plan (PPLP) for independent examination by a Planning Inspector appointed by the Secretary of State. An integrated Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) Report was submitted alongside the Plan.
- 1.2 At the public examination of the PPLP, held between 14th May and 16th May 2019, the Inspector requested that the Council identify a site (or sites) for the objectively assessed needs of Gypsies, Travellers and Travelling Showpeople over the Core Strategy Review plan period up to 2037.

Gypsy and Traveller Accommodation Needs

- 1.3 The Council has been working with a consortium of Kent local planning authorities, as part of the duty to cooperate, to produce a new Gypsy and Travellers Accommodation Assessment (GTAA) for the county. On completion, the new GTAA will supersede the previous East Kent Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (University of Salford, April 2014).
- 1.4 Individual reports are being produced for the different local authority areas, with a county-wide report to be produced at the end of the process. For Folkestone & Hythe, Section 7 of the draft updated GTAA identifies the site requirements for the District as follows:
 - Travelling Showpeople plots – There is a need for two additional Travelling Showpersons pitches to 2036/37. The study reports that this need can be met on existing sites.
 - Gypsy and Traveller pitches – There is a need for five additional Gypsy and Traveller pitches in the District to 2036/37. The need is the same whether the cultural definition of Travellers or the definition given in 'Planning policy for traveller sites' is used.
 - Transit pitches – There is a need for three to five additional transit pitches.
- 1.5 Planning permission was granted for an additional Gypsy and Traveller pitch on an existing site at Brenzett.² This reduces the remaining need for Gypsy and Traveller accommodation to four pitches to 2036/37.

First Search for Site Options

- 1.6 The process of identifying and assessing sites is set out in the Council's Gypsy, Traveller and Travelling Showpeople Site Identification Study (2019). To ensure that all reasonable alternatives for potential Gypsy and Traveller sites were considered a 'long-list' of sites was compiled by the Council through:
 - A comprehensive review of sites promoted through the Council's call for sites exercises, most recently the exercise undertaken for the Core Strategy Review from the 29th March to 18th May 2018.
 - Interviews with the existing Gypsy and Traveller community in the District to ascertain the willingness of families to create additional pitches on existing sites, and whether they own any additional land within the District that they would be prepared to put forward for consideration for development for additional pitches.
 - A review of existing privately-owned caravan parks within the District.
 - A review of public sector property assets, including District Council and County Council land holdings and the land holdings of the Ministry of Defence and other public-sector organisations.
 - Consultation with housing associations with a management presence in the District.

¹ The local planning authority changed its name on 1 April 2018 from Shepway District Council to Folkestone & Hythe District Council. References to 'Shepway' are kept in this report where they appear in titles from documents produced before 1 April 2018.

² Fishers Paddock, Ashford Road, Brenzett (Y18/0303/SH).

- A review of sites in the SHLAA database that were scored 'green' or 'amber' in terms of suitability but not allocated within existing or emerging plans.
- Consultation with the Church Commissioners for England to ascertain whether the Church has any landholdings within the District that could be made available for Gypsy and Traveller pitches.

1.7 A long list of 40 potential sites was compiled from these sources.

Site Assessment and Sieving to Inform Selection

1.8 Given that the site (or sites) being sought are for permanent pitches for members of the Gypsy and Traveller community, any future allocation(s) would adopt a residential land classification. Consequently, the Council considered it appropriate to adapt the Council's Strategic Housing Land Availability Assessment (SHLAA) methodology drawing on the guidance set out in paragraph 67 of the NPPF³ and national Planning Policy for Traveller Sites (PPTS)⁴.

1.9 The Gypsy and Traveller site assessment process resulted in the shortlisting of seven sites from the long list of 40 sites:

- GT11 – Land west of Cockreed Lane, New Romney
- GT12 – Brickyard Poultry Farm, New Romney
- GT13 – Craythorne Farm, New Romney
- GT16 – Highways Depot, Running Waters Corner, New Romney
- GT17 – Station Approach, New Romney
- GT19 – Kitewell Lane (North), Lydd
- GT20 – Kitewell Lane (South), Lydd

1.10 During the appraisal of the seven shortlisted sites, Council officers identified site options GT19 and GT20 as the preferred site options for the provision of four Gypsy and Traveller pitches. These sites were initially preferred as it was understood that these options were likely to be less affected by environmental constraints and more sustainably located (an assumption which was later confirmed by the policy-off SA of the shortlisted sites). Furthermore, both sites are under public-sector ownership and therefore more likely to be made available for Gypsy and Traveller use. However, following consultation with wider Council teams, it transpired that both sites had been earmarked for delivery of permanent housing development within the PPLP plan period, and discussions are progressing about bringing one of the sites forwards for development.

1.11 Regarding site GT16 (Highways Depot, Running Waters Corner, New Romney), further work was done to investigate its status. It is used intermittently by Kent County Council to store highways materials, but after some investigation it was found that it is in fact owned by Highways England. While it may be possible to work with KCC and Highways England to secure ownership of the site in the future, alternative land would need to be found for KCC's current use of the site.

1.12 It was therefore concluded that the deliverability of sites GT16, GT19 and GT20 could not be confirmed.

1.13 The deliverability of the other shortlisted site options was reviewed in greater detail and the remaining shortlisted site options were all found to be in private ownership, with many having been actively promoted for allocation as housing sites. The Council therefore concluded that the deliverability of the remaining shortlisted site options could also not be established with any certainty and were also discounted.

Second Search for Site Options

1.14 Following the conclusion of this site identification work, the Council's attention was drawn to an established Romany Gypsy family living and working in the Romney Marsh area who acquired a parcel of land with the aspiration of developing it as a Gypsy and Traveller site. Officers

³ National Planning Policy Framework, Ministry of Housing, Communities and Local Government, February 2019

⁴ Planning Policy for Traveller Sites, Department for Communities and Local Government, August 2015

contacted the family and identified the 1.5ha site as 'Land adjacent to 'The Retreat', Lydd Road, Old Romney' (GT41). The site was subsequently assessed and subjected to SA.

- 1.15 Although the site does not technically meet the Stage 1 screening criteria⁵ that would automatically take it forward for a more detailed assessment, it was considered that, given all other reasonable options had been discounted and the site is available, in this case it was reasonable to progress to Stage 2 of the site assessment process, shortlisting and SA.

SA Addendum Reporting

- 1.16 The seven shortlisted sites and the additional site GT41 have been subjected to SA, incorporating SEA, in this addendum. The findings of the SA have been used to inform the selection of the preferred option for allocation in the PPLP.
- 1.17 **Appendix 1** provides a summary of the reasons why:
- The sites on the long list were not selected for further consideration on the short list.
 - The preferred site was selected above the other shortlisted sites.
- 1.18 **Appendix 2** contains the detailed appraisal matrices setting out the likely effects of allocating each of the seven shortlisted Gypsy and Traveller site options and the additional site GT41.
- 1.19 **Appendix 3** contains the detailed appraisal matrix setting out the likely effects of draft Policy RM15.
- 1.20 **Appendix 4** sets out the SA framework assumptions used to appraise the Gypsy and Traveller site options.

Sustainability Appraisal and Strategic Environmental Assessment

- 1.21 The purpose of SA is to promote sustainable development by integrating sustainability considerations into the preparation and adoption of plans. SA is a statutory requirement of the Planning and Compulsory Purchase Act 2004. It is designed to ensure that the plan-making process maximises the contribution that a plan makes to sustainable development and minimises any potential adverse impacts. The SA process appraises the likely social, environmental and economic effects of the strategies and policies within Local Plans (in this case the PPLP) from the outset of its development.
- 1.22 SEA is also a statutory assessment process, required under the SEA Directive⁶, transposed in the UK by the SEA Regulations (Statutory Instrument 2004, No 1633). The SEA Regulations require the formal assessment of plans and programmes which are likely to have significant effects on the environment, and set the framework for future consent of projects requiring Environmental Impact Assessment (EIA).⁷ The purpose of SEA, as defined in Article 1 of the SEA Directive is 'to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans....with a view to promoting sustainable development'.
- 1.23 SEA and SA are separate processes but have similar aims and objectives. Simply put, SEA focuses only on the likely environmental effects of a plan whilst SA includes a wider range of considerations, extending to social and economic impacts. The Government's Sustainability Appraisal guidance⁸ outlines how it is possible to satisfy both requirements by undertaking a joint SA/SEA process, and to present an SA report that incorporates the requirements of the SEA Regulations.

⁵ The site was found to be more than 500m from the District's main towns and villages, but within 500m of Old Romney with direct access onto the A259 and New Romney. As such, it is considered that the site would not exclude Gypsy and Traveller families and that opportunities would still exist for them to be able to integrate with both of the neighbouring local communities.

⁶ SEA Directive 2001/42/EC

⁷ Under EU Directives 85/337/EEC and 97/11/EC concerning EIA.

⁸ DCLG (2015) Planning Practice Guidance. Available at: <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/>

- 1.24 Details on how the SA/SEA process has informed the PPLP can be found in the SA Report which accompanied the examined Proposed Submission Draft PPLP⁹.
- 1.25 Each of the seven shortlisted sites, as well as the additional site GT41, has been appraised using the same SA framework of SA objectives set out in the SA Report that accompanied the Proposed Submission Draft PPLP. Development of an SA Framework is not a requirement of the SEA Directive. However, it provides a recognised way in which the likely sustainability effects of a plan can be predicted, described, analysed and compared in a consistent way. Once SA objectives are developed they provide the basis for testing options and policy formulation of relevant aspects of a Plan. The objectives derived from this process are the basis for identifying appropriate indicators and targets against which the success of adopted strategies and policies may be judged.
- 1.26 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.
- 1.27 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. The use of assumptions to evaluate significance is a recognised technique in SA and ensures consistency in the SA of each potential site allocation. This SA framework has been consulted upon on four separate occasions through the publication of the four SA reports prepared alongside the PPLP to date:
- An SA Scoping Report was published for consultation in April 2014, in advance of any SA work on the options for incorporation in the PPLP.
 - The first SA Report appraised and was published alongside the options set out in the Issues and Options version of the PPLP in January 2015.
 - The second SA Report appraised and was published alongside the preferred options and reasonable alternatives set out in the Preferred Options version of the PPLP in October 2016.
 - The third version of the SA Report appraised the site allocations and development management policies and new reasonable alternatives set out in the proposed Submission Draft version of the PPLP in January 2018.
- 1.28 The SA assumptions for each SA objective in the SA framework are presented in **Appendix 4**. The judgements differentiate between significant effects and other more minor effects through the use of colour coded symbols, as shown in **Table 1** below. Mixed effects are recorded for an SA objective where there is potential for both positive and negative effects.

Table 1: Key to symbols of effects used in the SA of the Folkestone & Hythe 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

⁹ Sustainability Appraisal of Shepway District Council's Places and Policies Local Plan – Proposed Submission Draft Version, LUC, January 2018

SA Findings

Policy-off appraisals of shortlisted site options

1.29 Prior to the selection of the preferred option, all seven shortlisted sites were subjected to a 'policy-off' sustainability appraisal designed to identify the likely significant effects of developing each of the site options prior to consideration of potential mitigation and enhancement measures that might come forward on a given site. The 'policy-off' appraisal approach allows for all site options to be appraised on their own merits and to the same level of detail, and is consistent with the SA of the site options undertaken during the SA of previous iterations of the PPLP. The seven short listed sites are:

- GT11 – Land west of Cockreed Lane, New Romney
- GT12 – Brickyard Poultry Farm, New Romney
- GT13 – Craythorne Farm, New Romney
- GT16 – Highways Depot, Cobb Lane, New Romney
- GT17 – Station Approach, New Romney
- GT19 – Land South of Kitewell Lane, Lydd
- GT20 – Land South of Kitewell Lane, Lydd

1.30 In addition, following the conclusion that all the shortlisted site options were found to be undeliverable, an additional site was identified and subjected to SA:

- GT41 – Land Adjacent to 'The Retreat', Lydd Road, Old Romney

1.31 The location of the sites within Folkestone & Hythe District is illustrated in **Figure 1**.

Significant positive effects

1.32 Significant positive effects (++) are expected for all sites against SA objectives' criteria 5a (Affordable housing) and 5b (Housing for older people) because every site is expected to be able to accommodate 4 pitches, which would meet the outstanding need identified in the GTAA to 2036/37.

1.33 Five sites (GT13, GT16, GT17, GT19 and GT20) scored a significant positive effect against SA objective criterion 10b (Sustainable transport modes) because they are all within convenient walking distance of bus stops, with one site also being within convenient walking distance of a train station (GT17).

1.34 Three sites (GT17, GT19 and GT20) scored a significant positive effect against SA objectives 6 (Employment) and 10a (Reduce the need to travel) because they are all adjacent to at least one employment area. One of these sites, GT17, also scored a significant positive effect against SA objective criterion 8c (Townscape regeneration) because although it appears to be brownfield, it has since become naturalised and blended back into the landscape. As such, the site is likely to require some remediation and is therefore considered to make a significant contribution to the regeneration of the wider townscape. The effect is uncertain due to the appropriateness of the development.

Minor positive effects

1.35 Three sites scored a minor positive effect against SA objectives 6 (Employment) and criterion 10a (Reduce the need to travel) because they are all within convenient walking distance of an employment area. Two of these sites, GT11 and GT12, also scored a minor positive effect against SA objective 3 (Community), because they are within walking distance of various services and facilities. Site GT17 also scored a minor positive effect against SA3.

1.36 Site GT17 scored a minor positive effect against SA objective criterion 11a (Efficient use of land) because it is previously developed and therefore considered a more efficient use of land compared to developing greenfield sites.

Significant negative effects

- 1.37 Significant negative effects are expected against SA objective 1 (Flood risk) for sites GT11, GT12, GT13, GT16, GT17 and GT41. This is due to the fact these sites fall entirely or partially within Flood Zones 2 and 3.
- 1.38 Site GT17 also scored a significant negative effect against SA9 because it falls within a national Biodiversity Action Plan (BAP) Priority Habitat.
- 1.39 Sites GT16 and GT41 scored a significant negative effect against SA objective criterion 11b (Efficient use of land) because they both comprise Grade 2 agricultural land. Site GT41 also contains Grade 1 agricultural land.

Minor negative effects

- 1.40 All sites with the exception of GT17, scored a minor negative effect against SA objective criterion 11a (Efficient use of land) because they all fall on undeveloped land. This represents a less efficient use of land compared to the redevelopment of brownfield land.
- 1.41 A minor negative effect is recorded against SA objective 7 (Historic environment) for sites GT11, GT12, GT13 and GT17. This is due to the fact all four sites scored either 3 or 4¹⁰ in Kent County Council's heritage assessment of the District's reasonable site options. As mentioned previously, the effect is recorded as uncertain because the actual effect will depend on the scale, design and layout of the new development and opportunities may exist to enhance the setting of heritage features.
- 1.42 Two sites (GT19 and GT20) scored a minor negative effect against SA objective 9 (Biodiversity) because they are located within 250m of designated biodiversity sites.
- 1.43 Site GT17 scored a minor negative effect against SA objective criterion 11b (Soil quality) because it partially falls on Grade 3 agricultural land.

Summary

- 1.44 Overall, sites GT19 and GT20 scored more favourably than the other sites, with significant positive effects recorded against five of the SA objectives' criteria (5a, 5b, 6, 10a and 10b). Both GT19 and GT20 scored minor negative effects against SA objective 9 and SA objective criterion 11a, with the effect against 11a being recorded as uncertain. GT19 and GT20 are the only sites that do not fall within a Flood Zone. Similarly, GT19 and GT20 form part of two housing allocations (Policies RM6 and RM7 in the PPLP, respectively). It is therefore possible that some of the minor scores recorded against sites GT17, GT19 and GT20 will increase to significant effects. For example, during construction there may be an increase in construction dust, which could have a temporary adverse effect on the health and wellbeing of residents.
- 1.45 One of the other sites, GT17, scored a significant positive effect against six SA objectives' criteria compared to five. However, it also scored a significant negative effect against SA objective 9 (Biodiversity) because it falls within a national BAP Priority Habitat. Site GT17 is located adjacent to Policy E1 (Mountfield Road Phase 3 and 4), an employment site allocated in the Places and Policies Local Plan (PPLP). This allocation is protected for business uses under use classes B1 (business), B2 (general industrial) and B8 (storage and distribution), as well as a proportion of non-business use classes (up to 25%).
- 1.46 **Table 2** provides a summary of all the effects described above and **Appendix 2** contains the appraisal matrices for each shortlisted site option and additional site GT41.

¹⁰ Kent County Council used a five point scale to assess the potential for effects on the historic environment – 1 highlighting the potential for major impacts and 0 highlighting no issues.




Table 2: SA findings for the 7 shortlisted Gypsy and Traveller site options and additional site GT41¹¹

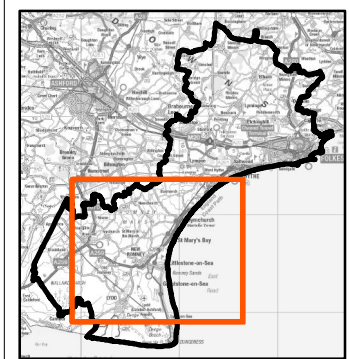
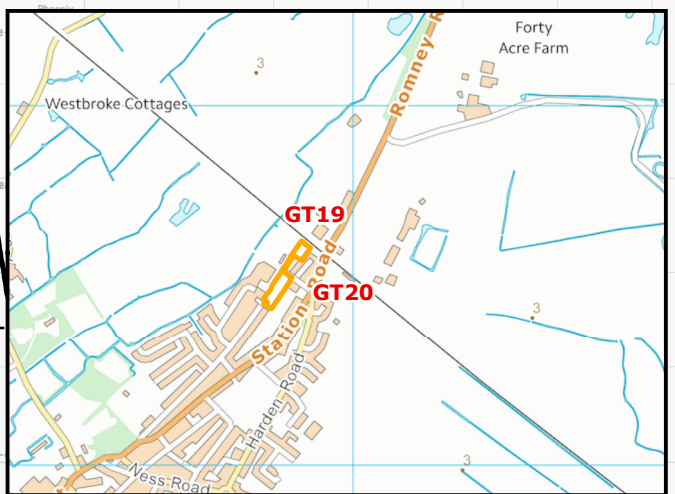
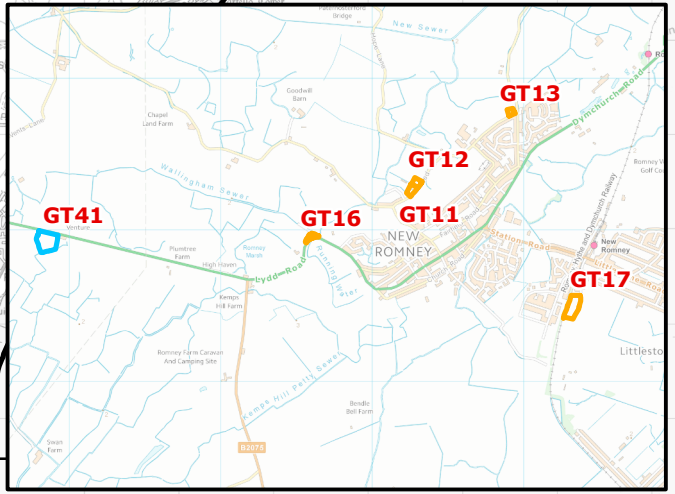
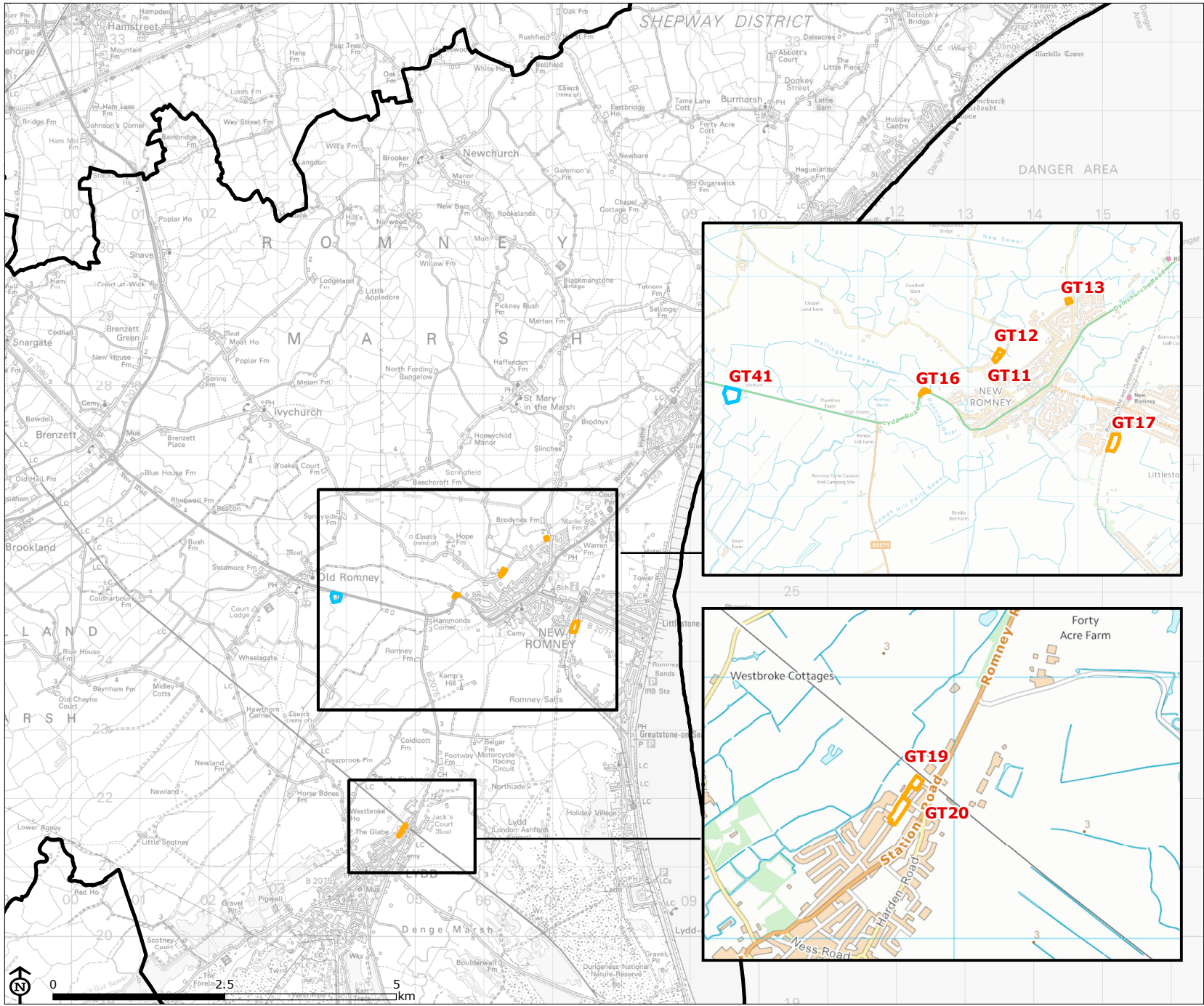
Sites	SA Objectives																				
	SA 1 Flood Risk	SA 2: Climate Change Mitigation	SA 3: Community vibrancy, services and facilities	SA 4: Crime Reduction	SA 5(a) : Affordable Housing	SA 5(b) : Housing for Older People	SA 6: Employment Opportunities	SA 7: Historic Environment	SA 8(a) : Landscape 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
GT11	--	0	+	0	++	++	+	-?	0?	0	0	0?	+	0	-	0	0	0	0	0	0
GT12	--	0	+	0	++	++	+	-?	0?	0	0	0?	+	0	-	0	0	0	0	0	0
GT13	--	0	0	0	++	++	0	-?	0?	0	0	0?	0	++	-	0	0	0	0	0	0
GT16	--	0	0	0	++	++	+	0	0?	0	0	0?	+	++	-	--	0	0	0	0	0
GT17	--	0	+	0	++	++	++	-?	0?	0	++?	--	++	++	+	-	?	0	0	0	0
GT19	0	0	0	0	+	+	++	0	0?	0	0	-?	++	++	-	0	0	0	0	0	0
GT20	0	0	0	0	+	+	++	0	0?	0	0	-?	++	++	-	0	0	0	0	0	0
GT41	--	0	0	0	++	++	0	0	0?	0	0	0	0	0	-	--	0	0	0	0	0

¹¹ GT41 the preferred site for allocation is coloured in blue the first column. The remaining sites (coloured in orange) represent the reasonable alternatives.

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Figure 1: Preferred Gypsy and Traveller Site and the Shortlisted Reasonable Alternatives

-  Folkestone and Hythe District Boundary
- Traveller Sites**
-  Preferred Site
-  Reasonable Alternatives



Source: OS, Folkestone & Hythe District Council

Map Scale @ A4: 1:80,000



Appraisal of Policy RM15

1.47 Following the appraisal of the seven shortlisted site options and the additional site GT41 and consideration of other evidence the Council selected site GT41 as the preferred option for allocation in the PPLP¹². Policy RM15 allocating the Land Adjacent to 'The Retreat', Lydd Road, Old Romney was subsequently drafted for inclusion within the PPLP. Policy RM15 seeks to mitigate the potential for significant negative effects identified in the policy-off appraisal of GT41 and create opportunities for the enhancement of positive effects.

1.48 A sustainability appraisal of draft policy RM15 was subsequently carried out. A summary of the likely significant effects of policy RM15 and further recommendations are set out below. **Appendix 3** contains the detailed appraisal matrix setting out the likely effects of draft Policy RM15.

Significant positive effects

1.49 Draft Policy RM15 scores a significant positive effect against SA objectives' criteria 5a (Affordable housing) and 5b (Housing for older people) because it makes provision for four pitches, which would provide for the entire identified need for travellers to 2036/37.

Minor positive effects

1.50 Minor positive effects are expected against SA objective criterion 8a (Landscape) and SA objective 9 (Biodiversity) due to the provisions set out within Policy RM15 for the provision of an appropriate landscaping scheme, retaining existing hedgerows and enhancing the eastern boundary of the site through additional planting. These same measures have the potential to enhance and create new habitats for local protected species.

1.51 Draft Policy RM15 also scores a minor positive effect against SA objective 12 (Water quality) because it states that drainage channels abutting the site should be assessed for their ecological importance and if appropriate, mitigation measures introduced that maintain or improve water quality in accordance with CSD5 of the Core Strategy. It also states that a surface water drainage and foul sewerage disposal strategy should be resolved to the satisfaction of the statutory authority.

Significant negative effects

1.52 Draft Policy RM15 scored a significant negative effect against SA objective 1 (Flood risk) because the land within the site is wholly designated as Flood Zone 2 and partially designated as Flood Zone 3. The effect is recorded as uncertain due to the potential benefits associated with the proposed mitigation measures. Currently the policy requires that the areas of the site at greatest risk of flooding be avoided. Whilst the site is located in Flood Zones 2 and 3, the Council's Strategic Flood Risk Assessment (2015) shows that a proportion of the site is identified as being of a Nil flood risk. However, **it is recommended that the policy includes additional wording requesting a detailed Flood Risk Assessment to identify mitigation measures to protect the site from existing flood risk and the increased likelihood of flooding associated with the effects of climate change.**

1.53 A significant negative effect is also expected against SA objective criterion 11b (Soil quality) because the site falls on Grade 1 and 2 agricultural land (the 'Best and Most Versatile Agricultural Land'). The loss of agricultural land for development cannot be reasonably mitigated through policy.

Minor negative effects

1.54 Draft Policy RM15 scored a minor negative effect against SA objective criterion 11a (Efficient use of land) because the site is on undeveloped land, which represents a less efficient use of land when compared to the redevelopment of brownfield land.

1.55 **Table 3** provides a summary of all the effects described above and **Appendix 3** contains the appraisal matrix for Policy RM15.

¹² The reasoning behind the selection of site option GT41 over the other shortlisted sites is presented in **Appendix 1** of this addendum.

Table 3: SA finding for Draft Policy RM15

Sites	SA Objectives																				
	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
RM15	-	0	0	0	++	++	0	0	+	0	0	+	0	0	-	-	0	0	+	0	0

Conclusions

- 1.56 This SA Addendum reports the SA findings of the appraisal of site options for the provision of Gypsy and Traveller pitches in the PPLP and preferred policy RM15. The SA Addendum has been prepared following consultation on the Proposed Submission SA Report, which accompanied the Proposed Submission Draft PPLP and was subsequently submitted to the Secretary of State for examination.
- 1.57 Although sites GT19 and GT20 perform most favourably against the SA framework, Appendix 1 reports that these site options are considered not deliverable for gypsy and traveller use. Furthermore, as detailed in the Council's Gypsy, Traveller and Travelling Showpeople Site Identification Study, other problems of land availability also prevented any of the other shortlisted sites being taken forward for allocation. Consequently, site option GT41 has been selected as the preferred option and is allocated in Policy RM15. Policy RM15 is considered likely to generate a significant positive effect against SA objective 5 (Housing) and significant negative effects against SA objectives 1 (Flood Risk) and 11 (Efficient Use of Land). The significant negative effect recorded against SA objective 1 (Flood Risk) is recorded as uncertain until such time as the potential for mitigation measures are known.
- 1.58 Despite the potential for adverse effects associated with the allocation of site GT41 through Policy RM15, site option GT41 is considered the only available and suitable site capable of delivering four Gypsy and Traveller pitches. Further justification for the selection of site option GT41 over the other reasonable alternatives identified is set out in **Appendix 1** of this SA Addendum.

LUC

July 2019

Appendix 1

Reasons for the Selection and Non-selection of the Gypsy and Traveller Site Options Identified for Consideration

Reasons for the Selection and Non-selection of the Gypsy and Traveller Site Options Identified for Consideration

Note that site options discounted following the SHLAA of the long list are shaded in grey, shortlisted site options are shaded in orange. Additional site GT41 is shaded in blue.

Ref. No	Address	Site Selection Reasoning
Folkestone & Hythe		
GT01	Land off Sandgate Road, Folkestone	The site is located in Folkestone within the Seafront / Creative Regeneration Arc (Core Strategy Policy CSD6). It is considered that the proposed use would not contribute towards achieving the aims and objectives of the policy.
GT02	Land at North Street, Folkestone	The site is located in Folkestone within the Seafront / Creative Regeneration Arc (Core Strategy Policy CSD6). It is considered that the proposed use would not contribute towards achieving the aims and objectives of the policy.
GT03	Land north of East Street, Folkestone	The site is located in Folkestone within the Seafront / Creative Regeneration Arc (Core Strategy Policy CSD6). It is considered that the proposed use would not contribute towards achieving the aims and objectives of the policy.
GT04	Land b/w Valebrook & Valestone Close, Folkestone	The site is located within Seabrook Valley, part of which is identified for a major green infrastructure upgrade (Core Strategy Policy SS7). Development would be harmful to the local landscape character of the Seabrook Valley. It may also result in the gradual coalesce of the two settlements leading to greater urbanisation of the countryside.
GT05	Vale Farm (The Piggeries), Horn Street, Hythe	The site is located within Seabrook Valley. It is removed from the local highway and achieving a suitable access and connection of utilities is unlikely. Whilst the site is well screened, development would erode the rusticity and rurality of the location and would be harmful to the local landscape character of the Seabrook Valley.
GT06	Land adjacent 43 Horn Street, Hythe	The site is located within Seabrook Valley. It is accessed via a private road and therefore achieving a suitable access and connection of utilities is uncertain. Whilst the site is well screened, development would require the clearance of a number of trees that would be harmful to the local landscape character of the Seabrook Valley.
GT07	Land north-west of Blackhouse Hill, Hythe	The site is located on the north eastern edge of Hythe. It of an open and exposed nature set within the Kent Downs AONB and a Special Character Area. Development would have a detrimental impact on the landscape and prominent views across the Saltwood Valley. There is also potential impact on the adjacent local wildlife site.
GT08	Land at Botolphs Bridge, West Hythe	The site is located on the western edge of Hythe. It is completely enveloped by areas of extreme and significant flood risk on the SFRA 2115 Mapping. Not appropriate for development given the particular vulnerability of caravans.
GT09	Prince of Wales Residential Park, Hythe	The site is located within the urban area of Hythe. It is within areas of significant and extreme flood on the SFRA 2115 Mapping. Not appropriate for development given the particular vulnerability of caravans.
GT10	Willow Tree Farm Mobile Home Park, Hythe	The site is located within the urban area of Hythe. It is within areas of significant and extreme flood on the SFRA 2115 Mapping. Not appropriate for development given the particular vulnerability of caravans.
Romney Marsh		
GT11	Land west of Cockreed Lane, New Romney	The site is located on the northern outskirts of New Romney. Whilst detached from the settlement boundary, the land in between is allocated for housing. Once developed, the site could be within a reasonable walking distance of local services. It is well screened from the wider landscape by a number of mature trees and no landscape or wildlife designations.

GT12	Brickyard Poultry Farm, Cockreed Lane, New Romney	The site is located on the northern outskirts of New Romney. Whilst detached from the settlement boundary, the land in between is allocated for housing. Once developed, the site could be within a reasonable walking distance of local services. There are a number of agricultural structures in situ. It is well screened from the wider landscape by mature trees and no landscape or wildlife designations.
GT13	Craythorne Farm, New Romney	The site is located on the north eastern edge of New Romney. It has direct access to the local highway and whilst a fair walking distance of local services, it is well connected by footpaths. It is well screened from the wider landscape by a number of mature trees and there are no landscape or wildlife designations associated with the site.
GT14	Land North of Langport Road (1), New Romney	The site is located on the eastern edge of New Romney. It is detached from the local highway separated by third party land and therefore achieving a suitable access and connection of utilities is uncertain. Whilst a fair walking distance of local services, it is well connected by footpaths. There are no landscape or wildlife designations associated with the site.
GT15	Land North of Langport Road (2), New Romney	The site is located on the eastern edge of New Romney. It is detached from the local highway separated by third party land and therefore achieving a suitable access and connection of utilities is uncertain. It is considered to be unrelated to the existing settlement and is a fair distance from local services. There may be some potential landscape impacts.
GT16	Highways Depot, Running Waters Corner, New Romney	The site is located on the north western edge of New Romney. It has good access to the local highway and existing hardstanding given its previous use as a highways depot. It is well screened and a reasonable distance from existing residents. It is within reasonable walking distance of a range of local services. There are no landscape or wildlife designations associated with the site. Potential contamination to be investigated.
GT17	Station Approach, New Romney	The site is located on the settlement boundary in between New Romney and Littlestone. It is situated in a semi commercial area with direct access to the local highway. Whilst a fair walking distance of local services, it is well connected by footpaths. It is considered to be well related but a reasonable distance from existing residents. There are no landscape or wildlife designations associated with the site. Potential contamination to be investigated.
GT18	St Andrews Road, Littlestone	The site is located on the north eastern edge of Littlestone. It is directly adjacent to the Dungeness, Romney Marsh and Rye Bay SSSI and Ramsar and therefore has some ecological value. Development would also result in the partial loss of an open sports facility.
GT19	Land North of Kitewell Lane, Lydd	This site is located on the northern eastern edge of Lydd. It is situated in a semi commercial area, which includes the Bridge Home (Caravan) Park and has good access to the local highway. Whilst a fair walking distance of local services, it is well connected by footpaths. It is considered to be well related but a reasonable distance from existing residents. There are no landscape or wildlife designations associated with the site. There may be potential costs associated with the connection of utilities.
GT20	Land South of Kitewell Lane, Lydd	This site is located on the northern eastern edge of Lydd. It is situated in a semi commercial area, which includes the Bridge Home (Caravan) Park and has direct access to the local highway. Whilst a fair walking distance of local services, it is well connected by footpaths. It is considered to be well related but a reasonable distance from existing residents. There are no landscape or wildlife designations associated with the site.
GT21	East Ripe(1), Lydd	The site is located on the north eastern outskirts of Lydd. It is within the Dungeness, Romney Marsh and Rye Bay SSSI and is therefore certain to have some ecological value.
GT22	East Ripe(2), Lydd	The site is located on the north eastern outskirts of Lydd. It is within the Dungeness, Romney Marsh and Rye Bay SSSI and is therefore certain to have some ecological value.
GT23	East Ripe(3), Lydd	The site is located on the north eastern outskirts of Lydd. It is within the Dungeness, Romney Marsh and Rye Bay SSSI and is therefore certain to have some ecological value.
GT24	Hérons Park, Lydd	The site is located on the southern outskirts of Lydd. It is more than 500m from the nearest settlement boundary and within an area of significant and extreme flood on the SFRA 2115 Mapping. Not appropriate for development given the particular vulnerability of caravans.

GT25	Lydd Caravan Park, Lydd	The site is located on the western outskirts of Lydd. It is more than 500m from the nearest settlement boundary and within an area of significant and extreme flood on the SFRA 2115 Mapping. Not appropriate for development given the particular vulnerability of caravans.
GT26	Dymchurch Parish Car Park	The site is located within the urban area Dymchurch. It is within an area of significant and extreme flood on the SFRA 2115 Mapping. Not appropriate for development given the particular vulnerability of caravans.
GT27	Land at Dymchurch, Recreation Field	The site is located within on the northern edge of Dymchurch. It is within an area of significant and extreme flood on the SFRA 2115 Mapping. Not appropriate for development given the particular vulnerability of caravans.
GT28	Orchard Caravan Park, Dymchurch	The site is located on the northern outskirts of Dymchurch. It is more than 500m from the nearest settlement boundary and within an area of significant and extreme flood on the SFRA 2115 Mapping. Not appropriate for development given the particular vulnerability of caravans.
GT29	Bellfield Farm, Romney Marsh	The site is located in a rural location on the Romney Marsh. It is more than 500m from the nearest settlement boundary and within an area of significant and extreme flood on the SFRA 2115 Mapping. Not appropriate for development given the particular vulnerability of caravans.
GT30	Harveyland Farm, Romney Marsh	The site is located in a rural location on the Romney Marsh. It is more than 500m from the nearest settlement boundary and within an area of significant and extreme flood on the SFRA 2115 Mapping. Not appropriate for development given the particular vulnerability of caravans.
GT41	Land adjacent to 'The Retreat', Lydd Road, Old Romney	The site is located in between the settlements of New Romney and Old Romney. It has direct access to the local highway and whilst not within walking distance of local facilities these are accessible with a short car journey. The site is largely free of constraints, with the exception of flood risk. However, mitigation measures are being sought to avoid and reduce flood risk. Consideration would need to be given to surface drainage, ecology and landscape; although the site is reasonable well screened by mature trees. The site is available for development as a small-scale Gypsy and Traveller site.
North Downs		
GT31	Land west of Canterbury Road, Hawkinge	The site is located on the south eastern edge of Hawkinge. It is accessed via a private road and therefore achieving a suitable access and connection of utilities is uncertain. Whilst the site is well screened, it considered that development would be harmful to the local landscape character of the Kent Downs AONB. There is potential also to have some ecological value.
GT32	Land rear of Brook Lane Cottages, Brook Lane, Sellindge	The site is located on the eastern edge of Sellindge. It is removed from the local highway via a narrow driveway in between two properties and therefore achieving a suitable access and connection of utilities is unlikely. It is also a fair distance from local services and along a road without a footpath.
GT33	Red House Lane, Lyminge	This site is located on the eastern edge of Lyminge. There is direct access to the local highway, although this is a country lane that over sails the former railway line and therefore achieving a suitable access and connection of utilities is unlikely. The site is set within the Kent Downs AONB. Whilst well screen, development would be an encroachment on the landscape. There is potential also to have some ecological value.
GT34	Land east of former railway, Teddars Leas Road, Etchinghill	This site is located on the northern edge of Etchinghill. It is accessed via a farm track and therefore achieving a suitable access and connection of utilities is uncertain. It is of an open and exposed nature set within the Kent Downs AONB. Development would have a detrimental impact on the landscape. It is in close proximity to the Folkestone to Etchinghill Escarpment SSSI and Ancient Woodland and is therefore certain to have some ecological value.
GT35	Highview Residential Park	This site is located on the western outskirts of Capel and currently functions as a residential and touring caravan site. It has direct access to the local highway and whilst a fair distance of local services it is well connected by footpaths. The site is set within the Kent Downs AONB and adjacent to the Folkestone Warren SSSI; development as part of the existing facility is thought would not be harmful to the character of the landscape or ecological value. The site is not regarded as available as the owners have not expressed an interest to accommodating G & T pitches.

GT36	Black Horse Farm Caravan Club Site	The site is located on the western edge of Densole and currently functions as a residential and touring caravan site. It has direct access to the local highway and whilst a fair distance of local services it is well connected by footpaths. The site is set within the Kent Downs AONB, although development as part of the existing facility is thought would not be harmful to the character of the landscape. The site is not regarded as available as the owners have not expressed an interest to accommodating G & T pitches.
GT37	The Chequers Caravan Site, Selsted	The site is located on the eastern edge of Selsted and is more than 500m from the nearest settlement boundary.
GT38	Little North Leigh Farm	The site is located in a rural location west of Stelling Minnis and is more than 500m from the nearest settlement boundary.
GT39	Paddlesworth Court Farm, Paddlesworth	The site is located in a rural location west of Hawkinge and is more than 500m from the nearest settlement boundary.
GT40	Page Farm	The site is located on the edge of Postling and is more than 500m from the nearest settlement boundary.

Appendix 2

SA Matrices for Gypsy and Traveller Shortlisted Site Options and Additional Site GT41

GT11 – Land west of Cockreed Lane, New Romney

GT11 – Land west of Cockreed Lane, New Romney		
SA Objectives	Effect	Justification
1: Reduce the risk of flooding, taking into account the effects of climate change.	--	The land within the site is wholly designated as Flood Zones 2 and 3 but is not identified in the District's SFRA (2015) as at risk of 'extreme', 'moderate' or 'significant' coastal flooding. The site does not include a flood storage area. Therefore, there is a significant risk of flooding within the site.
2. Increase energy efficiency in the built environment, the proportion of energy use from renewable sources and resilience to a changing climate and extreme weather.	0	The location of the sites will not have an effect on levels of domestic energy consumption and the potential for renewable energy use. Therefore, all sites are considered to have a negligible effect on this objective.
3. Promote community vibrancy, provide opportunities to access services, facilities and environmental assets for all and avoid creating inequalities of opportunity for access.	+	The site is within convenient walking distance of two medical surgeries, St Nicholas Church of England Primary School and Marsh Academy, a post office, outdoor sports and recreational facilities and a number of open spaces. A minor positive effect is likely.
4. Reduce crime and the fear of crime.	0	The effects of new developments on levels of crime and fear of crime will depend on detailed design factors, such as the incorporation of green space or the use of appropriate lighting, not by the location of the sites. All sites are assumed to have a negligible effect.
5. 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	The site is expected to be able to accommodate 4 pitches, which would meet the outstanding identified need for traveller pitches to 2036/37.
	5(b) Dwellings for older people	
6. Support the creation of high quality and diverse employment opportunities.	+	The site is within convenient walking distance of New Romney High Street where there are a number of shopping parades.
7. Conserve and enhance the fabric and setting of historic assets.	-?	This site falls within SHLAA site 373, which scored 3 in KCC's heritage assessment. This is due to the presence of a sewer along the western boundary of site 373 and other bounding drainage ditches, all of which are depicted in the Hope Tithe Map. Site 373 is also located in an area of multi-period archaeological potential, and extensive medieval earthworks are visible on aerial photographs within the fields on the opposite side of Cockreed Lane. Overall, a minor negative but

GT11 – Land west of Cockreed Lane, New Romney			
SA Objectives	Effect	Justification	
		uncertain effect is expected.	
8. Conserve, and where relevant enhance, the quality, character and local distinctiveness of the landscape and townscape.	8(a) Landscape	0?	The site is not within 1km of the Kent Downs AONB. A negligible effect is therefore likely. This potential effect will be uncertain as the exact impacts on the landscape will depend on factors relating to the specific design and layout of the new development.
	8(b) Settlement character: coalescence	0	The site lies between the boundary of the settlement of New Romney and the settlement of Ivychurch. The development of the site would result in the loss of less than 10% of the gap between these two settlements, which is likely to have a negligible effect. This is uncertain until the detailed design, layout and landscaping of the site is known.
	8(c) Townscape: regeneration	0	The site is on undeveloped greenfield land. Therefore, a negligible effect is likely as there would be no potential for regeneration.
9. Conserve and enhance biodiversity.	0?	The site does not contain or lie in close proximity to any ecological designations; however, the site is made up of undesignated greenfield land. Therefore, a negligible uncertain effect is recorded.	
10. 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	+	The site is within convenient walking distance of New Romney High Street where there is a parade of shops.
	10(b) Increase opportunities to choose sustainable transport modes	0	The site is not within convenient walking distance of public transport modes.
11. Use land efficiently and safeguard soils, geology and economic mineral reserves.	11(a) Efficient use of land	-	The site is on undeveloped greenfield land. This represents a less efficient use of land compared to developing brownfield sites.
	11(b) Soil quality and quantity	0	The site is not on graded agricultural land.
	11(c) Land contamination	0	The site is not considered to be contaminated.
	11(d) Minerals safeguarding	0	The site is not in a Mineral Safeguarding Area.

GT11 – Land west of Cockreed Lane, New Romney		
SA Objectives	Effect	Justification
12. Maintain and improve the quality of groundwater, surface waters and coastal waters.	0	The site is within the parish of St. Mary in the Marsh which is not considered to have waste water capacity issues. The site does not fall within a Groundwater Source Protection Zone.
13. Use water resources efficiently.	0	Development standards in relation to water efficiency are not related to a site's location.
14. Protect and enhance open space and ensure that it meets local needs.	0	The site is not a designated area of open space.

GT12 – Brickyard Poultry Farm, Cockreed Lane, New Romney

GT12 – Brickyard Poultry Farm, New Romney		
SA Objectives	Effect	Justification
1: Reduce the risk of flooding, taking into account the effects of climate change.	--	The land within the site is wholly designated as Flood Zones 2 and 3 but is not identified in the District's SFRA (2015) as at risk of 'extreme', 'moderate' or 'significant' coastal flooding. The site does not include a flood storage area. Therefore, there is a significant risk of flooding within the site.
2. Increase energy efficiency in the built environment, the proportion of energy use from renewable sources and resilience to a changing climate and extreme weather.	0	The location of the sites will not have an effect on levels of domestic energy consumption and the potential for renewable energy use. Therefore, all sites are considered to have a negligible effect on this objective.
3. Promote community vibrancy, provide opportunities to access services, facilities and environmental assets for all and avoid creating inequalities of opportunity for access.	+	The site is within convenient walking distance of two medical surgeries, St. Nicholas Church of England Primary School and Marsh Academy, a post office, outdoor sports and recreational facilities, a shopping parade (New Romney High Street) and open spaces.
4. Reduce crime and the fear of crime.	0	The effects of new developments on levels of crime and fear of crime will depend on detailed design factors, such as the incorporation of green space or the use of appropriate lighting, not by the location of the sites. All sites are assumed to have a negligible effect.
5. 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	The site is expected to be able to accommodate 4 pitches, which would meet the outstanding identified need for traveller pitches to 2036/37.
	5(b) Dwellings for older people	
6. Support the creation of high quality and diverse employment opportunities.	+	The site is within convenient walking distance of New Romney High Street where there are a number of shopping parades.
7. Conserve and enhance the fabric and setting of historic assets.	-?	This site falls within SHLAA site 1015, which scored 3 in KCC's heritage assessment. This is due to a number of reasons including the fact that the drains and sewers bounding site 1015 are depicted in the Hope Tithe Map. Site 1015 is also located in an area of multi-period archaeological potential. Extensive medieval earthworks are visible in aerial photographs within the fields on the opposite side of Cockreed Lane. A brickworks is also recorded on the site in the Kent HER, but the

GT12 – Brickyard Poultry Farm, New Romney		
SA Objectives	Effect	Justification
		Hope Tithe Map and First Edition Ordnance Survey map show the brickworks to be located to the south-west. The site forms part of New Romney which is a more rural settlement and is within 500m of Romney Priory Scheduled Monument directly to the south of the site within the historic core of New Romney. Overall, a minor negative but uncertain effect is expected.
8. Conserve, and where relevant enhance, the quality, character and local distinctiveness of the landscape and townscape.	8(a) Landscape	0?
	8(b) Settlement character: coalescence	0
	8(c) Townscape: regeneration	0
9. Conserve and enhance biodiversity.	0?	The site does not contain or lie in close proximity to any ecological designations; however, the site is made up of undesignated greenfield land. Therefore, a negligible uncertain effect is recorded.
10. 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	+
	10(b) Increase opportunities to choose sustainable transport modes	0
11. Use land efficiently and safeguard soils, geology and economic mineral reserves.	11(a) Efficient use of land	-
	11(b) Soil quality and quantity	0
	11(c) Land	0

GT12 – Brickyard Poultry Farm, New Romney		
SA Objectives	Effect	Justification
contamination		
11(d) Minerals safeguarding	0	The site is not in a Minerals Safeguarding Area.
12. Maintain and improve the quality of groundwater, surface waters and coastal waters.	0	The site is within the parish of St Mary in the Marsh which is not considered to have waste water capacity issues. The site does not fall within a Groundwater Source Protection Zone.
13. Use water resources efficiently.	0	Development standards in relation to water efficiency are not related to a site's location.
14. Protect and enhance open space and ensure that it meets local needs.	0	The site is not in a designated area of open space.

GT13 – Craythorne Farm, New Romney

GT13 – Craythorne Farm, New Romney		
SA Objectives	Effect	Justification
1: Reduce the risk of flooding, taking into account the effects of climate change.	--	The land within the site is wholly designated as Flood Zones 2 and 3 but is not identified in the District's SFRA (2015) as at risk of 'extreme', 'significant' or 'moderate' flooding. The site does not include a flood storage area. Therefore, there is a significant risk of flooding within the site.
2. Increase energy efficiency in the built environment, the proportion of energy use from renewable sources and resilience to a changing climate and extreme weather.	0	The location of the sites will not have an effect on levels of domestic energy consumption and the potential for renewable energy use. Therefore, all sites are considered to have a negligible effect on this objective.
3. Promote community vibrancy, provide opportunities to access services, facilities and environmental assets for all and avoid creating inequalities of opportunity for access.	0	The site is within convenient walking distance of two schools, St. Nicholas Church of England Primary School and Marsh Academy, outdoor sports and recreational facilities and an area of open space. Overall, accessibility to two broad types of facility is not considered significant enough to have a positive effect on this objective.
4. Reduce crime and the fear of crime.	0	The effects of new developments on levels of crime and fear of crime will depend on detailed design factors, such as the incorporation of green space or the use of appropriate lighting, not by the location of the sites. All sites are assumed to have a negligible effect.
5. 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	The site is expected to be able to accommodate 4 pitches, which would meet the outstanding identified need for traveller pitches to 2036/37.
	5(b) Dwellings for older people	
6. Support the creation of high quality and diverse employment opportunities.	0	The site is not within convenient walking distance of an employment area or shopping parade.
7. Conserve and enhance the fabric and setting of historic assets.	-?	This site scored 3 in KCC's heritage assessment. This is due to the site being located within an area of multi-period archaeological potential to the north of the historic port and town of New Romney. There are no built heritage assets within close proximity of the site. Overall, a minor negative but uncertain effect is expected.

GT13 – Craythorne Farm, New Romney			
SA Objectives		Effect	Justification
8. Conserve, and where relevant enhance, the quality, character and local distinctiveness of the landscape and townscape.	8(a) Landscape	0?	The site is not within 1km of the Kent Downs AONB. A negligible effect is therefore likely. This potential effect will be uncertain as the exact impacts on the landscape will depend on factors relating to the specific design and layout of the new development.
	8(b) Settlement character: coalescence	0	The site lies between the boundary of the settlement of New Romney and the settlement of Ivychurch. The development of the site would result in the loss of less than 10% of the gap between these two settlements, which is likely to have a negligible effect. This is uncertain until the detailed design, layout and landscaping of the site is known.
	8(c) Townscape: regeneration	0	The site is on undeveloped land. Therefore, a negligible effect is likely as there would be no potential for regeneration.
9. Conserve and enhance biodiversity.		0?	The site does not contain or lie in close proximity to any ecological designations; however, the site is made up of undesignated greenfield land. Therefore, a negligible uncertain effect is recorded.
10. 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	0	The site is not within convenient walking distance of an employment area or shopping parade.
	10(b) Increase opportunities to choose sustainable transport modes	++	The site is within convenient walking distance of a number of bus stops.
11. Use land efficiently and safeguard soils, geology and economic mineral reserves.	11(a) Efficient use of land	-	The site is on undeveloped land. This represents a less efficient use of land compared to developing brownfield sites.
	11(b) Soil quality and quantity	0	The site is not on graded agricultural land.
	11(c) Land contamination	0	The land within the site is not considered to be contaminated.
	11(d) Minerals safeguarding	0	The site is not in a Minerals Safeguarding Area.

GT13 – Craythorne Farm, New Romney		
SA Objectives	Effect	Justification
12. Maintain and improve the quality of groundwater, surface waters and coastal waters.	0	The site is within the parish of St. Mary in the Marsh which is not considered to have waste water capacity issues. The site is also not within a Groundwater Source Protection Zone.
13. Use water resources efficiently.	0	Development standards in relation to water efficiency are not related to a development site's location.
14. Protect and enhance open space and ensure that it meets local needs.	0	The site is not in a designated area of open space.

GT16 –Highways Depot, Running Waters Corner, New Romney

GT16 –Highways Depot, Running Waters Corner, New Romney		
SA Objectives	Effect	Justification
1: Reduce the risk of flooding, taking into account the effects of climate change.	--	The land within the site is wholly designated as Flood Zone 2, with approximately 80% of the site within a Flood Zone 3 area. The site does not include a flood storage area and is not identified in the District's SFRA (2015) as at risk of 'extreme', 'moderate' or 'significant' coastal flooding. Overall, there is a significant risk of flooding within the site. The Environment Agency note that the site falls on the edge of the flood zones area and outside the breach analysis in the SFRA; however, they warn that any permission on the site should be time limited to account for future climate change predictions.
2. Increase energy efficiency in the built environment, the proportion of energy use from renewable sources and resilience to a changing climate and extreme weather.	0	The location of the sites will not have an effect on levels of domestic energy consumption and the potential for renewable energy use. Therefore, all sites are considered to have a negligible effect on this objective.
3. Promote community vibrancy, provide opportunities to access services, facilities and environmental assets for all and avoid creating inequalities of opportunity for access.	0	The site is within convenient walking distance of a parade of shops, a post office and outdoor sports and recreational facilities. There are no other services or facilities within close proximity.
4. Reduce crime and the fear of crime.	0	The effects of new developments on levels of crime and fear of crime will depend on detailed design factors, such as the incorporation of green space or the use of appropriate lighting, not by the location of the sites. All sites are assumed to have a negligible effect.
5. 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	++
	5(b) Dwellings for older people	
6. Support the creation of high quality and diverse employment opportunities.	+	The site is within convenient walking distance of New Romney High Street where there is a parade of shops.
7. Conserve and enhance the fabric and setting of historic assets.	0	The site sits within a rural area of Folkestone & Hythe, near the town of New Romney. There are no built heritage assets within close proximity, and the site is not covered by KCC's heritage assessment.

GT16 –Highways Depot, Running Waters Corner, New Romney

SA Objectives		Effect	Justification
8. Conserve, and where relevant enhance, the quality, character and local distinctiveness of the landscape and townscape.	8(a) Landscape	0?	The site is not within 1km of the Kent Downs AONB. A negligible effect is therefore likely. This potential effect will be uncertain as the exact impacts on the landscape will depend on factors relating to the specific design and layout of the new development.
	8(b) Settlement character: coalescence	0	The development of the site is not considered to contribute to the coalescence of New Romney with neighbouring settlements.
	8(c) Townscape: regeneration	0	The site sits on undeveloped land. Therefore, a negligible effect is likely as there would be no potential for regeneration.
9. Conserve and enhance biodiversity.		0?	The site does not contain or lie in close proximity to any ecological designations; however, despite containing a gravelled area, the site is made up of undesignated greenfield land. Therefore, a negligible uncertain effect is recorded.
10. 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	+	The site is within convenient walking distance of New Romney High Street where there are a number of shopping parades.
	10(b) Increase opportunities to choose sustainable transport modes	++	The site is within convenient walking distance of one bus stop.
11. Use land efficiently and safeguard soils, geology and economic mineral reserves.	11(a) Efficient use of land	-	Although the site contains a gravelled area and is sometimes used to store highways materials, the land is undeveloped. This represents a less efficient use of land when compared with the redevelopment of brownfield land. Therefore, a minor negative effect is recorded.
	11(b) Soil quality and quantity	--	The whole site lies on Grade 2 agricultural land.
	11(c) Land contamination	0	The site is not considered to be contaminated.
	11(d) Minerals safeguarding	0	The site is not in a Minerals Safeguarding Area.
12. Maintain and improve the quality of		0	The site is within the parish of Old Romney which is not considered to have waste water capacity issues. The site does not

GT16 –Highways Depot, Running Waters Corner, New Romney		
SA Objectives	Effect	Justification
groundwater, surface waters and coastal waters.		fall within a Groundwater Source Protection Zone.
13. Use water resources efficiently.	0	Development standards in relation to water efficiency are not related to a site's location.
14. Protect and enhance open space and ensure that it meets local needs.	0	The site is not in a designated area of open space.

GT17 – Station Approach, New Romney

GT17 – Station Approach, New Romney		
SA Objectives	Effect	Justification
1: Reduce the risk of flooding, taking into account the effects of climate change.	--	The whole site is within a Flood Zone 2 and 3 area, although not identified in the District's SFRA (2015) as at risk of 'extreme', 'significant' and 'moderate' coastal flooding. The site does not include a flood storage area. A significant negative effect is therefore likely.
2. Increase energy efficiency in the built environment, the proportion of energy use from renewable sources and resilience to a changing climate and extreme weather.	0	The location of the sites will not have an effect on levels of domestic energy consumption and the potential for renewable energy use. Therefore, all sites are considered to have a negligible effect on this objective.
3. Promote community vibrancy, provide opportunities to access services, facilities and environmental assets for all and avoid creating inequalities of opportunity for access.	+	The site is within convenient walking distance of a medical surgery, Marsh Academy, an employment area, outdoor sports and recreational facilities and open spaces. Therefore, the site is considered to have a minor positive effect on this objective.
4. Reduce crime and the fear of crime.	0	The effects of new developments on levels of crime and fear of crime will depend on detailed design factors, such as the incorporation of green space or the use of appropriate lighting, not by the location of the sites. All sites are assumed to have a negligible effect.
5. 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	++
	5(b) Dwellings for older people	
6. Support the creation of high quality and diverse employment opportunities.	++	The site is adjacent to an employment area and is within convenient walking distance of New Romney High Street where there are a number of shopping parades.
7. Conserve and enhance the fabric and setting of historic assets.	-?	This site scored 4 in KCC's heritage assessment. This is due to the site being located alongside the Romney, Hythe & Dymchurch Railway. Station Road, Canfield Road and Neptune Road appear in the Second and Third Edition Ordnance Survey maps. With the exception of Station Road, all had disappeared by the time the 4th Edition Map was published. There are no built heritage assets within close proximity of the site. Overall, a minor negative but uncertain effect is

GT17 – Station Approach, New Romney			
SA Objectives	Effect	Justification	
		expected.	
8. Conserve, and where relevant enhance, the quality, character and local distinctiveness of the landscape and townscape.	8(a) Landscape	0?	The site is not within 1km of the Kent Downs AONB. A negligible effect is therefore likely. This potential effect will be uncertain as the exact impacts on the landscape will depend on factors relating to the specific design and layout of the new development.
	8(b) Settlement character: coalescence	0	The site is not considered to contribute to the coalescence of New Romney with neighbouring settlements.
	8(c) Townscape: regeneration	++?	While the site appears to be brownfield, it has since become naturalised and blended back into the landscape. The site is likely to require some remediation and therefore redevelopment of the site is considered to make a significant contribution to the regeneration of the wider townscape, although there is an element of uncertainty relating to the appropriateness of development.
9. Conserve and enhance biodiversity.	--	This entire site is within a national BAP Priority Habitat (coastal and floodplain grazing marsh). A significant negative effect is therefore likely.	
10. 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	++	The site is adjacent to an employment area and is within convenient walking distance of New Romney High Street where there are a number of shopping parades.
	10(b) Increase opportunities to choose sustainable transport modes	++	The site is within convenient walking distance of New Romney train station and a number of bus stops.
11. Use land efficiently and safeguard soils, geology and economic mineral reserves.	11(a) Efficient use of land	+	The site appears to be previously developed. This is considered to be a more efficient use of land compared to developing greenfield sites.
	11(b) Soil quality and quantity	-	Approximately 55% of the land within the site is on Grade 3 agricultural land.
	11(c) Land contamination	?	The site appears to have had a previous unknown use. There is therefore potential for contamination.

GT17 – Station Approach, New Romney			
SA Objectives		Effect	Justification
	11(d) Minerals safeguarding	0	The site is not in a Minerals Safeguarding Area.
12. Maintain and improve the quality of groundwater, surface waters and coastal waters.		0	The site is within the parish of New Romney which is not considered to have waste water capacity issues. The site is also not within a Groundwater Source Protection Zone.
13. Use water resources efficiently.		0	Development standards in relation to water efficiency are not related to a site's location.
14. Protect and enhance open space and ensure that it meets local needs.		0	The site is not in a designated area of open space.

GT19 – Land North of Kitewell Lane, Lydd

GT19 – Land North of Kitewell Lane, Lydd		
SA Objectives	Effect	Justification
1: Reduce the risk of flooding, taking into account the effects of climate change.	0	The land within the site is not within Flood Zones 2 or 3 or identified in the District's SFRA (2015) as at risk of 'extreme', 'significant' or 'moderate' flooding and does not include a flood storage area. Therefore, there is no risk of flooding.
2. Increase energy efficiency in the built environment, the proportion of energy use from renewable sources and resilience to a changing climate and extreme weather.	0	The location of the sites will not have an effect on levels of domestic energy consumption and the potential for renewable energy use. Therefore, all sites are considered to have a negligible effect on this objective.
3. Promote community vibrancy, provide opportunities to access services, facilities and environmental assets for all and avoid creating inequalities of opportunity for access.	0	The site is within convenient walking distance of two sports/recreation facilities and areas of open space, as well as three employment sites. Therefore, a negligible effect is likely.
4. Reduce crime and the fear of crime.	0	The effects of new developments on levels of crime and fear of crime will depend on detailed design factors, such as the incorporation of green space or the use of appropriate lighting, not by the location of the sites. All sites are assumed to have a negligible effect.
5. 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	The site is expected to be able to accommodate 4 pitches, which would meet the outstanding identified need for traveller pitches to 2036/37. The use of the site for traveller pitches would prevent the site being developed for homes under PPLP Policy RM6 (Kitewell Lane, rear of Ambulance Station, Lydd). Consequently, only a minor positive effect is recorded against this objective.
	5(b) Dwellings for older people	
6. Support the creation of high quality and diverse employment opportunities.	++	The site is directly adjacent to an employment area and within convenient walking distance of two others.
7. Conserve and enhance the fabric and setting of historic assets.	0	The site is located on the edge of the town Lydd. There are no built heritage assets within close proximity, and the site is not covered by KCC's heritage assessment.
8. Conserve, and where relevant enhance, the quality,	8(a) Landscape	0?
		The site is not within 1km of the Kent Downs AONB. A negligible effect is likely. This potential effect will be uncertain as the exact impacts on the landscape will depend on factors relating to the specific design and layout of the new

GT19 – Land North of Kitewell Lane, Lydd		
SA Objectives	Effect	Justification
character and local distinctiveness of the landscape and townscape.		development.
8(b) Settlement character: coalescence	0	The site lies between the boundary of the settlement of Lydd and the settlement of New Romney. The development of the site would result in the loss of less than 10% of the gap between these two settlements, which is likely to have a negligible effect. This is uncertain until the detailed design, layout and landscaping of the site is known.
8(c) Townscape: regeneration	0	The site is on undeveloped land. Therefore, a negligible effect is likely as there would be no potential for regeneration.
9. Conserve and enhance biodiversity.	-?	The site is located within 250m of the Dungeness, Romney Marsh and Rye Bay SSSI, as well as some Local Wildlife Sites and BAP Priority Habits. Overall, a minor negative but uncertain effect is expected. The effect is uncertain due to the potential for impacts on undesignated habitats and species of biodiversity interest.
10. 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	++
	10(b) Increase opportunities to choose sustainable transport modes	++
11. Use land efficiently and safeguard soils, geology and economic mineral reserves.	11(a) Efficient use of land	-
	11(b) Soil quality and quantity	0
	11(c) Land contamination	0
	11(d) Minerals safeguarding	0
12. Maintain and improve the quality of	0	The site is within the parish of Lydd which is not considered to have waste water capacity issues. The site does not fall within a Groundwater Source Protection Zone.

GT19 – Land North of Kitewell Lane, Lydd		
SA Objectives	Effect	Justification
groundwater, surface waters and coastal waters.		
13. Use water resources efficiently.	0	Development standards in relation to water efficiency are not related to a site's location.
14. Protect and enhance open space and ensure that it meets local needs.	0	The site is not in a designated area of open space.

GT20 – Land South of Kitewell Lane, Lydd

GT20 – Land South of Kitewell Lane, Lydd		
SA Objectives	Effect	Justification
1: Reduce the risk of flooding, taking into account the effects of climate change.	0	Approximately 10% of the site is within a Flood Zone 2 area. The site does not include a flood storage area and is not identified in the District's SFRA (2015) as at risk of 'extreme', 'moderate' or 'significant' coastal flooding. Overall, a negligible effect is likely.
2. Increase energy efficiency in the built environment, the proportion of energy use from renewable sources and resilience to a changing climate and extreme weather.	0	The location of the sites will not have an effect on levels of domestic energy consumption and the potential for renewable energy use. Therefore, all sites are considered to have a negligible effect on this objective.
3. Promote community vibrancy, provide opportunities to access services, facilities and environmental assets for all and avoid creating inequalities of opportunity for access.	0	The site is within convenient walking distance of two sports/recreation facilities and areas of open space, as well as three employment sites. Therefore, a negligible effect is likely.
4. Reduce crime and the fear of crime.	0	The effects of new developments on levels of crime and fear of crime will depend on detailed design factors, such as the incorporation of green space or the use of appropriate lighting, not by the location of the sites. All sites are assumed to have a negligible effect.
5. 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	The site is expected to be able to accommodate 4 pitches, which would meet the outstanding identified need for traveller pitches to 2036/37. The use of the site for traveller pitches would prevent the site being developed for homes under PPLP Policy RM7 (Land South of Kitewell Lane, Lydd) or lead to a reduced capacity, with fewer homes being provided. Consequently, only a minor positive effect is recorded against this objective.
	5(b) Dwellings for older people	
6. Support the creation of high quality and diverse employment opportunities.	++	The site sits within an employment site and within convenient walking distance of two others.
7. Conserve and enhance the fabric and setting of historic assets.	0	The site is located near the edge of the town Lydd. There are no built heritage assets within close proximity, and the site is not covered by KCC's heritage assessment.
8. Conserve, and where relevant enhance, the quality,	8(a) Landscape	0?
		The site is not within 1km of the Kent Downs AONB. A negligible effect is likely. This potential effect will be uncertain as the exact impacts on the landscape will depend on factors relating to the specific design and layout of the new

GT20 – Land South of Kitewell Lane, Lydd			
SA Objectives	Effect	Justification	
character and local distinctiveness of the landscape and townscape.		development.	
	8(b) Settlement character: coalescence	0	The development of the site is not considered to contribute to the coalescence of Lydd with neighbouring settlements.
	8(c) Townscape: regeneration	0	The site is on undeveloped land. Therefore, a negligible effect is likely as there would be no potential for regeneration.
9. Conserve and enhance biodiversity.	-?	The site is located within 250m of the Dungeness, Romney Marsh and Rye Bay SSSI, as well as some Local Wildlife Sites and BAP Priority Habits. Overall, a minor negative but uncertain effect is expected. The effect is uncertain due to the potential for impacts on undesignated habitats and species of biodiversity interest.	
10. 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	++	The site sits within an employment site and within convenient walking distance of two others.
	10(b) Increase opportunities to choose sustainable transport modes	++	The site is within convenient walking distance of five bus stops.
11. Use land efficiently and safeguard soils, geology and economic mineral reserves.	11(a) Efficient use of land	-	The site is on undeveloped land. This represents a less efficient use of land when compared with the redevelopment of brownfield land. Therefore, a minor negative effect is recorded.
	11(b) Soil quality and quantity	0	The site is not on graded agricultural land.
	11(c) Land contamination	0	The site is not considered to be contaminated.
	11(d) Minerals safeguarding	0	The site is not in a Mineral Safeguarding Area.
12. Maintain and improve the quality of	0	The site is within the parish of Lydd which is not considered to have waste water capacity issues. The site does not fall within a Groundwater Source Protection Zone.	

GT20 – Land South of Kitewell Lane, Lydd		
SA Objectives	Effect	Justification
groundwater, surface waters and coastal waters.		
13. Use water resources efficiently.	0	Development standards in relation to water efficiency are not related to a site's location.
14. Protect and enhance open space and ensure that it meets local needs.	0	The site is not in a designated area of open space.

GT41 – Land Adjacent to ‘The Retreat’, Lydd Road, Old Romney

GT41 – Land Adjacent to The Retreat, Lydd Road, Old Romney		
SA Objectives	Effect	Justification
1: Reduce the risk of flooding, taking into account the effects of climate change.	--	The land within the site is wholly designated as Flood Zone 2, with approximately 95% of the site within a Flood Zone 3 area. The site does not include a flood storage area but parts of the site are identified in the District’s SFRA (2015) as at risk of ‘moderate’ and ‘significant’ coastal flooding. The Strategic Flood Risk Assessment (SFRA) shows that the area to the north, nearest the road, is at Nil risk of flooding. Overall, a significant negative effect is likely.
2. Increase energy efficiency in the built environment, the proportion of energy use from renewable sources and resilience to a changing climate and extreme weather.	0	The location of the sites will not have an effect on levels of domestic energy consumption and the potential for renewable energy use. Therefore, all sites are considered to have a negligible effect on this objective.
3. Promote community vibrancy, provide opportunities to access services, facilities and environmental assets for all and avoid creating inequalities of opportunity for access.	0	The site is not within convenient walking distance of any services or facilities.
4. Reduce crime and the fear of crime.	0	The effects of new developments on levels of crime and fear of crime will depend on detailed design factors, such as the incorporation of green space or the use of appropriate lighting, not by the location of the sites. All sites are assumed to have a negligible effect.
5. 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	The site is expected to be able to accommodate 4 pitches, which would meet the outstanding identified need for traveller pitches to 2036/37.
	5(b) Dwellings for older people	
6. Support the creation of high quality and diverse employment opportunities.	0	The site is not within convenient walking distance of an employment area or shopping parade.
7. Conserve and enhance the fabric and setting of historic assets.	0	The site sits within a rural area of Folkestone & Hythe, near Old Romney Village. There are no built heritage assets within close proximity, and the site is not covered by KCC’s heritage assessment.

GT41 – Land Adjacent to The Retreat, Lydd Road, Old Romney			
SA Objectives	Effect	Justification	
8. Conserve, and where relevant enhance, the quality, character and local distinctiveness of the landscape and townscape.	8(a) Landscape	0?	The site is not within 1km of the Kent Downs AONB. A negligible effect is likely. This potential effect will be uncertain as the exact impacts on the landscape will depend on factors relating to the specific design and layout of the new development.
	8(b) Settlement character: coalescence	0	The site lies close to the village of Old Romney between the boundary of the settlement of New Romney and the settlement of Brenzett. The development of the site would result in the loss of less than 10% of the gap between these two settlements, which is likely to have a negligible effect. This is uncertain until the detailed design, layout and landscaping of the site is known.
	8(c) Townscape: regeneration	0	The site is on undeveloped land. Therefore, a negligible effect is likely as there would be no potential for regeneration.
9. Conserve and enhance biodiversity.	0	The site does not contain or lie in close proximity to any ecological designations; however, the site is made up of undesignated greenfield land. Therefore, a negligible uncertain effect is recorded.	
10. 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	0	The site is not within convenient walking distance of an employment site or shopping parade.
	10(b) Increase opportunities to choose sustainable transport modes	0	The site is not within convenient walking distance of a train station or bus stops.
11. Use land efficiently and safeguard soils, geology and economic mineral reserves.	11(a) Efficient use of land	-	The site is on undeveloped land. This represents a less efficient use of land when compared with the redevelopment of brownfield land. Therefore, a minor negative effect is recorded.
	11(b) Soil quality and quantity	--	Approximately 90% and 10% of the land within the site is on Grade 1 and 2 agricultural land, respectively.
	11(c) Land contamination	0	The site is not considered to be contaminated.
	11(d) Minerals safeguarding	0	The site is not in a Minerals Safeguarding Area.

GT41 – Land Adjacent to The Retreat, Lydd Road, Old Romney		
SA Objectives	Effect	Justification
12. Maintain and improve the quality of groundwater, surface waters and coastal waters.	0	The site is within the parish of Old Romney which is not considered to have waste water capacity issues. The site does not fall within a Groundwater Source Protection Zone.
13. Use water resources efficiently.	0	Development standards in relation to water efficiency are not related to a site's location.
14. Protect and enhance open space and ensure that it meets local needs.	0	The site is not in a designated area of open space.

Appendix 3
SA Matrix for Draft Policy RM15

Draft Policy RM15 – Land adjacent to ‘The Retreat’, Lydd Road, Old Romney

Draft Policy RM15 – Land Adjacent to ‘The Retreat’, Lydd Road, Old Romney’		
SA Objectives	Effect	Justification
1: Reduce the risk of flooding, taking into account the effects of climate change.	--?	The land within this site is wholly designated as Flood Zone 2, with approximately 95% of the site within a Flood Zone 3 area. Furthermore, the site does not include a flood storage area but parts of the site are identified in the District’s SFRA (2015) as at risk of ‘moderate’ and ‘significant’ coastal flooding. Whilst the site is located in Flood Zones 2 and the 3, the Council’s Strategic Flood Risk Assessment (2015) shows that a proportion of the site is identified as being of a Nil flood risk. Policy RM15 states that development proposals will be supported where pitches are sensitively sited and located away from the areas of highest flood risk. Overall, a significant negative effect is likely. This effect is recorded as uncertain due to the potential for some mitigation. It is recommended that the policy include additional wording requesting a detailed Flood Risk Assessment to identify additional mitigation measures to protect the site from existing flood risk and the increased likelihood of flooding associated with the effects of climate change.
2. Increase energy efficiency in the built environment, the proportion of energy use from renewable sources and resilience to a changing climate and extreme weather.	0	The policy would not have a direct effect on this SA objective.
3. Promote community vibrancy, provide opportunities to access services, facilities and environmental assets for all and avoid creating inequalities of opportunity for access.	0	The site is not within convenient walking distance of any services or facilities. As such, the policy is likely to have a negligible effect against this objective.
4. Reduce crime and the fear of crime.	0	The policy would not have a direct effect on this SA objective.
5. 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	The policy makes provision for 4 pitches, which would meet the outstanding identified need for traveller pitches to 2036/37.
	5(b) Dwellings for older people	
6. Support the creation of high quality and diverse employment opportunities.	0	The policy would not have a direct effect on this SA objective.

Draft Policy RM15 – Land Adjacent to ‘The Retreat’, Lydd Road, Old Romney’			
SA Objectives		Effect	Justification
7. Conserve and enhance the fabric and setting of historic assets.		0	There are no heritage assets within close proximity to the site. Furthermore and due to the fact the site was not covered by KCC’s heritage assessment, it is unknown what archaeological assets may be in close proximity to the site. Yet, Policy RM15 states that development proposals will be supported where the archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place. Given the fact that any archaeology found on site will be appropriately dealt with a negligible effect is recorded against this objective.
8. Conserve, and where relevant enhance, the quality, character and local distinctiveness of the landscape and townscape.	8(a) Landscape	+	The site is not within 1km of the Kent Downs AONB. However, the policy acknowledges the sites rural location and requires that development proposals provide suitable landscaping, retaining existing trees and hedgerows along the north, south and western boundaries; and, where appropriate, enhances the eastern boundary through additional planting. Furthermore, it states that development proposals will be supported where additional boundary treatments are compatible with the rural setting and wider landscape. Overall, it is considered that the provision of appropriate landscape treatments have the potential to enhance the local landscape and rural setting with a minor positive effect on this objective.
	8(b) Settlement character: coalescence	0	Due to the fact the development of this site would result in the loss of less than 10% of the gap between the settlements of New Romney and Brenzett, it is not considered that this policy would have a direct effect on this SA objective.
	8(c) Townscape: regeneration	0	The site is on undeveloped land. As such, it is not considered that this policy would have a direct effect on this SA objective.
9. Conserve and enhance biodiversity.		+	The site does not contain or lie in close proximity to any ecological designations but is made up of undesignated greenfield land. However, Policy RM15 states that development proposals will be supported where they conserve and enhance the natural environment in accordance with Policy NE2. Furthermore, the landscaping scheme required by the policy will ensure that existing trees and hedgerows are retained, and that the eastern boundary of the site is enhanced through additional planting. Overall, the policy has the potential to generate a minor positive effect on this objective.
10. 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	0	The site is not within convenient walking distance of an employment site or shopping parade. As such, the policy is likely to have a negligible effect against this objective.
	10(b) Increase opportunities to choose sustainable transport modes	0	The site is not within convenient walking distance of a train station or bus stops. As such, the policy is likely to have a negligible effect against this objective.
11. Use land efficiently and	11(a) Efficient use	-	The site is on undeveloped land, which represents a less efficient use of land when compared to the redevelopment of

Draft Policy RM15 – Land Adjacent to ‘The Retreat’, Lydd Road, Old Romney’		
SA Objectives	Effect	Justification
safeguard soils, geology and economic mineral reserves.	of land	brownfield land. As such, this policy could have a minor negative effect on this SA objective.
	11(b) Soil quality and quantity	--
	11(c) Land contamination	0
	11(d) Minerals safeguarding	0
12. Maintain and improve the quality of groundwater, surface waters and coastal waters.	+	The site is within the parish of Old Romney which is not considered to have waste water capacity issues. Furthermore, the site does not fall within a Groundwater Source Protection Zone. However, Policy RM15 states that the drainage channels abutting the site should be assessed for their ecological importance and if appropriate, mitigation measures introduced that maintain or improve water quality in accordance with CSD5 of the Core Strategy. It also states that a surface water drainage and foul sewerage disposal strategy should be resolved to the satisfaction of the statutory authority. Overall, a minor positive effect is likely.
13. Use water resources efficiently.	0	The policy would not have a direct effect on this SA objective.
14. Protect and enhance open space and ensure that it meets local needs.	0	The site is not in a designated area of open space. As such, it is not considered that this policy would have a direct effect on this objective.

Appendix 4

SA Framework

General Assumptions for SA of site allocations

The approach to the SA of site allocations builds on the framework of sustainability objectives and supporting appraisal questions used by Folkestone & Hythe District Council to appraise its development management policies. The table below sets out the detailed assumptions that were made in assessing the significance of the effect of the reasonable alternative site allocations for housing and for employment / retail developments against each SA objective. The assumptions draw on relevant baseline data and reference documents where available.

Developable area assumption

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

Distance assumptions

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

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

For the purposes of the appraisal, distances in the appraisal will be measured as the straight line distance from the edge of the site option to existing services and facilities, and therefore actual walking distances are likely to be greater (e.g. depending on the house location within a larger site and the availability of a direct route). It is considered that this is a reasonable approach, and professional judgement will be used when applying these distances to each site option and the range of services and facilities considered by the appraisal, for example to take account of significant barriers to straight-line movement, such as railway lines. The distances used in the appraisal will vary depending upon the type of destination being accessed/the mode of transport, for example the standard distance of 800 m has been used for rail stations but a shorter distance of 400 m has been used for bus stops, reflecting the fact that individuals are likely to be prepared to walk greater distances to larger scale facilities.

Increasing cycling is also an important sustainability objective for the District and positive sustainability scores relating to development allocations being within convenient walking distance of services and facilities also reflect the fact that such allocations are also likely to increase the proportion of trips made by bike.

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

Direct effects

The assessments of site allocations will only consider the direct sustainability effects of those allocations i.e. factors which vary according to the size and location of the allocated site. Effects of development which have already been assessed at a higher level in the hierarchy of Local Plan documents are not re-assessed here. For example, although all housing development is likely to give rise to positive effects on SA objective 5 in relation to meeting housing need, the scale of housing provision has already been fixed by the Folkestone & Hythe Core Strategy and is not the subject of the Places and Policies Local Plan. Whilst larger site allocations will make a greater contribution individually, the same total housing provision could be achieved by a larger number of smaller allocations. The SA of site allocations does not, therefore, assess the effects of providing housing per se. Instead, it restricts itself to assessing the sustainability implications of allocating housing at a particular location and particular size of site. For example, where the Core Strategy requires provision of different proportions of provision of affordable housing or housing for older people in developments of different sizes, this is reflected in the assumptions below. The type and tenure of housing to be provided, including housing to meets the needs of the elderly, will be considered in the SA of development management policies. Similarly, the positive effects of employment provision across the Plan area as a whole on SA objective 6 are not dependent on the locations of the particular sites chosen and were therefore more appropriately assessed within the SA of the Core Strategy whose policies determine the scale of employment development.

SA Objective	Appraisal questions. Will the plan/option lead to...?	Assumptions for SA of site options
<p>1: Reduce the risk of flooding, taking into account the effects of climate change.</p>	<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 Folkestone & Hythe 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 surface water flooding and combined sewer overflows?</p>	<p>Development on greenfield land would increase the area of impermeable surfaces and could therefore increase overall flood risk, particularly where the sites are within high risk flood zones. While new development in any location may offer good opportunities to incorporate SuDS, and therefore have a positive effect on reducing flood risk, this would depend on the design of the proposed development and not on the location of the site.</p> <p>National Planning Practice Guidance identifies residential properties as a 'more vulnerable use', which is suitable in areas of flood zone 1 and 2 but would require an exception test in flood zone 3a, and is unsuitable in flood zone 3b.</p> <p>Folkestone & Hythe District Council have recently published a detailed Strategic Flood Risk Assessment (SRFA, 2015) which clearly maps areas of extreme, significant, moderate and low flood risk. These areas represent a more detailed picture of flood risk in the District's coastal floodplain; however, the flood risks associated with many of the streams and man-made watercourses within the District are mapped solely within the national mapping of 'Flood Zones'. Therefore, both datasets have been used in the assessment of sites against this assumption.</p> <ul style="list-style-type: none"> • Sites having a significant proportion of land ($\geq 25\%$) within Flood Zones 3a or 3b or an area of 'extreme' or 'significant' flood risk, and/or including flood storage areas are assumed to have a significant negative (--) effect. • Sites having as significant proportion of land ($\geq 25\%$) within an area of 'moderate' flood risk or Flood Zone 2 or that are 5-25% within an area of 'extreme' or 'significant' flood risk or Flood Zones 3a and 3b are assumed to have a minor negative (-) effect. • Sites with less than 5% of their land within an area of 'extreme' or 'significant' flood risk or Flood Zones 3a or 3b, less than 25% of their land within an area of 'moderate' flood risk or Flood Zone 2 and do not include flood storage areas are assumed to have a negligible (0) effect. <p>The opportunity to incorporate SuDS to mitigate the risks of surface water flooding and surface water contamination is a design issue and does not form part of the SA of Site Allocations.</p> <p>(Sources required: EA Flood Zones; SFRA 2015; flood storage areas)</p>
<p>2. Increase energy efficiency in the built environment, the proportion of energy use from renewable sources and resilience to a changing climate and extreme weather.</p>	<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 fossil fuel consumption?</p> <p>Opportunities for modal shift away from private</p>	<p>While new housing development will inevitably lead to an increase in greenhouse gas emissions (both through emissions from properties and the increased vehicle traffic associated with population growth), the location of individual housing sites will not have an effect on levels of domestic energy consumption and the potential for renewable energy use. These factors would be influenced more by the specific design and construction methods used, and whether renewable energy infrastructure is to be incorporated in the housing development, which are influenced by detailed development management policies.</p> <p>Therefore, the effects of the potential sites on this SA objective will be assumed to be negligible (0).</p>

SA Objective	Appraisal questions. Will the plan/option lead to...?	Assumptions for SA of site options
	motor vehicles?	
<p>3. Promote community vibrancy, provide opportunities to access services, facilities and environmental assets for all and avoid creating inequalities of opportunity for access.</p>	<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>	<p>The location of housing sites will not directly affect the number or range of services in a particular location (although a large scale housing development could potentially stimulate the provision of new services). However, the location of housing sites could affect this objective by influencing people's ability to access existing services and facilities, particularly by walking.</p> <p>Sites that are within convenient walking distance (800 m) of three or more different types of the following service/facility/asset:</p> <ul style="list-style-type: none"> • a GP surgery or a hospital; • a sports/recreation facility or an area of open space; • a Parade of shops or post office; • a primary or secondary school; • a Major Employment Site. <p>...are assumed to have a minor positive (+) effect on this aspect of the SA objective because of the potential to use these facilities.</p> <p>Where a site is within walking distance of three or more of the above but there are potential barriers to access for all ages and abilities (e.g. topography, major road), reducing the number of easily accessible facilities to below 3 facilities/services, the score is downgraded to negligible (0).</p> <p>Allocations which are located in an area within one of the 20% most deprived areas within the District ('access to services' domain of English Indices of Deprivation) are assessed as having a significant positive (++) effect overall.</p> <p>Other allocations are assessed as having a negligible (0) effect.</p> <p>(Sources required: GIS mapping of GP surgeries; hospitals; sports/recreation facilities; open spaces; post offices;; primary schools; secondary schools; Major Employment Sites; ; shop frontages; Indices of Multiple Deprivation).</p>
<p>4. Reduce crime and the fear of crime.</p>	<p>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,</p>	<p>The effects of new developments on levels of crime and fear of crime will depend on factors such as the incorporation of green space within developments which, depending on design and the use of appropriate lighting, could have an effect on perceptions of personal safety, particularly at night. However, such issues will not be influenced by the location of development sites (rather they will be determined through the detailed proposals for each site). Therefore, the effects of the potential sites</p>

SA Objective	Appraisal questions. Will the plan/option lead to...?	Assumptions for SA of site options
<p>5. Improve the provision of homes, including affordable housing, having regard to the needs of all sections of society, including the elderly.</p>	<p>lighting etc.?</p> <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>	<p>on this SA objective will be assumed to be negligible (0).</p> <p>As described in the text preceding this table, the SA of site allocations does not assess the effects of housing provision per se as the effect of the Local Plan as a whole on meeting housing need has already been assessed through the SA of the Core Strategy and is not altered by the mix of site sizes or the particular locations of individual allocations in the Places and Policies Local Plan.</p> <p>5(a) Affordable housing</p> <p>Core Strategy policy CSD1 requires that, subject to viability, development proposing 15 or more dwellings or land with an area of 0.5 ha or more should provide 30% affordable dwellings. Sites of this size are assessed as having a significant positive (++) effect on this aspect of the SA objective.</p> <p>Sites capable of accommodating 5-14 dwellings are required by CSD1 to provide 1-2 affordable dwellings. Assuming a development density of 30 dwellings per hectare (dph) as above, this equates to sites of 0.167-0.5 ha so allocated sites in this range will be assessed as having a minor positive (+) effect.</p> <p>Smaller sites will be assessed as having a negligible (0) effect.</p> <p>5(b) Dwellings for older people</p> <p>Core Strategy policy CSD2 requires that, subject to viability and design restrictions, development proposing 10 or more dwellings should include 20% of market dwellings meeting Lifetime Homes standards. Assuming a development density of 30 dwellings per hectare (dph) as above, this equates to sites of >=0.33 ha so allocated sites of this size will therefore be assessed as having a significant positive (++) effect on this aspect of the SA objective. Smaller sites will be assessed as having a negligible (0) effect.</p> <p>(Sources required: none)</p>
<p>6. Support the creation of high quality and diverse employment opportunities.</p>	<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 Folkestone & Hythe Economic Strategy?</p> <p>Improved access to jobs for local people from all sectors of the 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?</p> <p>Provision of high quality employment sites and</p>	<p>Sites within convenient walking distance (800 m) of a Major Employment Site are assumed to have a significant positive (++) effect on this SA objective by minimising travel distances and enabling easier access to employment opportunities.</p> <p>Where an allocation is within 800 m of a shopping parade a minor positive (+) effect is assumed.</p> <p>Where a site is within walking distance of an employment location but there are potential barriers to access for all ages and abilities (e.g. topography, major road), the score is downgraded to the next lowest score (e.g. ++ score becomes + or + becomes 0).</p> <p>Other allocations are assessed as having a negligible effect.</p> <p>It is recognised that broadband access could have an influence on people's ability to work flexibly and from home. Information about current levels of broadband provision at the different towns is not readily available, and access will also depend heavily on the incorporation of broadband infrastructure into the new developments. Therefore, broadband access has not been taken into account in the SA.</p> <p>(Sources required: GIS mapping of Major Employment Sites and shop frontages.)</p>

SA Objective	Appraisal questions. Will the plan/option lead to...?	Assumptions for SA of site options
	associated infrastructure suitable for the likely continuation in a shift from manufacturing to higher skill, service industries.	
7. Conserve and enhance the fabric and setting of historic assets.	<p>Development that avoids negative effects on listed buildings, conservation areas, scheduled 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 historic assets and other aspects of heritage, such as, parks and open spaces, and areas with a particular historical or cultural association?</p>	<p>The effects of development site options will depend upon the type of development proposed, current land uses, its context, and its relationship to heritage assets. This is particularly the case within urban areas. For example, effects can be minimal even where a development site is in close proximity to a heritage asset, such as where there is existing built-up area between the site and the asset. Conversely, in more open landscapes/townscape, longer distances between the development site and the heritage asset may not preclude negative effects occurring. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance, or may be neutral¹³. Some development sites could result in an enhancement to the setting of a heritage asset or historic landscape/townscape.</p> <p>Proximity to designated heritage assets provides an indication of the potential for an adverse effect.</p> <p>Forthcoming development management policies will seek to ensure that the effects on the historic environment are minimised and where possible enhanced. In addition, the assessment scores may need to be adjusted to take into account the relationship of the development site option and the designated site using Historic England’s guidance on SEA:</p> <ul style="list-style-type: none"> • The nature and significance of the heritage asset(s) on or within the vicinity of the potential site allocation. • The contribution of the site to the significance of heritage assets on or within its vicinity, taking into account setting of the heritage site. • The potential impacts of development upon the significance of heritage asset. • The potential to remove or reduce any harm. • The potential for any enhancements. <p>The assessment of Kent County Council’s (KCC) heritage officer on promoted SHLAA sites has been incorporated into the SA scoring in consideration of Historic England’s guidance outlined above:</p> <ul style="list-style-type: none"> • Sites which score 1 and 2¹⁴ in KCC’s heritage assessment are considered to have the potential for significant negative effects (i.e. - -?). • Sites which score 3 and 4¹⁵ in KCC’s heritage assessment are considered to have the potential for

¹³ English Heritage (now Historic England). The Setting of Heritage Assets REVISION NOTE June 2012.

¹⁴ 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.

SA Objective	Appraisal questions. Will the plan/option lead to...?	Assumptions for SA of site options
		<p>minor negative effects (i.e. -?).</p> <ul style="list-style-type: none"> Sites which score 5¹⁶ in KCC's heritage assessment are considered to have a negligible effect (i.e. 0). <p>Effects are assumed to be uncertain as the actual effects on historic assets will depend on the exact scale, design and layout of the new development and opportunities may exist to enhance the setting of heritage features (e.g. where sympathetic development replaces a derelict brownfield site which is currently having an adverse effect).</p> <p>A desk-based heritage assessment has been undertaken for site options that have not been assessed by KCC's heritage assessment, using proximity of heritage assets as an indication of potential adverse effects.</p> <ul style="list-style-type: none"> Where the site is within a Conservation Area an uncertain minor negative (-?) effect will be assumed likely. Within existing built-up areas, where the site is within 100m of a listed building (all grades), or 200m of a scheduled monument or registered park or garden an uncertain significant effect (--?) will be assumed likely. Outside of existing built-up areas, where the site is within 250m of a listed building (all grades), or 500m of a scheduled monument or registered park or garden an uncertain significant effect (--?) will be assumed likely. Where the site would result in the loss of all or part of a designated heritage asset, a significant negative (--) effect will be assumed likely. <p>(Sources required: GIS mapping of listed buildings; Scheduled Monuments; Registered Parks and Gardens; Conservation Areas; 'at risk' heritage assets to be brought back into use; brownfield sites)</p>
<p>8. Conserve, and where relevant enhance, the quality, character and local distinctiveness of the landscape and townscape.</p>	<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</p>	<p>8(a)Landscape</p> <p>It is not possible to precisely determine effects on the landscape during a desk-based strategic SA exercise such as this in the absence of a District-wide landscape sensitivity and capacity study. An indication of potential effects on landscape features and character will be based on the following assumptions:</p> <ul style="list-style-type: none"> Sites that are within the Kent Downs AONB will be assessed as having a potential significant negative (--?) effect on landscape character and features unless the development site represents 'infill' development and/or is screened from the wider AONB by existing built-up development, in which case the site is likely to have only a minor adverse effect (-?). Sites that are outside, but within the setting of the Kent Downs AONB, assumed to be within 1 km of the AONB boundary, will be assessed as having a potential minor negative (-?) effect on

¹⁵ 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.

¹⁶ No issue identified.

SA Objective	Appraisal questions. Will the plan/option lead to...?	Assumptions for SA of site options
	<p>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>	<p>landscape character and features unless the development site represents 'infill' development and/or is screened from the wider AONB by existing built-up development, in which case the site is likely to have a negligible effect (0?).</p> <ul style="list-style-type: none"> Sites which do not fall within the above scenarios are considered to have a negligible uncertain effect (0?). All sites will be assessed as having an uncertain (?) effect on landscape character and features. <p>In all cases, potential effects will be uncertain as the exact impacts on the landscape will depend on factors relating to the specific design and layout of the new development.</p> <p>8(b)Settlement character: coalescence</p> <p>In addition to the above, sites that are judged to significantly add to the risk of future coalescence of neighbouring settlements are likely to have an adverse effect on settlement character. Sites which represent over 50% of an existing strategic gap between settlements are considered to have a significant adverse effect (--?).</p> <p>Sites which represent between 10% and 50% of an existing strategic gap between settlements are considered to have a minor adverse effect (-?).</p> <p>Sites which represent less than 10% of an existing strategic gap between settlements are considered to have a negligible effect (0?).</p> <p>All these effects are uncertain until the detailed design, layout and landscaping of the sites are known; however, sites which do not sit within a strategic gap, i.e. within an existing urban area or far away from neighbouring settlements, are likely to have a negligible effect with no uncertainty (0).</p> <p>8(c)Townscape: regeneration</p> <p>In addition to the above, the Council's SHLAA site assessment identifies whether sites are on previously developed land or their redevelopment would be consistent with regeneration objectives (e.g. due to poor current condition). Where this is the case a significant positive effect (++?) has been recorded for townscape, with some uncertainty relating to the appropriateness of the design of the development. A negligible effect for this objective will be recorded if this information is not recorded in the Council's SHLAA assessments.</p> <p>Other townscape, design and green infrastructure aspects of this SA objective are not relevant to SA of the location of housing site allocations.</p> <p>(Sources required: AONB boundary; settlement boundaries; SHLAA site assessment)</p>
9. Conserve and enhance biodiversity.	<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?</p>	<p>Site options that are close to an international, national or locally designated conservation site have the potential to affect the biodiversity of those sites, e.g. through habitat damage/loss, fragmentation, disturbance to species, air pollution, increased recreation pressure etc. However, some built up area may already include urban development close to nature conservation sites. There may also be opportunities to promote habitat connectivity if new developments include green infrastructure.</p> <p>Proximity to designated sites provides an indication of the potential for an adverse effect:</p>

SA Objective	Appraisal questions. Will the plan/option lead to...?	Assumptions for SA of site options
	<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>	<ul style="list-style-type: none"> Sites within an SSSI, SAC, SPA, Ramsar site and/or National Nature Reserve (NNR) are likely to have a significant negative (--) effect. Sites that are wholly or partly within another nationally or locally designated biodiversity site, e.g. Local Nature Reserve (LNR), Local Wildlife Site (LWS) and areas of ancient woodland are likely to have a significant negative (--) effect. Sites that contain National Priority Habitats, Kent Biodiversity Action Plan Habitats are likely to have negative effects on this objective: <ul style="list-style-type: none"> >10% coverage is likely to generate a significant negative (--) effect. 10%-0% coverage is likely to generate a minor negative (-) effect. Sites that are within 250m of a SSSI, SAC, SPA and/or Ramsar site are likely to have an uncertain minor negative (-?) effect. Sites that are within 250m of a nationally or locally designated biodiversity site are likely to have an uncertain minor negative (-?) effect. <p>Sites which do not fall within the above scenarios are considered to have a negligible uncertain effect (0?). The uncertainty attached to this effect is due to the potential for impacts on undesignated habitats and species of biodiversity interest, both on greenfield and brownfield land.</p> <p>Appropriate mitigation may avoid adverse effects and may even result in beneficial effects. The assessment scores may need to be adjusted to take into account the relationship of the development site option and the designated site. Factors that will be taken into account will include type of development site option, the current use of the site, whether there are existing barriers between the development site and the designated site (e.g. existing built development), and the potential for human disturbance and trampling (e.g. from recreation and dog walking, or from noise or light), where relevant.</p> <p>The Habitats Regulations Assessment of the preferred policies within the Local Plan will be reviewed in relation to the SA Objective during the SA/SEA of the preferred policies.</p> <p>(Sources required: boundaries of designated wildlife sites.)</p>
<p>10. Reduce the need to travel; increase opportunities to choose sustainable transport modes and avoid development that will result in significant traffic congestion.</p>	<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 and walking routes?</p> <p>Support for the objectives of the Folkestone & Hythe Cycling Plan?</p>	<p>Similar assessment criteria to those listed under SA objective 2 are applicable; however, the significance of effects has the potential to be greater against this objective.</p> <p>10(a) Reduce the need to travel</p> <p>The location of housing sites will not directly affect the number or range of services in a particular location (although a large scale housing development could potentially stimulate the provision of new services). However, the location of housing sites could affect this objective by influencing people's ability to access existing services and facilities, particularly by walking.</p> <ul style="list-style-type: none"> Where an allocation is within convenient walking distance (800 m) of a Major Employment Site there is a significant positive (++) effect on this aspect of the SA objective due to minimising travel distances and enabling easier access to employment opportunities.

SA Objective	Appraisal questions. Will the plan/option lead to...?	Assumptions for SA of site options
		<ul style="list-style-type: none"> Where an allocation is within 800 m of a shopping parade a minor positive (+) effect is assumed. Where a site is within walking distance of a site or centre but there are potential barriers to access for all ages and abilities (e.g. topography, major road), the score is downgraded to the next lowest score (e.g. ++ score becomes + or + becomes 0). Other allocations are assessed as having a negligible effect. <p>10(b) Increase opportunities to choose sustainable transport modes</p> <p>The proximity of residential sites to public transport links will affect the extent to which residents are able to make use of non car-based modes of transport to access services, facilities and job opportunities. It is possible that new transport links such as bus routes or cycle paths may be provided as part of larger-scale housing developments but this cannot be assumed.</p> <ul style="list-style-type: none"> Sites within walking distance of a rail station (800 m) or bus stop (400 m) are assumed to have a significant positive (++) effect on this aspect of the SA objective. Where a site is within walking distance of rail station or bus stop but there are potential barriers to access for all ages and abilities (e.g. topography, major road), the score is downgraded to +. Other allocations are assessed as having a negligible effect. <p>Increasing cycling is an important sustainability objective for Folkestone & Hythe and positive sustainability scores relating to development allocations being within convenient walking distance of services and facilities also reflect the fact that such allocations are also likely to increase the proportion of trips made by bike.</p> <p>(Sources required: GIS mapping of Major Employment Sites;; shop frontages; train stations; bus stops)</p>
<p>11. Use land efficiently and safeguard soils, geology and economic mineral reserves.</p>	<p>Development that avoids high quality agricultural land?</p> <p>The remediation of contaminated sites?</p> <p>Development on brownfield sites?</p> <p>Development that protects soil processes and functions?</p> <p>Development that protects sites valued for their geological characteristics?</p> <p>Development that avoids sterilising economic mineral reserves?</p>	<p>11(a) Efficient use of land</p> <p>Prioritising the development of previously developed (brownfield) land can help to ensure that greenfield land is protected from unnecessary development. It represents a more efficient use of land providing that it is not of high environmental value (e.g. for biodiversity).</p> <ul style="list-style-type: none"> Sites which are mainly brownfield land (>=50%) are assumed to have a minor positive effect (+). Sites which are mainly greenfield land (>50%) are assumed to have a minor negative (-) effect. <p>11(b) Soil quality and quantity</p> <p>Sites on high quality agricultural land would result in land being lost to farming and food production. Therefore, site allocations containing a significant proportion of high quality (grade 1, 2 or 3) agricultural land are assumed to have negative effects on preserving soil quality:</p> <ul style="list-style-type: none"> Sites with a significant proportion (=>25%) of grade 1 or 2 agricultural land are assumed to have a significant negative (--) effect. Sites with a significant proportion (>=25%) of grade 3 agricultural land but no significant proportion at higher grades are assumed to have a minor negative (-) effect.

SA Objective	Appraisal questions. Will the plan/option lead to...?	Assumptions for SA of site options
		<ul style="list-style-type: none"> Other sites are assumed to have a negligible (0) effect. <p>11(c) Land contamination</p> <p>Housing allocations located on contaminated land would be required to remediate the land during construction and are therefore likely to have a significant positive effect on this aspect of the objective (++); if contamination status of the land is unknown an uncertain effect (?) will be recorded; if the site allocation is not thought to be contaminated negligible effect (0) has been recorded.</p> <p>11(d) Minerals safeguarding</p> <p>All new development will result in the increased consumption of minerals for construction but this will not be influenced by the location of development sites. However, the location of development sites can influence the efficient use of minerals by their proximity to Mineral Safeguarding Areas as defined by Kent County Council as development in those areas may sterilise mineral resources and restrict the availability of resources in the Districts.</p> <p>Since the new Kent Minerals and Waste Plan 2013-2030 has yet to be adopted, an uncertain effect (?) is identified for sites that overlap a Minerals Safeguarding Area.</p> <p>All other sites are likely to have a negligible effect (0) on this objective.</p> <p>Geological quality and quantity</p> <p>Local Geological Sites are selected for their educational, historical and/or aesthetic value. The Council has confirmed that no such sites exist within the District.</p> <p>(Sources required: GIS mapping of agricultural land classifications, Minerals Safeguarding Areas, contaminated and brownfield land.)</p>
<p>12. Maintain and improve the quality of groundwater, surface waters and coastal waters.</p>	<p>Development that will not lead to the deterioration of the quality of groundwater, surface waters or coastal waters or deterioration of Water Framework Directive status?</p> <p>Development where adequate foul drainage, sewage treatment facilities and surface water drainage are available?</p> <p>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?</p>	<p>The location of housing allocations may affect water quality due to spatial variations in the capacity of existing WwTWs and the foul and combined sewer network to accommodate additional demand from new development as well as variations in the sensitivity of groundwater and surface water receptors.</p> <p>In relation to wastewater treatment capacity, the Water Cycle Study¹⁷ did not identify significant constraints to planned development.</p> <p>In relation to the capacity of the foul and combined sewer network to accommodate additional development, the Water Cycle Study identifies a potential capacity issue in the strategic wastewater link between the Westenhanger and Lympne area and Sellindge WwTW. Development in this area could therefore increase the risk of wastewater overflows, with adverse effects on water quality but the risk is judged minor due to the regulatory requirement for the water undertaker to provide a connection to wastewater treatment facilities at some point. It is therefore assumed that residential allocations in the parishes of Lympne, Stanford or Hooks Norton have the potential for minor adverse effects on this SA objective (-?) with uncertainty relating to whether the development is of sufficient size to require a new link to Sellindge WwTW or whether such a link will be secured, e.g. via developer contributions.</p>

¹⁷ Shepway District Council (2011) Shepway Water Cycle Study

SA Objective	Appraisal questions. Will the plan/option lead to...?	Assumptions for SA of site options
		<p>Folkestone & Hythe contains groundwater Source Protection Zones within which there is a risk of contamination of groundwater resources from certain activities. Housing construction within these zones is assessed as having a minor adverse effect on the SA objective but with uncertainty (-?) relating to the construction activities (e.g. dewatering) and mitigation that would be employed.</p> <p>Pollution risks to surface waters from construction of housing are assumed to be fully addressed by compliance with Environment Agency pollution prevention guidance and do not form part of the SA of Site Allocations.</p> <p>All other sites are likely to have a negligible effect (0) on this objective.</p> <p>The potential benefits to water quality of incorporating SuDS are dealt with in the SA of Development Management policies and do not form part of the SA of site allocations.</p> <p>(Sources required: parish boundaries; groundwater Source Protection Zones)</p>
13. Use water resources efficiently.	<p>Development where adequate water supply is available?</p> <p>Water efficient design and reduction in water consumption (e.g. rainwater recycling/grey water reuse and BREEAM/ EcoHomes Excellent Standard)?</p>	<p>Development standards in relation to water efficiency are not related to site location therefore the SA of site allocations does not assess this; potential effects of water efficient design are instead dealt with in the SA of Development Management policies.</p> <p>(Sources required: EA none)</p>
14. Protect and enhance open space and ensure that it meets local needs.	<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>	<p>Where a significant proportion ($\geq 25\%$) of an allocated site is within an existing area of open space a significant adverse (--?) effect is assumed. Where a smaller part (5-25%) of an allocated site is within an existing open space a minor negative (-?) effect is assumed.</p> <p>In both cases uncertainty relates to the extent to which the development will contribute to alternative provision of open space that is lost to development.</p> <p>Site that are <5% open space are assumed to have a negligible (0) effect.</p> <p>(Sources required: open space boundaries)</p>