

**EB 02.20**



[www.landuse.co.uk](http://www.landuse.co.uk)

# Folkestone and Hythe Core Strategy Review

## HRA Addendum

Prepared by LUC  
November 2019

Planning & EIA  
Design  
Landscape Planning  
Landscape Management  
Ecology  
Mapping & Visualisation

LUC LONDON  
250 Waterloo Road  
London  
SE1 8RD  
T +44 (0)20 7383 5784  
[london@landuse.co.uk](mailto:london@landuse.co.uk)

Offices also in:  
Bristol  
Glasgow  
Edinburgh



FS 566056 EMS 566057

Land Use Consultants Ltd  
Registered in England  
Registered number: 2549296  
Registered Office:  
43 Chalton Street  
London NW1 1JD  
LUC uses 100% recycled paper



[www.landuse.co.uk](http://www.landuse.co.uk)

**Project Title:** Folkestone and Hythe Core Strategy Review HRA Addendum

**Client:** Folkestone and Hythe District Council

Version	Date	Version Details	Prepared by	Checked by	Approved by
1.1	14/11/19	Issue 1	Rebecca Turner	David Green	David Green

# Contents

<b>1</b>	<b>Chapter 1</b>	<b>1</b>
	Background	1
	Proposed Changes to the Core Strategy Review	1
	Approach to the HRA Addendum	2
	HRA Findings	2
	Conclusion	4

## Tables

	Table 1.1 Core Strategy Review – a breakdown of housing supply	1
--	--	---

# 1 Chapter 1

## Background

- 1.1 This addendum report has been produced in response to changes to the Folkestone and Hythe Core Strategy Review, which contains a new housing need figure following the publication of the Government's new standard methodology for calculating housing need.
- 1.2 This addendum considers the implications of the new calculated housing need for the HRA findings reported previously and should be read in conjunction with the HRA report.

## Proposed Changes to the Core Strategy Review

- 1.3 Folkestone & Hythe District Council has prepared a schedule of Proposed Changes to the Proposed Submission version of the Core Strategy Review, to reflect the changes set out above as well as any evidence base updates. The schedule contains changes to the wording contained within Policies SS2 (Housing and the Economy Growth Strategy) and SS6 (New Garden Settlement – Development Requirements), as well as the text in chapters 4 and 5 of the Core Strategy Review.
- 1.4 A review of the schedule of proposed changes to the Core Strategy Review identified changes to housing requirements to the following policies:
  - **Policy SS2:** Housing and Economy Strategy – this policy makes provision for 13,515 new homes with an average minimum of 738 dwellings a year over the plan period between 2019/20 to 2036/37, in line with the new standard methodology. This is an increase in 670 new homes compared to the previous iteration of the Core Strategy Review, which proposed 12,845 with an average of 676 new dwellings a year over the plan period between 2018/19 to 2036/37. Table 1.1 outlines the delivery of this housing over the plan period.

**Table 1.1 Core Strategy Review – a breakdown of housing supply**

Source of Housing Supply	Proposed revisions to housing delivery of the Core Strategy Review Submission Draft (2019/20-2036/37), following review of sources of housing supply	Proposed housing delivery set out in Core Strategy Review Submission Draft
Current planning permissions and sites under construction (with adjustment for lapsed permissions)	4,274	4,100
Places and Policies Local Plan and 2013 Core Strategy sites without planning permission	1703	1400
Windfall allowance (95 homes a year over 15 years)	1425	935
New garden settlement (Core Strategy Review policies SS6-	5,925	6375

Source of Housing Supply	Proposed revisions to housing delivery of the Core Strategy Review Submission Draft (2019/20-2036/37), following review of sources of housing supply	Proposed housing delivery set out in Core Strategy Review Submission Draft
SS9)		
Expansion of Sellindge (Core Strategy Review policy CSD9) (part of allocation without permission)	188	350
<b>Total Core Strategy Review plan period</b>	<b>13,515</b>	<b>12,845</b>

- **Policy SS6:** New Garden Settlement – Development Requirements – this policy makes provision for 5925 new homes within the Core Strategy Review plan period (2019/20-2036/37). This is a decrease of 450 new homes compared to the previous iteration of the Core Strategy Review, which proposed 6375 new homes over the plan period. However, no changes are proposed to the overall amount of development allowed for by Policy SS6.

1.5 Policy SS2 specifically relates to new housing targets in relation to Policies SS6-9 and CSD9. In line with the approach taken in the HRA, these changes will be assessed in relation to the specific housing policies.

## Approach to the HRA Addendum

1.6 The approach to undertaking the HRA set out in this addendum is in accordance with the method set out in the main HRA report which accompanied the Proposed Submission Core Strategy Review as listed above.

## HRA Findings

### Air Pollution

- 1.7 Proposed changes to the housing targets outlined in policy SS2, which will be delivered via policy SS6 and CSD9 as part of the Core Strategy Review have potential to result in impacts to European sites from increased air pollution. A review of the air quality assessment previously completed as part of the HRA has been undertaken to determine whether the findings of this assessment remain valid based on the scenario that the Core Strategy Review will make provision for an additional 8,000 new dwellings within the District. Modelling took account not only of forecast traffic growth arising from the Places and Policies Local Plan and Core Strategy Review, but also forecast growth arising from all other sources (e.g. surrounding authorities) over the same time period.
- 1.8 Based on proposed changes to policy SS2 and SS6 the following additional housing will be delivered:
- 5,925 dwellings to be delivered through the allocated garden settlement (Policy SS6), within the plan period;
  - 350 (162 granted consent, 188 allocations remaining) through the expansion of Sellindge (Policy CSD9); and

- 1,425 (95 homes over 15 years) as part of the 'Windfall sites'.

1.9 This provides a total of 7,700 additional houses over the plan period. This figure continues to fall below the threshold for the assessment scenario for the delivery of an additional 8,000 new homes, which concluded no adverse effects in relation to all European sites. This includes Folkestone to Etchingill Escarpment SAC providing the mitigation and avoidance safeguards outlined in the air quality assessment are implemented. **In light of changes to the housing target in policy SS2 and provision of housing delivered in policy SS6, it can therefore be concluded that the findings of the HRA remain valid. Impacts from air pollution to European sites identified within the HRA will be adequately mitigated for and will not lead to adverse effects on integrity either alone or in-combination with other plans and projects.**

### Recreation

1.10 Proposed changes to the housing target as detailed in policy SS2 of the Core Strategy Review will not result in the provision of additional site allocations but will result in changes to the number of houses delivered within the district. This will primarily result in a decrease in houses delivered by a total of 450 dwellings under policy SS6 within the Core Strategy Review plan period, which proposes the development of a new garden settlement. However, the overall amount of development allowed for by policy SS6 remains unchanged. This will result in a reduced impact from recreation on Folkestone to Etchingill Escarpment SAC and Dungeness Romney Marsh and Rye Bay SPA/Ramsar alone and in-combination with other plans and projects. Due to distance and a lack of unique coastal features, all other European sites were considered unlikely to be affected by increased recreational pressure from development within this site allocation. **Based on the above, it can be concluded the findings presented in the HRA remain valid. Impacts from recreational pressure to Folkestone to Etchingill Escarpment SAC and Dungeness Romney Marsh and Rye Bay SPA/Ramsar identified within the HRA will be adequately mitigated for and will not lead to adverse effects on integrity either alone or in-combination with other plans and projects.**

### Physical Damage/Loss (offsite)

1.11 The proposed development in policy SS6 will result in changes to the number of dwellings within the existing allocation proposed in the Core Strategy Review plan period. However, the overall amount of development allowed for by policy SS6 remains unchanged. This will not lead to the provision of additional site allocations within the district and as found with the HRA the impacts from offsite physical damage and loss to Dungeness SAC and Dungeness, Romney Marsh and Rye Bay SPA/Ramsar, which is located over 12km from the nearest allocation, will not result in likely significant effects, either alone or in-combination with other plans and projects. **In light of the changes to the provision of housing to policy SS6, it can be concluded that the findings presented in the HRA remain valid. Impacts from physical damage and loss (offsite) to Dungeness SAC and Dungeness, Romney Marsh and Rye Bay SPA/Ramsar identified within the HRA will not result in likely significant effects either alone or in-combination with other plans and projects.**

### Water Quality and Quantity

1.12 The HRA considered the potential impacts to Dungeness SAC and Dungeness, Romney Marsh and Rye Bay SPA/Ramsar in relation to changes to water quality and quantity as a result of increased development within the district. The findings of the HRA concluded that due to a lack of hydrological connectivity and distance of these European sites from the nearest site allocation that there was no pathway by which policies in the Core Strategy Review could result in a likely significant effect to these European sites. **Given that the proposed changes to the provision of housing in relation to SS6 will not result in additional site allocations within the district, it can be confirmed that the findings presented in the HRA remain valid. Impacts from water quality and quantity to Dungeness SAC and Dungeness, Romney Marsh and Rye Bay SPA/Ramsar identified within the HRA will not result in likely significant effects either alone or in-combination with other plans and projects.**

## Conclusion

- 1.13 The HRA work to date for the Folkestone and Hythe Core Strategy Review has concluded that the Plan would not result in adverse effects on the integrity of any European site. This HRA Addendum has considered whether those HRA findings would be altered as a result of changes to the proposed housing supply over the plan period.
- 1.14 **It can be concluded that the findings of the HRA report remain consistent and accurate and that subject to the provisions listed in the HRA report, the Folkestone and Hythe Core Strategy Review will not result in adverse effects on European Sites either alone or in-combination.**