

**EB 02.40**



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

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

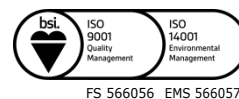
## **Sustainability Appraisal Report**

Prepared by LUC  
December 2018

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

LUC LONDON  
43 Chalton Street  
London  
NW1 1JD  
T +44 (0)20 7383 5784  
[london@landuse.co.uk](mailto:london@landuse.co.uk)

Offices also in:  
Bristol  
Glasgow  
Edinburgh  
Lancaster  
Manchester



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

**Project Title:** Folkestone & Hythe Proposed Submission Core Strategy Review – Sustainability Appraisal Report

**Client:** Folkestone & Hythe District Council

Version	Date	Version Details	Prepared by	Checked by	Approved by
1.0	21/02/2018	Draft Reg. 18 SA Report	Kieran Moroney Josh Allen	Josh Allen	Jeremy Owen
2.0	21/02/2018	Final Draft Reg. 18 SA Report	Kieran Moroney Josh Allen	Josh Allen	Jeremy Owen
3.0	08/03/2018	Final Reg. 18 SA Report	Josh Allen	Josh Allen	Jeremy Owen
4.0	09/11/2018	Draft Reg. 19 SA Report	Josh Allen Lauren Ielden Sarah Temple	Josh Allen	Jeremy Owen
5.0	17/12/2018	Final Reg. 19 SA Report	Josh Allen Sarah Temple Michelle Statton	Jeremy Owen	Jeremy Owen

# Contents

<b>1</b>	<b>Introduction</b>	<b>1</b>
	The Review of the Folkestone & Hythe Core Strategy	1
	Sustainability Appraisal and Strategic Environmental Assessment	3
	Structure of the SA Report	8
<b>2</b>	<b>Appraisal Methodology</b>	<b>9</b>
<b>3</b>	<b>Relevant Plans, Programmes and Strategies</b>	<b>13</b>
	Key International Plans, Policies and Programmes	13
	Key National Plans, Policies and Programmes	14
	Local Plans, Policies and Programmes	14
<b>4</b>	<b>Baseline information</b>	<b>16</b>
<b>5</b>	<b>Sustainability Appraisal Framework</b>	<b>45</b>
	Use of the SA Framework	52
<b>6</b>	<b>Appraisal of High Level Growth Options</b>	<b>53</b>
	Approach to High-level Growth Options Appraisal	57
	Summary of SA findings for Six Character Areas	59
	Overview of Character Area SA findings	62
	Summary of SA findings for Character Area 4 Sub-areas	65
	Overview of Sub-area SA findings	68
<b>7</b>	<b>Appraisal of Spatial Options at Otterpool and Sellindge</b>	<b>69</b>
	Approach to Spatial Options Appraisal	77
	Overview of Otterpool Spatial Option SA Findings	80
	Overview of Sellindge Spatial Option SA Findings	83
<b>8</b>	<b>Appraisal of Proposed Submission Core Strategy Review</b>	<b>84</b>
	Consideration of Reasonable Alternatives	86
	Policy SS1 – District Spatial Strategy Revisions	90
	Policy SS2 – Housing and the Economy Growth Strategy Revisions	91
	Policy SS3 – Place-Shaping and Sustainable Settlements Strategy Revisions	92
	Policy SS4 – Priority Centres of Activity Strategy Revisions	93
	Policy CSD1 Balanced Neighbourhoods for Folkestone & Hythe	94
	Policy CSD2 – District Residential Needs Revisions	95
	Policy CSD5 – Water and Coastal Environmental Management Revisions	96
	New Garden Settlement Policies SS6, SS7, SS8 and SS9	97
	Policy CSD9 Sellindge Strategy	103
	Cumulative Effects	108
	Mitigation	110
	Recommendations	114
<b>9</b>	<b>Monitoring</b>	<b>116</b>
<b>10</b>	<b>Conclusions</b>	<b>119</b>
	Next Steps	120
<b>Appendix 1</b>		<b>121</b>
	Consultation Representations on Core Strategy Review SA Scoping Report	121

<b>Appendix 2</b>	<b>143</b>
Review of Policies, Plans and Programmes	143
<b>Appendix 3</b>	<b>175</b>
High Level Growth Options Appraisal Matrices	175
Character Areas	176
Character Area 4 Sub-areas	206
<b>Appendix 4</b>	<b>222</b>
Otterpool and Sellindge Spatial Options Appraisal Matrices	222
Otterpool Spatial Options	223
Sellindge Spatial Options	235
<b>Appendix 5</b>	<b>252</b>
Proposed Submission Core Strategy Review New Policy Appraisal Matrices	252

# 1 Introduction

- 1.1 Folkestone & Hythe District Council commissioned LUC in October 2016 to carry out Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) of the Review of the Core Strategy Local Plan.
- 1.2 This SA Report is published for consultation alongside the Proposed Submission Core Strategy Review in line with the SEA Regulations and Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. It sets out the context and framework for the SA/SEA of the Core Strategy Review before reporting the appraisal findings of growth options tested to inform the preferred Core Strategy Review policies, as well as the appraisal findings of the policies in the Proposed Submission Core Strategy Review.

## The Review of the Folkestone & Hythe Core Strategy

- 1.3 Folkestone & Hythe District Council formally adopted a Core Strategy in September 2013. The adopted Core Strategy sets out the strategic planning policy framework and strategic site allocations<sup>1</sup> for the District to March 2031, providing the basis for decisions on land use planning affecting Folkestone & Hythe District. The adopted Core Strategy seeks to strike an overall balance between regeneration aspirations and protecting the District's sensitive landscapes and habitats.
- 1.4 The Core Strategy Review Local Plan will soon be supplemented by the Places and Policies Local Plan (PPLP) which is programmed for adoption in 2019. Once adopted the PPLP will sit alongside the adopted Core Strategy allocating small and medium-sized sites for development and containing detailed development management policies to guide planning applications in the District.

### Drivers for the Review

- 1.5 Since the adoption of the Core Strategy in 2013, the Council has reviewed its Corporate Plan which now emphasises a commitment to Folkestone & Hythe residents to enable them to enjoy a healthy, prosperous lifestyle and benefit from high quality and affordable housing by making sure new homes are built in the District and by developing a sustainable and vibrant local economy.
- 1.6 The adopted Core Strategy plans to deliver a target of 8,000 new homes (with a minimum requirement of 7,000 new homes) during the plan period from 2006-2026. However, the latest demographic evidence indicates that the District's future housing need will be unmet unless new growth initiatives are brought forward.
- 1.7 While the Core Strategy prioritises development on brownfield land, a Strategic Housing Land Availability Assessment (SHLAA) undertaken to inform the preparation of the Places and Policies Local Plan confirmed that the options for providing significant housing growth in the District appear to be constrained due to the limited availability of brownfield land and the statutory designation of the Kent Downs Area of Outstanding Natural Beauty and the coverage of Romney Marsh by flood zone restrictions. The Council therefore envisages that future growth (beyond that allocated in the Core Strategy and Places and Policies Local Plan) cannot be provided by in-filling within existing settlement boundaries and therefore a new, visionary response to meeting future housing need will need to be identified.
- 1.8 Consequently, the Council commissioned two key updates to its Local Plan Evidence Base:

---

<sup>1</sup> The two strategic site allocations and two strategic broad locations allocated within the adopted CS now have planning permission.

- An update to the District’s Strategic Housing Market Assessment (SHMA)<sup>2</sup> to establish what the housing needs of the District are likely to be over the remaining period of the Core Strategy plan period and beyond.
  - A Growth Options Study<sup>3</sup> to identify and test potential approaches to strategic planning for growth in Folkestone & Hythe, to determine whether the District can meet its housing needs, and if so the most appropriate approach to do so.
- 1.9 While the Council has been preparing the Core Strategy Review, the Government consulted on the introduction of a standard national methodology for calculating housing need. 'Planning for the Right Homes in the Right Places' was published by the Department for Communities and Local Government (DCLG) in September 2017. Following this consultation, the newly formed Ministry of Housing, Communities and Local Government (MHCLG) prepared and consulted on a revised draft of the National Planning Policy Framework (NPPF) which was published in July 2018. The NPPF includes a new national methodology for calculating housing need.
- 1.10 Informed by the updated NPPF, SHMA, the Growth Options Study, reviewed Corporate Plan and other updates to the District’s Local Plan evidence base<sup>4</sup>, the Review of the Core Strategy plans for development and growth to at least 2037.

### Approach to the SA/SEA

- 1.11 SA/SEA work has been carried out on a series of growth options tested to inform the Core Strategy Review policies, the preferred policies included in a Draft of the Core Strategy Review and the policies in the Proposed Submission Core Strategy Review. All the high-level options tested in the Growth Options Study have been appraised (see **Chapter 6**) followed by a series of spatial options for strategic scale growth in and around Otterpool and the village of Sellindge (see **Chapter 7**). The policies within the Proposed Submission Core Strategy Review are appraised in **Chapter 8**. The appraisal findings of the preferred policies in the Draft Core Strategy Review are presented in the SA Report published in March 2018 and available on the Council’s website<sup>5</sup>.
- 1.12 The SA/SEA of the growth options tested to inform the Core Strategy Review policies takes into account how growth options perform in sustainability terms. For example, the SA/SEA considers how well the growth options relate to the existing and planned communities, jobs, services and facilities, as well as road and rail infrastructure, within Folkestone & Hythe District and neighbouring districts. Each option has been appraised on the basis of its environmental assets and constraints, such as biodiversity, landscape character and sensitivity, flood risk, soils quality and the historic environment, and how they help meet Folkestone & Hythe’s needs, considering factors such as:
- Commuting patterns and travel to work areas.
  - Transport infrastructure, traffic congestion (and related air quality and carbon emissions issues), and options to travel through use of sustainable transport options, such as rail.
  - Accessibility not only to Folkestone and Hythe, but also to the regional centres of growth, considering economic and social relationships and linkages.
- 1.13 The SA/SEA of the Proposed Submission Core Strategy Review policies focuses on the new policies not included in the adopted Core Strategy (2013) and the adopted Core Strategy policies that have been significantly revised. The adopted Core Strategy policies that have not materially changed have only been appraised through consideration of the in-combination effects with the Core Strategy Review as a whole. Folkestone & Hythe District’s adopted Core Strategy (2013) was subject to SA/SEA throughout its preparation. This SA/SEA work has been drawn on throughout the SA/SEA of the Core Strategy Review.

<sup>2</sup> Folkestone and Hythe Strategic Housing Market Assessment Available at: <https://www.folkestone-hythe.gov.uk/planning/planning-policy/local-plan/core-strategy-review-2016>

<sup>3</sup> Folkestone and Hythe Growth Options Study Available at: <https://www.folkestone-hythe.gov.uk/planning/planning-policy/local-plan/core-strategy-review-2016>

<sup>4</sup> For example, alongside the Growth options Study, the council have commissioned a high-level Landscape Appraisal used to inform the strategic review of the relative impacts of strategic level development in various locations.

<sup>5</sup> SA of the Draft Core Strategy Review . Available at: <http://shepway-consult.objective.co.uk/portal/>

## Sustainability Appraisal and Strategic Environmental Assessment

- 1.14 Under the Planning and Compulsory Purchase Act 2004, SA is mandatory for Development Plan Documents. For these documents it is also necessary to conduct an environmental assessment in accordance with the requirements of the Strategic Environmental Assessment (SEA) Directive (European Directive 2001/42/EC) as transposed into law in England by the SEA Regulations<sup>6</sup>. Therefore, it is a legal requirement for the Review of the Core Strategy to be subject to SA and SEA throughout its preparation.
- 1.15 The requirements to carry out SA and SEA are distinct, although it is possible to satisfy both using a single appraisal process (as advocated in the National Planning Practice Guidance<sup>7</sup>), whereby users can comply with the requirements of the SEA Regulations through a single integrated SA process – this is the process that is being undertaken in Folkestone & Hythe. From here on, the term ‘SA’ should therefore be taken to mean ‘SA incorporating the requirements of the SEA Regulations’.

### Meeting the Requirements of the SEA Regulations

- 1.16 **Table 1.1** below signposts the relevant sections of the SA Report that are considered to meet the SEA Regulations’ requirements (the remainder will be met during subsequent stages of the SA of the Core Strategy Review).

**Table 1.1: Meeting the Requirements of the SEA Regulations**

SEA Regulations’ Requirements	Covered in this SA Report?
<b>Environmental Report</b>	
Where an environmental assessment is required by any provision of Part 2 of these Regulations, the responsible authority shall prepare, or secure the preparation of, an environmental report in accordance with paragraphs (2) and (3) of this regulation. The report shall identify, describe and evaluate the likely significant effects on the environment of: (a) implementing the plan or programme; and (b) reasonable alternatives taking into account the objectives and geographical scope of the plan or programme. (Regulation 12(1) and (2) and Schedule 2).	This SA Report constitutes the ‘environmental report’ for the Draft Core Strategy Review. Updated SA Reports will be produced at later stages in the plan-making process, as the Council moves towards a ‘Submission’ version of the Core Strategy Review.
1) An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes.	<b>Chapters 1, 2, 3 and Appendix 2.</b>
2) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	<b>Chapter 4.</b>
3) The environmental characteristics of areas likely to be significantly affected.	<b>Chapter 4.</b>
4) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC on the conservation of wild birds and the Habitats Directive.	<b>Chapters 4 and 5.</b>
5) The environmental protection, objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation.	<b>Chapters 3 and 4 and Appendix 2.</b>

<sup>6</sup> The Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004 No. 1633)

<sup>7</sup> <http://planningguidance.planningportal.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainabilityappraisal/strategic-environmental-assessment-and-sustainability-appraisal-and-how-does-it-relate-to-strategic-environmentalassessment/>

SEA Regulations' Requirements	Covered in this SA Report?
<p>6) The likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive effects, and secondary, cumulative and synergistic effects, on issues such as:</p> <ul style="list-style-type: none"> <li>(a) biodiversity;</li> <li>(b) population;</li> <li>(c) human health;</li> <li>(d) fauna;</li> <li>(e) flora;</li> <li>(f) soil;</li> <li>(g) water;</li> <li>(h) air;</li> <li>(i) climatic factors;</li> <li>(j) material assets;</li> <li>(k) cultural heritage, including architectural and archaeological heritage;</li> <li>(l) landscape; and</li> <li>(m) the interrelationship between the issues referred to in sub-paragraphs (a) to (l).</li> </ul>	<p><b>Chapters 6, 7 and 8.</b></p>
<p>7) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.</p>	<p><b>Chapter 8</b></p>
<p>8) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.</p>	<p><b>Chapters 6, 7 and 8</b> for alternatives.  <b>Chapter 1</b> for difficulties encountered.</p>
<p>9) A description of the measures envisaged concerning monitoring in accordance with regulation 17.</p>	<p><b>Chapter 9.</b></p>
<p>10) A non-technical summary of the information provided under paragraphs 1 to 9.</p>	<p>A separate non-technical summary of the SA Report accompanying the Proposed Submission Core Strategy Review has been prepared and published on the Council's website.</p>
<p>The report shall include such of the information referred to in Schedule 2 to these Regulations as may reasonably be required, taking account of:</p> <ul style="list-style-type: none"> <li>(a) current knowledge and methods of assessment;</li> <li>(b) the contents and level of detail in the plan or programme; the stage of the plan or programme in the decision-making process; and</li> <li>(c) the extent to which certain matters are more appropriately assessed at different levels in that process in order to avoid duplication of the assessment.</li> </ul> <p>(Regulation 12 (3))</p>	<p>This SA Report has adhered to this requirement.</p>
<b>Consultation</b>	
<p>When deciding on the scope and level of detail of the information that must be included in the environmental report, the responsible authority shall consult the consultation bodies. (Regulation 12(5))</p>	<p>Consultation with the relevant statutory environmental bodies was undertaken in relation to the Scoping Report for seven weeks between December 2016 and January 2017.</p>
<p>Every draft plan or programme for which an environmental report has been prepared in accordance with regulation 12 and its accompanying report ("the relevant documents") shall be made available for the purposes of consultation in accordance with the following provisions of this regulation. As soon as reasonable practical after the preparation of the relevant documents, the responsible authority shall:</p> <ul style="list-style-type: none"> <li>(a) send a copy of those documents to each consultation</li> </ul>	<p>This SA Report accompanying both the Draft Core Strategy Review and Proposed Submission Core Strategy Review are published on Folkestone &amp; Hythe District Council's website. Public consultation on the Review of</p>



SEA Regulations' Requirements	Covered in this SA Report?
<p>body;</p> <p>(b) take such steps as it considers appropriate to bring the preparation of the relevant documents to the attention of the persons who, in the authority's opinion, are affected or likely to be affected by, or have an interest in the decisions involved in the assessment and adoption of the plan or programme concerned, required under the Environmental assessment of Plans and Programmes Directive ("the public consultees");</p> <p>(c) inform the public consultees of the address (which may include a website) at which a copy of the relevant documents may be viewed, and the period within which, opinions must be sent.</p> <p>The period referred to in paragraph (2) (d) must be of such length as will ensure that the consultation bodies and the public consultees are given an effective opportunity to express their opinion on the relevant documents. (Regulation 13 (1), (2), and (3))</p>	<p>the Core Strategy and accompanying SA will continue through the examination process up to the adoption of the Folkestone &amp; Hythe Core Strategy Review.</p>
<p>Where a responsible authority, other than the Secretary of State, is of the opinion that a plan or programme for which it is the responsible authority is likely to have significant effects on the environment of another Member State, it shall, as soon as reasonable practicable after forming that opinion:</p> <p>(a) notify the Secretary of State of its opinion and of the reasons for it; and</p> <p>(b) supply the Secretary of State with a copy of the plan or programme concerned, and of the accompanying environmental report. (Regulation 14 (1))</p>	<p>Unlikely to be relevant to the Review of the Core Strategy, as there will be no effects beyond the UK.</p>
<p><b>Taking the environmental report and the results of the consultations into account in decision-making (relevant extracts of Regulation 16)</b></p>	
<p>As soon as reasonably practicable after the adoption of a plan or programme for which an environmental assessment has been carried out under these Regulations, the responsible authority shall:</p> <p>(a) make a copy of the plan or programme and its accompanying environmental report available at its principal office for inspection by the public at all reasonable times and free of charge. (Regulation 16(1))</p>	<p>Requirement will be met at a later stage in the SA process.</p>
<p>As soon as reasonably practicable after the adoption of a plan or programme:</p> <p>(a) the responsible authority shall inform (i) the consultation bodies; (ii) the persons who, in relation to the plan or programme, were public consultees for the purposes of regulation 13; and (iii) where the responsible authority is not the Secretary of state, the Secretary of State, that the plan or programme has been adopted, and a statement containing the following particulars:</p> <p>(a) how environmental considerations have been integrated into the plan or programme;</p> <p>(b) how the environmental report has been taken into account;</p> <p>(c) how opinions expressed in response to: (i) the invitation in regulation 13(2)(d); (ii) action taken by the responsible authority in accordance with regulation 13(4), have been taken into account;</p> <p>(d) how the results of any consultations entered into under regulation 14(4) have been taken into account;</p> <p>(e) the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and</p> <p>(f) the measures that are to be taken to monitor the</p>	<p>Requirement will be met at a later stage in the SA process.</p>

SEA Regulations' Requirements	Covered in this SA Report?
significant environmental effects of the implementation of the plan or programme.	
<b>Monitoring</b>	
The responsible authority shall monitor the significant effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action. (Regulation 17(1))	Requirement will be met at a later stage in the SA process.

### Data limitations and difficulties encountered

- 1.17 The SEA Regulations require that the environmental report should include information on "any difficulties (such as technical deficiencies or lack of know how) encountered in compiling the required information" (Schedule 2(8)). The difficulties encountered in carrying out the SA are described below.
- 1.18 The actual impacts of specific site allocation policies will depend very much upon how they are applied in specific locations. Professional judgement has therefore had to be applied to identify likely effects.
- 1.19 Following the SA of the Draft Core Strategy Review, it was recommended that further heritage work was undertaken to inform heritage strategies and policy measures for site allocations in the final Core Strategy Review document. This work has informed the SA of the Proposed Submission Core Strategy Review.
- 1.20 The sheer number of strategies, plans, programmes, policy documents, advice and guidance produced by a range of statutory and non-statutory bodies means that it has not been possible within the resources available to consider every potentially relevant document in detail (see **Chapter 2** and **Appendix 2**). However, we have drawn out the key messages relevant to the preparation of the Core Strategy Review and the SA.
- 1.21 Similarly, every reasonable effort has been made to ensure that the final version of this SA Report reflects the latest evidence base.

### Habitats Regulations Assessments

- 1.22 Under Article 6 (3) and (4) of the Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (Habitats Directive) land-use plans, including Local Plans, are also subject to Habitats Regulations Assessment (HRA). The purpose of HRA is to assess the impacts of a land-use plan against the conservation objectives of a European Site and to ascertain whether it would adversely affect the integrity of that site. European sites comprise<sup>8</sup>:
- Special Protection Areas (SPAs) classified under the European Council Directive "on the conservation of wild birds" (79/409/EEC; 'Birds Directive') for the protection of wild birds and their habitats (including particularly rare and vulnerable species listed in Annex 1 of the Birds Directive, and migratory species), including potential SPAs (pSPAs).
  - Special Areas of Conservation (SACs), which are designated under the Habitats Directive and target particular habitats (Annex 1) and/or species (Annex II) identified as being of European importance, including candidate SACs (cSACs).
  - Ramsar sites, which support internationally important wetland habitats and are listed under the Convention on Wetlands of International Importance especially as Waterfowl Habitat (Ramsar Convention, 1971).
- 1.23 The following European sites fall within 10km of Folkestone & Hythe District:
- Dungeness, Romney Marsh and Rye Bay Ramsar.
  - Dungeness, Romney Marsh and Rye Bay SPA.

<sup>8</sup> Department of Communities and Local Government (March 2012) National Planning Policy Framework (para 118).

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

1.24 The HRA process for the Core Strategy Review has also been undertaken by LUC on behalf of Folkestone & Hythe District Council and the findings have been taken into account in the SA where relevant.

1.25 The broad steps followed in carrying out the HRA are set out in **Table 1.2**.

**Table 1.2: Approach to HRA of Folkestone & Hythe Core Strategy Review**

Stage	Task	Outcome
Stage 1: Screening (the 'Significance Test')	Description of the plan. Identification of potential effects on European Sites.  Assessing the effects on European Sites.	Where effects are unlikely, prepare a 'finding of no significant effect report'.  Where effects judged likely, or lack of information to prove otherwise, proceed to Stage 2.
Stage 2: Appropriate Assessment (the 'Integrity Test')	Assess whether the Plan will adversely affect the integrity of the sites' qualifying features (taking into account potential mitigation provided by other policies in the plan). Gather information (plan and European Sites). Impact prediction. Evaluation of impacts in view of conservation objectives. Where impacts considered to affect qualifying features, identify alternative options.  Assess alternative options. If no alternatives exist, define and evaluate mitigation measures where necessary.	Appropriate assessment report describing the plan, European site baseline conditions, the adverse effects of the plan on the European site, how these effects will be avoided through, firstly, avoidance, and secondly, mitigation including the mechanisms and timescale for these mitigation measures.  If effects remain after all alternatives and mitigation measures have been considered proceed to Stage 3.
Stage 3: Assessment where no alternatives exist and adverse impacts remain taking into account mitigation	Identify 'imperative reasons of overriding public interest' (IROPI).  Identify potential compensatory measures.	This stage should be avoided if at all possible. The test of IROPI and the requirements for compensation are extremely onerous.

1.26 The HRA Report of the Folkestone & Hythe Proposed Submission Core Strategy Review concluded that the Core Strategy Review will not have any significant adverse effects on the integrity of European sites, either alone or in-combination with other plans or projects. The HRA recommended that the Core Strategy Review include a commitment to monitoring roadside NOx at regular intervals over the plan period in order to track the projected improvements in air quality. This has now been incorporated into the Core Strategy Review.

## Structure of the SA Report

- 1.27 This chapter has described the background to the production of the Review of the Folkestone and Hythe Core Strategy Local Plan and the requirement to undertake SA and other assessment processes. The remainder of this report is structured into the following chapters:
- **Chapter 2** sets out the methodology for the SA process (**Appendix 1** sets out the representations received on the SA Scoping Report).
  - **Chapter 3** describes the plans, policies and programmes of relevance to the SA of the Core Strategy Review. Chapter 3 is supported by more detailed information in **Appendix 2**.
  - **Chapter 4** summarises the District's baseline information, including key environmental, social and economic issues and problems, which informed the appraisal of the growth options and policies in the Core Strategy Review.
  - **Chapter 5** presents the SA framework, including SA objectives and associated appraisal questions being used to appraise the Core Strategy Review.
  - **Chapter 6** sets out the findings of the appraisal of the high-level growth options, notably the six character areas and four sub areas identified in the Growth Options Study. Chapter 6 is supported by detailed appraisal matrices for each growth option in **Appendix 3**.
  - **Chapter 7** sets out the findings of the appraisal of the spatial options for strategic scale growth in and around Otterpool and the village of Sellindge. Chapter 7 is supported by detailed appraisal matrices for each spatial option in **Appendix 4**.
  - **Chapter 8** sets out the findings of the appraisal of the Proposed Submission Core Strategy Review policies, focussing on the new policies not included in the adopted Core Strategy (2013) and the adopted Core Strategy policies that have been significantly revised. It includes a description of the mitigation measures that are included in the Core Strategy Review to address any negative effects identified, together with remaining recommendations arising out of the SA at this stage. Chapter 8 is supported by detailed appraisal matrices for the new policies within the Core Strategy Review in **Appendix 5**.
  - **Chapter 8** recommends a set of monitoring indicators for the social, environmental and economic effects of implementing the Core Strategy Review.
  - **Chapter 10** summarises the conclusions of the SA to date and describes the next steps to be undertaken in the SA of the Folkestone & Hythe Core Strategy Review.

## 2 Appraisal Methodology

Schedule 2(18) of the SEA Regulations requires that the Environmental Report shall include:

*"...a description of how the assessment was undertaken including any difficulties (such as technical difficulties or lack of know-how) encountered in compiling the required information."*

- 2.1 The purpose of SA is to promote sustainable development through the better integration of sustainability considerations into the preparation and adoption of plans. It should be viewed as an integral part of good plan making, involving ongoing iterations to identify and report on the likely significant effects of the emerging plan and the extent to which sustainable development is likely to be achieved through its implementation.
- 2.2 In addition to complying with legal requirements, the approach taken to the SA of the Folkestone & Hythe Core Strategy Review has been based on current best practice and the guidance on SA/SEA set out in the National Planning Practice Guidance<sup>9</sup>. **Table 2.1** below sets out the main stages of the plan-making process and shows how these correspond to the SA process.

**Table 2.1: Corresponding stages in Plan-making and SA**

Local Plan Step 1: Evidence Gathering and engagement
SA stages and tasks
<p><b>Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope</b></p> <ul style="list-style-type: none"> <li>• 1: Identifying other relevant policies, plans and programmes, and sustainability objectives</li> <li>• 2: Collecting baseline information</li> <li>• 3: Identifying sustainability issues and problems</li> <li>• 4: Developing the SA Framework</li> <li>• 5: Consulting on the scope of the SA</li> </ul>
Local Plan Step 2: Production
SA stages and tasks
<p><b>Stage B: Developing and refining options and assessing effects</b></p> <ul style="list-style-type: none"> <li>• 1: Testing the Plan objectives against the SA Framework</li> <li>• 2: Developing the Plan options</li> <li>• 3: Evaluating the effects of the Plan</li> <li>• 4: Considering ways of mitigating adverse effects and maximising beneficial effects</li> <li>• 5: Proposing measures to monitor the significant effects of implementing the Plan</li> </ul>
<p><b>Stage C: Preparing the Sustainability Appraisal Report</b></p> <ul style="list-style-type: none"> <li>• 1: Preparing the SA Report</li> </ul>

<sup>9</sup> <http://planningguidance.communities.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/>

### **Stage D: Seek representations on the Plan and the Sustainability Appraisal Report**

- 1: Public participation on Plan and the SA Report
- 2(i): Appraising significant changes

### **Local Plan Step 3: Examination**

SA stages and tasks

- 2(ii): Appraising significant changes resulting from representations

### **Local Plan Step 4 and 5: Adoption and Monitoring**

SA stages and tasks

- 3: Making decisions and providing information

### **Stage E: Monitoring the significant effects of implementing the Plan**

- 1: Finalising aims and methods for monitoring
- 2: Responding to adverse effects

### **SA Stage A: Scoping**

- 2.3 The Scoping stage of the SA involves understanding the social, economic and environmental baseline for the plan area as well as the policy context and key sustainability issues. The SA Scoping Report was prepared in December 2016 and presented the outputs of the following tasks:
- Policies, plans and programmes of relevance to Folkestone & Hythe's Core Strategy Review were identified and the relationships between them were considered, enabling any potential synergies to be exploited and any potential inconsistencies and incompatibilities to be identified and addressed (See **Chapter 3** and **Appendix 2**).
  - In line with the requirements of the SEA Regulations, baseline information was collected on the following 'SEA topics': biodiversity, flora and fauna; population and human health; water; soil; air; climatic factors; material assets; cultural heritage; and the landscape. Data on social and economic issues were also taken into consideration. This baseline information provided the basis for predicting and monitoring the likely effects of the Core Strategy Review and helps to identify alternative ways of dealing with any adverse effects identified (see **Chapter 4**).
  - Drawing on the review of relevant plans, policies and programmes and the baseline information, key sustainability issues for the District were identified (including environmental problems, as required by the SEA Regulations) (see **Chapter 4**).
  - A 'Sustainability Appraisal Framework' was developed, comprising a list of SA objectives against which growth options and, subsequently, site options and policies would be appraised. The SA framework provides a clear way in which the sustainability impacts of implementing a plan can be described, analysed and compared. It sets out a series of sustainability objectives and associated sub-questions that can be used to 'interrogate' options and draft policies during the plan-making process. These SA objectives reflect international, national and local policies, the key sustainability issues identified for the District, and the long-term aspirations of the Council with regard to social, economic and environmental considerations. Throughout the SA process the performance of Core Strategy Review options (and later policies and site allocations) are assessed against these SA objectives and sub-questions (see **Chapter 5**).
- 2.4 Public and stakeholder participation is an important part of the SA and wider plan-making processes. It helps to ensure that the SA report is robust and has due regard for all appropriate information that will support the Core Strategy Review in making a contribution to sustainable development. An SA Scoping Report for the Core Strategy Review was published in December

2016 for a seven week consultation period with the statutory consultees Natural England, the Environment Agency, Historic England and the public. **Appendix 1** lists the comments that were received during the consultation on the Scoping Report and explains how these have been dealt with. Following the consultation and associated updates, a final version of the SA Scoping Report was published in March 2017 on the Council's website<sup>10</sup>.

- 2.5 Since the SA Scoping Report was finalised, the review of plans, policies and programmes (see **Chapter 3** and **Appendix 2**) and the baseline information (see **Chapter 4**), has been updated as part of the preparation of this SA Report in order to ensure that they reflect the current situation in Folkestone & Hythe District and take account of the most recent evidence.

### SA Stage B: Developing and refining options and assessing effects

Regulation 12 (2) of the SEA Regulations requires that the Environmental Report (also known as the SA Report) shall:

*"identify, describe and evaluate the likely significant effects on the environment of—*

*(a) implementing the plan or programme; and*

*(b) reasonable alternatives, taking into account the objectives and the geographical scope of the plan or programme."*

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

*"(h) an outline of the reasons for selecting the alternatives dealt with"*

- 2.6 The SA must appraise not only the policies or site allocations preferred by the Review of the Core Strategy but 'reasonable alternatives' to those policies and allocations. This implies that alternatives that are not reasonable do not need to be subject to appraisal. There is no requirement in the SEA Regulations for all possible reasonable alternatives to be subject to appraisal. Part (b) of Regulation 12(2) above notes that reasonable alternatives should take into account the objectives of the plan, as well as its geographical scope. Therefore, alternatives that do not meet the objectives of national policy, or are outside the plan area are unlikely to be reasonable.
- 2.7 The SA findings are not the only factors taken into account by a local planning authority when determining a preferred option to take forward in a plan. Indeed, there will often be a similar number of positive or negative effects identified for different options, such that it is not possible to 'rank' them based on sustainability performance in order to select a preferred option. Factors such as public opinion, deliverability, conformity with national policy and other evidence will also be taken into account by plan-makers when selecting preferred options for a plan.

#### *Identification and appraisal of options for the Core Strategy Review*

- 2.8 A series of growth options have been tested to inform the Core Strategy Review, specifically all the high-level options tested in the Growth Options Study have been appraised (see **Chapter 6**) followed by a series of spatial options for strategic scale growth in and around Otterpool and the village of Sellindge (see **Chapter 7**). The policies within the Proposed Submission Core Strategy Review are appraised in **Chapter 8**. The appraisal findings of the preferred policies in the earlier Draft Core Strategy Review are presented in the SA Report published in March 2018 and available on the Council's website.

### SA Stage C: Preparing the Sustainability Appraisal report

- 2.9 This SA Report represents the 'environmental report' required under the SEA Regulations. It describes the process that has been undertaken to date in carrying out the SA of the Core Strategy Review. The report highlights any likely significant effects – positive and negative, secondary, cumulative, synergistic, short, medium and long-term, permanent and temporary

<sup>10</sup> Folkestone and Hythe Core Strategy Review SA Scoping Report, March 2017 Available at: <https://www.Folkestone and Hythe.gov.uk/planning/planning-policy/local-plan/core-strategy-review-2016>

effects – helping the Council to identify the locations for additional growth within the District that help to mitigate negative effects and maximise the benefits.

#### **SA Stage D: Consultation on Core Strategy Review and this SA report**

- 2.10 Folkestone & Hythe District Council consulted on a Draft of the Core Strategy Review under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and an accompanying SA Report. Both documents were published on the Council’s website for consultation in March and April 2018.
- 2.11 Following the current consultation on the Folkestone & Hythe Proposed Submission Core Strategy Review under Regulation 19 of the Local Planning Regulations, the Core Strategy Review will be ‘submitted’ to the Secretary of State under Regulation 22 of the Local Planning Regulations, and then subject to Public Examination before a Government appointed Inspector. Should any modifications to the Submission Core Strategy Review be proposed as a result of the Examination, these may require further SA, and the SA Report updated accordingly, with potentially a further round of public consultation prior to adoption.
- 2.12 **Appendix 1** presents the consultation comments that have been received to date in relation to the SA Scoping Report and the SA Report accompanying the Draft Core Strategy Review and explains how they have been addressed.

#### **Stage E: Post adoption reporting and monitoring**

- 2.13 The SEA Regulations require certain information to be made available following the adoption of a plan or programme for which SA/SEA has been undertaken.
- 2.14 This SA Report sets out recommendations for monitoring the significant sustainability effects of the Core Strategy Review identified by the SA. The monitoring proposals should be considered within the context of the broader monitoring framework for the SA Report and the data collection for the Council’s Authority Monitoring Report (AMR).
- 2.15 Once the Council is ready to adopt the Core Strategy Review, an Adoption Statement will be drafted as a separate report to the final SA Report. It will contain sections describing how each of the requirements in SEA Regulation 16(4) (a)-(f) have been met during the integrated SA/SEA process for the Core Strategy Review. The sections will therefore cover:
- How environmental considerations have been integrated into the Core Strategy Review.
  - How the environmental report and the opinions expressed during consultations have been taken into account.
  - The reasons for choosing the Core Strategy Review as adopted, in the light of the other reasonable alternatives dealt with.
  - The measures decided concerning monitoring of significant environmental effects.
- 2.16 Recommendations for monitoring the social, environmental and economic effects of implementing Folkestone & Hythe’s Proposed Submission Core Strategy Review are outlined in **Chapter 8**.



### 3 Relevant Plans, Programmes and Strategies

Schedule 2 of the SEA Regulations requires:

*(1) "an outline of the ... relationship with other relevant plans or programmes"; and*

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

- 3.1 Folkestone & Hythe District Council, as the Local Planning Authority (LPA), is preparing a Core Strategy Review, which will form part of its Local Plan in accordance with the Planning and Compulsory Purchase Act, 2004. The Core Strategy Review is not prepared in isolation, being greatly influenced by other plans, policies and programmes and by broader sustainability objectives. It needs to be consistent with national planning policy and should contribute to the goals of a wide range of other programmes and strategies, such as those relating to social policy, culture and heritage. It must also conform to environmental protection legislation and the sustainability objectives established at the international, national and regional levels.
- 3.2 It is necessary to identify the relationships between the Core Strategy Review and the relevant plans, policies and programmes so that any potential links can be built upon and any inconsistencies and constraints addressed.
- 3.3 During the Scoping stage of the SA, a review was undertaken of the other plans, policies and programmes that are relevant to the Core Strategy Review. This review has been revised and updated since it was originally presented in the SA Scoping Report, in light of comments received during the Scoping consultation and to make the review more concise, ensuring that it reviews an appropriate range of up-to-date plans, policies and programmes in an appropriate level of detail.
- 3.4 The updated review can be seen in full in **Appendix 2** and the key findings are summarised below.
- 3.5 The review is not exhaustive. It seeks to identify the main policies, plans and programmes of relevance to the SA and the Core Strategy Review.

#### Key International Plans, Policies and Programmes

- 3.6 At the international level, Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the 'SEA Directive') and Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (the 'Habitats Directive') are particularly significant as they require Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) to be undertaken in relation to the Core Strategy Review. These processes should be undertaken iteratively and integrated into the production of the plan in order to ensure that any potential negative environmental effects (including on European-level nature conservation designations) are identified and can be mitigated.
- 3.7 There are a wide range of other EU Directives and international agreements relating to issues such as water quality, waste and air quality, most of which have been transposed into UK law through national-level regulations and policy; however the relevant international law and agreements have been included in **Appendix 2** for completeness.

## Key National Plans, Policies and Programmes

- 3.8 The most significant national policy context for the Core Strategy Review is the National Planning Policy Framework (NPPF). The Local Plan must be consistent with the requirements of the NPPF. The NPPF sets out information about the purposes of local plan-making, stating that:
- "Plans should be prepared with the objective of contributing to the achievement of sustainable development."*
- 3.9 The NPPF also requires Local Plans to be "*aspirational but deliverable*". This means that opportunities for appropriate development should be identified in order to achieve net gains in terms of sustainable social, environmental and economic development; however significant adverse impacts in any of those areas should not be allowed to occur.
- 3.10 The NPPF requires local planning authorities to set out the strategic policies for the area in the Local Plan. This should include strategic policies to deliver:
- housing (including affordable housing), employment, retail, leisure and other commercial development;
  - infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
  - community facilities (such as health, education and cultural infrastructure); and
  - conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.
- 3.11 In addition, Local Plans should:
- look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure.; and
  - collaborate to identify the relevant strategic matters which they need to address in their plans, including effective and ongoing joint working between strategic policy-making authorities and relevant bodies.

## Local Plans, Policies and Programmes

- 3.12 At the sub-regional and local levels there are a wide range of plans and programmes that are specific to Kent and Folkestone & Hythe District and which provide further context for the Core Strategy Review. These plans and programmes relate to issues such as housing, transport, renewable energy and green infrastructure, and have also been reviewed in **Appendix 2**.
- 3.13 The key relationship of the Core Strategy Review with other components of the Local Plan is as follows.

### Folkestone & Hythe District Council's adopted Core Strategy Local Plan

- 3.14 The highest tier document of the Local Plan, the Core Strategy Local Plan, was adopted in September 2013. It is a strategic planning policy document and interprets national planning policy from the NPPF in the context of the District of Folkestone & Hythe.
- 3.15 The Core Strategy is the long term plan for the District up to 2031. It brings together the objectives and actions of the Government, the Council, residents, businesses and voluntary groups for managing land use and development.
- 3.16 Taking into account the economic, social and environmental issues relevant to Folkestone & Hythe, the Core Strategy sets out three over-arching strategic objectives:
- To improve employment, educational attainment and economic performance in Folkestone & Hythe.

- To enhance the rich natural and historic assets in Folkestone & Hythe.
  - To improve the quality of life and sense of place, vibrancy, and social mix in neighbourhoods, particularly where this reduces existing socio-economic disparities in Folkestone & Hythe.
- 3.17 The Core Strategy seeks to deliver these strategic objectives through a series of strategic policies and strategic allocations to guide development and land use.
- 3.18 Supplementing the Core Strategy is the Folkestone & Hythe District Local Plan Review (2006, policies saved in 2009) which includes policies to manage development applications. However, due to the age of the document, some of these policies are out of date, insufficient or non-compliant with the NPPF. These policies are currently being reviewed and will be replaced by the Places and Policies Local Plan.
- 3.19 The Folkestone & Hythe Core Strategy Review will replace the adopted Core Strategy (2013).

### **Folkestone & Hythe District Council Places and Policies Local Plan**

- 3.20 The Folkestone & Hythe Places and Policies Local Plan (PPLP) is a planning document that will form part of the statutory Development Plan for the District. The PPLP will sit below the Core Strategy and has two functions. The first function is to allocate smaller site allocations (i.e. non-strategic sites) to meet the requirements set out in the Core Strategy for residential, employment and community developments. The second function is to set out development management policies that will be used to assess planning applications and guide future development (and will replace the Saved 2006 Local Plan policies).
- 3.21 The PPLP will, therefore, play an important role in shaping the future of the District and ensuring that the Council's aims set out in the Core Strategy are met. The policies in the PPLP will ensure that new developments will be sustainable, the natural and historic environment will be maintained and that new developments through their design will improve the quality of life of residents and help to foster healthy lifestyles.
- 3.22 When adopted the PPLP will replace the remaining saved policies in the 2006 Local Plan.

### **Other Local Plan Documents**

- 3.23 The Council published a first draft of the District's Community Infrastructure Levy (CIL) Charging Schedule for public consultation during September-October 2014. Following two rounds of consultation and an examination in public, the Council adopted the CIL Charging Schedule on the 20<sup>th</sup> July 2016. CIL charges came into effect in the District on the 1st August 2016 and facilitate charges on new development to provide funding for associated infrastructure requirements, alongside other sources.
- 3.24 New Neighbourhood Planning measures that came into force in April 2012 allow communities to shape new development by coming together to prepare Neighbourhood Plans. A Neighbourhood Plan, which must be in general conformity with higher tier plans in the Local Plan, is currently being prepared for St Mary in the Marsh Parish. Consultation on the Draft St Mary in the Marsh Neighbourhood Plan took place from 9 November to 21 December 2017 and was subsequently examined by an independent examiner in the spring of 2018. Following the successful examination, the St Mary in the Marsh Neighbourhood Development Plan proceeded to a Neighbourhood Planning Referendum on 8 November 2018, where 87 per cent of those who took part voted to bring the Neighbourhood Plan into force. The Council will now proceed to adopt the plan and use it to decide planning applications within the parish. In addition, Hythe, Lympne, New Romney and Sellindge have been designated as Neighbourhood Areas, although the local communities have not progressed further with Neighbourhood Plans for these areas.

## 4 Baseline information

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

The Environment Report should include:

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

SEA Regulations Schedule 2 (2, 3 and 4)

- 4.2 Baseline information to meet these requirements has been collected and is organised below by SA theme. Analysis of the baseline information has enabled a number of key sustainability issues facing Folkestone & Hythe to be identified, as well as consideration of the likely evolution of the plan area if the Core Strategy Review were not to be implemented.
- 4.3 In general, the current trends in relation to the various social, economic and environmental issues affecting Folkestone & Hythe would be more likely to continue without the implementation of the Core Strategy Review, although the policies in the adopted Core Strategy will go some way towards addressing many of the issues. In most cases, the emerging Core Strategy Review offers opportunities to directly and strongly affect existing trends in a positive way, through an up-to-date plan which reflects the requirements of the NPPF, building on the Core Strategy policies. These issues may also be addressed in the forthcoming Places and Policies Local Plan.
- 4.4 Data referred to have been chosen primarily for regularity and consistency of collection, in order to enable trends in the baseline situation to be established, and also subsequent monitoring of potential sustainability effects. All figures are presented at the end of the Baseline Section. Each of the sustainability issues identified from the baseline information is addressed by an SA objective in the SA framework, each of which has been used in the appraisal of the Core Strategy Review (see references below each sustainability issue below).
- 4.5 SEA Guidance recognises that data gaps will exist, but suggests that where baseline information is unavailable or unsatisfactory, authorities should consider how this will affect their assessments and determine how to improve it for use in the assessment of future plans. Where there are data gaps in the baseline and forthcoming reports, these are highlighted in the text. The collection and analysis of baseline data is regarded as a continual and evolving process, given that information can change or be updated on a regular basis. Relevant baseline information has been updated during the SA process as and when new data were published.

### Location of Folkestone & Hythe District

- 4.6 Folkestone & Hythe is located in the south east of England on the southern coast of the County of Kent (see **Figure 4.1**). The District benefits from significant transport investment that includes the M20/A20 corridor towards Greater London, high speed rail, the channel tunnel terminus and easy access to the Port of Dover. Folkestone, the District's primary town, is now less than an hour from Central London on regular High Speed 1 rail services.

- 4.7 The District's settlement hierarchy is dominated by the settlements of Folkestone & Hythe in the eastern half of the District; however, there are dozens of villages and hamlets scattered throughout the rural areas of the District.
- 4.8 Folkestone & Hythe is largely rural in character with the north eastern half of the District containing landscapes protected by the larger Kent Downs Area of Outstanding Natural Beauty (AONB) designation, and the south western half of the District consisting of the largely flat Romney Marsh.
- 4.9 The District shares boundaries with the administrative areas of Ashford, Canterbury and Dover in Kent and Rother in East Sussex.

### Housing

- 4.10 The housing stock in the District is relatively old, with almost 80% constructed prior to 1980, 42% prior to 1945 and 32% prior to 1919. The worst housing conditions are focused in the older housing stock.
- 4.11 There is a high demand for affordable homes in Folkestone & Hythe. The District's Healthier Housing Strategy 2018-2023 reports that there are currently around 1,181 households registered on the council's housing waiting list for council and housing association homes in the district. One of the key drivers of housing need within the district is the increasing number of individual households. The average household size in the district has decreased considerably over recent years and will continue to decrease to around 2.02 persons by the end 2021.<sup>11</sup>
- 4.12 There are currently around 500 long-term empty homes in the District. Despite this, homelessness in Folkestone & Hythe is an issue. The rough sleeping count completed in November 2017, identified 16 individual people sleeping rough in the Folkestone area.<sup>12</sup>
- 4.13 There are key challenges to housing delivery including the development restrictions posed by the Kent Downs AONB and a lack of large sites, which limits the potential to deliver significant quantities of affordable housing.
- 4.14 The current average house price for the district currently stands at approximately £309,000 (November 2017), considerably above the national average, although below the regional average. Highest values are found in the vicinity of Hythe and in rural areas of the District. Average house prices in 2017 stood at more than six times the average household income in the District and for newly forming households, closer to 9.5 times the average household income.<sup>13</sup>
- 4.15 The adopted Core Strategy sets out a minimum delivery target of 8,750 dwellings by 2031 under policy SS2. This equates to a minimum delivery of 350 dwellings per annum from 2006/7 to 2030/31 inclusive.<sup>14</sup>
- 4.16 From dwellings already completed, and identified potential housing locations in the Core Strategy, it is expected that:
- At least 7,500 dwellings will be on previously developed land.
  - The requirements of Policy CSD1 will provide approximately 2,000–2,500 affordable housing units.
  - Approximately 6,500–7,000 dwellings will be in the Urban Area (Folkestone/Hythe).<sup>15</sup>
- 4.17 The updated SHMA<sup>16</sup> jointly commissioned by Folkestone & Hythe District Council and Dover District Council set out an annual Objectively Assessed Housing Need (OAN) for housing in the District for the period 2014-2037 of 633 dwellings per annum (dpa), 12,030 homes over the full period, with the potential for a higher need of 676 homes under the Government's new national methodology, or 12,845 dwellings over the plan period. The SHMA goes on to recommend that an appropriate buffer over and above the total need to ensure that the housing need is met within

<sup>11</sup> Folkestone and Hythe District Council (2018) Folkestone and Hythe Healthier Housing Strategy 2018-2023

<sup>12</sup> Folkestone and Hythe District Council (2018) Folkestone and Hythe Healthier Housing Strategy 2018-2023

<sup>13</sup> Folkestone and Hythe District Council (2018) Folkestone and Hythe Healthier Housing Strategy 2018-2023

<sup>14</sup> Folkestone and Hythe Adopted Core Strategy (2013)

<sup>15</sup> Folkestone and Hythe Adopted Core Strategy (2013)

<sup>16</sup> Folkestone and Hythe District Council and Dover District Council Strategic Housing Market Assessment (SHMA), PBA, 2017

the period. The SHMA states that 139 dpa must be affordable homes and 90 dpa must be new Starter Homes.

4.18 While the Council has been preparing the Core Strategy Review, the Government consulted on the introduction of a standard national methodology for calculating housing need. 'Planning for the Right Homes in the Right Places' was published by the Department for Communities and Local Government (DCLG) in September 2017. Following this consultation, the newly formed Ministry of Housing, Communities and Local Government (MHCLG) prepared and consulted on a revised draft of the National Planning Policy Framework. The final version of the National Planning Policy Framework was published in July 2018. Regarding new housing, this states that: *"To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals".*<sup>17</sup>

4.19 The national methodology for housing need factors in the latest household projections<sup>18</sup> and information on housing affordability<sup>19</sup> to arrive at a figure for the minimum annual local housing need that local authorities should plan for. At the time of preparing the Proposed Submission version of the Core Strategy Review, the latest household projection and affordability ratio for the District suggest that the Council should plan for 676 new homes, on average, each year. Over the plan period 2018/12 to 2036/37 (19 years), this equates to 12,845 additional homes in total.

#### *Gypsies and Travellers*

4.20 There is relatively limited local need for Gypsy and Traveller accommodation. A 2014 assessment of the needs of Gypsies and Travellers identified a current provision of four authorised residential pitches in Folkestone & Hythe and a possible need for seven additional pitches between 2013 and 2027. This assessment is currently being updated by Folkestone & Hythe and other authorities across East Kent using a standard methodology.<sup>20</sup>

#### *Sustainability issues and relevance to the Core Strategy Review*

- There are key challenges to housing delivery including the development restrictions posed by the Kent Downs AONB and a lack of large sites, which limits the potential to deliver affordable housing. [Addressed by SA objective 1].
- Lack of affordability of housing is a growing issue in the District. [Addressed by SA objective 1].

4.21 The Core Strategy Review should seek to meet the growing housing needs by reference to up to date evidence on the required mix of dwelling types, sizes and tenures to decrease the number of people living in unfit housing and reduce the increasing number of homeless people in Folkestone & Hythe.

#### *Likely evolution of the issues without the Core Strategy Review*

4.22 Paragraph 8 of the NPPF states that local authorities should ensure *"that a sufficient number and range of homes can be provided to meet the needs of present and future generations"*. However, the issue of housing affordability is likely to continue without a positive and proactive approach to delivery of local housing through an up to date Local Plan for the District, for example delivery of a range of dwelling types and tenures to meet need. A coordinated approach to housing allocation is essential to ensure that housing delivery takes place in a sustainable manner and to ensure that those sites which are both suitable (e.g. with fewer environmental constraints) and deliverable are selected.

### **Economy and Labour Market**

4.23 The recent economic performance of Folkestone & Hythe has been characterised by high unemployment and long-term contraction of established local industries. There has been

---

<sup>17</sup> National Planning Policy Framework – Paragraph 60, MHCLG, July 2018

<sup>18</sup> Updated every two years to take account of the latest demographic trends (usually in April).

<sup>19</sup> The most recent median workplace-based affordability ratios, published by the Office for National Statistics at a local authority level and updated every year (usually in March).

<sup>20</sup> East Kent Gypsies, Travellers and Travelling Showpeople Accommodation Assessment, Salford University, 2014

relatively strong growth in certain areas, such as finance and insurance; however, this has been insufficient to offset the losses to the Folkestone & Hythe's healthcare base, manufacturing base, distribution and catering sectors. Folkestone & Hythe's future growth is likely to be characterised by continuing rationalisation of traditional manufacturing activities and shift into the service sector, including some movement into higher value activities.<sup>21</sup>

- 4.24 Folkestone & Hythe supported around 48,200 jobs in 2016, which represented an employment growth of 27% over the period from 1997. This employment growth was much higher than the growth recorded in Kent (22%), the South East (19%) and the UK (19%).<sup>22</sup> If recent demographic trends of an ageing population and shrinking average household sizes continue, there is the potential for Folkestone & Hythe's working age population to fall, with resulting labour supply issues having a negative effect on economic performance. The amounts and type of development proposed by the adopted Core Strategy is designed to address this and is expected to almost maintain the labour supply to 2026.<sup>23</sup> In particular, the Employment Land Needs Assessment<sup>24</sup> forecasts growth of 237 jobs a year (between 2018 and 2037) compared with 445 jobs a year (between 2006 and 2026) in the 2017 Employment Land Review. Translated into net floorspace requirements, jobs growth forecasts indicate a demand for office space of 24,750sqm and a requirement for industrial space of -8,390sqm, leading to a total demand for all 'B class' employment uses of 16,360sqm net.
- 4.25 Unemployment in Folkestone & Hythe has dropped significantly from 6.7% (Jul 13-Jun 14) to 4.4% (Apr 2017-March 2018).<sup>25</sup> The most recent figure is higher than the regional and national average (3.4% and 4.3% respectively),<sup>26</sup> as well as the majority of the Districts in Kent (Thanet, Gravesham, Medway and Swale have a higher unemployment rate). Youth unemployment (aged 18-24 years) in the District during August 2018 stood at 3.4%, higher than the rate amongst those aged 25-49 (2.3%). Levels of youth unemployment are higher than Kent (2.9%) and National levels (3.0%).<sup>27</sup>
- 4.26 A large proportion of the employment available within the District is relatively low paid. Figures for Folkestone & Hythe (2014) show that the average gross weekly pay for Folkestone & Hythe residents in full-time employment was £524.80, a decrease of £19.00 since the previous year. The target set out in the Core Strategy is an increase of £3.35 per annum. Resident based weekly earnings for Kent as a whole was £574.90 in 2017<sup>28</sup>. Employment within higher skilled managerial and professional occupations is comparably low in relation to overall Kent and South East England levels.<sup>29</sup> Employment in the knowledge economy has seen a decline from its peak of 15% in 2007, in contrast to Kent as a whole which has seen a steady overall rise over the period 2003-2010.<sup>30</sup>
- 4.27 Folkestone & Hythe has a number of economic strengths, including its good transport links (M20 motorway, High Speed rail links to London, and proximity to the Channel Tunnel), low wage levels and land/building costs relative to the wider South East region, a large working age population and a high quality natural environment.
- 4.28 The largest employment sectors in Folkestone & Hythe are professional and other private services (22%), healthcare (11%), hospitality and recreation (10%), retail (10%) and wholesale and transport (9%). The education (9%) and public administration and defence sectors (8%) are also important employers.<sup>31</sup>

---

<sup>21</sup> Folkestone and Hythe District Council (2017) Folkestone and Hythe Employment Land Review

<sup>22</sup> Folkestone and Hythe District Council (2018) Otterpool Park Garden Town Employment Opportunities Study

<sup>23</sup> Folkestone and Hythe District Council (2011) Development Requirements Report

<sup>24</sup> Lichfields (2018) Employment Land Needs Assessment

<sup>25</sup> Nomis – Labour Market Profile – Folkestone and Hythe. Accessed 5<sup>th</sup> October 2018

<sup>26</sup> Nomis – Labour Market Profile – Folkestone and Hythe. Accessed 5<sup>th</sup> October 2018

<sup>27</sup> Kent County Council (2018) District Unemployment Bulletin [http://www.kent.gov.uk/\\_\\_data/assets/pdf\\_file/0019/8182/District-unemployment-bulletin.pdf](http://www.kent.gov.uk/__data/assets/pdf_file/0019/8182/District-unemployment-bulletin.pdf)

<sup>28</sup> Folkestone and Hythe District Council (2017) Authority Monitoring Report

<sup>29</sup> Folkestone and Hythe District Council (2015) Folkestone and Hythe Economic Development Strategy 2015-2020

<sup>30</sup> Folkestone and Hythe District Council (2012) Folkestone and Hythe Economic Development Strategy 2012-2017

<sup>31</sup> Folkestone and Hythe District Council (2018) Otterpool Park Garden Town Employment Opportunities Study

- 4.29 Economic weaknesses include its relative remoteness, relatively low rates of entrepreneurship and few residents with higher skills.<sup>32</sup> In 2011, around 31% of working residents in Folkestone & Hythe commuted outside the District for their work: Ashford (10%), Dover (5%), Canterbury (4%) and London (4%). Overall, Folkestone & Hythe has a net commuting outflow of 3,920 workers.<sup>33</sup> There is a need to increase the take up rate of further education courses and diversify the skills base of the local labour market, to ensure local business sectors are able to improve the long term prosperity of residents.
- 4.30 Due to its high quality natural environment and its visitor attractions (such as Port Lympne Reserve; Romney, Hythe and Dymchurch Railway; Medieval castles and Roman remains; the Battle of Britain Museum at Hawkinge) the tourism, leisure and hospitality sector represents a significant proportion of the local economy. Research conducted in 2013 estimated that this sector contributes £235.2 million to the local economy and supports around 4,500 jobs. This equates to approximately 12% of total jobs in the District.<sup>34</sup>
- 4.31 Folkestone & Hythe is the District's main centre, with the largest concentration of shops and services in Folkestone & Hythe and is a key focus for economic activity.<sup>35</sup> It has suffered a decline over recent years but continues as a tourist destination. In 2015/2016 the primary shopping vacancy rates in Folkestone Primary were 8.1%, 3.5% in Hythe, 4.3% in New Romney and 10.5% in Cheriton. In 2016/17 the primary shopping vacancy rates in Folkestone Primary were 7%, 4.1% in Hythe, 1.7% in New Romney, 13.1% in Cheriton and 6.0% in Sandgate.<sup>36</sup>
- 4.32 In recent years the District has seen a considerable amount of regeneration activity, most notably through socio-economic programmes such as the Single Regeneration Budget in Folkestone and the Romney Marsh. Positive changes include that Folkestone has begun to carve out an identity as an up-and-coming coastal destination; the arrival of High Speed One in 2009; the considerable investment in the Old Town to create a Creative Quarter; and plans for the regeneration of Folkestone Seafront.<sup>37</sup>
- 4.33 Outside Folkestone, the main centres of economic activity and employment are industrial estates within the larger towns. On Romney Marsh, Lydd Airport and Dungeness Power Station provide much of the employment.<sup>38</sup> The nuclear power stations at Dungeness have been central to the Marsh's economy for many years contributing some £50 million to the local economy annually. They employ around 1,200 people, many of whom live on the Marsh. Decommissioning of the Magnox 'A' site is underway with the site planned to enter care and maintenance in 2027. In response to this, and supported by Magnox and the Nuclear Decommissioning Authority, Folkestone & Hythe District Council and Kent County Council produced the Romney Marsh Socio-Economic Plan to co-ordinate regeneration projects and as a basis for attracting funding for projects designed to offset the loss of employment associated with the loss of Dungeness 'A'. These projects seek to broaden the employment base and develop education and skills in the local population; associated project locations include Mountfield Road Industrial Estate in New Romney, Kitewell Lane Industrial Estate in Lydd, Lydd Airport and areas around the periphery of Romney Marsh (given the constraints on development within the Marsh posed by flood risk and nature conservation designations).
- 4.34 Dungeness 'B' nuclear power station is still operational; decommissioning is set to commence in 2028.<sup>39</sup> At present the Government has not included Dungeness as a site for new generation power stations due to concerns over potential damage to the Dungeness Special Area of Conservation.
- 4.35 Lydd Airport has been significant in the area for more than 50 years and, by 2019, is expected to have implemented planning consent for extended runways and a new terminal building, to allow

<sup>32</sup> Folkestone and Hythe District Council (2015) Folkestone and Hythe Economic Development Strategy 2015-2020

<sup>33</sup> Folkestone and Hythe District Council (2018) Otterpool Park Garden Town Employment Opportunities Study

<sup>34</sup> Cool Tourism (2015) The Economic Impact of the Kent Visitor Economy 2013

<sup>35</sup> Folkestone and Hythe District Council (2015) Folkestone and Hythe Economic Development Strategy 2015-2020

<sup>36</sup> Folkestone and Hythe District Council (2017) Authority Monitoring Report

<sup>37</sup> Folkestone and Hythe District Council (2012) Folkestone and Hythe Economic Development Strategy 2015-2020

<sup>38</sup> Folkestone and Hythe District Council (2012) Folkestone and Hythe Economic Development Strategy 2015-2020

<sup>39</sup> EDF Energy (2016) Dungeness B power station <https://www.edfenergy.com/energy/power-stations/dungeness-b> Accessed 23rd May 2017



passenger flights using aircraft the size of Boeing 737 or Airbus 319, thereby creating up to 200 jobs locally.

- 4.36 The District has an ample quantity of employment land allocated.<sup>40</sup> Despite this quantitative oversupply of employment land in the District, a large share of the existing employment sites do support ageing premises and infrastructure. Therefore, there is a need for new employment land/space.<sup>41</sup>
- 4.37 While Folkestone & Hythe is assessed as having a sufficient supply of employment land to meet future needs in broad quantitative terms, a cautious approach is required to managing the competing pressures on employment sites within the District.<sup>42</sup>
- 4.38 A Town Centre Study based upon quantitative and qualitative need and focussing on sites in Folkestone, Hythe and New Romney town centres, but also covering other centres was completed in 2015<sup>43</sup>. The study recognises Folkestone as the District's major town centre, followed by Hythe town centre, the District centres of Cheriton and New Romney and the local centres of Lydd, Hawkinge, Lyminge, Elham and Dymchurch. The study identifies a qualitative need for larger retail units within Folkestone town centre to meet the needs for national retailers particularly clothing retailers, as well as Cheriton and Hawkinge. The study identifies an acute qualitative need for an improved evening economy within Folkestone town centre, particularly in respect of 'family dining' restaurants and cinema provision. The study goes on to identify the Folkestone Bus Station and the existing retail units on Guildhall Street and Shellons Street and the Sainsbury's Store and adjacent areas at Bouverie Place West as offering the greatest opportunity for redevelopment.
- 4.39 **Figure 4.2** illustrates the location of the District's existing employment areas and education facilities.

#### *Sustainability issues and relevance to the Core Strategy Review*

- Folkestone & Hythe is situated on the south-east coast of Kent, and benefits from strong transport links to London and west Kent from the M20 motorway and direct rail services from Folkestone. [Addressed by SA objective 2].
  - Folkestone & Hythe's economic growth has been historically poor. It has suffered from a decline in manufacturing and dependence on relatively low paid and seasonal tourism jobs and on nuclear power generation at Dungeness. However, recent employment growth in Folkestone & Hythe has been at a higher level than the growth registered at the regional and national levels, with the majority of this growth associated with non B class sectors. [Addressed by SA objective 2].
  - Unemployment in general and youth unemployment in particular are high in Folkestone & Hythe and many of the jobs available are relatively low paid. [Addressed by SA objective 2].
  - Folkestone & Hythe has relatively low levels of educational attainment and skills which could hinder economic growth in the District. [Addressed by SA objective 2].
  - Parts of Folkestone, notably several areas of the 'secondary frontage', suffer from high vacancy rates of retail premises. [Addressed by SA objective 2].
- 4.40 There is a need for the Core Strategy Review to:
- Support the regeneration of the District's principal urban centre, Folkestone. [Addressed by SA objective 2].
  - Provide employment land suitable for the likely continuation in a shift from manufacturing to service industries and encourage higher skill, higher paid sectors through provision of high quality employment sites. [Addressed by SA objective 2].
  - Support access to education.

---

<sup>40</sup> Folkestone and Hythe District Council (2015) Authority Monitoring Report

<sup>41</sup> Folkestone and Hythe District Council (2017) Folkestone and Hythe Employment Land Review

<sup>42</sup> Folkestone and Hythe District Council (2017) Folkestone and Hythe Employment Land Review

<sup>43</sup> PBA (2015) Folkestone and Hythe Town Centres Study

- Protect and promote appropriate access to its high quality natural environment. [Addressed by SA objective 2].
- Support expansion or upgrading of key visitor attractions. [Addressed by SA objective 2].
- Plan for the consequences of the de-commissioning of Dungeness 'B' nuclear power station. [Addressed by SA objective 2].

*Likely evolution of the issues without the Core Strategy Review*

- 4.41 Folkestone & Hythe's economy is lagging behind that of others in the South East. However, the NPPF states in paragraph 80 that the *"The Government's Industrial Strategy sets out a vision to drive productivity improvements across the UK, identifies a number of Grand Challenges facing all nations, and sets out a delivery programme to make the UK a leader in four of these: artificial intelligence and big data; clean growth; future mobility; and catering for an ageing society."* . Therefore, without the Core Strategy Review this issue is being addressed to some extent by other policy.
- 4.42 Despite this, Folkestone & Hythe's economy is likely to continue to lag behind that of others in the South East without coordinated action from the Core Strategy Review to promote regeneration of its towns, provision of appropriate employment space and access to education and training.

**Landscape**

- 4.43 Folkestone & Hythe is a coastal District with over 20 miles of coastline, a section of which is designated as Heritage Coast. Over 33% of the District falls within the Kent Downs Area of Outstanding Natural Beauty (AONB). The District has a number of locally designated 'Local Landscape Areas' concentrated around Romney Marsh and also parts of the Sandgate Escarpment and Seabrook Valley, Eaton Lands, Cooling Lane, Enbrook Valley and Mill Lease Valley.<sup>44</sup>
- 4.44 Folkestone & Hythe features a variety of landscape types, from chalk downland and wooded valleys to areas of marshland. The District of Folkestone & Hythe spans three National Character Areas.
- The southern half of Folkestone & Hythe is within the Romney Marsh NCA:
    - A flat, open and agricultural landscape, with distinctive drainage dykes, marshes and open skies. Dungeness is the largest shingle foreland in Europe, with a real sense of isolation and remoteness especially along the coast. 20th century development is evident in the towns along the coastal strip. Much of this area is dominated by the imposing power station and associated transmission lines. Past gravel extraction pits, now flooded, military uses and expanding holiday resorts add to the general clutter along the coast.
  - The Wealden Greensand NCA runs in a narrow band west from Folkestone:
    - A belt of Greensand typified by woodlands, scattered settlements and scarp / dip-slope topography. The East Kent section has a gentler, more open aspect and can be described as less intimate and less distinctive than other areas. It is also more marked by development, with the presence of major towns and communication corridors.
  - The northern quarter of the District lies within the North Downs NCA:
    - A distinctive chalk downland with a steep scarp, and broad dip slope incised by valleys or 'coombes'. Unimproved, species rich grassland and ancient woodland are found on some less fertile soils, although much of the lower dip slope in Kent is fertile and is used for intensive arable agriculture. Rural with scattered and distinctive farmsteads and large houses.<sup>45</sup>
- 4.45 The Kent Downs Management Plan was adopted in 2014 and sets a 20 year vision for the AONB seeking to protect this special designated landscape. 'Up on the Downs Landscape Partnership' is a £2.5 million Heritage Lottery Fund which operated until 2017 and was set up to provide

<sup>44</sup> Folkestone and Hythe District Council (2013) Annual Monitoring Report

<sup>45</sup> Natural England, National Character Areas Profiles (2013) [online] available at: <http://www.naturalengland.org.uk/publications/nca/>

landscape and nature management investment, community engagement and training, and access improvements to areas including Folkestone Warren.<sup>46</sup>

#### *Sustainability issues and relevance to the Core Strategy Review*

- The District contains a number of distinct rural landscapes as well as those more influenced by human development which could be harmed by inappropriate development. [Addressed by SA objective 3].

4.46 The Core Strategy Review should ensure that designated landscapes (such as the Kent Downs AONB and its setting) are protected and enhanced as appropriate and that development outside these designations takes account of the setting of the AONB and the variation in landscape character across the District.

#### *Likely evolution of the issues without the Core Strategy Review*

4.47 Pressures on local landscapes are likely to increase with the rising population of the District, new development and climate change. Strategic developments allocated through the Core Strategy Review will need to provide capacity for new residential and employment developments without compromising the local integrity of the District's environmental assets, including the District's most sensitive landscapes.

### **Historic Environment**

4.48 There is a wealth of notable heritage in the District – Iron Age and Roman settlements, medieval churches, Tudor castles and Napoleonic fortifications and other defensive sites.<sup>47</sup> The District has 913 Listed Buildings, including 30 Grade I and 39 Grade II\*<sup>48</sup>, and 65 Scheduled Monuments. Listed buildings are not evenly distributed throughout the District but concentrated in the Folkestone area, which is home to c 200, and in Hythe and Elham, which feature c 100 each.

4.49 Folkestone & Hythe District Council has designated 21 Conservation Areas, which make up 1% of the District's land area.<sup>49</sup>

4.50 There are two Registered Parks and Gardens in Folkestone & Hythe – the Grade II\* Port Lympne, an early 20th century formal terraced garden and woodland and Grade II Sandling Park, a 19th century formal and ornamental garden set in parkland, woodland and farmland.

4.51 The English Heritage at Risk Register 2018<sup>50</sup> lists two buildings in Folkestone & Hythe deemed at risk: Church of St Peter, The Durlocks, Folkestone and the Parish Church of St James, Elmsted.<sup>51</sup>

4.52 The Register also identifies monuments deemed to be at risk. In Folkestone & Hythe there are nine: Martello Towers Nos. 4, 5, 6, 7 and 9; Dymchurch Redoubt; Motte and Bailey Castle 200m north west of Stowting Church; Bowl barrow 150m north east of Red House Farm, Swingfield; and Bowl barrow at Minnis Beeches, Swingfield.

4.53 **Figure 4.3** illustrates the location of the District's main heritage assets.

#### *Sustainability issues and relevance to the Core Strategy Review*

- There are many sites, features and areas of historical and cultural interest in the District, a number of which are at risk, and which could be adversely affected by poorly planned development. [Addressed by SA objective 4].
- There are opportunities to improve access to and interpretation of the District's historic environment, particularly its assets from the Napoleonic period at Shornccliffe.

4.54 The Core Strategy Review should seek to conserve and enhance the historic environment, appropriate to its significance, taking into account character and setting. Where possible, the Core Strategy Review should aim to bring 'at risk' historic assets into sympathetic productive use.

---

<sup>46</sup> Folkestone and Hythe District Council (2014) Annual Monitoring Report

<sup>47</sup> Folkestone and Hythe District Council (2017) Heritage Strategy

<sup>48</sup> Folkestone and Hythe District Council (2017) Heritage Strategy

<sup>49</sup> Folkestone and Hythe District Council (2017) Heritage Strategy

<sup>50</sup> English Heritage Risk Register (2018)

<sup>51</sup> Folkestone and Hythe District Council (2013) Annual Monitoring Report

### *Likely evolution of the issues without the Core Strategy Review*

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

### **Biodiversity**

- 4.56 Folkestone & Hythe District contains a wide range of habitats including species-rich chalk grassland, ancient woodland, low lying marsh, shingle, and dune areas. Within the County of Kent the greatest cover of the habitat type is arable and horticulture (35%). Improved grassland covers the second largest portion of the county at 29.7%. Broadleaved, mixed and yew woodland is the largest of the semi-natural habitats, covering 44,490ha (11.4%) of the county, followed by neutral grasslands which cover 28,531ha (7.3% of Kent)<sup>52</sup>.
- 4.57 Parkgate Downs, Dungeness and the Folkestone to Etchinghill Escarpment have been designated Special Areas of Conservation (SACs) and Dungeness, Romney Marsh and Rye Bay have recently been designated as a Special Protection Area (SPA) and Ramsar site, which means these areas are regarded as being of international importance under the EU Habitats Directive<sup>53</sup>. Dungeness is also a National Nature Reserve.
- 4.58 There are 13 Sites of Special Scientific Interest (SSSIs) in Folkestone & Hythe District of varying condition. Eight of these are considered to be broadly in 'favourable' condition and three broadly in 'unfavourable recovering' condition. One site is classified as 'unfavourable no change' and another 'unfavourable declining'.<sup>54</sup>
- 4.59 There is a significant amount of Ancient Woodland in Folkestone & Hythe, concentrated to the west, northwest and north of Folkestone. The distribution of this woodland is patchy leading to limited ecological connectivity between the areas, although there are some less fragmented areas in the Northwest of the District.
- 4.60 The District contains 40 Local Wildlife Sites. Located mainly to the west and north of Folkestone & Hythe these sites are mainly woodland and species-rich grassland sites, in contrast to the District's SSSIs, which are primarily coastal or wetland habitats.
- 4.61 **Figure 4.4** illustrates the location of the District's main ecological assets.
- 4.62 In support of a 'Living Landscapes' approach, Biodiversity Opportunity Areas (BOAs) in Kent have been mapped to indicate where the delivery of Kent Biodiversity Action Plan (BAP) targets was to be focused to secure the maximum biodiversity benefits and the best opportunities for establishing large habitat areas and/or networks. This BAP has subsequently been replaced by the Kent Biodiversity 2020 and beyond – a strategy for the natural environment 2015-2025. However targets were set up to 2015 for maintaining, enhancing, restoring and creating habitats occurring in each BOA and for species conservation. Targets to 2020 are currently being reviewed and updated<sup>55</sup>. It is not intended that nature conservation becomes the primary land-use within the BOAs, so long as the targets and objectives for each area can be met, and development of any kind is not precluded. However, consideration may in some cases need to be given to ensuring that development within a BOA does not significantly increase the fragmentation of wildlife habitats within target areas or preclude significant opportunities for habitat restoration or recreation. Four BOAs have been identified in Folkestone & Hythe:
- Dover and Folkestone Cliffs and Downs (KT08).
  - Low Weald Woodlands (KT14).
  - Romney Marsh and Rye Bay (KT15).

---

<sup>52</sup> Kent County Council (2012) Kent Habitat Survey

<sup>53</sup> Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Fauna and Flora

<sup>54</sup> Natural England (2014) Condition of SSSI units [online] available at:  
<http://www.sssi.naturalengland.org.uk/special/sssi/report.cfm?category=R,RF>

<sup>55</sup> <http://kentnature.org.uk/assets/files/Nat-Env/Kent-Biodiversity-Strategy-final.pdf>

- East Kent Woodlands and Downs (KT07).<sup>56,57</sup>
- 4.63 Some brownfield sites in Kent support some of the country's most important populations of reptiles and invertebrates.<sup>58</sup>
- 4.64 There are two Marine Conservation Zones (MCZs) designated along the District's Coastline; the Folkestone Pomerania was designated in November 2013<sup>59</sup> and more recently, in January 2016, the Dover to Folkestone MCZ was designated.<sup>60</sup> MCZs protect a range of nationally important marine wildlife, habitats, geology and geomorphology and can be designated anywhere in English and Welsh inshore and UK offshore waters.

*Sustainability issues and relevance to the Core Strategy Review*

- Folkestone & Hythe contains a significant resource of designated biodiversity sites, a number of which are in unfavourable condition. It also contains a significant but fragmented resource of Ancient Woodland. Folkestone & Hythe's landscape outside of designated sites contains important habitats, including a number which have the potential to contribute to large scale ecological networks. All of these biodiversity assets could be harmed by inappropriate development. [Addressed by SA objective 5].
  - Green networks for wildlife and natural green spaces need to be fully reflected in the Green Infrastructure Strategy to provide a framework for the consideration of development proposals, and for avoiding harm and gaining enhancements where appropriate. [Addressed by SA objectives 5 and 6].
- 4.65 The Core Strategy Review should ensure that designated wildlife sites are conserved and enhanced and also seek to maintain and enhance the four large-scale ecological networks (BOAs) identified in the District.

*Likely evolution of the issues without the Core Strategy Review*

- 4.66 With the population of the District increasing, pressure on recreation and wildlife areas is likely to be exacerbated.
- 4.67 Paragraph 170(d) of the NPPF seeks to minimise impacts on biodiversity and provide net gains in biodiversity where possible, which may afford some protection to the SSSIs and local designations in the District. Furthermore paragraph 175 of the NPPF requires that to conserve wildlife and cultural heritage in conservation sites (SSSIs, Special Protection Areas, Special Areas of Conservation and listed or proposed Ramsar sites) permission should be refused for major developments except in exceptional circumstances and where it can be demonstrated to be in the public interest.
- 4.68 The Habitats and Birds Directives provide protection to the internationally designated biodiversity sites and certain species in proximity to the District. Adopting a strategic, local approach to the allocation of development will ensure that the impacts of development (both singularly and in combination) on all nature conservation interest can be better managed.
- 4.69 Without the Core Strategy Review there is less opportunity to adopt a co-ordinated approach to the development of green networks for wildlife and natural green spaces designed to steer recreational pressure away from sensitive wildlife sites. Strategic developments allocated through the Core Strategy Review will need to provide capacity for new residential and employment developments without compromising the local integrity of the District's biodiversity assets and ecological networks.
- 4.70 The severity and likelihood of adverse impacts on local ecosystems is also likely to increase with predicted climate change. Without an up to date Core Strategy, there is less opportunity to adopt a co-ordinated, spatial approach to managing the effects of this change through careful site allocations and targeted wildlife conservation and enhancement initiatives.

---

<sup>56</sup> The Wildlife Trust, A Living Landscape for the South East available online at:

[http://www.kentwildlifetrust.org.uk/sites/kent.live.wt.precedenthost.co.uk/files/A\\_Living\\_Landscape\\_for\\_the\\_South\\_East.pdf](http://www.kentwildlifetrust.org.uk/sites/kent.live.wt.precedenthost.co.uk/files/A_Living_Landscape_for_the_South_East.pdf)

<sup>57</sup> <http://kentnature.org.uk/kent-biodiversity-strategy2.html>

<sup>58</sup> <http://www.kentbap.org.uk/habitats-and-species/priority-habitat/built-up-areas-and-gardens/>

<sup>59</sup> Folkestone and Hythe District Council (2014) Annual Monitoring Report

<sup>60</sup> DEFRA (2016) Dover to Folkestone Marine Conservation Zone

## Soil and Minerals

- 4.71 The 2002 Agricultural Land Classification Survey defined approximately 60% of the District's land area as 'Excellent' or 'Very Good' for agricultural purposes.<sup>61</sup> Romney Marsh ward is the most productive area, containing virtually all of the 'Grade I' agricultural land in the District and a significant proportion of the County's 'Grade I' agricultural land.
- 4.72 There are a range of potentially contaminated sites within the District of which the Council is aware. Contamination can be the result of historic land uses and current uses such as the handling and storage of fuels and the transportation and storage of waste.
- 4.73 Construction aggregates – sand, gravel and crushed rock - are the most significant (in quantity terms) worked and imported into Kent. Within Folkestone & Hythe, sharp sand and gravel deposits have historically been exploited in the southern part of Romney Marsh although these reserves are to some extent becoming worked out.<sup>62</sup>

### *Sustainability issues and relevance to the Core Strategy Review*

- Folkestone & Hythe contains some of the most productive agricultural land in the South East but this could be lost to development. [Addressed by SA objective 7].
  - Folkestone & Hythe contains areas of historically contaminated land which could pose a risk to human health and the natural environment or which could be remediated and brought into appropriate use. [Addressed by SA objective 7].
  - Folkestone & Hythe contains valuable sand and gravel reserves which could be sterilised by development. [Addressed by SA objective 7].
- 4.74 The Core Strategy Review should seek to avoid development on the best and most versatile agricultural land. Where such use is permitted it should, where possible, be temporary and reversible.
- 4.75 Previously developed land should be prioritised for development, recognising that brownfield sites may include priority habitats and/or support significant biodiversity interest. The Core Strategy Review should support development which achieves remediation of contaminated sites and avoid development which poses a risk to human health or the wider natural environment.
- 4.76 The Core Strategy Review should seek to avoid sterilising economic minerals reserves.

### *Likely evolution of the issues without the Core Strategy Review*

- 4.77 The NPPF requires local planning authorities to take into account the benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be used in preference to those of a higher quality.
- 4.78 The NPPF also requires local planning authorities to encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value.
- 4.79 In relation to minerals, the NPPF requires local planning authorities to avoid needlessly sterilising known locations of minerals resources of local and national importance by non-mineral development. The Kent Minerals and Waste Local Plan<sup>63</sup> seeks to deliver a sustainable, efficient supply of land-won minerals and to safeguard economic mineral resources for future generations and provides a mechanism by which to implement these requirements via its land allocations for minerals extraction. The incorporation of new strategic allocations within the Core Strategy Review may result in the need for the County Council to review the capacity of local minerals reserves to accommodate this increase local growth.

---

<sup>61</sup> Folkestone and Hythe District Council (2011) Folkestone and Hythe Rural Services Study

<sup>62</sup> Kent County Council (2016) Kent Minerals and Waste Local Plan 2013-30

<sup>63</sup> Kent County Council (2016) Kent Minerals and Waste Local Plan 2013-30

## Water Quality and Water Resources

- 4.80 Kent has one of the lowest levels of rainfall in the country and is extremely dependent on groundwater for drinking water supplies. The condition of aquifers under Folkestone & Hythe in terms of both water quality and quantity is a matter of concern. The Environment Agency reports that the chalk and greensand aquifers in Kent are suffering from diffuse pollution from nitrate.<sup>64</sup> It is important for security of drinking water supplies and the health of sensitive surface water habitats that new development does not adversely affect the quality or place unsustainable demands on the quantity of these water resources. The Stour Catchment is of particular importance as it contains the District's principal aquifers. A number of Source Protection Zones have been established, mainly in the north of the District, to protect groundwater quality in sensitive areas.<sup>65</sup> The adopted Core Strategy states that Source Protection Zones must be protected and that effective pollution prevention measures are required, as appropriate.
- 4.81 The majority of surface water bodies in Folkestone & Hythe have been classified as having a 'moderate' Water Framework Directive (WFD) status. Some areas to the north of the District are classified as being 'poor', but none receive the lowest category of 'bad'. The Seabrook Stream / eastern end of the Royal Military Canal is the only current example of a watercourse in 'good' condition. Given the WFD requirement for all surface waters to achieve 'good' status by 2015 it is important, as a precursor to improvements, that the Core Strategy Review prevents any further deterioration in the quality of surface water and where possible supports improvement of water quality.<sup>66</sup>
- 4.82 The quality of Folkestone & Hythe's coastal waters is important, particularly to the District's tourism economy. These are ultimately the 'sink' for urban runoff and whilst the volume of marine water available to dilute pollutants is significant, the Council acknowledges the importance of protecting its generally 'excellent' bathing water quality.<sup>67</sup>
- 4.83 The settlements of Folkestone & Hythe have a good level of coverage from waste water treatment works (WwTWs). Most of them have a current or planned capacity sufficient to meet planned growth although there is potentially insufficient capacity in the strategic wastewater connection between the Westenhangar and Lympne area and the Sellindge WwTW, an issue which the Water Cycle Study recommends is addressed via developer contributions to support strategic development in this area.<sup>68</sup> The Folkestone & Hythe Water Cycle Study reports that the development of a garden town at Otterpool will require a new wastewater treatment solution owing to the limited capacity of the inland watercourses in the area.<sup>69</sup>
- 4.84 Many parts of Folkestone & Hythe are served by combined sewers, creating the risk that extreme rainfall events (which are increasingly likely under climate change) could lead to combined sewer overflows (CSOs) and associated risks of flooding and adverse effects on water quality. The Water Cycle Study recommends a positive but selective approach to Sustainable Drainage Systems (SuDS) to reduce the amount of water discharged to combined sewers and WwTWs, where technically feasible.<sup>70</sup>
- 4.85 As Folkestone & Hythe falls within a designated Water Scarcity Status Area, water efficiency measures are appropriate in new development and supported by the Environment Agency.<sup>71</sup> The Water Resources Management Plan<sup>72</sup> concludes that demand for water is unlikely to outstrip supply over the Folkestone & Hythe Core Strategy plan period. The Folkestone & Hythe Water Cycle Report<sup>73</sup> has considered the implications of the Core Strategy on the Water Resources Management Plan and found that the two are consistent but that it is appropriate for local planning policy to directly support efforts to significantly reduce average domestic consumption.

---

<sup>64</sup> Folkestone and Hythe District Council (2018) Folkestone and Hythe Water Cycle Study

<sup>65</sup> Folkestone and Hythe District Council (2018) Folkestone and Hythe Water Cycle Study

<sup>66</sup> Folkestone and Hythe District Council (2018) Folkestone and Hythe Water Cycle Study

<sup>67</sup> Folkestone and Hythe District Council (2018) Folkestone and Hythe Water Cycle Study

<sup>68</sup> Folkestone and Hythe District Council (2018) Folkestone and Hythe Water Cycle Study

<sup>69</sup> Folkestone and Hythe District Council (2018) Folkestone and Hythe Water Cycle Study

<sup>70</sup> Folkestone and Hythe District Council (2018) Folkestone and Hythe Water Cycle Study

<sup>71</sup> Folkestone and Hythe District Council (2013) Folkestone and Hythe Core Strategy, Policy SS6

<sup>72</sup> Affinity Water (2014) Final Water Resources Management Plan 2015-2020, 'Our Plan for Customers and Communities'

<sup>73</sup> Folkestone and Hythe District Council (2018) Folkestone and Hythe Water Cycle Study

The Core Strategy requires all residential developments to achieve a maximum water usage of 105 litres/person/day (as required by Code for Sustainable Homes 'level 3 and level 4') with a more stringent standard of 90 litres/person/day applied to strategic residential allocations at Folkestone Seafront (Policy SS6) and Shorncliffe Garrison, Folkestone (Policy SS7).<sup>74</sup>

#### *Sustainability issues and relevance to the Core Strategy Review*

- Surface water and groundwater quality are a significant issue in the District. There is the potential for impacts from development on water quality due to increases in contaminated surface runoff, runoff to combined sewers, and increased discharges of treated wastewater from WwTWs. [Addressed by SA objectives 8 and 11].
- Drinking water is a scarce resource in the District and population and household growth will place further pressure on this resource. [Addressed by SA objectives 8 and 11].
- There is potentially insufficient capacity in the strategic link wastewater connection between the Westenhanger and Lympe area and the Sellindge WwTW. [Addressed by SA objectives 8 and 11].

- 4.86 The Core Strategy Review should seek to ensure that the location of development takes into account the sensitivity of the water environment and that wastewater infrastructure (notably in the Westenhanger area) and processes are in place such that development will not result in deterioration in water quality. It should also ensure that development is designed so as to make efficient use of water resources. Efficient use of water resources can also help to safeguard surface water quality by helping to maintain flows within surface water and reducing the risk of combined sewer overflows.

#### *Likely evolution of the issues without the Core Strategy Review*

- 4.87 Population growth, together with the hotter, drier summers expected under climate change, are likely to put ever greater pressure on the District's water resources.
- 4.88 National plans and strategies encourage new development to meet water efficiency standards and water companies must plan to reduce leaks from the water supply network as well as improve water efficiency. Without the Core Strategy Review, however, it will be more difficult to adopt a co-ordinated approach to water resource planning with water companies and more difficult to implement water efficient design in new development.
- 4.89 The Core Strategy (Policy CSD5) requires that "new buildings and dwellings must be delivered in line with wastewater capacity" and that "the quality of water passed on to watercourses and the sea must be maintained or improved". Supporting text specifies that if there is insufficient capacity in the sewerage system to accommodate the increased volumes of flow arising from a new development, the development will need to connect off-site to the nearest point of adequate capacity.

#### **Climatic Factors**

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

#### *Climate Change Mitigation*

- 4.91 The Government publishes data on the CO<sub>2</sub> emissions per capita in each Local Authority that are deemed to be within the influence of Local Authorities. The latest available data<sup>75</sup> show that CO<sub>2</sub> emissions per capita in Folkestone & Hythe fell by approximately 40% over 2005-2016 although this masks widely different falls in the three broad sectors measures: Industry and Commerce - 65%; Domestic -35%; and Road Transport -5%.

---

<sup>74</sup> Folkestone and Hythe District Council (2013) Folkestone and Hythe Core Strategy, Policy SS6

<sup>75</sup> DECC (2018) 2005 to 2016 UK local and regional CO<sub>2</sub> emissions full dataset



- 4.92 Dungeness 'B' nuclear power station is a significant generator of low carbon energy for the UK Grid. It is currently due to be decommissioned in 2028<sup>76</sup>. Planning for nuclear power generation, however, is carried out at the national level and is not a direct current concern for the Folkestone & Hythe Core Strategy Review.
- 4.93 The Core Strategy Review is concerned, though, with ways in which renewable energy generation can be achieved at the macro and the micro scales. Folkestone & Hythe District Council's existing renewable energy capacity is dominated by onshore wind turbines. During 2015, the installation of a 10m high wind turbine at The Grannary, Densole Lane was approved with conditions. In 2012, one onshore 15m high 5.5m diameter freestanding horizontal axis wind turbine was granted planning permission on appeal at Beech Tree Farm, Elmsted and two solar farms have been granted permission: 204 free standing ground solar panels at Lydd Camp and Solar farm at Sycamore Farm, Old Romney. In 2008, 26 wind turbines at Little Cheyne Court, East Guldeford near Brookland started exporting electricity to the National Grid<sup>77</sup>, the scheme was granted planning permission on appeal. The wind farm has the capacity to generate approximately 52-78 MW, which is enough to power around 32,500 homes. The site raised considerable controversy, not least because of the potential for risk to wildlife and the sensitive landscape more generally.
- 4.94 The energy efficiency of new dwellings is measured in Folkestone & Hythe using the Standard Assessment Procedure (SAP). The SAP is the Government system for rating energy efficiency of dwellings. Targets to improve the SAP rating across the District have been set by Folkestone & Hythe District Council.

#### *Sustainability issues and relevance to the Core Strategy Review*

- The need to meet national sustainability and carbon reduction targets. The Core Strategy Review can address these through sustainable design and construction standards, reducing reliance on fossil fuels by support for renewables and other low carbon technologies, and reducing the need to travel, especially by private car. [Addressed by SA objective 10].
- The sensitivity of the natural environment in Folkestone & Hythe may limit the number of acceptable locations for further large scale renewable energy developments. [Addressed by SA objective 10].

#### *Climate Change Adaptation*

- 4.95 Changes to the climate will bring new challenges to the District's built and natural environments. Hotter drier summers may have adverse health impacts and may exacerbate the adverse environmental effects of air and water pollution. The UK Climate Projections (UKCP09) predicts that by the 2050s the climate in the South East is set to get warmer, with wetter winters and drier summers than at present.<sup>78</sup> Specifically:
- Under Medium emissions, the increase in winter mean temperature is estimated to be 2.2°C; it is very unlikely to be less than 1.1°C and is very unlikely to be more than 3.4°C.
  - Under Medium emissions, the increase in summer mean temperature is estimated to be 2.8°C; it is very unlikely to be less than 1.3°C and is very unlikely to be more than 4.6°C.
- 4.96 A changing climate may place pressure on some native species and create conditions suitable for new species, including invasive non-native species. Adaptation to changes in flood risk that may result from climate change is dealt with in the separate section on flood risk below.

#### *Sustainability issues and relevance to the Core Strategy Review*

- Hotter, drier summers expected under climate change have the potential for adverse effects on human health. [Addressed by SA objectives 6 and 9].

<sup>76</sup> EDF Energy (2016) Dungeness B power station <http://www.edfenergy.com/energy/power-stations/Dungeness-b> Accessed 9th October 2018

<sup>77</sup> RWE (no date) Little Cheyne Court Wind Farm <http://www.rwe.com/web/cms/en/310488/rwe-innogy/sites/wind-onshore/united-kingdom/in-operation/little-cheyne-court/> Accessed 19<sup>th</sup> February 2016

<sup>78</sup> UK Climate Projections (2014) Map and Key Findings <http://ukclimateprojections.metoffice.gov.uk/21708?projections=23833> Accessed 9th October 2018

- The Core Strategy Review could take changing climatic and associated weather events into account in the design of new buildings and green infrastructure. [Addressed by SA objectives 6 and 9].
- Climate change is likely to impact upon habitats and thereby biodiversity. The sensitivities of these networks should be reflected in the Green Infrastructure Strategy and the Core Strategy Review's commitment to protect and enhance habitat networks. [Addressed by SA objectives 5 and 6].

#### *Likely evolution of the issues without the Core Strategy Review*

- 4.97 National renewable energy and carbon reduction targets and the NPPF require local authorities to reduce greenhouse gas emissions and actively support energy efficiency and renewable energy. Additionally, the Building Regulations are setting ever-tighter energy efficiency and carbon reduction requirements for new buildings. The Core Strategy Review can contribute to climate change mitigation through policies which require higher energy efficiency standards (e.g. for larger allocations) and provide a positive policy approach to the consideration of renewable energy applications.
- 4.98 The Core Strategy Review also has a role to play in implementing climate change adaptation, for example through appropriate building design and the identification of less vulnerable locations for development. It can also help to ensure that less environmentally sensitive locations are chosen, thereby reducing development pressure on wildlife which may already be under pressure from climate change.
- 4.99 Climate change and a rising local population are in combination and at certain times of the year, likely to exacerbate water and air pollution independently of any Local Plan. However, without a planned approach to development through the Core Strategy Review, there is less opportunity to adopt a co-ordinated, spatial approach that would help to manage health and environmental risks.

#### **Flood Risk**

- 4.100 There is a long history of flooding within Folkestone & Hythe including over 101 flooding events in the last decade.<sup>79</sup> Over half of homes in the District are at risk of flooding from either coastal or fluvial sources.<sup>80</sup> There are 11 watercourses that have been categorised as main rivers in the District and have been sources of flooding in the past. Additionally, 55% of the District is at or below sea level and the majority of District's 41km coastline lies below the mean high water mark.<sup>81</sup>
- 4.101 Virtually all of the Romney Marsh area is within flood zone 3 due to its topography (see **Figure 4.5**). However, the degree of risk varies significantly within the area, being dependent on factors such as topography, hydrological features and position in relation to flood defences.<sup>82</sup> Much of the coastline is protected by a number sea defences ranging from 'hard' structures to naturally forming shingle barrier beaches that are continually managed, so flooding from the sea will generally result from either the current sea defences breaching or being overtopped by wave action.<sup>83</sup>
- 4.102 The UK Climate Projections (UKCP09) predicts that there will be no significant change in annual mean precipitation by the 2050s in the South East, but extreme shifts in when the rain falls. The winter mean precipitation is estimated to increase by +16% and summer mean precipitation is estimated to fall by -19%.<sup>84</sup> Furthermore, it is predicted that the net sea level rise (relative to 1990) between 1999 to 2025 will be 4mm/yr, between 2025 to 2055 8.5mm/yr and 2055 to 2085 12mm/yr.<sup>85</sup>

<sup>79</sup> Herrington Consulting Ltd (2015) Strategic Flood Risk Assessment Folkestone and Hythe District Council

<sup>80</sup> Folkestone and Hythe District Council (2016) Flooding <https://www.folkestone-hythe.gov.uk/your-council/policies-plans-and-documents/type-of-emergencies/flooding> Accessed 9th October 2018

<sup>81</sup> Herrington Consulting Ltd (2015) Strategic Flood Risk Assessment Folkestone and Hythe District Council

<sup>82</sup> Folkestone and Hythe District Council (2011) Annual Monitoring Report

<sup>83</sup> Herrington Consulting Ltd (2015) Strategic Flood Risk Assessment Folkestone and Hythe District Council

<sup>84</sup> Map and Key Findings (2014) UK Climate Projections <http://ukclimateprojections.metoffice.gov.uk/21708?projections=23833> Accessed 9th October 2018

<sup>85</sup> Strategic Flood Risk Assessment Folkestone and Hythe District Council (2015) Herrington Consulting Ltd

4.103 In terms of climate change adaptation, flood defence works have been undertaken at sites across the District. These include a £30 million defence scheme at Dymchurch, covering 2.2km of coastline<sup>86</sup>. This is one of six projects in the “Folkestone to Cliff End Strategy”, which is envisaged to protect 14,500 dwellings across Romney Marsh.<sup>87</sup>

#### *Sustainability issues and relevance to the Core Strategy Review*

- Risk of flooding is a major concern in Folkestone & Hythe with 55% of the District at or below sea level. [Addressed by SA objective 9].
- The expected magnitude and probability of significant fluvial, tidal, ground and surface water flooding is increasing in the District due to climate change. [Addressed by SA objective 9].
- Coastal erosion and the associated flood risks are a considerable spatial constraint on new development in the District. [Addressed by SA objective 9].

4.104 The Core Strategy Review should seek an integrated approach to reducing flood risk.

#### *Likely evolution of the issues without the Core Strategy Review*

4.105 The severity and likelihood of flooding is likely to increase with current trends of climate change. Without a Local Plan it will be more difficult to manage the effects of developments on flood risk, although all developments would need to take account of national policy on flood risk, including the NPPF requirement that “*inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere*” (paragraph 155).

### **Waste**

4.106 During 2014/2015, 39,347 tonnes of household waste was collected in the District where nearly half (47.6%) of this was sent for recycling/composting/reuse. During 2015/2016, 36,726 tonnes of household waste was collected in the District where nearly half (44%) of this was sent for recycling/composting/reuse. During 2016/2017, 36,776 tonnes of household waste was collected in the District where nearly half (42.5%) of this was sent for recycling/composting/reuse.<sup>88</sup>

#### *Sustainability issues and relevance to the Core Strategy Review*

- Folkestone & Hythe performs relatively well in terms of recycling and composting of household waste in comparison to other local authorities in the UK. Whilst poorly planned new development could reduce recycling rates and increase waste generation from construction and demolition, achievement of waste and recycling objectives is mainly dependent on factors outside the scope of the Core Strategy Review. However, given the strategic nature of the Core Strategy Review, and in an effort to draw out the potential of reasonable alternatives to contribute positively to managing waste in the District, a new SA objective has been included in the SA framework. [Addressed by SA objective 12].

#### *Likely evolution of the issues without the Core Strategy Review*

4.107 Achievement of the waste reduction and recycling objectives will mainly depend on the success of policies in Kent County Council’s Minerals and Waste Plan, the County Council being the Waste Planning Authority for Folkestone & Hythe. The increasingly stringent national sustainability requirements of the Building Regulations will also have a positive contribution. However, the creation of new communities, potentially new sustainable villages and towns, through the Core Strategy Review has the potential to positively influence waste management at a strategic-scale across the District.

### **Air Pollution**

4.108 The Council monitors air quality across the District. According to the results for 2015/16, air quality pollution levels of NO<sub>2</sub> – Nitrogen Dioxide - have increased in 11 out of 12 monitoring

---

<sup>86</sup> Folkestone and Hythe District Council (2017) Annual Monitoring Report

<sup>87</sup> Folkestone and Hythe District Council (2017) Annual Monitoring Report

<sup>88</sup> DEFRA Local Authority Collected Waste Management Statistics. Available at: <https://data.gov.uk/dataset/5aea1caf-3e38-4d57-b321-ba34eb762b6e/local-authority-collected-waste-management-statistics>

points. However the results are still within the DEFRA air quality objectives levels of below 40µm/m<sup>2</sup> annual mean<sup>89</sup>.

- 4.109 Folkestone & Hythe District currently has no Air Quality Management Areas<sup>90</sup>. In 2013, all prescribed air quality objectives were met.<sup>91</sup>

#### *Sustainability issues and relevance to the Core Strategy Review*

- Air quality is not currently judged to be a significant issue in the District. However, locations targeted for large-scale development could experience significant increases in road traffic from residents and/or employees, resulting in localised adverse effects, in urban areas such as Folkestone and along major roads such as the M20. [Addressed by SA objective 13].

- 4.110 The Core Strategy Review should seek to minimise the need to travel by car by promoting sustainable locations for development and travel by sustainable modes.

#### *Likely evolution of the issues without the Core Strategy Review*

- 4.111 The need to travel by unsustainable modes and associated emissions of air pollutants are likely to increase without action from the Core Strategy Review to direct development to sustainable locations and increase provision of sustainable transport infrastructure. Nevertheless, the ability of the Core Strategy Review to influence air pollution in the District is limited by the fact that much of the traffic passing through it is on the strategic road network and driven by regional and national factors.
- 4.112 Kent's Local Transport Plan<sup>92</sup> has a lead role to play in managing transport related issues and its objectives include reducing emissions, encouraging a shift to sustainable transport and tackling congestion, all of which should help to manage transport-related air quality issues, even in the absence of the Core Strategy Review.

### **Transport**

- 4.113 Whilst the District is primarily of a rural nature there have been significant improvements in transport connections in and out of Folkestone & Hythe over recent decades. Rail connections have been improved by the High Speed 1 domestic rail service which began to operate in December 2009, reducing the journey time from Folkestone to London to under an hour. According to the operators of the Southeastern rail franchise, High Speed 1 has been steadily drawing additional users from around Kent who wish to take advantage of the reduced journey times it offers to and from central London. In 2014, the Department of Transport funded a new car park at Folkestone West to meet this increased passenger demand<sup>93</sup>. Improvements to Folkestone West Station were completed in July 2015 as part of £1.7 million investment which delivered an extra 200 car parking space. In addition, a comprehensive way-finding initiative to improve linkages between Folkestone Central Railway Station and Folkestone Town Centre and Coastline was also completed in 2015<sup>94</sup>.
- 4.114 All of the four railway stations in Folkestone & Hythe provide direct connections to Dover to the east and Ashford to the northwest, as well as direct rail access into London, at London Bridge, via Ashford and Tonbridge. For the reporting year 2016/17 compared to figures from 2015/16, the estimated total number of entries and exits made at stations, shows that there was an increase in station usage at Folkestone West of 0.3% and at Folkestone Central of 2.7%, with a decrease at Sandling of 5.1% and a 3.7% decrease recorded at Westenhanger<sup>95</sup>.
- 4.115 Stanford West lorry area was proposed within the District to alleviate the traffic congestion along the M20 which results due to the procedure of holding lorries on the motorway, known as 'Operation Stack'. Up to 11,000 lorries per day make use of Kent's roads given its strategic location for international freight passing through the Strait of Dover. The Secretary of State for

---

<sup>89</sup> Bureau Veritas Air Quality (2017) Folkestone and Hythe District Council LAQM Annual Status Report 2017

<sup>90</sup> Defra, Air Quality Management Areas [online] available at: <http://aqma.defra.gov.uk/aqma/home.html> Accessed 9th October 2018

<sup>91</sup> Bureau Veritas Air Quality (2013) Folkestone and Hythe District Council LAQM Progress Report 2013

<sup>92</sup> Kent County Council (2017) Local Transport Plan 4: Delivering Growth without Gridlock 2016-2031

<sup>93</sup> Folkestone and Hythe District Council (2017) Annual Monitoring Report

<sup>94</sup> Folkestone and Hythe District Council (2017) Annual Monitoring Report

<sup>95</sup> Folkestone and Hythe District Council (2017) Annual Monitoring Report

Transport announced that a single lorry area would be provided at Stanford West in July 2016. Consultation on the £250 million site to the west of the village of Stanford took place between August and September 2016<sup>96</sup>. However, in November 2017 the Transport Secretary announced that the Government would no longer try to build the lorry holding park at Stanford West following a judicial review into the plans. Ministers have nevertheless reaffirmed their commitment to a permanent alternative to Operation Stack. In June 2018 Highways England held a series of public information events to present initial concept ideas on a proposed approach to reduce congestion caused during periods when Operation Stack is called, and feedback was invited. Information on a temporary traffic management measure(s) on the M20 were presented, and these measures are to be made available for use by March 2019. A longer-term permanent solution will have to follow a formal planning process, and if a permanent solution is progressed then a formal consultation process will take place in winter 2018-19.

- 4.116 **Figure 4.6** maps the District's transport network.
- 4.117 2001 Census information<sup>97</sup> indicated that approximately 59% of the Folkestone & Hythe working population travelled to work by car, which is a slightly higher than the average for England. Of those who drive to work, approximately 65% travel to work by car within the District itself. More recent data show that although there is a heavy dependency on the use of private transport to access employment, relatively few people commute out of Folkestone & Hythe (73% of Folkestone & Hythe's working residents worked in Folkestone & Hythe and 77% of its workforce was resident in the District in 2011<sup>98</sup>). This creates a good starting point for efforts to promote decreased car dependency.
- 4.118 According to the 2011 Census data<sup>99</sup>, Folkestone & Hythe has slightly lower than the national average for car ownership categories, but higher compared to Kent especially in and surrounding Folkestone, which may well be related to the large elderly population. Nearly a quarter (23.7%) of residents in Folkestone & Hythe had no cars or vans in their household, with the national average of 25.6% and county average of 20%. 44.3% of Folkestone & Hythe's households had one car or van with national average of 42.2% and Kent's average of 42.7%. 24.4% of Folkestone & Hythe households had two cars or vans in household and the national average being of 24.7% and Kent's average of 28.0%.
- 4.119 Commuting estimates<sup>100</sup> reveal that nearly 10,000 travel into Folkestone & Hythe with approximately half originating from Dover and 2,000 journeys from Ashford and another 2,000 from Canterbury. Around 12,600 people commute from Folkestone & Hythe with 3,400 commuting to Ashford and 3,000 to Dover. There is a lower than average modal share of bus use, with 4% travelling to work by this means in comparison to 8% across England.<sup>101</sup> In March 2011 the Folkestone & Hythe Joint Transport Board adopted the 2011 Folkestone & Hythe Cycling Plan which was endorsed as Council policy in 2013.<sup>102</sup> The document sets out a five year plan promoting cycling across the District. The plan recognises the scope for people to switch to using the bicycle to make local trips, particularly across Romney Marsh, and in parts of Hythe and Folkestone where there is a flat terrain.<sup>103</sup>
- 4.120 In 2016, AECOM was commissioned by the Council to undertake a comprehensive update of the Shepway Transport Model, incorporating the latest available data since the 2011 model was completed. The Draft Review and Findings Update<sup>104</sup> also reflects the adopted Core Strategy and incorporates recent traffic surveys which have been undertaken as part of major development proposals. The Draft Review and Findings Update recognised that there are a number of junction improvements and network changes which have taken place since the last Folkestone & Hythe Transport Model had been prepared. In addition, the updated Folkestone & Hythe Transport

<sup>96</sup> Highways England (2016) Managing freight vehicles through Kent: A consultation on proposals for a lorry area at Stanford West

<sup>97</sup> 2011 Census data not available for this measure

<sup>98</sup> Commuting Patterns from the Annual Population Survey, Great Britain, 2010 and 2011, ONS, 2013

<sup>99</sup> ONS (2011) Table KS404EW Car or Van availability, Local Authorities in England and Wales

<sup>100</sup> Commuting flows from the Annual Population Survey, Great Britain (2011)

[http://www.neighbourhood.statistics.gov.uk/HTMLDocs/Commute\\_APS\\_Map/Index.html](http://www.neighbourhood.statistics.gov.uk/HTMLDocs/Commute_APS_Map/Index.html) Accessed 23<sup>rd</sup> February 2016

<sup>101</sup> URS/Scott Wilson (2011) Folkestone and Hythe District Council Transport Strategy

<sup>102</sup> Folkestone and Hythe District Council (2013) Annual Monitoring Report

<sup>103</sup> Kent County Council (2011) Folkestone and Hythe Cycling Plan

<sup>104</sup> AECOM (2017) Briefing Note: Folkestone and Hythe Transport Model Update: Review and Findings

Model assessed the associated impact of traffic movements generated by occupation of the Otterpool Park garden settlement development quanta. The study appraised the performance of key highway junctions across the District using a 'RAG Assessment' methodology, and the output has identified which junctions will require a scheme of highway mitigation to provide additional capacity to offset the traffic impact of proposed site allocations within the plan period..

#### *Sustainability issues and relevance to the Core Strategy Review*

- A significant number of people in Folkestone & Hythe do not have access to a car. Where this combines with poorer public transport provision, such as in rural areas with a dispersed population, it leads to difficulty in accessing services and facilities. Inappropriately located development could exacerbate this. [Addressed by SA objective 13].
- There is a heavy dependency on the private car to access employment. If this pattern continues, planned housing and employment growth could lead to problems of traffic congestion and increasing emissions of greenhouse gases and air pollutants. [Addressed by SA objective 13].

4.121 The Core Strategy Review could address these issues by promoting sustainable locations for development, provision of sustainable transport infrastructure and support for the Folkestone & Hythe Cycling Plan.

#### *Likely evolution of the issues without the Core Strategy Review*

4.122 The adopted Core Strategy already includes policies encouraging the use of sustainable modes of transport such as Policy SS5: District Infrastructure Planning, which requires applicants to ensure the location, design or management of development provides a choice of means of transport and allows sustainable travel patterns, for pedestrians, cyclists and/or public transport. While such policies would continue to apply, the Review offers an opportunity to tailor policies that would address private vehicle use within the District, and encourage the use of more sustainable modes of transport in specific areas. This would also help to address health and obesity issues.

### **Population and Human Health**

#### *Demographics*

- 4.123 Recent data<sup>105</sup> show that in 2015 the population of Folkestone & Hythe was 111,400 people (an increase of 2.4% between 2013 and 2017) which is predicted to increase to 125,300 people in 2037.<sup>106</sup> However, past trends may be disrupted by changes in policies relating to future housing and economic growth and for this reason Kent County Council produces population forecasts which take account of future house building plans in each of the Kent Districts' Local Plans. The Folkestone & Hythe Core Strategy aim of delivering 8,000 dwellings between 2006 and 2026 (which would result in a rate of house building in line with trends of recent decades) would result in population growth of 7.3% for 2011-2031.<sup>107</sup> The Core Strategy states that this is expected to lead to a more manageable change in the social balance and labour supply and only limited decrease in the size of the labour force.
- 4.124 The majority of residents in Folkestone & Hythe live in urban areas (63.0%), with the remaining 37.0% to be found living in rural areas.<sup>108</sup> Approximately 1 in 10 people in Folkestone & Hythe (9%) live in isolated dwellings, hamlets or small villages (below 1,000 people). Romney Marsh ward is the largest and the most sparsely populated area in the District.
- 4.125 Average household size in Folkestone & Hythe was projected to decrease notably during 2006-2016 under all housing growth scenarios, although slightly less so under higher growth scenarios.<sup>109</sup> During the period 2016-2017, where data are available, 234 dwellings out of 400

<sup>105</sup> Nomis – Labour Market Profile – Folkestone and Hythe. Accessed 9<sup>th</sup> October 2017.

<sup>106</sup> Folkestone and Hythe District Council Equality and Diversity Report (2016) Folkestone and Hythe District Council

<sup>107</sup> Interactive Population Forecast Toolkit available from <http://www.kent.gov.uk/about-the-council/information-and-data/Facts-and-figures-about-Kent/population-and-census#tab-3>

<sup>108</sup> Kent County Council (2016). Mid year population estimates – Ward level

<sup>109</sup> Folkestone and Hythe LDF Core Strategy Cabinet Report April 2011 Appendix 1: Strategic Requirement

dwellings built had 3 or more bedrooms, resulting in a percentage of 58.5%. This figure is 5.58% higher than for the 2015-2016 period<sup>110</sup>

- 4.126 The mean age in Folkestone & Hythe (mid 2017) was 41 years (41.9 for females, 40 for males) which is slightly higher than the national average age of 39.9 years.<sup>111</sup> Approximately 24.2% of the population in Folkestone & Hythe is aged 65 and over. Around 34% of all households include people over the state retirement age<sup>112</sup> and 51% of the District's population is aged 45 or over.<sup>113</sup> Folkestone & Hythe is forecast to continue to have a large proportion of older people in its population compared to the Kent County average over the period 2010-2035. This will be in conjunction with a decline in the number of residents who are of working age (16-64).

#### *Qualifications*

- 4.127 In 2015, the percentage of Folkestone & Hythe residents with qualifications at NVQ Level 4 and above was 22.8%. Whilst this is falling short of the target set out in the Core Strategy, there has been somewhat of a recovery since 2011, when the attainment level actually dipped to 20.5%, but then increased by 1.5% in 2012 to 21.5% and then increased sharply by 5.3% to 26.8% in 2013, to then fall by 1.1% to 25.7% in 2014.<sup>114</sup> This figure then rose again to 32.1% in 2017<sup>115</sup>

#### *Crime*

- 4.128 Crime rates are not disproportionately high in Folkestone & Hythe as a whole, but local pockets of higher crime rates exist.

#### *Health*

- 4.129 Compared to other English authorities, Folkestone & Hythe has a high proportion of people with limiting long term illness. A high percentage of the population claim disability related benefits, with the District ranked amongst the top 20% of authorities in England for this indicator. At 83.4 years, life expectancy from birth in females is 3.7 years higher than males in Folkestone & Hythe (at 79.7 years) in line with the UK figures, although below that of Kent and the South East.<sup>116</sup>

#### *Deprivation*

- 4.130 Based on death rates over the period 2006-2010, the difference in life expectancy between the most and least deprived members of the population is 9.4 years in males and 6.9 years in females. Over a fifth (21.5%) of children in Folkestone & Hythe lived in poverty (defined as children living in families in receipt of out of work benefits), which is higher than most of the areas in Kent.<sup>117</sup>
- 4.131 The English Indices of Deprivation 2015<sup>118</sup> is a measure of multiple deprivation in small areas or neighbourhoods, called Lower-layer Super Output Areas (LSOA), which are a similar size to electoral wards. Seven domains of deprivation are measured: Income Deprivation; Employment Deprivation; Health Deprivation and Disability; Education, Skills and Training Deprivation; Crime; Barriers to Housing and Services; and Living Environment Deprivation. Each domain contains a number of indicators. The seven domains are combined to give a multiple deprivation score. There are 32,844 LSOAs nationally and 67 LSOAs in the Folkestone & Hythe District.<sup>119</sup> An examination of the 2015 Index of Multiple Deprivation (illustrated in **Figure 4.7**) data reveals that:
- Folkestone & Hythe is ranked 113th in the IMD out of 326 local authorities nationally, and is the third most deprived authority in Kent.<sup>120</sup>

---

<sup>110</sup> Folkestone and Hythe District Council (2017) Annual Monitoring Report

<sup>111</sup> 2017 Mid-Year Population Estimates: Age and gender profile (2018) Kent County Council

<sup>112</sup> Folkestone and Hythe District Council (2011) Folkestone and Hythe Housing Strategy 2011-2016

<sup>113</sup> Folkestone and Hythe District Council Equality and Diversity Profile (2016) Folkestone and Hythe District Council

<sup>114</sup> Folkestone and Hythe District Council (2016) Authority Monitoring Report

<sup>115</sup> Folkestone and Hythe District Council (2017) Authority Monitoring Report

<sup>116</sup> Folkestone and Hythe District Equality and Diversity Profile (2016) Folkestone and Hythe District Council

<sup>117</sup> Folkestone and Hythe District Equality and Diversity Profile (2016) Folkestone and Hythe District Council

<sup>118</sup> The English Indices of Deprivation (2015), DCLG

<sup>119</sup> The English Indices of Deprivation (2015), DCLG: File 1: Index of multiple deprivation

<sup>120</sup> The English Index of Multiple Deprivation (IMD 2015): Headline findings for Kent (2015) Kent County Council

- Folkestone & Hythe has moved down in the rankings which indicates that levels of deprivation have reduced between 2010 and 2015 relative to other local authorities in England.<sup>121</sup>
- The District has four LSOAs that are in the top 10% most deprived nationally which are to be found in or around the urban area of Folkestone with the most deprived of these having been ranked 572nd out of 32,844 SOAs nationally; Folkestone Harbour (014A), Folkestone Harvey Central (014B), Folkestone East (003C) and Folkestone Harvey Central (014D).
- Whilst much deprivation is concentrated in the urbanised coastal areas of the District, there are also significant areas of high deprivation in the rural south.
- The majority of least deprived SOAs in Folkestone & Hythe are located in the north of the District, in the vicinity of the M20 motorway, the Kent Downs and on the outskirts of Folkestone/Hythe. In 2015 the least deprived SOA ranked 31,159<sup>th</sup> nationally.

#### *Access to services*

- 4.132 Folkestone has the largest concentration of shops and services in the District. However, due to accessibility factors, residents in the west of the District at New Romney may choose to visit Ashford, whilst those to the north around Elham and Stelling Minnis may look to Canterbury.
- 4.133 Within the rest of the District's town centres, Hythe and New Romney continue to maintain a mixture of essential services and goods provision. Other centres, such as Sandgate and Lydd, have retained convenience goods and local service provision in their small retail units. There is limited future retail need for additional convenience floorspace in the District.
- 4.134 In terms of access to healthcare services, the proportion of households within walking distance in rural areas is approximately half that of urban areas. This relative isolation from health services is coupled with a generally older population. Around 52% of rural dwellings are within 0.5 mile of a post office service and nearly 50% of rural dwellings are within 500 metres of a primary school.

#### *Sustainability issues and relevance to the Core Strategy Review*

- Folkestone & Hythe as a whole suffers from considerable deprivation relative to the national average and there is also significant inequality within the District with deprivation concentrated in the urbanised coastal areas and the rural south. Rural areas have poorer access to services and facilities. [Addressed by SA objective 14].
  - Folkestone & Hythe suffers from high levels of disability / long term illness, reflecting, in part, the relatively high proportion of older people living in the District. [Addressed by SA objectives 13 and 14].
  - Population growth, household growth and demographic change will place additional and changing demands on key services and facilities such as housing, health, education and social care. [Addressed by SA objective 14].
  - There are some areas of Folkestone & Hythe where crime is likely to have a significant effect on the health and well-being of individuals and communities, as well as the potential for economic growth and diversification. [Addressed by SA objective 15].
- 4.135 The Core Strategy Review can set out to reduce deprivation and inequality. It should provide for the needs of older people and tackle the health of its residents more generally in an integrated fashion by providing for, or encouraging access to, healthcare facilities, opportunities to walk or cycle, access to natural greenspace, as well as addressing deprivation and social inequality. By addressing deprivation and providing for jobs, housing, services, facilities and other opportunities the Core Strategy Review can help to deal with the causes of criminality. It can also have more direct effects by development management policies which help to 'design out' crime.

#### *Likely evolution of the issues without the Core Strategy Review*

- 4.136 The issues described above are likely to continue without appropriate policy responses. Although there are many other factors that affect the issues, including health and education policy, planning does have a role to play. For example, responding to the housing needs of an ageing population may be less co-ordinated in the absence of the Local Plan.

---

<sup>121</sup> The English Index of Multiple Deprivation (IMD 2015) | Headline findings for Kent (2015) Kent County Council



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

### Open Space

- 4.138 Folkestone & Hythe features a number of significant open spaces. These include four with greater than local importance for their facilities or natural features: the Coastal Park in Folkestone; Brockhill Country Park in Hythe; Dungeness National Nature Reserve; and The Warren, Folkestone. The majority of parks and major open spaces of Folkestone & Hythe are within urban areas, predominantly Folkestone. The Lower Leas Coastal Park, Radnor Park, Brockhill Country Park and the Royal Military Canal have Green Flag status in recognition of their value to local people as a recreational resource.<sup>122</sup>
- 4.139 Folkestone & Hythe's 2013 Annual Monitoring Report records the loss of a number of open spaces to residential development but no gains in the extent of open space were noted.<sup>123</sup> The Annual Monitoring Report in 2017 highlighted improvements to public open space completed at Mackeson Square and Shorncliffe Garrison and a replanting project at The Lea.<sup>124</sup> Folkestone & Hythe's Open Space Strategy<sup>125</sup> found that, despite being a green District, a significant proportion of the District's residents are deficient in access to open space. This is due, in part, to the large areas of land that are not available for informal recreation in the District, such as agricultural land, marshland or sports pitches with restricted access. The study also found that whilst the quantity of open space provision in the District is generally adequate, there are some issues with the quality of open spaces, particularly natural and semi-natural greenspace.
- 4.140 The Folkestone & Hythe Play Area Review<sup>126</sup> and Folkestone & Hythe Play Area Strategy<sup>127</sup> identified deficiencies in play areas within the centre of New Romney, intermittent areas along coastal residential areas in Romney Marsh, to the south-east of Folkestone harbour and within Broadmead. The results of the audit show that Folkestone & Hythe has a variety of play areas, which are generally well located and offering good play value. However, there tend to be issues with the quality of the play areas across the District.

### *Sustainability issues and relevance to the Core Strategy Review*

- There is a need for the quality of some open spaces, particularly parks, to be improved. Recent development has resulted in some open spaces in the District being lost with no net gains. Future development could lead to further losses and greater demand. [Addressed by SA objectives 6 and 14].
- 4.141 The Core Strategy Review should seek to ensure that existing open spaces are protected, and where necessary, enhanced. Open space quality improvements should be sought, where relevant.

### *Likely evolution of the issues without the Core Strategy Review*

- 4.142 With the rising population of the District, pressures on the quality and availability of open space are likely to continue without a planned approach to development. Without the Core Strategy Review there is less opportunity to adopt a co-ordinated, spatial approach to the development of open green spaces/green networks for recreation, walking and cycling networks, and wildlife.
- 4.143 The adopted Core Strategy already includes Policy CSD4: Green Infrastructure of Natural Networks, Open Spaces and Recreation, which requires such assets to be protected and enhanced. In addition, the adopted Core Strategy includes strategic allocation policies which make provision for new open spaces. While such policies would continue to apply, the Review offers an opportunity to create new policies associated with new development allocations, helping to protect and improve existing open spaces and provide new, multifunctional open spaces.

---

<sup>122</sup> Green Flag Award (online) South East <http://www.greenflagaward.org/> Accessed on 9th October 2018

<sup>123</sup> Folkestone and Hythe District Council (2013) Annual Monitoring Report




<sup>124</sup> Folkestone and Hythe District Council (2017) Authority Monitoring Report

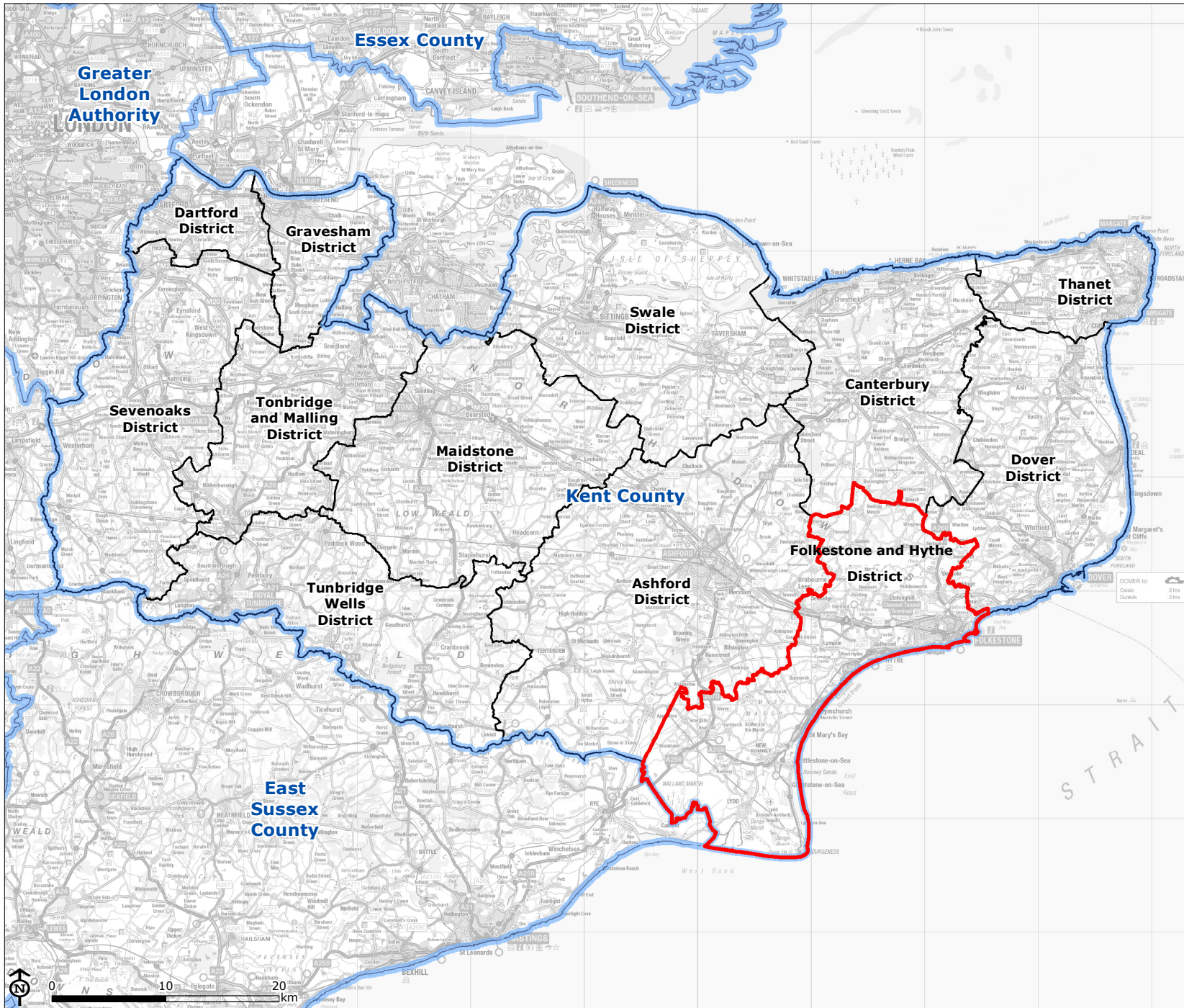
<sup>125</sup> LUC (2017) Folkestone and Hythe Open Space Strategy

<sup>126</sup> LUC (2017) Folkestone and Hythe Play Area Review

<sup>127</sup> LUC (2017) Folkestone and Hythe Play Area Strategy

**Figure 4.1: Location of District**

-  District boundary
-  County boundary
-  District boundary









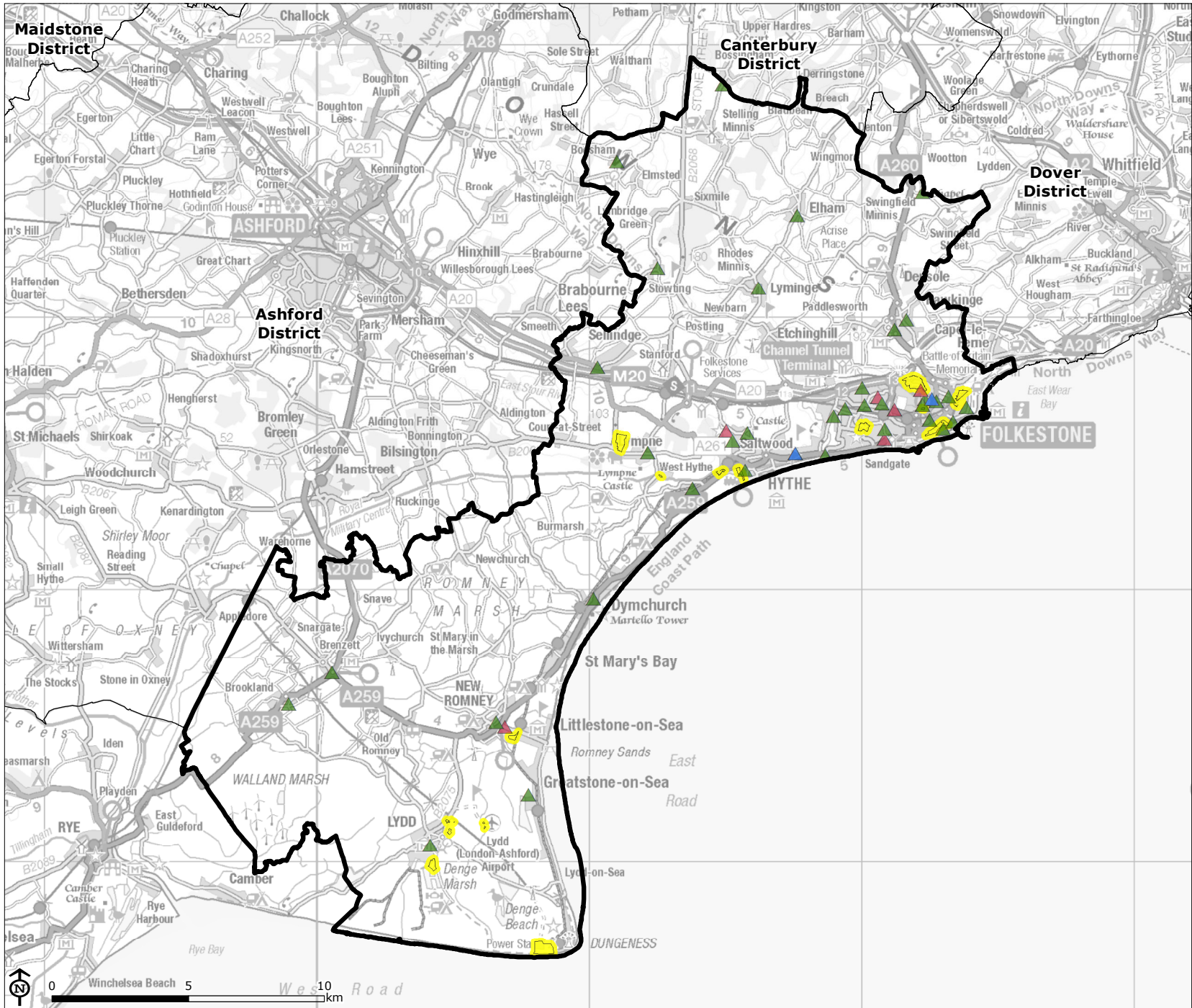
Source: OS

Map Scale @ A4: 1:480,000




**Figure 4.2: Employment Areas and Educational Facilities**

-  Folkestone and Hythe
-  District boundary
-  Employment site
-  Primary school
-  Secondary school
-  Special school











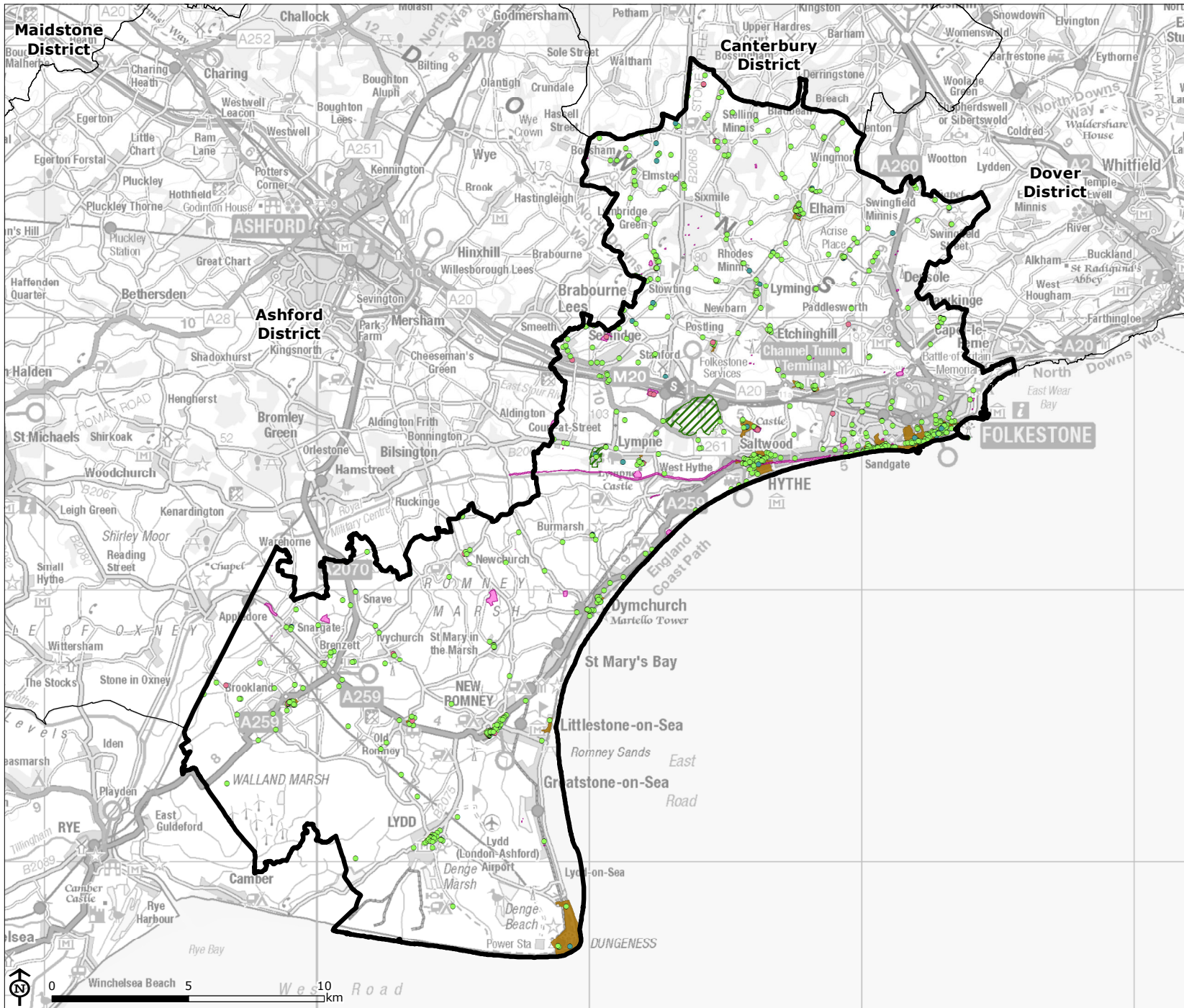
Source: OS, Folkestone and Hythe District Council

Map Scale @ A4: 1:200,000

The bottom right corner contains two logos. On the left is the LUC logo, which consists of the letters 'LUC' in white on a green square background. To its right is the logo for Folkestone Hythe & Romney Marsh Shepway District Council, featuring the council's name and a stylized graphic of a bird or wing.

Figure 4.3: Heritage Assets

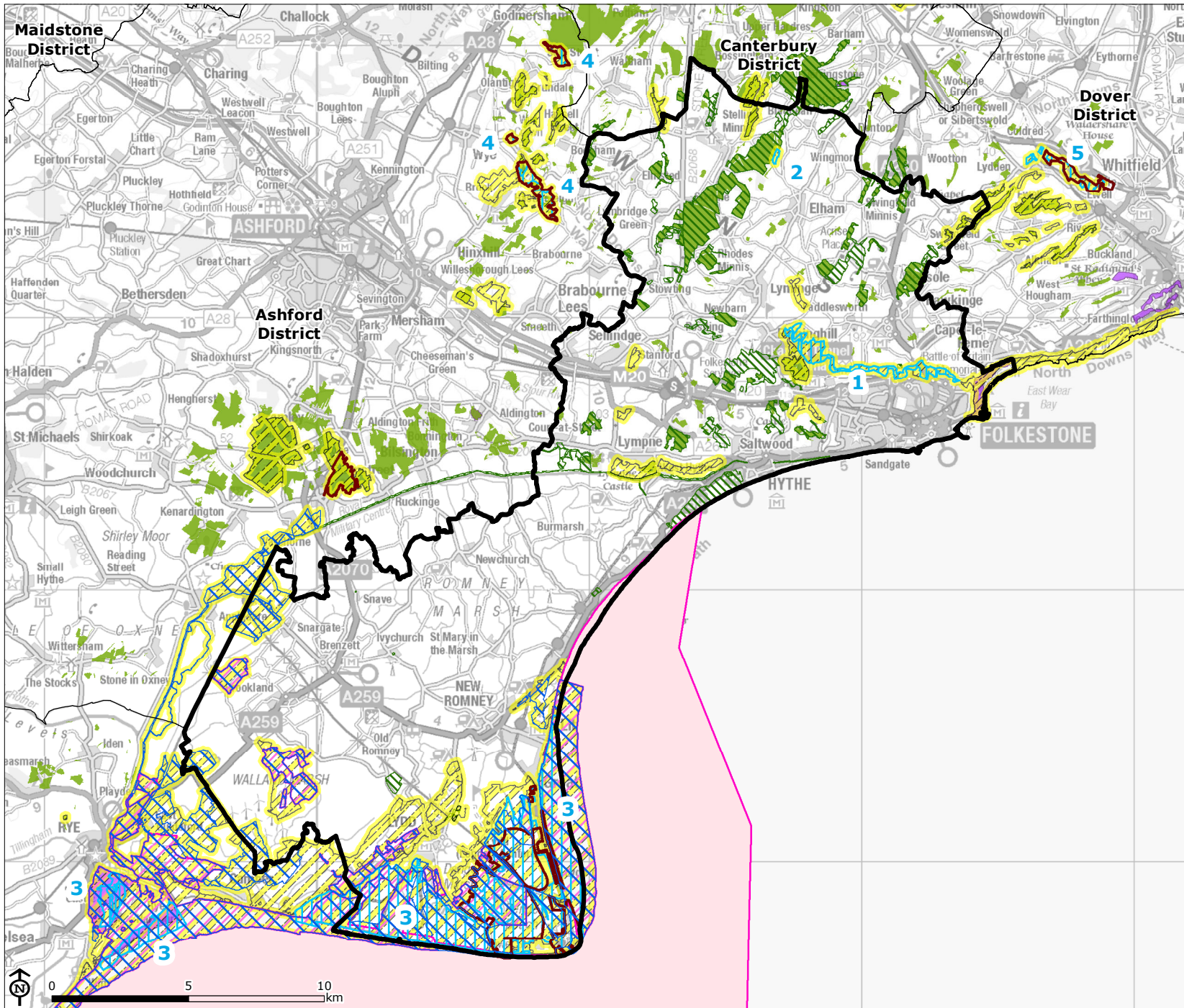
-  Folkestone and Hythe
-  District boundary Grade
-  I Listed Building Grade
-  II Listed Building
-  Grade II\* Listed Building
-  Scheduled Monument
-  Registered Park & Garden
-  Conservation Area



Source: OS, Folkestone and Hythe District Council, Historic England

Map Scale @ A4: 1:200,000

**Figure 4.4: Ecological Assets**



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





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

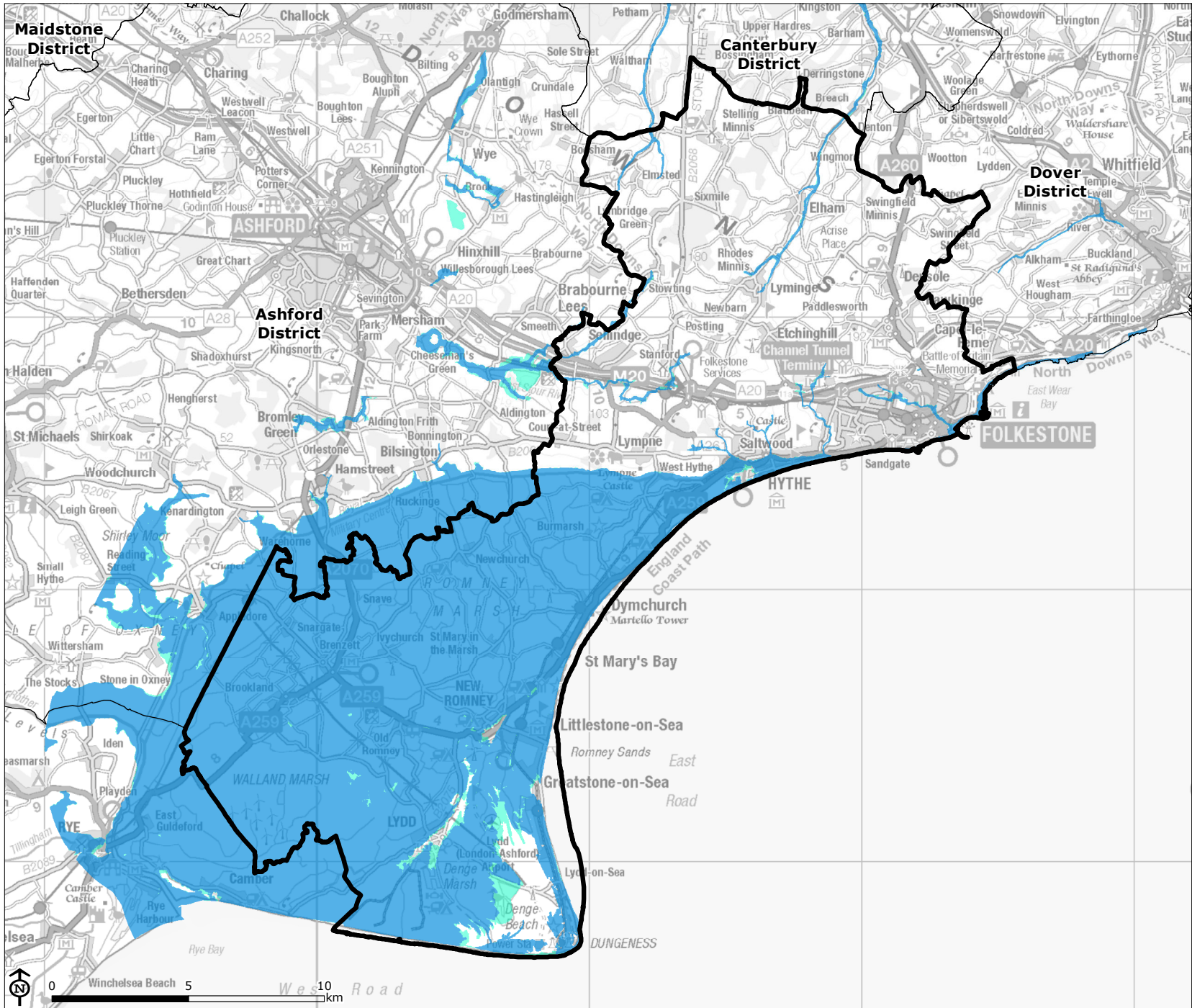
Source: OS, Folkestone and Hythe District Council, Natural England, JNCC

Map Scale @ A4: 1:200,000



Figure 4.5: Flood Risk

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

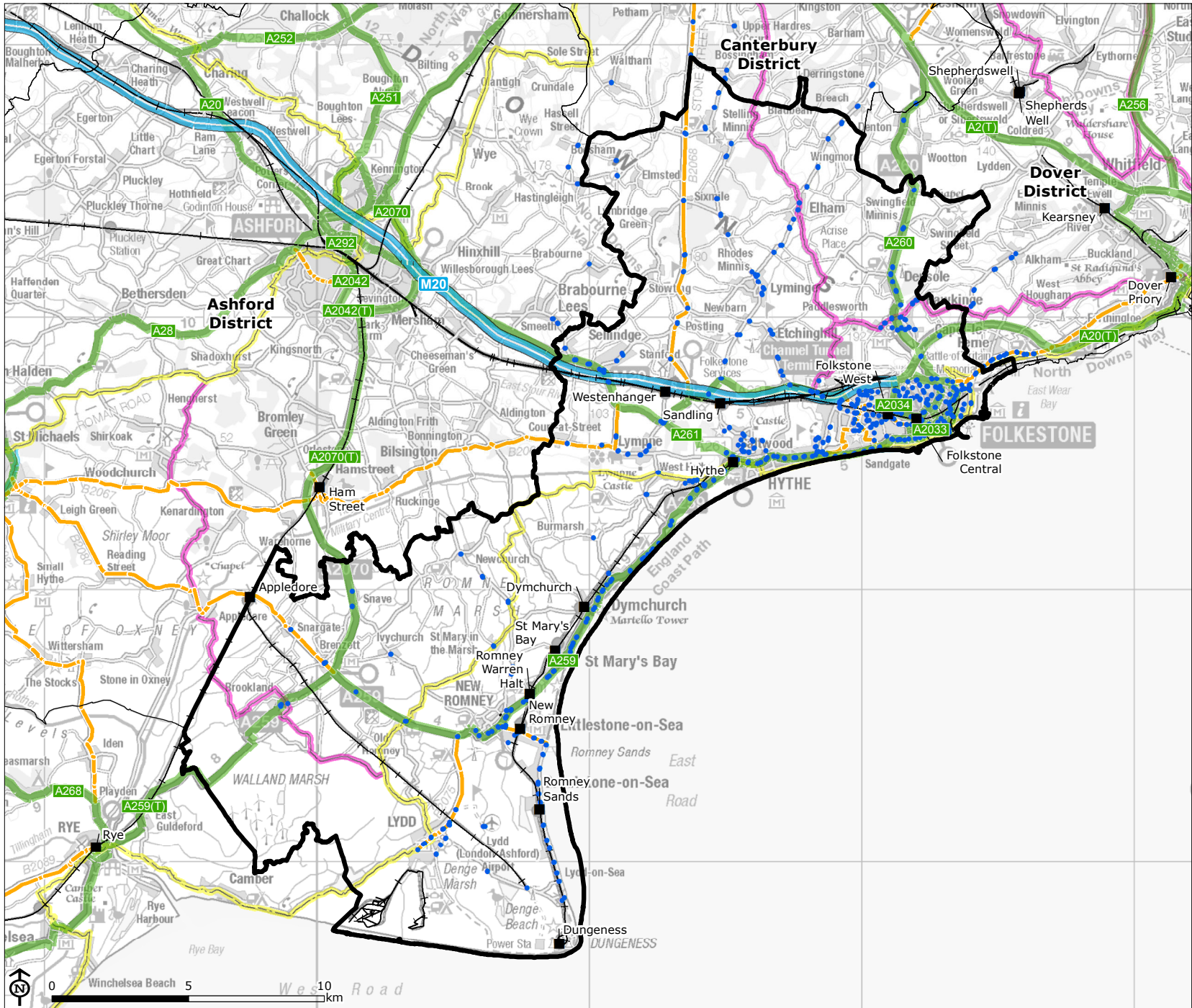


Source: OS, Folkestone and Hythe District Council

Map Scale @ A4: 1:200,000



**Figure 4.6: Transport Network**



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

Source: OS, Folkestone and Hythe District Council, Sustrans

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

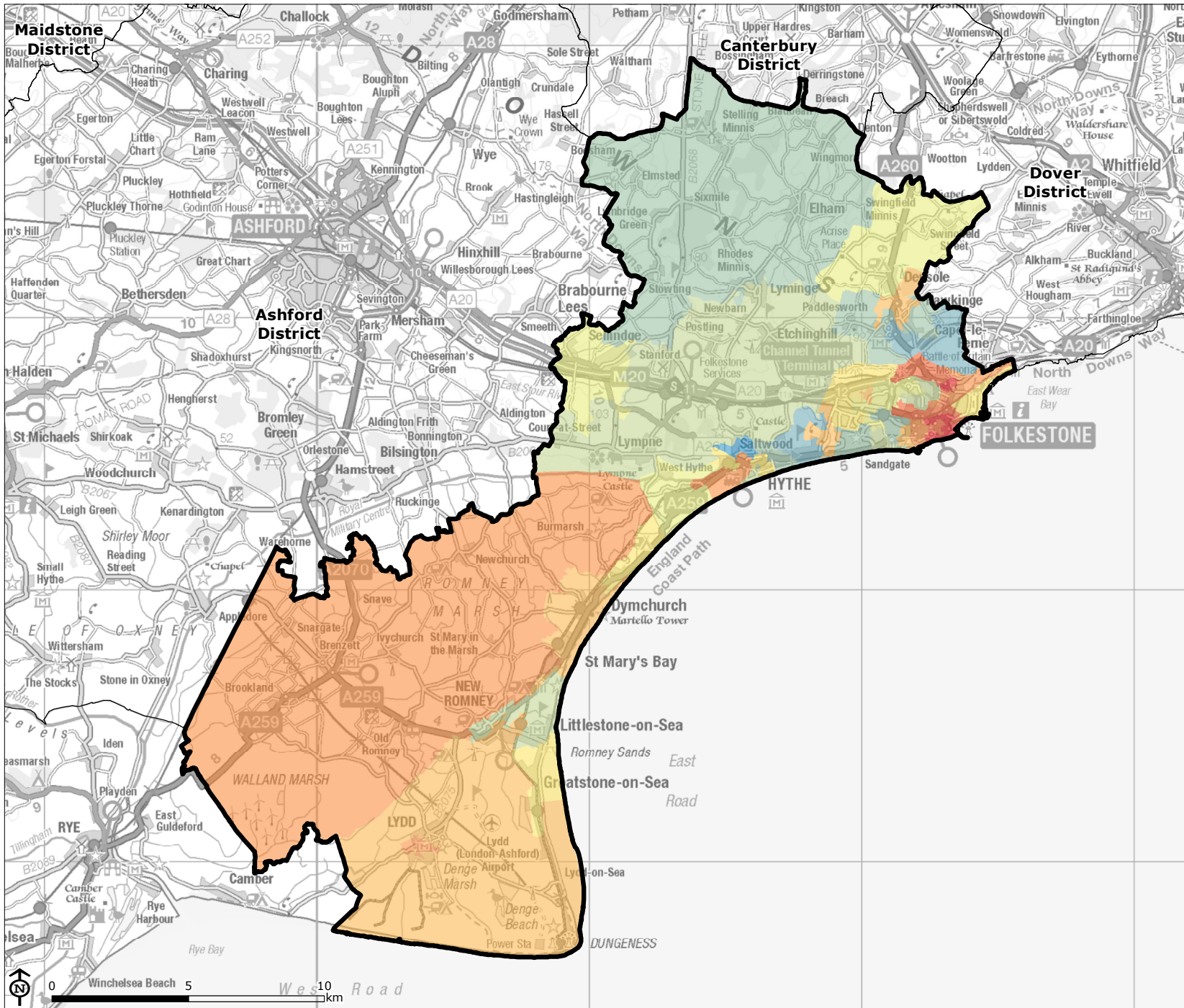


**Figure 4.7: Indices of Multiple Deprivation**

Folkestone and Hythe  
 District boundary

**Indices of Multiple Deprivation**

- 0 - 10% (most deprived)
- 10 - 20%
- 20 - 30%
- 30 - 40%
- 40 - 50%
- 50 - 60%
- 60 - 70%
- 70 - 80%
- 80 - 90%
- 90 - 100% (least deprived)



Source: OS, DCLG

Map Scale @ A4: 1:200,000





## 5 Sustainability Appraisal Framework

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

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

### Sustainability Appraisal Objectives

- 5.1 The development of a set of SA objectives (known as the SA framework) is a recognised way in which the likely environmental and sustainability effects of a plan can be described, analysed and compared. SA objectives are developed from the review of plans, policies and programmes, the collection of baseline information and the identification of the key sustainability issues.
- 5.2 The SA objectives used for the appraisal of the Places and Policies Local Plan have been used as a starting point for the development of a set of SA objectives for the Core Strategy Review. The Places and Policies Local Plan SA objectives drew upon those developed for SA of the adopted Core Strategy and amended them to reflect an up to date assessment of sustainability issues facing the District as well as the different scope of the Places and Policies Local Plan.
- 5.3 The Places and Policies Local Plan SA objectives have been reviewed and reordered in light of the review of plans, policies and programmes, baseline information and key sustainability issues for Folkestone & Hythe (as presented in **Chapters 3** and **4** and **Appendix 2**) and amendments have been made to a number of the objectives to ensure that they are appropriate for the SA of the Core Strategy Review. All of the topics specifically required in Schedule 2(6) of the SEA Regulations are clearly addressed by the headline SA objectives.
- 5.4 The total number of SA objectives has increased from 14 to 15, with the inclusion of a strategic waste management SA objective. The review of the SA objectives has sought to avoid duplication and any single SA objective covering too many issues (as this would result in mixed effects always being identified for that SA objective).
- 5.5 The SA Framework for the Review of the Core Strategy is presented in **Table 5.1** overleaf. The objectives were consulted on during the SA Scoping stage and the representations received were considered when deciding whether any amendments were required to the SA objectives. The final column in the table demonstrates which SA objective addresses each of the topics that are required by Schedule 2 of the SEA Regulations, which broadly correlate with the health and wellbeing of the District – a key strand to the District’s new Corporate Strategy. The SA Framework also provides indicative appraisal questions to illustrate the considerations that will be relevant when assessing the Review of the Core Strategy options.

**Table 5.1: Folkestone & Hythe Framework for SA of Review of the Core Strategy**

SA Objective Reference	SA Objective	Appraisal questions: will the Plan/option lead to...?	Relationship with the SEA Topics / District's Health and Well Being
SA1	Improve the provision of homes, including affordable housing, having regard to the needs of all sections of society, including the elderly.	<p>Create strategic-scale developments that make significant contributions to local housing needs in the short, medium and long term?</p> <p>Provision of a high-quality mix of housing developments suitable for the full range of ages and abilities in need of affordable accommodation?</p> <p>The provision of the range of types and tenure of housing as identified in the housing market assessment?</p>	Population, Human Health and Material Assets
SA2	Support the creation of high quality and diverse employment opportunities.	<p>An adequate supply of land, skills and infrastructure (such as ICT and high speed broadband) to meet the requirements of sectors targeted for economic growth and diversification, including those set out in the District's Economic Strategy?</p> <p>New and improved education facilities which will support raising attainment and the development of skills, leading to a work ready population of school and college leavers?</p> <p>The promotion of the development of education services which retain young people through further and higher education in order to develop and diversify the skills needed to make Folkestone &amp; Hythe prosper?</p> <p>Improved access to jobs for local people from all sectors of the community that will lift standards of living?</p> <p>Enhanced vitality and vibrancy of town centres?</p> <p>Expansion or upgrading of key visitor attractions to support the visitor economy?</p> <p>Employment opportunities which address the economic consequences of the de-commissioning of Dungeness nuclear power station?<sup>128</sup></p> <p>Provision of high quality employment sites and associated infrastructure suitable for the likely continuation in a shift from manufacturing to higher skill, service industries?</p>	Population, Human Health and Material Assets

<sup>128</sup> Power generation at Dungeness 'A' finished in 2006; that at Dungeness 'B' is currently scheduled for 2018 but EDF has applied to extend this to 2028; employment levels at the site are typically maintained for several years after operation ceases to carry out de-commissioning.

SA Objective Reference	SA Objective	Appraisal questions: will the Plan/option lead to...?	Relationship with the SEA Topics / District's Health and Well Being
SA3	Conserve, and where relevant enhance, the quality, character and local distinctiveness of the landscape and townscape.	<p>Areas of the highest landscape sensitivity (i.e. Kent Downs AONB) being protected from adverse impacts on character and setting?</p> <p>Development which considers the existing character, form and pattern of the District's landscapes, buildings and settlements?</p> <p>The protection and enhancement of local distinctiveness and contribution to a sense of place?</p>	Landscape, Biodiversity, Flora and Fauna
SA4	Conserve and enhance the fabric and setting of historic assets.	<p>Development that avoids negative effects on listed buildings, conservation areas, scheduled ancient monuments, registered historic parks and gardens, and registered battlefields and their settings?</p> <p>Provision of appropriately scaled, designed and landscaped developments that relate well to and enhance the historic character of the District and contribute positively to its distinctive sense of place?</p> <p>Promotes the enhancement of the District's archaeological resource and other aspects of heritage, such as, parks and open spaces, and areas with a particular historical or cultural association?</p> <p>Promotes access to as well as enjoyment and understanding of the local historic environment for people including the District's residents?</p> <p>Improves participation in local cultural activities?</p> <p>Helps to foster heritage-led regeneration and address heritage at risk?</p> <p>Improves existing and provides new leisure, recreational, or cultural activities related to the historic environment?</p>	Cultural Heritage, including architectural and archaeological heritage
SA5	Conserve and enhance biodiversity, taking into account the effects of climate change.	<p>Protect and where possible enhance internationally and nationally designated biodiversity sites and species?</p> <p>Avoidance of net loss, damage to, or fragmentation of locally designated and non-designated wildlife sites, habitats and species (including biodiverse brownfield sites)?</p> <p>Opportunities to enhance and increase the extent of habitats for protected species and priority species identified in the Kent BAP or the England Biodiversity Strategy 2020?</p> <p>Opportunities for people to come into contact with resilient wildlife places whilst</p>	Biodiversity, Flora and Fauna

SA Objective Reference	SA Objective	Appraisal questions: will the Plan/option lead to...?	Relationship with the SEA Topics / District's Health and Well Being
		<p>encouraging respect for and raising awareness of the sensitivity of these sites?</p> <p>Development which includes the integration of ecological habitats and contributes to improvements in ecological connectivity and ecological resilience to current and future pressures, both in rural and urban areas?</p> <p>Maintenance and enhancement of the ecological networks in the District?</p> <p>N.B. Climate change is likely to impact upon habitats and thereby biodiversity. Plan policies which achieve the goals listed above should all help to enhance the ability of wildlife to adapt to a changing climate.</p>	
SA6	Protect and enhance green infrastructure and ensure that it meets strategic needs.	<p>Provision, stewardship and maintenance of green infrastructure assets and networks (including green open space, river/canal corridors and the coastline), ensuring that this is linked into new and existing developments, to improve the connectivity of green spaces and green networks?</p> <p>N.B. The East Kent Green Infrastructure (GI) Working Group has identified an East Kent GI Typology which encompasses the following GI types:</p> <ul style="list-style-type: none"> <li>- Biodiversity e.g. Natura 2000 sites, SSSIs, LNRs, Local Wildlife Sites.</li> <li>- Civic Amenity e.g. parks, allotments, cemeteries.</li> <li>- Linear features e.g. the Royal Military Canal, railway corridors.</li> </ul> <p>The full list of GI components of this typology is available from the District's GI Report, 2011.</p>	Landscape, Biodiversity, Flora and Fauna
SA7	Use land efficiently and safeguard soils, geology and economic mineral reserves.	<p>Development that avoids high quality agricultural land?</p> <p>Remediation of contaminated sites?</p> <p>Re-use and re-development of brownfield sites?</p> <p>Efficient use of recycled/ secondary materials?</p> <p>Protection of mineral resources and infrastructure?</p> <p>Development that protects sites valued for their geological characteristics?</p> <p>Development that avoids sterilising local mineral reserves and can be accommodated by existing or planned local mineral reserves?</p>	Soil, Climatic Factors and Landscape

SA Objective Reference	SA Objective	Appraisal questions: will the Plan/option lead to...?	Relationship with the SEA Topics / District's Health and Well Being
SA8	Maintain and improve the quality of groundwater, surface waters and coastal waters and the hydromorphological (physical) quality of rivers and coastal waters.	<p>Development that will not lead to the deterioration of groundwater, surface water, river or coastal water quality, i.e. their Water Framework Directive status?</p> <p>Development where adequate foul drainage, sewage treatment facilities and surface water drainage are, or can be made, available?</p> <p>Development which incorporates SuDS (including their long-term maintenance) to reduce the risk of combined sewer overflows and to trap and break down pollutants?</p>	Water, Biodiversity, Fauna and Flora
SA9	Reduce the risk of flooding, taking into account the effects of climate change.	<p>Avoid development in locations at risk from flooding or that could increase the risk of flooding elsewhere having regard to the District's Strategic Flood Risk Assessment, taking into account the impacts of climate change?</p> <p>Create development which incorporates SuDS (including their long-term maintenance) to reduce the rate of run-off and reduce the risk of surface water flooding and combined sewer overflows?</p>	Water, Soil, Climatic Factors and Human Health
SA10	Increase energy efficiency in the built environment and the proportion of energy use from renewable sources.	<p>Create strategic-scale developments that make significant and lasting contributions to the UK's national carbon target of reducing emissions by at least 80% from 1990 levels by 2050?</p> <p>Create connected energy networks that provide local low carbon and renewable electricity and heat?</p>	Air, Climatic Factors, and Human Health
SA11	Use water resources efficiently.	<p>Development where adequate water supply is, or can be made, available?</p> <p>Water efficient design and reduction in water consumption (e.g. rainwater recycling/grey water reuse and BREEAM)?</p>	Water and Climatic Factors

SA Objective Reference	SA Objective	Appraisal questions: will the Plan/option lead to...?	Relationship with the SEA Topics / District's Health and Well Being
SA12	To reduce waste generation and disposal, and achieve the sustainable management of waste.	<p>Will it promote sustainable waste management practices through a range of waste management facilities?</p> <p>Will it reduce hazardous waste?</p> <p>Will it increase waste recovery and recycling?</p> <p>Will it protect existing waste facilities and infrastructure or support the delivery of new facilities or infrastructure?</p>	Soil, Climatic Factors and Material Assets
SA13	Reduce the need to travel, increase opportunities to choose sustainable transport modes and avoid development that will result in significant traffic congestion and poor air quality.	<p>A complementary mix of land uses within compact communities that minimises the length of journeys to services and facilities and employment opportunities, increases the proportion of journeys made on foot or by cycle, and are of a sufficient density to support and enhance local services and public transport provision?</p> <p>Development in locations well served by public transport, cycle paths and walking routes?</p> <p>Development of new and improved sustainable transport networks, including cycle and walking routes, to encourage active travel and improve connectivity to local service centres, transport hubs, employment areas and open/green spaces?</p>	Air, Climatic Factors, Population and Human Health
SA14	Promote community vibrancy and social cohesion; provide opportunities to access services, facilities and environmental assets for all ages and abilities and avoid creating inequalities of opportunity for access.	<p>Create well-designed developments that contain compact communities with a sufficient critical mass or density to support local services and public transport provision?</p> <p>Create new opportunities to improve educational attainment, qualification levels and participation in education and training through access to existing or the provision of new educational infrastructure?</p> <p>Provision of new or enhancement of existing leisure facilities for young people, where thresholds/standards require these?</p> <p>Create opportunities to lead healthier lifestyles, including development that enhances existing and /or makes provision for and maintenance towards open spaces, sports and recreational facilities e.g. publicly available pitches, allotments, swimming pools, courts, etc.?</p> <p>Provision of new or enhanced local health services to support new and growing communities?</p>	Population, Human Health and Material Assets

SA Objective Reference	SA Objective	Appraisal questions: will the Plan/option lead to...?	Relationship with the SEA Topics / District's Health and Well Being
		<p>Improvements to strategic public transport infrastructure?</p> <p>Reintegration of physically divided or highly linear villages or neighbourhoods through, for example, provision of central social infrastructure?</p> <p>Provision for the specific needs of disabled and older people?</p>	
SA15	Reduce crime and the fear of crime.	Reduced levels of crime, anti-social behaviour and the fear of crime through high quality design and intervention, i.e. street layout, public space provision, passive surveillance, lighting etc.?	Population and Human Health

## Use of the SA Framework

- 5.6 It is the role of SA to identify those effects of the Plan which are significant. Schedule 1 of the SEA Regulations sets out criteria for determining the likely significance of effects. These criteria relate to:
- The characteristics of the plan or programme, in this case the Folkestone & Hythe Core Strategy Review.
  - The characteristics of the effects and of the area likely to be affected, in this case baseline conditions and sustainability issues facing the District, as set out in **Chapter 4**.
- 5.7 The SA has been undertaken in close collaboration with the Folkestone & Hythe District Council officers responsible for drafting the Core Strategy Review in order to fully integrate the SA process with the production of the Review of the Core Strategy.
- 5.8 The findings of the SA for the Core Strategy Review are presented through the use of colour coded symbols. The use of colour coding allow for likely significant effects (both positive and negative) to be easily identified, as shown in the key below. Mixed effects are recorded for an SA objective where there is potential for both positive and negative effects.

**Table 5.2: Symbols used in the SA of the effects of the Review of the Core Strategy**

++	Significant positive effect likely
+	Minor positive effect likely
0	Negligible effect likely
-	Minor negative effect likely
--	Significant negative effect likely
--/+	Mixed significant negative and minor positive effects likely
++/-	Mixed significant positive and minor negative effects likely
+/-	Mixed minor effects likely
?	Likely effect uncertain

- 5.9 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.
- 5.10 In determining the significance of the effects of the options contained in the Core Strategy Review it is important to bear in mind its relationship with the other documents in the planning system such as the NPPF, existing policies in Folkestone & Hythe's adopted Core Strategy that are not subject to the Review, and the forthcoming Places and Policies Local Plan, as these may provide additional safeguards or mitigation of potentially significant adverse effects.



## 6 Appraisal of High Level Growth Options

- 6.1 This chapter sets out the findings of the SA of the high-level growth options identified in the District's High-level Growth Options Study available on the Council's website<sup>129</sup>.
- 6.2 Phase one of the Study divided the District into six 'Character Areas', with each area comprising land with similar features, characteristics and landscape:
- **Area 1: Kent Downs** contains the majority of the AONB designation in the District, with the south-western boundary following the AONB boundary and the southern and south-eastern boundaries following the Folkestone/Hythe character area identified in the District's adopted Core Strategy.
  - **Area 2: Folkestone and Surrounding Area** is urban in character and contains the whole of the settlement of Folkestone. The western boundary of the area borders Hythe.
  - **Area 3: Hythe and Surrounding Area** is urban in character and contains the whole of the settlement of Hythe. The eastern boundary of the area borders Folkestone.
  - **Area 4: Sellindge and Surrounding Area** lies to the north east of urban areas of Folkestone and Hythe and contains the District's main connections to London: the M20 and HS1 corridor. The southern boundary follows the edge of North Downs character area in the District's Core Strategy.
  - **Area 5: Romney Marsh and Walland Marsh** is rural in character and contains large areas of marshland. The area's southern boundary follows the edge of the Romney Marsh character area in the District's Core Strategy. The south-eastern boundary is a combination of the coastline and the boundary of Romney Marsh ward.
  - **Area 6: Lydd, New Romney and Dungeness** is relatively rural but contains the larger urban areas of Lydd and New Romney.
- 6.3 The location of each Character Area is shown alongside the District's key strategic constraints in **Figure 6.1**.
- 6.4 Phase 1 of the District's Strategic Growth Options Study concluded that Character Area 4 is the only area within the District suitably free from strategic constraints to accommodate new development at a strategic scale.
- 6.5 The likely effects of accommodating strategic scale development in each of the six Character Areas were independently subject to SA by LUC as described below. **Table 6.1** presents the SA findings for each of the six Character Areas against the SA objectives set out in the SA Framework. The table is followed by summary text describing the reasons for the significant effects identified by SA objective. Detailed SA matrices setting out detailed justification for every effect identified for each Character Area are listed in order in **Appendix 3**.
- 6.6 Taking on board the findings of the Strategic Growth Options Study and the SA of the likely effects of accommodating strategic scale development within each of the six Character Areas, the Council decided to focus development within Character Area 4.
- 6.7 Consequently, smaller sub-areas defined as free from strategic constraints were defined within Character Area 4 for further assessment. The location of each sub-area and the strategic constraints within their immediate vicinity are shown in **Figure 6.2** and descriptions of each area are set out below:
- **Area A: North and East Sellindge** contains land to the north and east of the villages of Sellindge and Stanford. Both villages are located to the north of the M20 corridor and railway

---

<sup>129</sup> Folkestone and Hythe Core Strategy Review SA Scoping Report, March 2017 Available at: <https://www.Folkestone and Hythe.gov.uk/planning/planning-policy/local-plan/core-strategy-review-2016>























line, separating it from Hythe and Folkestone to the south east. The northern and eastern edges of the area follow the boundary of the AONB.

- **Area B: South of M20** contains a large area of land to the south of the M20 corridor. The villages of Westenhanger and Barrowhill border the area's northern edge. The village of Lympne borders the area to the south. The eastern and southern edges of the area follow the boundary of the AONB.
- **Area C: South and West Sellindge** is a relatively small pocket of land directly to the north of the M40 motorway and bordering the south western edge of the village of Sellindge.
- **Area D: East of Stone Hill** is a relatively small area of land. The northern edge of the area follows the District boundary. The western edge borders the hamlet of Stone Hill and the southern edge follows a small brook designated as flood Zone 3.

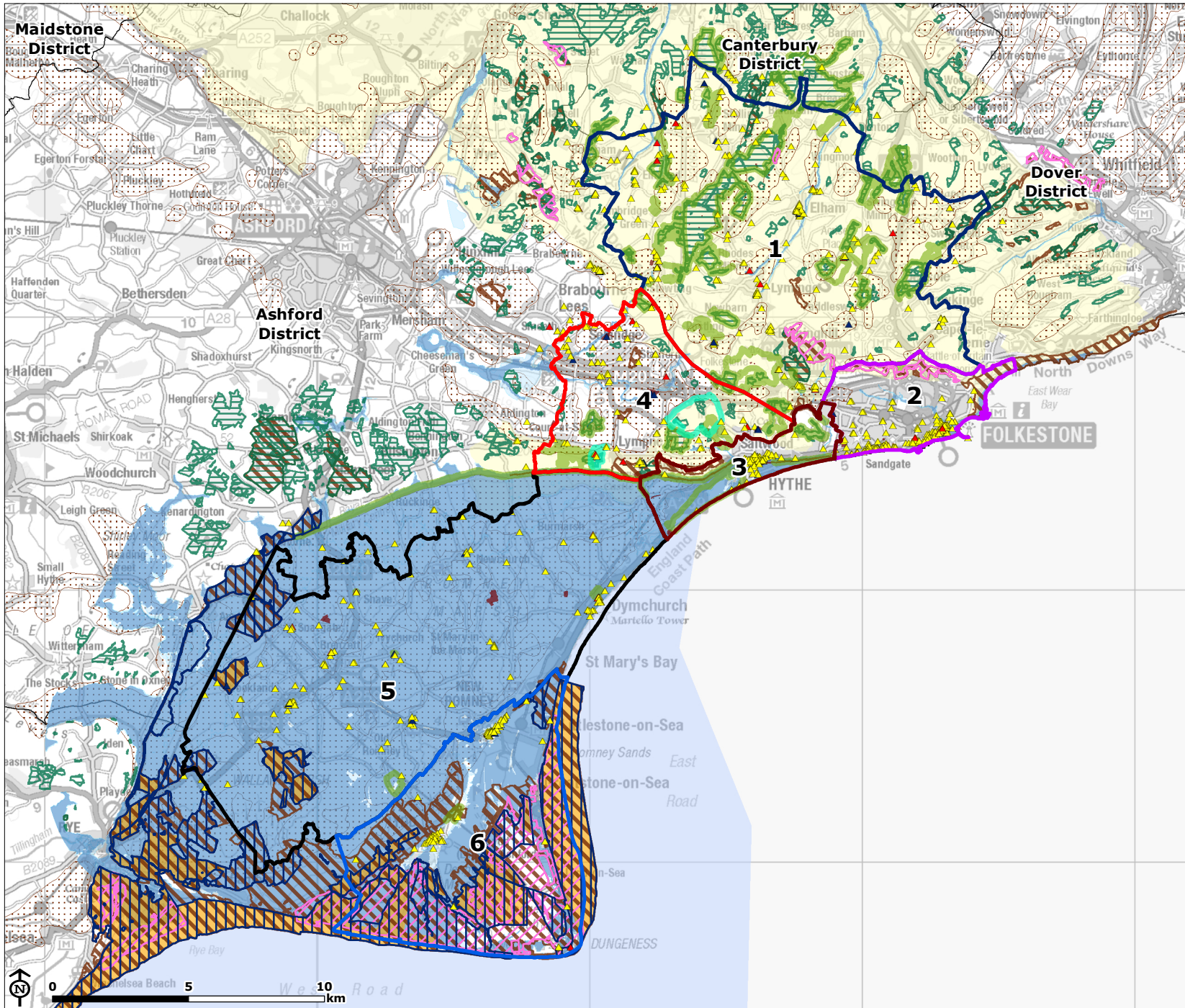
- 6.8 LUC appraised the four sub-areas within Character Area 4 against the SA Framework to determine the likely significant effects of providing strategic scale development within different parts of Character Area 4.
- 6.9 **Table 6.2** presents the SA findings for each of the four sub-areas within Character Area 4 against the SA objectives set out in the SA Framework. The table is followed by summary text describing the reasons for the significant effects identified by SA objective. Detailed SA matrices setting out detailed justification for every effect identified for each Sub-area are listed in order in **Appendix 3**.
- 6.10 The SA findings were used alongside the high-level Growth Options Study to define the spatial options for strategic scale growth described and appraised in **Chapter 7**.

**Figure 6.1: Folkestone and Hythe Character Areas**

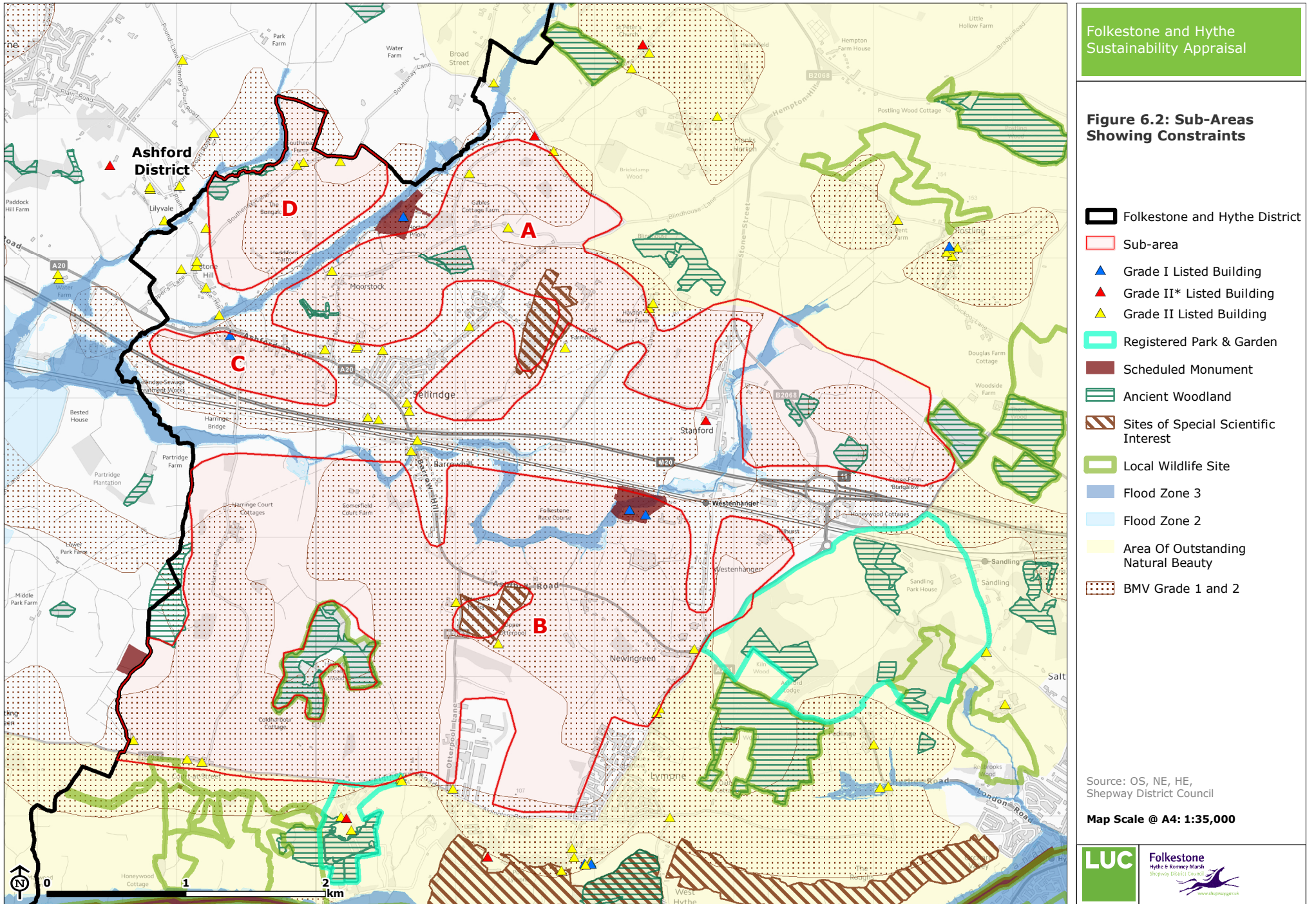
Character Areas

-  1: Kent Downs
  -  2: Folkestone and Surrounding Area
  -  3: Hythe and Surrounding Area
  -  4: Sellindge and Surrounding Area
  -  5: Romney Marsh and Walland Marsh
  -  6: Lydd, New Romney and Dungeness
  -  Grade I Listed Building
  -  Grade II\* Listed Building
  -  Grade II Listed Building
  -  Registered Park & Garden
  -  Scheduled Monument
  -  Special Protection Area
  -  Potential Special Protection Area
  -  Special Area of Conservation
  -  Ramsar
  -  Sites of Special Scientific Interest
  -  Local Wildlife Site
  -  Ancient Woodland
  -  Flood Zone 3
  -  Flood Zone 2
  -  Area Of Outstanding Natural Beauty
  -  BMV Grade 1 and 2
- Source: OS, NE, HE, Shepway District Council

Map Scale @ A4: 1:200,000



**Figure 6.2: Sub-Areas Showing Constraints**



- Folkestone and Hythe District
- Sub-area
- Grade I Listed Building
- Grade II\* Listed Building
- Grade II Listed Building
- Registered Park & Garden
- Scheduled Monument
- Ancient Woodland
- Sites of Special Scientific Interest
- Local Wildlife Site
- Flood Zone 3
- Flood Zone 2
- Area Of Outstanding Natural Beauty
- BMV Grade 1 and 2

Source: OS, NE, HE, Shepway District Council

Map Scale @ A4: 1:35,000



## Approach to High-level Growth Options Appraisal

- 6.11 Each high-level growth option (i.e. both the six Character Areas and four sub-areas within Character Area 4) were appraised against all the SA objectives outlined in the SA Framework in **Chapter 5** above at an early stage in the Core Strategy Review process, in order to help inform decisions on the most appropriate location for strategic scale development in the District.
- 6.12 Given the early stage in the development of the Folkestone & Hythe Core Strategy Review, the high-level growth options only offered an indication of the potential spatial distribution of growth in the District. Consequently, it was acknowledged that some SA objectives provide more opportunity to draw out variations in the effects of high-level growth options than others given the lack of detail about the potential design, layout and scale of development that could take place in each area. It was therefore assumed that all high level growth options would provide an opportunity to:
- Construct a significant number of new affordable homes for the District and wider region's growing diverse population, with **significant positive** effects (++) on **SA Objective 1 – Improve the Provision of Affordable Homes for All**.
  - Protect and enhance the District's green infrastructure to meet the strategic needs of the District's wildlife and residents. Such an opportunity is likely to have at least minor positive effects (+) on **SA Objective 6 – Protect and Enhance Green Infrastructure and Ensure it Meets Strategic Needs**. Although it is also acknowledged that development could also result in the loss or truncation of green infrastructure. Therefore, overall, a **mixed minor positive/minor negative** effect (+/-) was recorded against this SA objective.
  - Construct energy and water efficient and low-carbon developments that help to reduce the District's carbon and water footprints and increase the proportion of electricity and heat generated from local renewable sources. Such opportunities are likely to have at least **minor positive** effects (+) on **SA Objective 10 – Increase Energy Efficiency and Renewable Energy Generation** and **SA Objective 11 – Use Water Resources Efficiently**.
  - Construct developments that minimise waste generation and disposal in the short-term through sustainable and responsible construction practices and in the medium to long term through the incorporation of sustainable waste management facilities. Such opportunities are likely to have at least **minor positive** effects (+) on **SA Objective 12 – Reduce Waste Generation and Disposal, and Achieve Sustainable Waste Management**.
  - Construct developments that contribute to the reduction of crime and the fear of crime through appropriate security and landscaping measures. Such an opportunity is likely to have at least **minor positive** effects (+) on **SA Objective 15 – Reduce Crime and the Fear of Crime**.
- 6.13 The remaining SA objectives offered more opportunity to draw-out variations in the effects of the high-level growth options by identifying spatial variations in their extent, distribution and relationships with the District's existing pattern of development. These variations are drawn-out in the summary text below and in the individual appraisal matrices for each option in **Appendix 3**.
- 6.14 It was assumed that that growth could be located in any part of each of the areas identified within each growth option. However, it is important to note that the appraisals recognise that development may not be appropriate in all areas of each growth option.
- 6.15 To ensure that all growth options were appraised in a consistent manner, all the growth options were appraised by one person using the same baseline information.

**Table 6.1: SA scores for Six Character Areas**

Character Areas	SA Objective 1: housing	SA Objective 2: employment	SA Objective 3: landscape	SA Objective 4: historic environment	SA Objective 5: biodiversity and geodiversity	SA Objective 6: green infrastructure	SA Objective 7: land soils and mineral reserves	SA Objective 8: water quality	SA Objective 9: flood risk	SA Objective 10: energy efficiency	SA Objective 11: water efficiency	SA Objective 12: waste	SA Objective 13: sustainable transport	SA Objective 14: access to services and facilities	SA Objective 15: reduce crime and fear of crime
Character Area 1 (Kent Downs)	++	-	--	--	-	+/-	--	--	-	+	+	+	--	--	+
Character Area 2 (Folkestone and Surrounding Area)	+/-	++	-	-	0	+/-	+	0	-	+	+	+	++	++/--	+
Character Area 3 (Hythe and Surrounding Area)	+	+/-	-	--	-	+/-	0	-	--	+	+	+	+	+/-	+
Character Area 4 (Sellindge and Surrounding Area)	++	+	--	-	-	+/-	--	--	-	+	+	+	++	++/-	+
Character Area 5 (Romney Marsh and Walland Marsh)	+	+/--	--	--	--	+/-	--	-	--	+	+	+	--	--	+
Character Area 6 (Lydd, New Romney and Dungeness)	+/-	+/--	--	--	--	+/-	-	--	--	+	+	+	--	--	+

## Summary of SA findings for Six Character Areas

- 6.16 This section describes the potential effects of accommodating strategic scale development in each of the six Character Areas of Folkestone & Hythe District.

### **SA1: Improve the provision of homes, including affordable housing, having regard to the needs of all sections of society, including the elderly**

- 6.17 Strategic scale development in all of the Character Areas were expected to have at least a minor positive effect on this SA objective given that they would result in opportunities for the construction of a high number of new affordable homes over the plan period as well as contributing to the objectively assessed need for Folkestone & Hythe. Combined minor negative effects were, however, identified for those Character Areas (2: Folkestone and Surrounding Area and 6: Lydd, New Romney and Dungeness) in which there is less demand for new homes. Character Areas 1: Kent Downs and 4: Sellindge and Surrounding Area currently have higher house prices in comparison to other locations revealing a mismatch between supply and demand. Therefore a significant positive effect was identified for these Character Areas in relation to SA objective 1.

### **SA2: Support the creation of high quality and diverse employment opportunities**

- 6.18 While strategic scale development would likely result in the delivery of new employment opportunities for residents in Folkestone & Hythe this SA objective considered existing transport links at each Character Area as well as levels of deprivation which might be directly addressed through regeneration and new employment opportunities. Character Area 2: Folkestone and Surrounding Area was expected to perform most favourably with regards this SA objective given the current transport links accessible at the M20 and associated A-roads, mainline railway stations in Folkestone and Folkestone centre. Employment uses provided at this location would also help to address the current high level of deprivation identified in this Character Area.
- 6.19 Minor positive effects were identified for this SA objective for Character Areas 5: Romney Marsh and Walland Marsh and 6: Lydd, New Romney and Dungeness due the current high level of deprivation present. However, for both these Character Areas, significant adverse effects were also identified due to the relatively poor transport links in these areas.

### **SA3: Conserve, and where relevant enhance, the quality, character and local distinctiveness of the landscape and townscape**

- 6.20 Strategic scale development was considered likely to have adverse impacts on the character and landscape of the District due to the fact that it would be likely to result in the loss of greenfield land and the general encroachment of the open countryside. The Kent Downs AONB washes over the north western half of the District. Consequently, negative effects were identified for all Character Areas in relation to this SA objective.
- 6.21 These effects were expected to be more significant where development would take place within or in close proximity to the AONB, including areas which make up its setting as well as in areas which have been identified as having high sensitivity in terms of landscape character in Folkestone & Hythe's High Level Landscape Appraisal (2017)<sup>130</sup>. Strategic scale development in Character Areas 1: Kent Downs, 4: Sellindge and Surrounding Area, 5: Romney Marsh and Walland Marsh and 6: Lydd, New Romney and Dungeness was expected to have a significant negative effect for this SA objective for these reasons. The negative effects identified for Character Areas 2: Folkestone and Surrounding Area and 3: Hythe and Surrounding Area were expected to be minor given that the majority of these areas are already urbanised and fall outside the Kent Downs AONB.

---

<sup>130</sup> Shepway District High Level Landscape Appraisal, AECOM, February, 2017

#### **SA4: Conserve and enhance the fabric and setting of historic assets**

- 6.22 Strategic scale development has the potential to have adverse effects on the character of heritage assets, either through directly affecting their integrity or influencing their setting. As all Character Areas contain heritage assets of varied significance, all score negative effects against this objective.
- 6.23 Character Areas 1: Kent Downs, 3: Hythe and Surrounding Area, 5: Romney Marsh and Walland Marsh and 6: Lydd, New Romney and Dungeness were expected to have a significant negative effect on this SA objective due to the notable significance of the heritage assets they contain. Furthermore, Historic England has advised that strategic scale development in these areas would be less suitable. Minor negative effects were identified for this SA objective for Character Areas 2: Folkestone and Surrounding Area and 4: Sellindge and Surrounding Area. Historic England and Kent County Council both stated that these areas would be more suitable for strategic scale development.

#### **SA5: Conserve and enhance biodiversity, taking into account the effects of climate change**

- 6.24 Strategic scale development may result in damage or disturbance to habitats and species in the District through construction, or activities which may result following the completion of development most notably through recreation and transportation activities.
- 6.25 Much of the southern portion of the District is covered by European sites around Romney Marsh extending to the west and Dungeness National Nature Reserve in the south. As such, it was considered that strategic scale development could result in significant negative effects for those Character Areas (5: Romney Marsh and Walland Marsh and 6: Lydd, New Romney and Dungeness) within which these designations lie.
- 6.26 While other important biodiversity designations fall within the other Character Areas, the areas that they cover are significantly smaller, making it more likely that strategic scale development could be accommodated with these areas without significant adverse effects on the biodiversity of the District. A negligible effect was recorded for Character Area 2: Folkestone and Surrounding Area given its developed character and considering that the designations identified are located towards its edges.

#### **SA6: Protect and enhance green infrastructure and ensure that it meets strategic needs**

- 6.27 Providing strategic scale development within the District is expected to allow for opportunities for the appropriate incorporation of new open spaces, green corridors and other important elements of green infrastructure to meet the needs of the District's wildlife and residents. However, these beneficial effects will largely depend on successful long-term stewardship being secured and a robust blue/green strategy for the areas of development. It is also acknowledged that development could also result in the loss or truncation of green infrastructure. Therefore, overall, a mixed minor positive/minor negative effect (+/-) was recorded against this SA objective.

#### **SA7: Use land efficiently and safeguard soils, geology and economic mineral reserves**

- 6.28 The provision of strategic scale development in Folkestone & Hythe has the potential to result in the loss of high quality agricultural land as well as access to and sterilisation of important local mineral resources. This is particularly likely in Character Areas 1: Kent Downs, 4: Sellindge and Surrounding Area and 5: Romney Marsh and Walland Marsh much of which are covered by Minerals Safeguarding Areas as set out in the Kent Minerals and Waste Local Plan<sup>131</sup>. These areas also contain large areas of Grade 1 ('excellent') or Grade 2 (very good') quality agricultural land. A minor positive effect was expected for this SA objective for Character Area 2: Folkestone and Surrounding Area as it is mostly developed and there a number of larger vacant building and previously developed sites present which may present opportunities for redevelopment.

---

<sup>131</sup> Kent County Council (2016) Kent Minerals and Waste Local Plan 2013-2030



### **SA8: Maintain and improve the quality of groundwater, surface waters and coastal waters and the hydromorphological (physical) quality of rivers and coastal waters**

- 6.29 Source Protection Zones (SPZs) have been defined in the south and north of the District. Strategic level development in these locations has the potential to adversely impact upon water quality. Strategic scale development also has the potential to put pressure on the District's wastewater and water supply infrastructure network, which could result in adverse impacts on the District's water quality. The strategic wastewater connection between the Westenhanger and the Sellindge waste water treatment works is close to capacity.
- 6.30 As such, strategic scale development in the areas surrounding these settlements may put undue pressures on the existing infrastructure. Significant negative effects were therefore identified for Character Areas 1: Kent Downs, 4: Sellindge and Surrounding Area and 6: Lydd, New Romney and Dungeness. Character Areas 3: Hythe and Surrounding Area and 5: Romney Marsh and Walland Marsh were expected to have a minor negative effect on this SA objective as although these areas do not lie within SPZs, they do sit above aquifers and zones recognised as being vulnerable to nitrates.

### **SA9: Reduce the risk of flooding, taking into account the effects of climate change**

- 6.31 An increase of impermeable surfaces would likely result regardless of where strategic scale development is provided in the District, considering the number of new homes which would be required. Much of the District has flood defences in place, however there is still potential for fluvial and in particular tidal flooding in many areas.
- 6.32 The southern portion of the District into which much of Character Areas 3: Hythe and Surrounding Area, 5: Romney Marsh and Walland Marsh and 6: Lydd, New Romney and Dungeness fall is within Flood Zone 3 with smaller areas of high flood risk present in Character Areas 1: Kent Downs, 2: Folkestone and Surrounding Area and 4: Sellindge and Surrounding Area limited to the major rivers and tributaries. Residential development is classed as a more 'vulnerable use' which should not be located in areas designated as Flood Zone 3b and requires an exception test for allocations in Flood Zone 3a. Therefore, strategic scale development in Character Areas 3, 5 and 6 were considered to have the potential for significant negative effects on this SA objective.

### **SA10: Increase energy efficiency in the built environment and the proportion of energy use from renewable sources**

- 6.33 Providing strategic scale development within the District is likely to generate the economies of scale to incorporate high levels of energy efficient design, such as district heating and renewable energy schemes. A minor positive effect was therefore expected on this SA objective for all Character Areas.

### **SA11: Use water resources efficiently**

- 6.34 The delivery of strategic scale development within the District is likely to allow for opportunities to incorporate high levels of design which encourage water efficiency. A minor positive effect was therefore expected on this SA objective for all Character Areas.

### **SA12: To reduce waste generation and disposal, and achieve the sustainable management of waste**

- 6.35 Strategic scale development within the District is expected to result in opportunities for the provision of developments making use of sustainable and responsible construction practices and the incorporation of sustainable waste management facilities. A minor positive effect was therefore expected on this SA objective for all Character Areas.

### **SA13. Reduce the need to travel, increase opportunities to choose sustainable transport modes and avoid development that will result in significant traffic congestion and poor air quality**

- 6.36 The most important sustainable transport access in the District is provided through the mainline rail services at Folkestone, Westenhanger and Sandling. These transport nodes lie within Character Area 2: Folkestone and Surrounding Area and Character Area 4: Sellindge and

Surrounding Area. In addition, both these areas have excellent access to the existing strategic road network (particularly at the M20) which would help to reduce the potential for increased congestion levels in Folkestone & Hythe. Therefore, both character areas scored significant positive effects for this SA objective with respect to accommodating strategic scale development.

- 6.37 Transport links are less extensive and strategic in scale in the north and south of the District where access to a mainline rail service is not available. A significant negative effect was therefore recorded for Character Areas 1: Kent Downs, 5: Romney Marsh and Walland Marsh and 6: Lydd, New Romney and Dungeness for SA objective 13.

#### **SA14. Promote community vibrancy and social cohesion; provide opportunities to access services, facilities and environmental assets for all ages and abilities and avoid creating inequalities of opportunity for access**

- 6.38 Significant negative effects were identified for Character Areas 1: Kent Downs, 5: Romney Marsh and Walland Marsh, 6: Lydd, New Romney and Dungeness given the rural nature of these areas. Strategic scale development in these areas would be reliant on smaller rural centres where there are fewer services and facilities with less potential to accommodate significant growth. Furthermore, the more rural areas of the District are less accessible via road or more sustainable transport modes, making them less suitable for accommodating new local centres with new services and facilities.
- 6.39 While Character Area 2: Folkestone and Surrounding Area provides access to a good range of existing services and facilities in Folkestone, the boundaries of the Character Area are drawn tightly around the settlement. New strategic scale development within the town would provide limited space to accommodate the additional services and facilities required to meet the needs of these new development. Therefore, overall, a mixed effect (significant positive/significant negative) was identified for this Character Area.
- 6.40 Character Area 4: Sellindge and Surrounding Area performed most favourably for this SA objective. This is due to the better transport infrastructure within the area. Therefore a significant positive effect was identified for this objective. This effect was combined with a minor negative in recognition of the fact that existing services and facilities within the area are confined to the village of Sellindge, which has limited capacity to accommodate new growth.

#### **SA15. Reduce crime and the fear of crime**

- 6.41 Providing strategic scale development within the District is expected to allow for opportunities to 'design out' crime at new developments, for example through the suitable design of open spaces and the inclusion of appropriate lighting. A minor positive effect was therefore expected on this SA objective for all Character Areas.

### **Overview of Character Area SA findings**

- 6.42 The SA found that the more remote and rural areas of the District are considered to be less appropriate for strategic scale development. This is because these areas do not have an urban character, are less accessible via the existing transport network and contain fewer services and facilities. Being predominantly made-up of open countryside, these Character Areas contain a more diverse range of historic, ecological and landscape assets, all of which are vulnerable to adverse effects as a result of strategic growth. Furthermore, the prospect of replacing permeable open countryside with new homes, roads, local services, facilities and employment opportunities would inevitably result in a net loss of greenfield land, resulting in the loss of some of the District's best and most versatile agricultural land, potential sterilisation of mineral resources, and be in areas of higher flood risk, particularly near the coast. For these reasons, more significant negative effects were recorded for the most northerly (Character Area 1) and southerly Character Areas (Character Areas 5 and 6).
- 6.43 Character Area 2, which includes the urban area of Folkestone, is generally considered to be the most appropriate location for strategic scale development in the District due to the fact that the area is already urbanised with a good range of transport links, services and facilities. However, it is acknowledged that there are limited areas in the town that are available for redevelopment at

the scale that would be required to accommodate the number of additional homes needed over the plan period.

- 6.44 Character Area 3, which includes the urban area of Hythe, and Character Area 4, containing Sellindge and the surrounding area, were considered to be the next most appropriate locations for strategic growth. Character Areas 3 and 4 represent more rural and open Character Areas to Character Area 2. Despite some significant landscape, strategic wastewater and agricultural land constraints in certain parts of the Area, Character Area 4 has good transport links, which provide access to local services and facilities in the District and beyond.
- 6.45 Despite some significant heritage and flood risk constraints in certain parts of the Area, Character Area 3 scores slightly less negatively than Character Area 4 due to the fact that Character Area 4 is assessed as having more significant landscape and groundwater constraints as well as being largely open and green countryside; however Character Area 3's transport links are considered not to be as good as those within Character Area 4.

**Table 6.2: SA Scores for Character Area 4 Sub-areas**

Character Area 4 Sub-areas	SA Objective 1: housing	SA Objective 2: employment	SA Objective 3: landscape	SA Objective 4: historic environment	SA Objective 5: biodiversity and geodiversity	SA Objective 6: green infrastructure	SA Objective 7: land, soils and mineral reserves	SA Objective 8: water quality	SA Objective 9: flood risk	SA Objective 10: energy efficiency	SA Objective 11: water efficiency	SA Objective 12: waste	SA Objective 13: sustainable transport	SA Objective 14: access to services and facilities	SA Objective 15: reduce crime and fear of crime
Sub-area A (North and East Sellindge)	++	++/-	--	--	-	+/-	--	--	0	+	+	+	++/-	+/-	+
Sub-area B (South of M20)	++	++/-	-	-	-	+/-	--	--	0	+	+	+	++/-	++/-	+
Sub-area C (South and West of Sellindge)	++	+/-	0	-	-	+/-	--	--	0	+	+	+	+/-	+/-	+
Sub-area D (East of Stone Hill)	++	--	--	--	-	+/-	--	--	0	+	+	+	--	--	+

## Summary of SA findings for Character Area 4 Sub-areas

- 6.46 This section describes the potential effects of accommodating strategic scale development in each of the four Sub-areas within Character Area 4 of Folkestone & Hythe District, which was considered by the Council to have the greatest scope to accommodate the scale of development being addressed through the Core Strategy Review.

### **SA1: Improve the provision of homes, including affordable housing, having regard to the needs of all sections of society, including the elderly**

- 6.47 Providing new residential development as part of strategic scale development in Folkestone & Hythe would help to meet the housing requirements for Folkestone & Hythe and the wider Kent area as well as allowing for opportunities to deliver new affordable housing. All Sub-areas are located within Character Area 4 which has been shown to have the second highest house prices in the District. As such the delivery of new housing in any of the Sub-areas is likely to help to directly address a mismatch between local housing supply and demand. A significant positive effect was therefore recorded for all four Sub-areas.

### **SA2: Support the creation of high quality and diverse employment opportunities**

- 6.48 Areas with access to existing strategic road infrastructure and containing higher order settlements at which employment development would be considered more appropriate are expected to have a more positive effect on this SA objective.
- 6.49 Sub-areas A: North and East Sellindge and B: South of M20 would provide a good level of access to existing A-roads as well as the M20 and are in very close proximity to moderate population centres at Sellindge and Stanford and Lympne and Westenhanger respectively. As such a significant positive effect was recorded for each Sub-area.
- 6.50 A minor negative effect was recorded in combination with this significant positive effect for both Sub-areas as there are portions of each Sub-area which are unsuitable for employment uses due to the limited nature of the road network which would require significant improvements.
- 6.51 Sub-area D is the most isolated of the Sub-areas considered and given the poor local transport infrastructure in particular at this location a significant negative effect was recorded for SA objective 2.

### **SA3: Conserve, and where relevant enhance, the quality, character and local distinctiveness of the landscape and townscape**

- 6.52 Strategic scale development was considered to have the potential to give rise to significant negative effects on this SA objective in sub-areas A: North and East Sellindge and D: East of Stone Hill due to the role both Sub-areas play in terms of providing setting for the Kent Downs AONB.
- 6.53 While some of sub-area B forms part of the setting of the AONB (given that it borders the Area to the south and east) portions of sub-area B have been identified as capable of accommodating strategic development without the need for extensive landscape mitigation. A minor negative effect was therefore recorded for Sub-area B with regards this SA objective.

### **SA4: Conserve and enhance the fabric and setting of historic assets**

- 6.54 Sub-areas A: North and East Sellindge and D: East of Stone Hill contain identified heritage assets which make them less suitable for accommodating strategic scale development and as such significant negative effects were identified for these Sub-areas.
- 6.55 While Sub-areas B: South of M20 and C: South and West of Sellindge also contain identified heritage assets, portions of these Sub-areas are considered to be capable of accommodating strategic development through appropriate mitigation. A minor negative effect was recorded for SA objective 4 for these two sub-areas.

**SA5: Conserve and enhance biodiversity, taking into account the effects of climate change.**

- 6.56 Strategic scale development within all of the Sub-areas were considered to have a minor negative effect on SA objective 5. Parts of each Sub-area fall within at least one of the Impact Risk Zones marked out for the SSSIs designated at Gibbins Brook, Otterpool Quarry and Lympe Escarpment. While these biodiversity and geological designations are important for local habitats and species (although Otterpool Quarry is designated for its geological interest) it is expected that strategic scale development might be provided within these Sub-areas without significant adverse impacts, taking into consideration advice from Natural England. A minor negative effect has therefore been recorded for this SA objective for all Sub-areas.

**SA6: Protect and enhance green infrastructure and ensure that it meets strategic needs**

- 6.57 Providing strategic scale development within the District is expected to allow for opportunities for the appropriate incorporation of new open spaces, green corridors and other important elements of green infrastructure to meet the needs of the District's wildlife and residents. However, these beneficial effects will largely depend on successful long-term stewardship being secured and a robust blue/green strategy for the areas of development. It is also acknowledged that development could also result in the loss or truncation of green infrastructure. Therefore, overall, a mixed minor positive/minor negative effect (+/-) was recorded against this SA objective for all Sub-areas.

**SA7: Use land efficiently and safeguard soils, geology and economic mineral reserves**

- 6.58 The provision of strategic scale development in Folkestone & Hythe has the potential to result in the loss of high quality agricultural land as well as access to and sterilisation of important local mineral resources.
- 6.59 All Sub-areas contain mostly Grade 2 ('excellent') quality agricultural land. The majority of the land within each Sub-area is also covered by Mineral Safeguarding Areas for silica sand/construction sand, for sandstone or for limestone. A significant negative effect was therefore recorded for all Sub-areas for SA objective 7.

**SA8: Maintain and improve the quality of groundwater, surface waters and coastal waters and the hydromorphological (physical) quality of rivers and coastal waters**

- 6.60 The strategic wastewater connection between Sellindge and Westenhanger has been identified as potentially having insufficient capacity to support further development. Given the close proximity of these settlements to the Sub-areas, adopting a precautionary approach, a significant negative effect was recorded for SA objective 8 for each Sub-area, until such time as it is confirmed that an appropriate infrastructure solution can be found to meet the needs of any new strategic scale development in the area.<sup>132</sup>

**SA9: Reduce the risk of flooding, taking into account the effects of climate change**

- 6.61 None of the Sub-areas considered fall within areas of 'significant' or 'extreme' flood risk as per the Folkestone & Hythe District Council Strategic Flood Risk Assessment (2015). There are some small pockets of Flood Zone 2 and 3 within the flood plain of the River East Stour and its tributaries, however it is considered likely that strategic scale development could be provided in any of the sub-areas while avoiding these pockets. A negligible effect was therefore recorded for all Sub-areas for SA objective 9 with respect to accommodating strategic scale development.

**SA10: Increase energy efficiency in the built environment and the proportion of energy use from renewable sources**

- 6.62 Providing strategic scale development within the District is likely to generate the economies of scale to incorporate high levels of energy efficient design, such as district heating and renewable

---

<sup>132</sup> Southern Water has been consulted by the District Council on all versions of the emerging Core Strategy Review. Having reviewed the proposed site allocations, Southern Water advised the Council that it is likely that additional wastewater infrastructure would be required to serve new growth in certain locations. Southern Water has not identified any fundamental reasons why planned growth as set out in the Core Strategy Review could not be served.

energy schemes. A minor positive effect is therefore expected on this SA objective for all Sub-areas.

**SA11: Use water resources efficiently**

- 6.63 The delivery of strategic scale development within the District is likely to allow for opportunities to incorporate high levels of design which encourage water efficiency. A minor positive effect was therefore expected on this SA objective for all Sub-areas.

**SA12: To reduce waste generation and disposal, and achieve the sustainable management of waste**

- 6.64 Allowing for strategic scale development within the District is expected to result in opportunities for the provision of developments making use of sustainable and responsible construction practices and in the medium to long term through the incorporation of sustainable waste construction and waste management facilities. A minor positive effect was therefore expected on this SA objective for all Sub-areas.

**SA13. Reduce the need to travel, increase opportunities to choose sustainable transport modes and avoid development that will result in significant traffic congestion and poor air quality**

- 6.65 Allowing for strategic scale development in Sub-areas A: North and East Sellindge and B: South of M20 would provide a good level of access to mainline train services at Westenhanger. These areas would also provide access to the nearby M20 motorway which is able to accommodate more traffic than the rest of the strategic road network in the District, limiting the potential for adverse impacts associated with increased road congestion. Both these Sub-areas have a reduced level of access to bus services however and portions of each area are not currently served by the strategic road network. As such overall mixed effects (significant positive/minor negative) were recorded for these two Sub-areas.
- 6.66 Strategic scale development in Sub-area D: East of Stone Hill was expected to have a significant negative effect due to its more limited access to the sustainable transport network and limited access to the strategic road network. Sub-area D does not have direct access to the M20 motorway or a mainline rail service with the only route through the site being Southenay Lane.

**SA14. Promote community vibrancy and social cohesion; provide opportunities to access services, facilities and environmental assets for all ages and abilities and avoid creating inequalities of opportunity for access**

- 6.67 Only strategic scale development within Sub-area B: South of M20 was expected to have a significant positive effect on this SA objective. This area would provide access to existing services and facilities at Sellindge and is in close proximity to the M20 and sustainable transport links. The significant positive effect was considered likely to be combined with a minor negative effect however given that many of the services and facilities within Sellindge have been identified as being presently at capacity.
- 6.68 Sub-areas A: North and East Sellindge and C: South and West of Sellindge would also provide access to services and facilities at Sellindge; however they also contain services which are less accessible. Therefore, mixed minor positive/minor negative effects were recorded for these sub-areas.
- 6.69 Access to existing services and facilities in Sub-area D is reduced further still. Such provisions can be accessed by private car at Sellindge, however walking access is not currently possible. The limited nature of the road infrastructure at this location means that new services and facilities would be less suitable for provision in Sub-area D and therefore a significant negative effect was recorded overall for this Sub-area.

**SA15. Reduce crime and the fear of crime**

- 6.70 Providing strategic scale development within the District is expected to allow for opportunities to 'design out' crime within new developments for example through the suitable design of open

spaces and the inclusion of appropriate lighting. A minor positive effect was therefore expected on this SA objective for all Sub-areas.

## Overview of Sub-area SA findings

- 6.71 Strategic scale development in all four Sub-areas within Character Area 4 are expected to generate significant negative effects on the District's land, soils and minerals reserves (SA objectives 7 and 8) due to the fact that the area is generally made-up of open countryside, some of which is classified as the District's best and most versatile agricultural land and mineral reserves. Furthermore, there is currently insufficient wastewater infrastructure to accommodate significant growth in this area, which poses a risk to the water quality of the District without upgrades.
- 6.72 Sub-area B is considered to be the most accessible location for strategic scale development due to its close proximity to the area's strategic and sustainable transport infrastructure, notably the mainline rail services at Westenhanger as well as the M20 motorway at Junction 11, as well as the existing local services and facilities within the villages of Sellindge and Lympe.
- 6.73 Sub-area D is considered to be the least accessible location for strategic scale development in the Character Area as it is relatively remote from the strategic and sustainable transport links in the area compared to the other sub-areas.
- 6.74 Sub-areas D and A contain and lie in close proximity to sensitive landscape and historic assets and therefore strategic scale development could have significant adverse effects. Strategic scale development within Sub-area B also has the potential to have adverse impacts on local landscape character and the historic environment, but it is considered likely that the provision of such development could be achieved without the need for as many measures to mitigate such impacts.
- 6.75 At this stage of the SA process, recommendations for the definition of spatial options within each of the Character Area 4 Sub-Areas were provided to the Council to take on board while preparing the Core strategy Review. These are set out at the top of each of the detailed appraisal matrices in **Appendix 3**.



## 7 Appraisal of Spatial Options at Otterpool and Sellindge

- 7.1 Following on from the SA of the growth options tested and identified through the District's Growth Options Study, Folkestone & Hythe District Council selected the land in and around Otterpool and the village of Sellindge as the most appropriate location for delivering the strategic scale growth required in the Plan period. It was at this stage that all alternative strategic growth options, such as more dispersed growth across the District, were discounted.
- 7.2 Folkestone & Hythe District Council proceeded to identify six spatial options for appraisal in between the villages of Lympne, Sellindge and Westenhanger. This broad area is shown on Figure 1 of the Growth Options Study Phase Two Report<sup>133</sup> and is reproduced in this report in **Figure 6.2**.
- 7.3 The identification of reasonable alternatives to test within this broad area was informed by a range of factors including:
- The landscape sensitivity analysis undertaken for the High Level Landscape Appraisal.
  - The findings of the Phase Two Report and the Areas of Opportunity it identifies.
  - The constraints identified within the broad area (key constraints are illustrated in **Figure 6.2**).
  - The presence of the M20 and high speed rail (HS1) corridors crossing the area in an east-west direction dividing the area into north and south areas of potential.
  - The location of Westenhanger railway station and junction 11 of the M20 offering transport access into the area from the east.
  - Options for the growth of Sellindge appropriate to its position in the settlement hierarchy.
  - The results of earlier work undertaken for the Council's submission to the Government's Locally-led Garden Villages, Town and Cities prospectus (DCLG, 2016)<sup>134</sup>.
  - The need to find strategic development areas sufficient to meet the outstanding need for development identified in the Council's Strategic Housing Market Assessment<sup>135</sup>.
  - The need to test potential development areas with clear, defensible boundaries.
- 7.4 These factors led to the identification of six spatial options for appraisal as reasonable alternatives for strategic growth:
- **South of the M20/HS1 Corridor:** Two options focus on the potential to create a new garden settlement to the south.
  - **North of the M20/HS1 Corridor:** Four options focus on expansion of the existing settlement of Sellindge to the north.

### South of the M20/HS1 Corridor

- 7.5 Two spatial options focus on the development of a new garden settlement to the south of the M20/HS1 corridor at Otterpool, including significant growth around the existing settlements of Westenhanger and Lympne:
- **Otterpool Spatial Option A** represents the final output of the Folkestone & Hythe Growth Options Study, covering the area of land the Study identified as suitable for strategic scale development.

<sup>133</sup> Folkestone and Hythe Growth Options Study Phase Two Report, AECOM, April 2017, Figure 1, p. 1-7.

<sup>134</sup> Folkestone and Hythe Growth Options Study Phase Two Report, AECOM, April 2017, Figure 28, p.2-60.

<sup>135</sup> As outlined in paragraph 4.16 above.

- **Otterpool Spatial Option B** was developed from the Area of Search in the Council's submission to the Locally-led Garden Villages, Town and Cities prospectus. This is broadly the same as Otterpool Option A with two distinct differences to the south west and west:
  - To the south west, Otterpool B does not include the development to the south of Harringe Brooks wood proposed in Otterpool A.
  - To the west, the western edge of Otterpool B extends further westwards than Otterpool A up the hill towards Harringe Lane.

7.6 Otterpool Spatial Options A and B are illustrated in **Figure 7.1** and **Figure 7.2**, respectively.

#### North of the M20/HS1 Corridor

7.7 Four spatial options were identified around the existing settlement of Sellindge to the north of the M20/HS1 corridor:

- **Sellindge Spatial Option A** includes a southern extension to Sellindge on the agricultural land bordered by Ashford Road to the north and east (A20), the M20 to the south and Harringe Lane to the west.
- **Sellindge Spatial Option B** includes the same southern extension as Sellindge A and further development to the west of Harringe Lane.
- **Sellindge Spatial Option C** includes an eastern extension to Sellindge on agricultural land to the east of Ashford Road (A20) and Swan Lane.
- **Sellindge Spatial Option D** includes the same areas of development proposed in Sellindge A, B and C combined.

7.8 Sellindge Options A-D are illustrated in **Figure 7.3-Figure 7.6**.






7.9 The SA appraised each growth option against the SA Framework to determine the likely significant effects of providing strategic scale development within different parts of Otterpool and Sellindge.

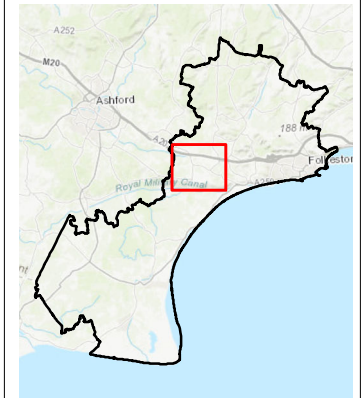
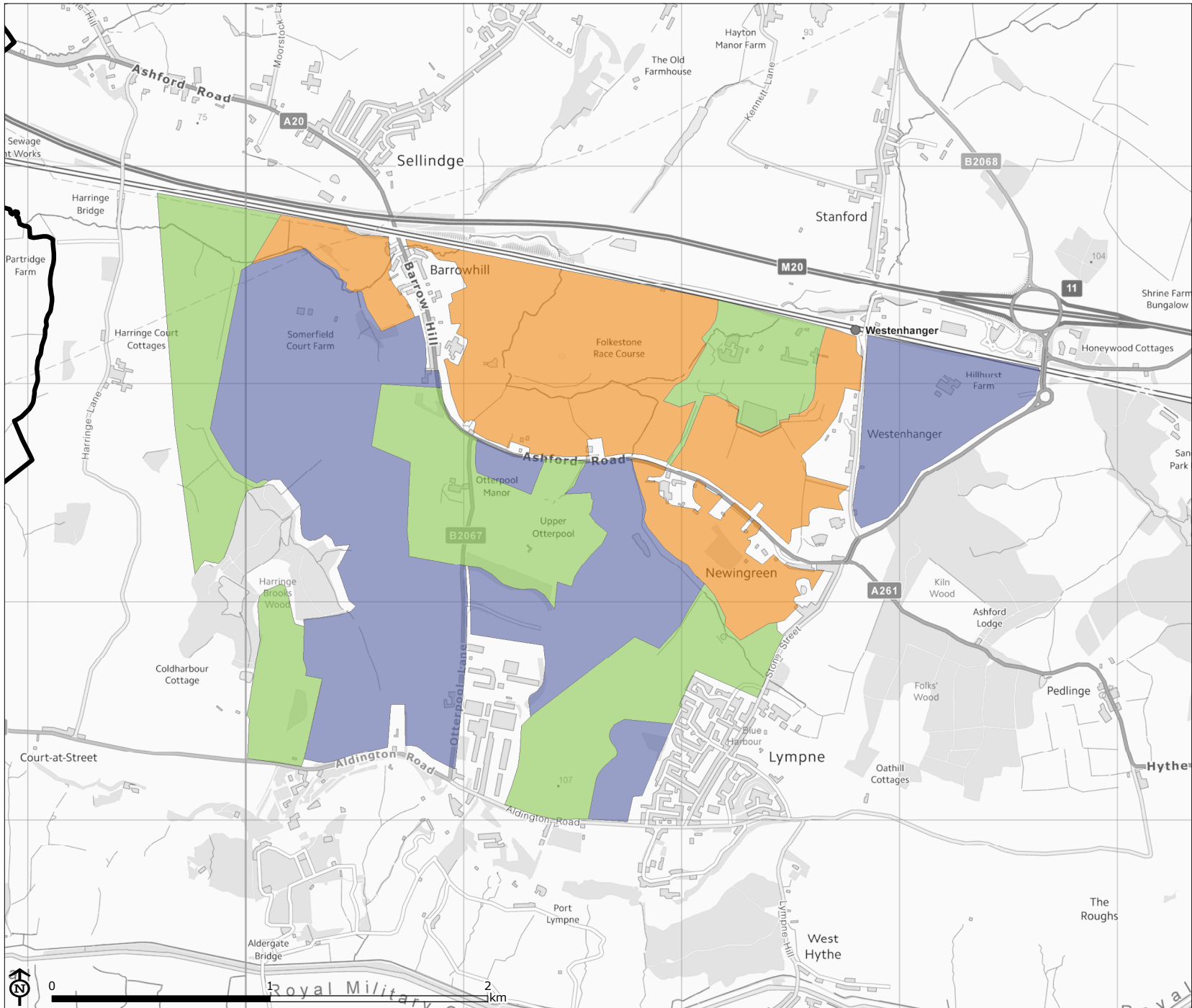
7.10 **Table 7.1** presents the SA findings for the two Otterpool spatial options against the SA objectives set out in the SA Framework. **Table 7.2** presents the SA findings for the four Sellindge spatial options against the SA objectives set out in the SA Framework. Each table is followed by summary text describing the reasons for the significant effects identified. Given that the spatial options around both Sellindge and Otterpool largely cover the same areas of land, this summary text focuses on the variations in significant socio-economic and environmental effects between the spatial options in order to help identify the most sustainable pattern of development around both Otterpool and Sellindge.

7.11 Detailed SA matrices setting out detailed justification for every effect identified for each spatial option are listed in order in **Appendix 4**.

7.12 These SA findings were used alongside the high-level Growth Options Study to define the site allocation policies in the Core Strategy Review described and appraised in **Chapter 8**.

**Figure 7.1: Development Proposed in Otterpool A**

-  Folkestone and Hythe
-  District boundary
-  Higher density development
-  Lower density development
-  Open green space








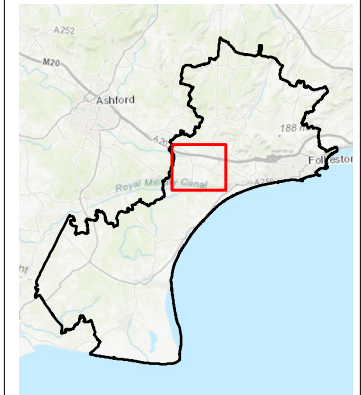
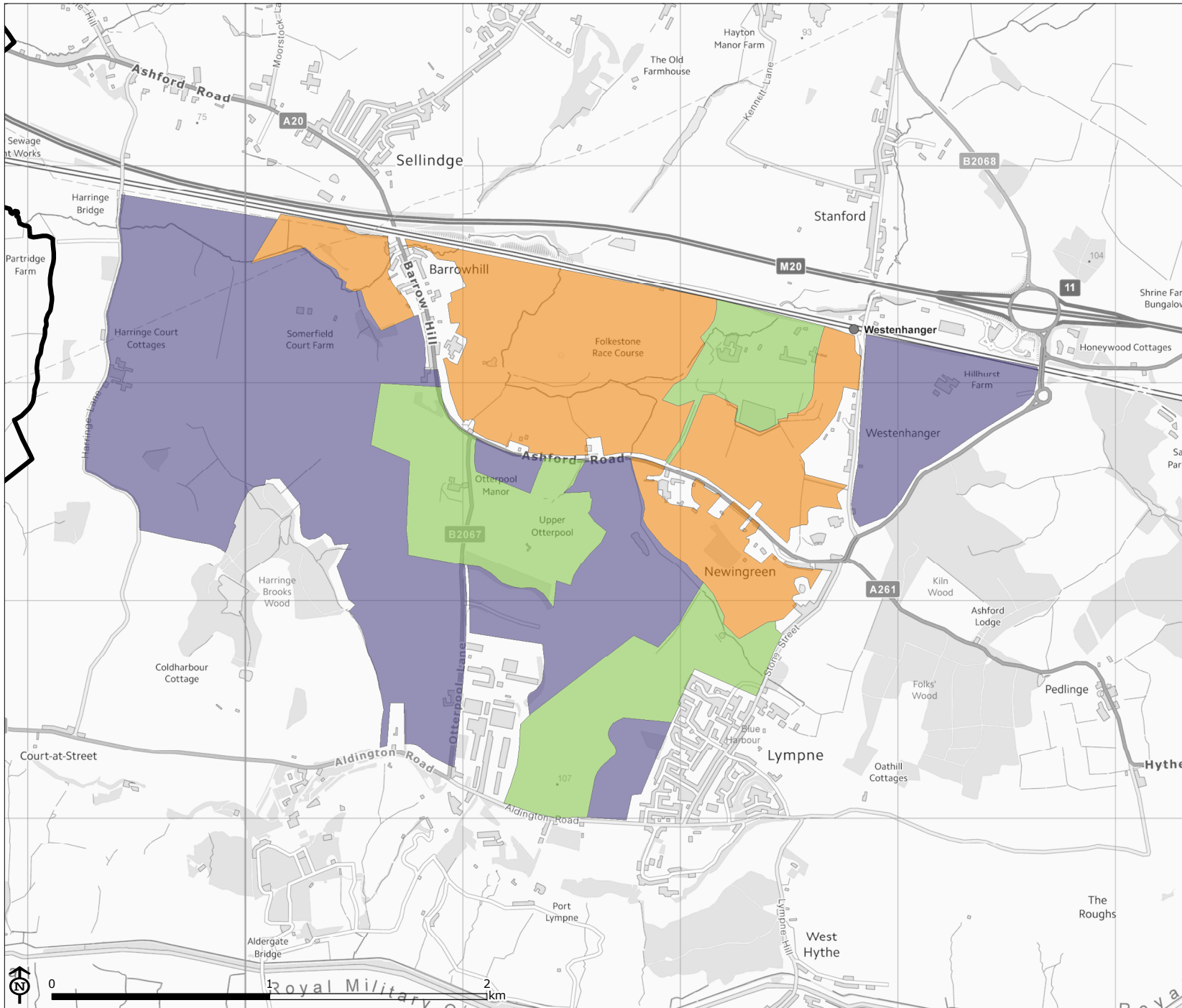
Source: OS, Folkestone and Hythe

District Council

Map Scale @ A4: 1:25,000

**Figure 7.2: Development Proposed in Otterpool B**

-  Folkestone and Hythe
-  District boundary
-  Higher density development
-  Lower density development
-  Open green space






Source: OS, Folkestone and Hythe

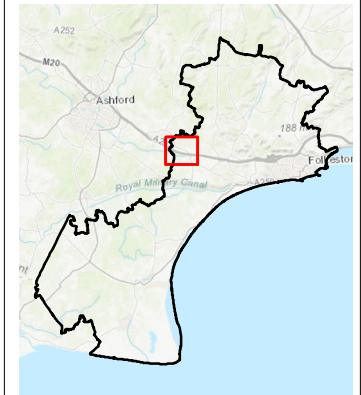
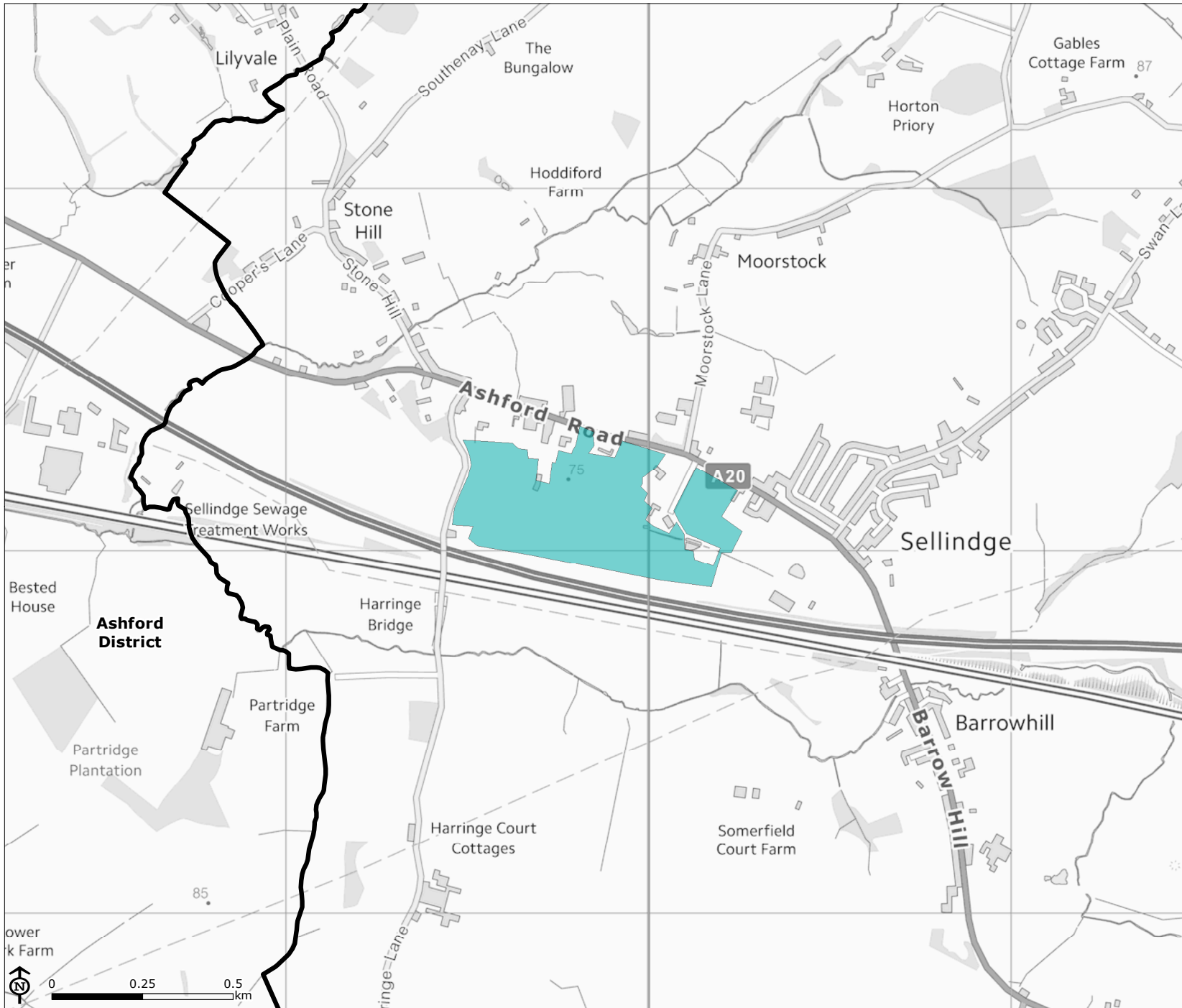
District Council

Map Scale @ A4: 1:25,000



**Figure 7.3: Development Proposed in Sellindge A**

-  Folkestone and Hythe
-  District boundary
-  Development






Source: OS, Folkestone and Hythe

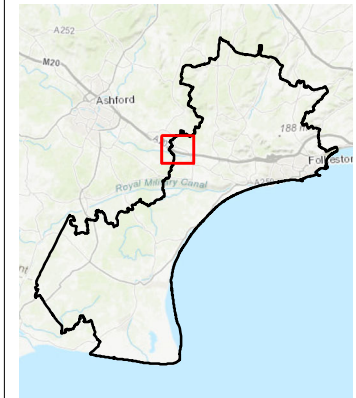
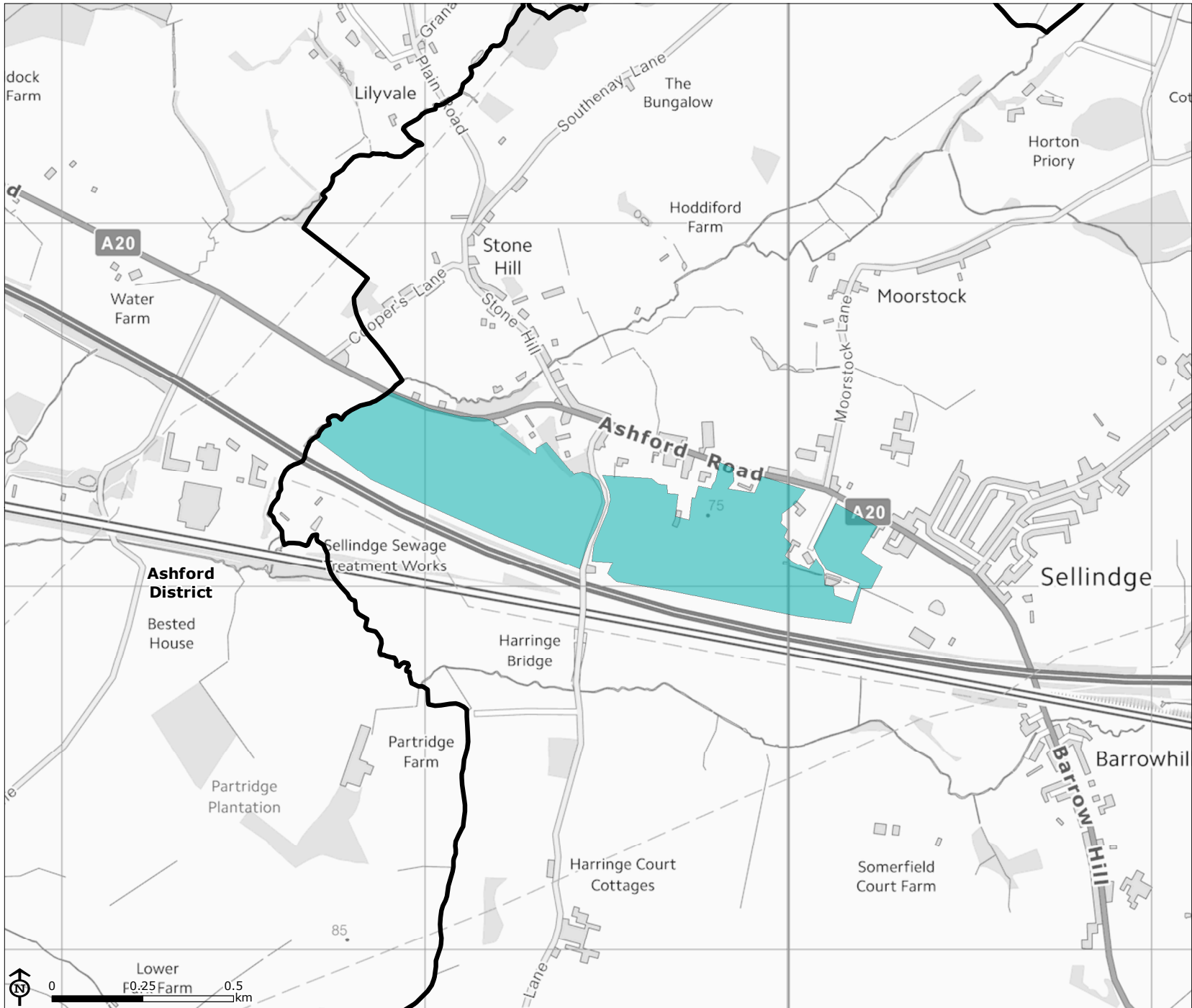
District Council

**Map Scale @ A4: 1:15,000**



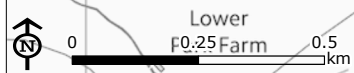
**Figure 7.4: Development Proposed in Sellindge B**

-  Folkestone and Hythe
-  District boundary
-  Development







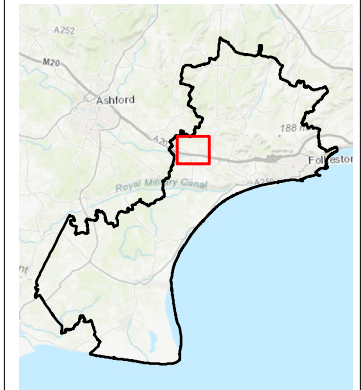
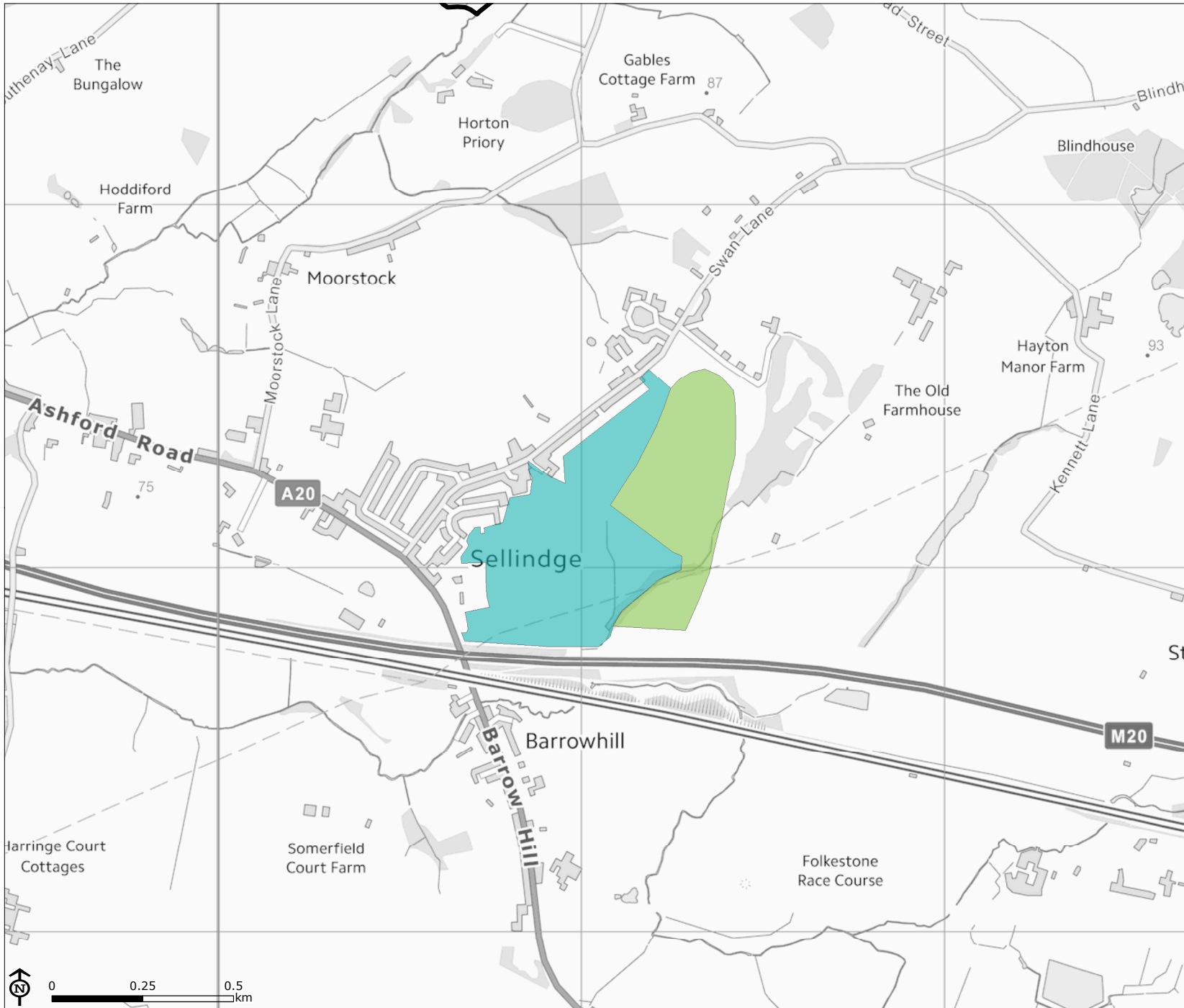
Source: OS, Shepway District Council

**Map Scale @ A4: 1:15,000**



**Figure 7.5: Development Proposed in Sellindge C**

-  Folkestone and Hythe
-  District boundary
-  Development
-  Open green space







Source: OS, Folkestone and Hythe

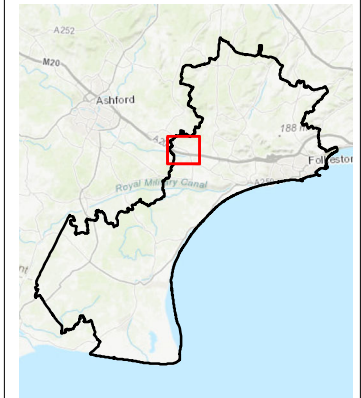
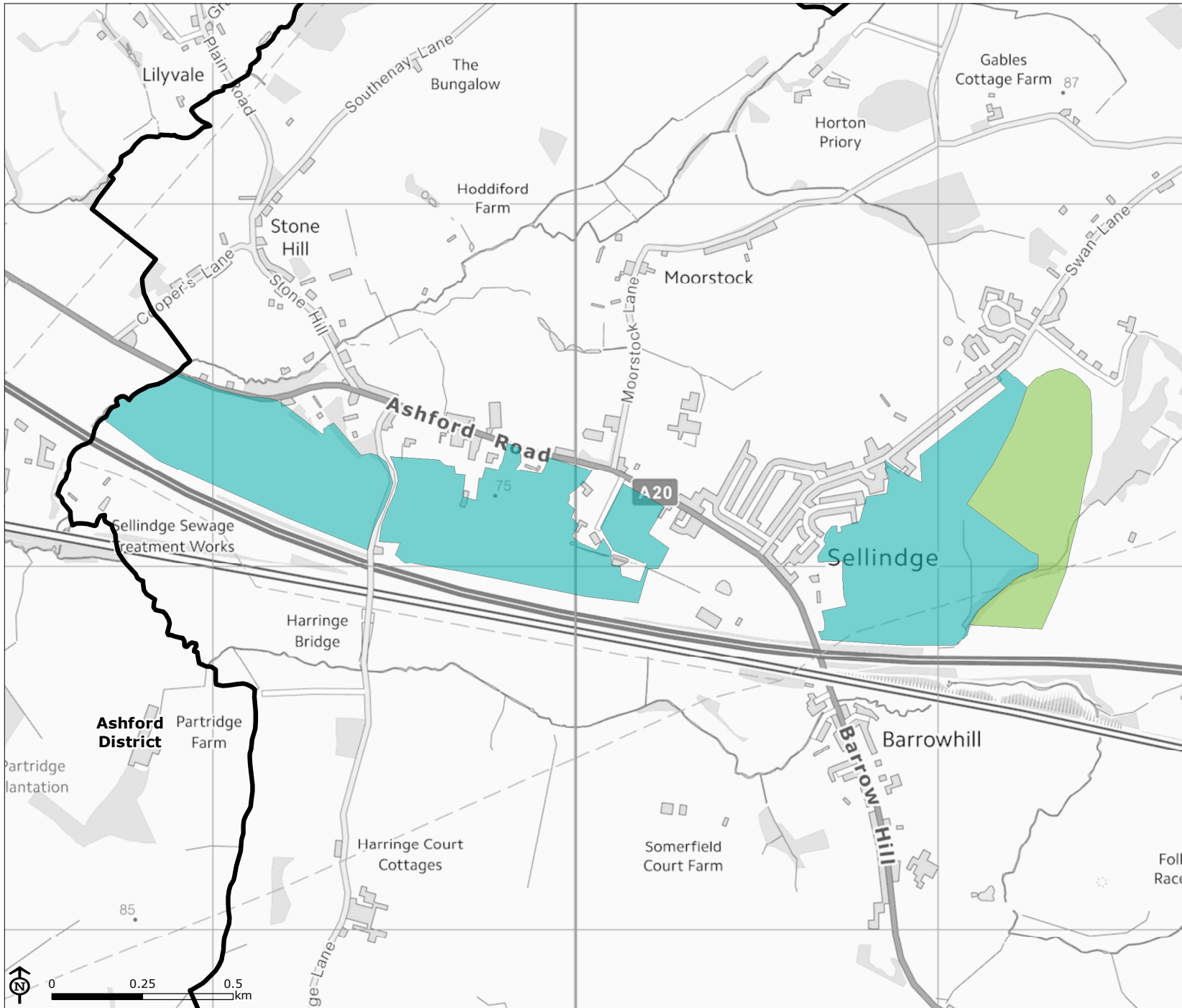
District Council

**Map Scale @ A4: 1:15,000**



**Figure 7.6: Development Proposed in Sellindge D**

-  Folkestone and Hythe
-  District boundary
-  Development
-  Open green space



Source: OS, Folkestone and Hythe  
District Council

Map Scale @ A4: 1:15,000





- 7.13 The SA has drawn on Landscape Sensitivity Assessments of the six spatial options undertaken by the Council in September 2017.

## Approach to Spatial Options Appraisal

- 7.14 Each spatial option has been appraised against all the SA objectives outlined in the SA Framework in **Chapter 4** above.
- 7.15 For the purposes of the appraisal, Folkestone & Hythe District Council estimated that all spatial options would deliver homes at a density of between 20 and 25 dwellings per hectare in an area with the second highest house prices in the District, and that all spatial options would deliver one new job for every new home. It should be noted that the appraisal scoring takes into account likely mitigation proposed by the Folkestone & Hythe Growth Options Study Phase Two Report (2017) and the likely positive effects of delivering 'Garden Town Principles' at Otterpool<sup>136</sup>, namely:
- Mixed-tenure homes and housing types that are genuinely affordable.
  - A wide range of local jobs within easy commuting distance of homes.
  - Beautifully and imaginatively designed homes with gardens, combining the best of town and country to create healthy communities, and including opportunities to grow food.
  - Development that enhances the natural environment, providing a comprehensive green infrastructure network and net biodiversity gains, and that uses low-carbon and energy-positive technology to ensure climate resilience.
  - Strong cultural, recreational and shopping facilities in walkable, vibrant, sociable neighbourhoods.
  - Integrated and accessible transport systems, with walking, cycling and public transport designed to be the most attractive forms of local transport.
- 7.16 To ensure that all spatial options were appraised in a consistent manner, all the spatial options were appraised by one person using the same baseline information.

---

<sup>136</sup> Town and county Planning Association – Garden City Principles: <https://www.tcpa.org.uk/garden-city-principles>

**Table 7.1: SA scores of Otterpool Spatial Options A and B**

SA Objectives	Otterpool A	Otterpool B
SA1. Improve the provision of homes, including affordable housing, having regard to the needs of all sections of society, including the elderly.	++	++
SA2. Support the creation of high quality and diverse employment opportunities.	++	++
SA3. Conserve, and where relevant enhance, the quality, character and local distinctiveness of the landscape and townscape.	-	--
SA4. Conserve and enhance the fabric and setting of historic assets.	--	--
SA5. Conserve and enhance biodiversity, taking into account the effects of climate change.	+/-	+/-
SA6. Protect and enhance green infrastructure and ensure that it meets strategic needs.	++/--	++/--
SA7. Use land efficiently and safeguard soils, geology and economic mineral reserves.	--	--
SA8. Maintain and improve the quality of groundwater, surface waters and coastal waters and the hydromorphological (physical) quality of rivers and coastal waters.	--	--
SA9. Reduce the risk of flooding, taking into account the effects of climate change.	--	--
SA10. Increase energy efficiency in the built environment and the proportion of energy use from renewable sources.	++	++
SA11. Use water resources efficiently.	++	++
SA12. To reduce waste generation and disposal, and achieve the sustainable management of waste.	+	+
SA13. Reduce the need to travel, increase opportunities to choose sustainable transport modes and avoid development that will result in significant traffic congestion and poor air quality.	++	++/-
SA14. Promote community vibrancy and social cohesion; provide opportunities to access services, facilities and environmental assets for all ages and abilities and avoid creating inequalities of opportunity for access.	++	++/-
SA15. Reduce crime and the fear of crime.	+	+

### Socio-economic effects

- 7.17 Significant positive effects were identified for **SA objectives 1 (Housing), 2 (Employment), 13 (Sustainable Transport Infrastructure) and 14 (Services and Facilities)** because of the significant number of new homes and jobs Otterpool will deliver in close proximity to new and improved local services and facilities, including sustainable transport infrastructure and services.
- 7.18 The development of a new community will occur over time, with its own identity and character, although it should be noted that the existing residents of Lympne, Barrowhill, Newingreen and Westenhanger are likely to feel that their settlements will lose their character, which could affect social cohesiveness until the new development becomes established.
- 7.19 It should be noted however that Otterpool B also scored minor adverse effects against **SA objectives 13 (Sustainable Transport Infrastructure) and 14 (Services and Facilities)**. These minor adverse effects were recorded in acknowledgement of the proposed western extension to development up to Harringe Lane which is a relatively minor road with limited capacity for improvement. Consequently, greater development in close proximity to Harringe Lane and any associated access is likely to make it harder for new residents/workers to access Otterpool from/to the west.

### Environmental effects

- 7.20 Significant positive effects were recorded for **SA objectives 10 (Energy Efficiency) and 11 (Water Efficiency)** in acknowledgement of the scale of the development and the aspiration to develop it in line with Garden Town Principles.
- 7.21 The potential for significant adverse effects were identified for **SA objectives 6 (Green Infrastructure) and 7 (Efficient Use of Land)** as the majority of the land proposed for development is greenfield land and best and most versatile agricultural land. However, significant positive effects were also identified for **SA objective 6 (Green Infrastructure)** as both options are to be masterplanned in line with Garden Town Principles. This is likely to result in at least 40% of the total footprint of the development to be retained/enhanced as greenspace, including significant areas of strategic open space along around Otterpool Quarry, by Westenhanger Castle and in between Lympne and Lympne Industrial Estate. These areas of strategic green infrastructure would protect existing wildlife habitats and corridors and offer new residents the opportunity to access the countryside, including existing residents in the villages of Westenhanger and Lympne. However, these effects will largely depend on successful long-term stewardship being secured and a robust blue/green strategy for the garden settlement.
- 7.22 Potential significant adverse effects were identified for **SA objective 8 (Water Quality) and 9 (Flood Risk)** due to the current lack of capacity in the waste water treatment works servicing Sellindge and Westenhanger and the potential for downstream flooding of the River Stour as a result of greater surface water flood risk in the new town.
- 7.23 Both Otterpool development options propose a pattern of development with lower densities and maintained strategic open spaces at the potentially more landscape sensitive locations and higher levels of development in areas that are more visually contained. These measures were considered to mitigate significant adverse effects on the rural character of the area identified for Otterpool A. However, the greater area of development at the western edge of Otterpool B would result in the development of land which is highly visible from the east, compromising the openness of the countryside in the narrow valley to the east of Harringe Lane. The sensitivity of this location was considered to be greater than the rest of the open countryside identified for development within Otterpool A. Therefore, a significant negative effect was recorded against **SA objective 3 (Landscape)** for Otterpool B.
- 7.24 Significant negative effects were recorded for **SA objective 4 (Historic Environment)**. This is based largely upon the potential physical effects of development within the site as opposed to setting effects. There is greater overall physical impact to designated assets with Option B as it includes a protected military aircraft crash site that will be susceptible to physical change.
- 7.25 Finally, both options contain a significant amount of development directly adjacent to the busy transport corridor of the M20 and the high-speed railway line both of which generate a significant amount of noise. The volume and constant nature of the noise could generate adverse effects on

the health and well being of new residents, although, measures would likely be put in place to mitigate such effects.

## Overview of Otterpool Spatial Option SA Findings

7.26 Overall, Otterpool A performs marginally better than its alternative option Otterpool B.

**Table 7.2: SA scores for Sellindge Spatial Options A, B, C and D**

SA Objectives	Sellindge A	Sellindge B	Sellindge C	Sellindge D
SA1. Improve the provision of homes, including affordable housing, having regard to the needs of all sections of society, including the elderly.	++	++	++	++
SA2. Support the creation of high quality and diverse employment opportunities.	++/-	++/--	++/-?	++/--?
SA3. Conserve, and where relevant enhance, the quality, character and local distinctiveness of the landscape and townscape.	-	-	-	-
SA4. Conserve and enhance the fabric and setting of historic assets.	--	--	-	--
SA5. Conserve and enhance biodiversity, taking into account the effects of climate change.	-	-	--	--
SA6. Protect and enhance green infrastructure and ensure that it meets strategic needs.	--	--	--	--
SA7. Use land efficiently and safeguard soils, geology and economic mineral reserves.	--	--	--	--
SA8. Maintain and improve the quality of groundwater, surface waters and coastal waters and the hydromorphological (physical) quality of rivers and coastal waters.	--	--	--	--
SA9. Reduce the risk of flooding, taking into account the effects of climate change.	0	0	0	0
SA10. Increase energy efficiency in the built environment and the proportion of energy use from renewable sources.	+	+	+	+
SA11. Use water resources efficiently	+	+	+	+
SA12. To reduce waste generation and disposal, and achieve the sustainable management of waste.	+	+	+	+
SA13. Reduce the need to travel, increase opportunities to choose sustainable transport modes and avoid development that will result in significant traffic congestion and poor air quality.	-	--	-	--
SA14. Promote community vibrancy and social cohesion; provide opportunities to access services, facilities and environmental assets for all ages and abilities and avoid creating inequalities of opportunity for access.	-	--	-	--
SA15. Reduce crime and the fear of crime.	+	+	+	+

### Socio-economic effects

- 7.27 Sellindge options A, B, C and D involve development north of the M20 and railway line and would therefore be relatively divorced from the major development proposed to south of the M20 and railway line at Otterpool, with only limited access between the two rather than seamless integration. This would be likely to result in different characters and identities north and south of the major transport corridor. The size of the potential extensions to the linear village of Sellindge have the potential to significantly change the character of the existing settlement, which could affect social cohesiveness until the new development becomes established.
- 7.28 All four Sellindge options were considered likely to generate significant positive effects against **SA objective 1 (Housing)** given that these options allocate more land for housing development. Similarly, given the assumption that a job will be created for each home constructed, all four options scored significant positive effects against **SA objective 2 (Employment)**. The significant positive effects expected in relation to SA objective 2 for Options B and D were considered likely to be combined with significant negative effects. This is because the areas identified for higher density development through these options may be unsuitable for employment provision given constraints in terms of potential improvements to the transport infrastructure through Sellindge and along those routes which link to the motorway to the north east of Sellindge. Uncertainty was associated with the minor and significant adverse effects identified against Options C and D under **SA objective 2 (Employment)** on the basis that certain development locations in these options have the potential to generate less adverse effects on the transport network than others.
- 7.29 Minor negative effects were identified for all options in relation to **SA objective 14 (Access to Services and Facilities)** given that significant growth in and around the village is likely to exacerbate the current capacity issues identified in the surrounding transport infrastructure, leading to further congestion and greater inaccessibility. The increased scale of growth in options B and D, coupled with the fact that a significant proportion of the development proposed within these options is relatively isolated from the existing centre of the village, have the potential to exacerbate such adverse effects. While it is acknowledged that the greater growth in options B and D could support the provision of new services and facilities, such as additional primary school capacity, the positive effects of such additional services and facilities have not been reflected in the appraisal scores until there is sufficient certainty that they will be delivered as part of the overall package of development.
- 7.30 All options providing strategic scale development were considered likely to allow for improved sustainable transport provision. However, particular issues have been flagged by the Council in relation to congestion concerns at junctions which strategic scale development may impact upon. Significant negative effects were expected for Options B and D for **SA objective 13 (Sustainable Transport and Congestion)** given the particularly high number of new homes which would result. It is recognised that new services and facilities are likely to be provided to the south of the M20 and railway line where the majority of the strategic scale development is to be delivered in and around Otterpool. It is expected that all four Sellindge options would result in increased level of travel through Sellindge beyond the M20 and railway line crossings to the west and east which have been identified as potential constraints to future development.
- 7.31 Finally, all four Sellindge options sit directly adjacent to the busy transport corridor of the M20 and the highspeed railway line both of which generate a significant amount of noise. The volume and constant nature of the noise have the potential to generate adverse effects on the health and well being of new residents in all four locations, without mitigation.

### Environmental effects

- 7.32 All four options were expected to have a minor negative effect on **SA objective 3 (Landscape)**, as they would all result in development within Landscape Character Areas (LCA) (either LCA 09: Sellindge to the north of the M20 or LCA 11: Lympne to the south) which have medium landscape sensitivity. Folkestone & Hythe's supplementary high-level landscape sensitivity survey assesses the potential landscape effects associated with developing Sellindge options A, B and C in isolation and in combination in option D. The assessment concluded that development to the south and west would be largely unseen from the wider landscape, but that development would devalue the scenic and intimate quality of the landscape in the eastern area. Development to the east would

result in the loss of openness within the immediate vicinity and create incongruous development features which would affect wider landscape character. The in-combination effects of development to the east, south and south west of Sellindge (Option D) were not considered to result in significant adverse landscape effects. However, it is acknowledged that effects of Sellindge D will be at a greater scale than the effects recorded for Sellindge options A, B and C.

- 7.33 Sellindge options A, B and D scored a significant negative effect in relation to **SA objective 4 (Historic Environment)** due to the potential impact of the protected military aircraft crash site. Option C scored a minor negative effect as a result of the potential harm to the setting of Rhodes House (Grade II), and the potential harm to the historic landscape and historic hedgerows.
- 7.34 While it is noted that all options would be on greenfield land and would be located within the Impact Risk Zone set out for Gibbin's Brook SSSI the greatest potential for adverse effects on **SA objective 5 (biodiversity and geodiversity)** is expected for those options (C and D) which are located adjacent to this designation. A significant negative effect was recorded for these options given that close proximity of new development has the potential to further exacerbate identified potential recreational pressures at the SSSI.

## Overview of Sellindge Spatial Option SA Findings

- 7.35 Overall, Sellindge A is considered to score marginally better than the other Sellindge options. Sellindge D has the greatest potential for significant negative effects.

## 8 Appraisal of Proposed Submission Core Strategy Review

- 8.1 The Council’s high level growth options work assessed the six Character Areas across the District and identified Character Area 4 as being the most appropriate for strategic scale development. Following the SA of the four Sub-areas within Character Area 4, six spatial options were defined for further SA – two spatial options for a new garden settlement centred on Otterpool and four spatial options for expanding the growth of the village of Sellindge. Following the appraisal of the six spatial options, indicative spatial plans and detailed site allocation policies were drafted for inclusion in a Draft Core Strategy Review in March 2018.
- 8.2 Following consultation on the Draft Core Strategy Review from March to May 2018, a refined Proposed Submission Core Strategy Review has been prepared for consultation prior to submission to the Secretary of State for examination. Policy SS6 presents the indicative spatial plan for the new garden settlement in the North Downs. This spatial plan represents a variation on Otterpool Spatial Option A tested in **Chapter 7**. Policy CSD9 represents the indicative spatial plan for the expansion of the village of Sellindge. This spatial plan represents a variation on Sellindge Spatial Options A and C.
- 8.3 Many of the policies within the adopted Core Strategy (2013) remain materially unchanged in the Proposed Submission Core Strategy Review. As such these policies are expected to have the same effects as were reported in the final SA Report which accompanied the adopted Core Strategy in 2013. **Table 8.1** lists the policies in the Draft Core Strategy Review and Proposed Submission Core Strategy Review which have not materially changed since the adoption of the original Core Strategy, including short summaries of the minor changes made to each policy. The final SA Report which accompanied the adopted Core Strategy in 2013 is published on the Council’s website<sup>137</sup>.

**Table 8.1: Policies which do not need to be appraised as part of the SA for the Regulation 19 Core Strategy Review**

Policy Number and Title	Overview of Reg. 18 Changes (March 2018)	Overview of Reg. 19 Changes (December 2018)
<b>Spatial Strategy Policies</b>		
Policy DSD 'Delivering Sustainable Development'	Reference added to the District Council collaborating with partners on preparation of joint Statements of Common Ground.	Following a meeting with the Planning Inspectorate (PINS), Inspectors advised that the NPPF states that local plans should not repeat national guidance, and that Policy DSD repeated the “presumption in favour of sustainable development”. Consequently, Policy DSD has been removed.
Policy SS5 'District Infrastructure Planning'	Text revised to recognise the adoption of the District’s Community Infrastructure Levy	Minor wording changes. References to ‘Folkestone and Hythe’ and final sentence

<sup>137</sup> Sustainability Appraisal (SA) of the Folkestone and Hythe Core Strategy, URS Scot Wilson, October 2012. Available at: <https://www.Folkestone and Hythe.gov.uk/planning/planning-policy/local-plan/core-strategy-examination-archive>



Policy Number and Title	Overview of Reg. 18 Changes (March 2018)	Overview of Reg. 19 Changes (December 2018)
	(CIL) Charging Schedule and Infrastructure Delivery Plan.	removed.
Policy SS10 'Spatial Strategy for Folkestone Seafront'	No change to policy text (previously Policy SS6).	Reference to Code for Sustainable Homes removed.
Policy SS11 'Spatial Strategy for Shorncliffe Garrison, Folkestone'	No change to policy text (previously Policy SS7).	Reference to Code for Sustainable Homes removed.
<b>Core Strategy Delivery Policies</b>		
Policy CSD3 'Rural and Tourism Development of Shepway'	No change to policy text.	No change to policy text.
Policy CSD4 'Green Infrastructure of Natural Networks, Open Spaces and Recreation'	Reference added to Kent Downs Area of Outstanding Natural Beauty.	Changes to wording to reflect new approach in relation to biodiversity gain set out in the government's 25 Year Environment Plan and new NPPF.
Policy CSD6 'Central Folkestone Strategy'	Policy reference corrected in text.	Minor changes to reflect wording of the new NPPF (2018) and the findings of the Retail and Leisure Need Assessment (Lichfields, 2018), at the same time as protecting Folkestone's Creative Quarter.
Policy CSD7 'Hythe Strategy'	No change to policy text.	Minor wording changes.
Policy CSD8 'New Romney Strategy'	Reference added to the District's Strategic Flood Risk Assessment.	Minor wording changes. More detail added regarding the layout and design of proposals.

- 8.4 The SA Report which accompanied the adopted Core Strategy (2013) highlighted some uncertainty related to the effects of growth in and around New Romney (Policy CSD8) in combination with the potential expansion of Lydd Airport on road congestion. The SA Report noted that if the expansion of Lydd Airport was approved the subsequent generation of additional trips would need to be addressed. The expansion has now been approved and is expected to be delivered in 2019, extending the runways and a new terminal building to allow passenger flights using aircraft the size of Boeing 737 or Airbus 319. The expansion will increase the amount of traffic on the roads connecting the airport to local and regional population centres, including London.
- 8.5 In combination, the expansion of the airport and the growth and New Romney has the potential to generate adverse effects against **SA objective 13 (Transport and Congestion)**. However, this effect is considered to be relatively minor given the fact that the vast majority of road traffic to and from the airport will bypass the village on the A259/B2075 to the west of New Romney. Both the A259/B2075 connect the airport to Ashford, including Ashford International Railway Station, the M20 and London beyond. Furthermore, Policy SS1 now states that should development proposals come forward for the further expansion of London Ashford Airport at Lydd, the Council will work with the airport, local community and other stakeholders to prepare and adopt an Area

Action Plan for the site. If this were to occur, this Area Action Plan would be subject to Strategic Environmental Assessment (SEA).

- 8.6 Four of the policies in the Core Strategy Review are new policies included to allocate, shape, manage and deliver a new garden settlement at Otterpool (see policies SS6, SS7, SS8 and SS9). In addition, Policy CSD9 has been rewritten to accommodate additional growth in the village of Sellindge.
- 8.7 The remaining seven policies in the Core Strategy Review were included in the adopted Core Strategy (2013) but include changes and additions that are considered to be significant enough to have the potential to generate new effects not previously reported. **Table 8.2** summarises the effects recorded for the seven revised Core Strategy policies SS1-SS4, CSD1, 2 and 5. **Table 8.3** summarises the effects of the new Core Strategy Review Policies SS6, SS7, SS8 and SS9 which set out the preferred distribution, scale, management and delivery of development within the proposed new garden settlement in the North Downs Area. **Table 8.3** also compares the likely effects of these policies requirements if applied to the alternative spatial options to the garden settlement in the North Downs Area tested in Chapter 7. **Table 8.4** summarises the combined effects of the new Core Strategy Review Policy CSD9 which set out the preferred distribution, scale, management and delivery of the revised growth strategy for the village of Sellindge.
- 8.8 While the remainder of this chapter focuses on the appraisal of these twelve policies, consideration is also given to the in-combination effects of the new and materially changed policies in the Core Strategy Review combined with the largely unchanged policies taken forward from the adopted Core Strategy (see **Table 8.1**) and the forthcoming Places and Policies Local Plan (PPLP).

## Consideration of Reasonable Alternatives

- 8.9 The definition of the preferred Spatial Strategy as presented in revised Policy SS1 has been informed by the District's Growth Options Study and the SA of the Growth Options and subsequent spatial options as described in **Chapters 6 and 7** above.
- 8.10 The District's new growth requirements set out in updated Policy SS2 have been defined through the calculation of an updated objectively assessed housing need using the Government's national methodology for calculating housing need and an Employment Land Review. Consequently, there are considered to be no reasonable alternatives to the defined housing and employment needs of the District.
- 8.11 The revisions to Policies SS3 and SS4 reflect the decision to allocate land for the development of a new garden settlement in the North Downs Area and at Sellindge, reasonable alternatives for which were considered through the SA of Growth Options and Spatial Options in Chapters 6 and 7 above.
- 8.12 The revisions to policies CSD1, CSD2 and CSD5 largely reflect changes in national planning policy and guidance and the findings of the District's objectively assessed housing need:
- **Policy CSD1: Balanced Neighbourhoods** has been amended to reflect the requirements of the District's housing need with regard to the split of affordable housing between shared equity and affordable rent/social rent tenures. The thresholds above which affordable housing should be provided have been amended to reflect Government policy<sup>138</sup> and updated Planning Practice Guidance<sup>139</sup>.
  - **Policy CSD2: District Residential Needs** has been amended to reflect targets for the provision of different tenures of new homes throughout the plan period and different sizes of homes by tenure. These changes reflect the findings of the District's updated housing need.
  - **Policy CSD5: Water and Coastal Environment Management** has been amended to clarify standards for water efficiency with regard to domestic dwellings and to introduce standards for non-residential developments. This is following the withdrawal of the Code for

---

<sup>138</sup> Written Ministerial Statement by The Minister of State, Department for Communities and Local Government, 28 November 2014

<sup>139</sup> Planning Practice Guidance, Paragraph 031, Reference ID: 23b-031-20161116

Sustainable Homes in 2015 and subsequent changes to Building Regulations and reflects the fact that the District falls within a designated Water Scarcity Status Area.

- 8.13 Given that these changes reflect legislation, national policy or updated local evidence there are considered to be no reasonable alternatives.

**Table 8.2: Summary of effects following the reappraisal of the revised Core Strategy Policies SS1-SS4, CSD1, 2 and 5**

SA Objectives	Policy SS1	Policy SS2	Policy SS3	Policy SS4	Policy CSD1	Policy CSD2	Policy CSD5
SA1. Improve the provision of homes, including affordable housing, having regard to the needs of all sections of society, including the elderly.	++	++	++	++	++	++	0
SA2. Support the creation of high quality and diverse employment opportunities.	++	++	++	++	0	0	0
SA3. Conserve, and where relevant enhance, the quality, character and local distinctiveness of the landscape and townscape.	+/-	+/-	+/-	+/-	+	+	0
SA4. Conserve and enhance the fabric and setting of historic assets.	+/-	+/-	+/-	+/-	0	+	0
SA5. Conserve and enhance biodiversity, taking into account the effects of climate change.	+/-	+/-	+/-	+/-	0	0	+
SA6. Protect and enhance green infrastructure and ensure that it meets strategic needs.	+/-	+/-	+/-	+/-	0	+	0
SA7. Use land efficiently and safeguard soils, geology and economic mineral reserves.	--	--	--	--	+	0	0
SA8. Maintain and improve the quality of groundwater, surface waters and coastal waters and the hydromorphological (physical) quality of rivers and coastal waters.	+	+	+	+	0	0	++
SA9. Reduce the risk of flooding, taking into account the effects of climate change.	+	+	+	+	+	0	++
SA10. Increase energy efficiency in the built environment and the proportion of energy use from renewable sources.	++	++	++	++	0	0	0
SA11. Use water resources efficiently	++	++	++	++	0	0	++

SA Objectives	Policy SS1	Policy SS2	Policy SS3	Policy SS4	Policy CSD1	Policy CSD2	Policy CSD5
SA12. To reduce waste generation and disposal, and achieve the sustainable management of waste.	0	0	0	0	0	0	0
SA13. Reduce the need to travel, increase opportunities to choose sustainable transport modes and avoid development that will result in significant traffic congestion and poor air quality.	++	++	++	++	+	0	0
SA14. Promote community vibrancy and social cohesion; provide opportunities to access services, facilities and environmental assets for all ages and abilities and avoid creating inequalities of opportunity for access.	++	++	++	++	++	++	+
SA15. Reduce crime and the fear of crime.	0	0	0	0	0	0	0

## Policy SS1 – District Spatial Strategy Revisions

- 8.14 Policy SS1 sets out the Spatial Strategy for growth in Folkestone & Hythe over the plan period. The definition of the preferred Spatial Strategy has been informed by the District's Growth Options Study and the SA of the Growth Options and subsequent spatial options as described in Chapters 6 and 7 above.
- 8.15 Policy SS1 in the Proposed Submission Core Strategy Review states that housing will be delivered through a new sustainable, landscape-led settlement, with supporting town centre and community uses, based on Garden Town Principles in the North Downs Area. Elsewhere in the District, priority will continue to be given to previously developed land in the Urban Area in Folkestone, with remaining development needs being focused on the most sustainable towns and villages. Development is only to be permitted within the countryside and at coastal locations as an exception. The policy also sets out strategic priorities for the three Character Areas of Folkestone & Hythe thereby providing guidance in relation to how acceptable types of development should be delivered in the Urban Area (Folkestone and Hythe), Romney Marsh Area and North Downs Area.

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

- 8.16 The SA of Policy SS1 in the adopted Core Strategy (2013) identified mostly positive effects. The positive effects related mainly to the policy limiting development at sensitive locations. Positive effects were identified in relation to biodiversity, the countryside and historic environment, water quality, energy efficiency, the efficient use of previously developed land, employment, housing, the creation and maintenance of sustainable communities, reductions in inequality, social exclusion and deprivation, health and wellbeing and sustainable transport. As the Spatial Strategy identifies a broad location for development within the low lying Romney Marsh a negative effect was identified in relation to flood risk. An uncertain effect was initially identified in relation to economic growth for this policy as it was noted that it may be uncertain whether the town centre first approach would help to enhance the perception of Folkestone Town Centre as a location to invest and do business.

### Changes to the adopted policy in the Draft Core Strategy Review (March 2018)

- 8.17 The main change to the adopted Policy SS1 following the preparation of the Draft Core Strategy Review (March 2018) was to update the policy to focus additional growth over the plan period at a new garden settlement within the North Downs Area and at Sellindge. Consequently, the original policy's commitment to focus major new development on previously developed land in the Urban Area has been removed. In addition, growth in Folkestone is to be focussed on the provision of commercial floor space and housing with a view to increasing densities at town centre locations and the maximisation of employment opportunities at key sites.

### Changes to the Draft Core Strategy Review policy in the Proposed Submission Core Strategy Review (December 2018)

- 8.18 Changes made to Policy SS1 following the publication of the Draft Core Strategy Review in the Proposed Submission Core Strategy Review (December 2018) include some minor changes to the wording to reflect the new wording of the NPPF (2018), emphasis on collaborative working and the preparation of an Area Action Plan for London Ashford Airport should further expansion occur, and reference added to the Kent Downs AONB in relation to development within the North Downs Area.

### Summary of the effects identified through the SA of the Proposed Submission Core Strategy Review (December 2018)

- 8.19 Considering these changes in the context of the wider spatial strategy, it is expected that the amended Policy SS1 set out in the Proposed Submission Core Strategy Review would have broadly similar effects to those identified during the appraisal of the adopted Core Strategy Policy SS1. However, the development of a large new settlement in the open countryside and significant extensions to the village of Sellindge will generate more significant effects than those identified previously. Significant positive effects are recorded against **SA objectives 1**

**(Housing)** and **2 (Employment)** for the significant increase in the provision of housing and employment over the plan period. Similarly, the Garden Settlement Principles of the new settlement will likely generate significant positive effects on **SA objectives 10 (Climate Change Mitigation), 11 (Water Efficiency), 13 (Transport and Congestion) and 14 (Access to Services and Facilities)**.

- 8.20 The development of a large area of greenfield land will have a significant negative effect on **SA objective 7 (Efficient Use of Land)**. Through maintaining broadly the same approach to the delivery of development at the sustainable settlements of Folkestone & Hythe and supporting the principle of development on previously developed land, as well as allowing for the new sustainable garden settlement south of the M20 near Westenhanger, this policy is expected to guide development to areas which have less sensitivity in terms of **landscape (SA objective 3), historic environment (SA objective 4), biodiversity (SA objective 5), water quality (SA objective 8) and flood risk (SA objective 9)**. While the development of a significant area of greenfield land increases the risk of adverse effects against these same objectives, development in the new garden settlement and at Sellindge is to be delivered to the highest standard in terms of design, landscape and townscape, with consideration for the surrounding countryside and heritage. Mixed minor positive and minor negative effects are therefore expected for these SA objectives. Furthermore allowing for development at further locations in the open countryside only as an exception should help to limit unplanned adverse effects.

## Policy SS2 – Housing and the Economy Growth Strategy Revisions

- 8.21 Policy SS2 sets out the District's updated housing quantum to be delivered over the plan period as well as the required level of employment development. The District's new housing growth requirements were defined in the Draft Core Strategy Review (March 2018) using the updated objectively assessed Strategic Market Housing Assessment (SHMA) and Employment Land Review. These figures were subsequently revised in the Proposed Submission Core Strategy Review (December 2018) based on the new national methodology for calculating housing need set out in the NPPF (2018), the findings of the Retail and Leisure Needs Assessment (Lichfields, 2018) and the Employment Land Needs Assessment (Lichfields, 2018). Consequently, given the evidence base underpinning the revisions to Policy SS2, there are considered to be no reasonable alternatives to the defined housing and employment needs of the District.

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

- 8.22 The SA of the adopted Shepway Core Strategy (2013) reported that Policy SS2 would generate positive effects on biodiversity, the countryside and the historic environment, energy efficiency, the efficient use of previously developed land, economic growth, employment, housing, the creation and maintenance of sustainable communities, reductions in inequality, social exclusion and deprivation and health and well-being. Uncertain effects were recorded in relation to education and sustainable transport.

### Changes to the adopted policy in the Draft Core Strategy Review (March 2018)

- 8.23 The main change to the adopted Policy SS2 following the preparation of the Draft Core Strategy Review (March 2018) was to update the policy to include the additional growth required over the plan period based on the Strategic Market Housing Assessment (SHMA) and Employment Land Review. The Draft Core Strategy Review (March 2018) planned to deliver a total requirement of 12,030 new homes over the plan period up to 2036/37. To allow for transition to the new housing requirement, 490 new homes a year on average were to be provided from 2018/19 to 2022/23, increasing to 633 homes per year following this. The vast majority of the new growth is to be delivered in a new garden settlement, including innovative forms of employment growth that maximise the benefits of the settlement's connections at Junction 11 of the M20 and Westenhanger station. Consequently, the original policy's brownfield target to deliver at least 65% of the District's housing need on previously developed land has been removed.

### Changes to the Draft Core Strategy Review policy in the Proposed Submission Core Strategy Review (December 2018)

- 8.24 The main change to Policy SS2 following publication of the Draft Core Strategy Review (March 2018) in the Proposed Submission Core Strategy Review (December 2018) has been to update the policy to plan for the number of homes calculated using the new national methodology for calculating housing need set out in the NPPF (2018). The policy now seeks to provide 12,845 new homes compared to 12,030 new homes in the Draft Core Strategy Review (815 more homes) over the plan period up to 2036/37. This equates to 676 new homes a year on average. Findings of the Retail and Leisure Needs Assessment (Lichfields, 2018) and the Employment Land Needs Assessment (Lichfields, 2018) have also resulted in updates to the policy, which now makes reference to the provision of 8.1ha (36,750sqm floorspace) of B class use development at the new garden settlement and 31,200sqm A1 use class development. The majority of the additional growth is to be delivered in the new garden settlement and through expansion at Sellindge. Therefore, there has been no change to the spatial strategy for delivering the level of growth required over the plan period.

### Summary of the effects identified through the SA of the Proposed Submission Core Strategy Review (December 2018)

- 8.25 Considering these changes, it is expected that the amended Policy SS2 set out in the Proposed Submission Core Strategy Review would have broadly similar effects to those identified during the appraisal of the adopted Core Strategy Policy SS2. However, the previous uncertainty recorded in relation to education and sustainable transport are likely to be replaced by significant positive effects against **SA objectives 13 (Sustainable Transport and Congestion)** and **14 (Access to Services and Facilities)**.
- 8.26 Although the significant increase in growth will put pressure on existing services, facilities and infrastructure, the growth is planned in a way which aims to meet the needs of the District's growing population, encourage active and sustainable travel and minimise congestion of the District's existing road and rail network. In addition, the significant increase in growth within the plan period and the location of this growth in a large new settlement in the open countryside and significant extensions to the village of Sellindge will generate more significant effects than those identified previously for the adopted Core Strategy (2013). The effects recorded for the updated Policy SS1 above are all considered to be relevant to Policy SS2.

## Policy SS3 – Place-Shaping and Sustainable Settlements Strategy Revisions

- 8.27 Policy SS3 seeks to direct development within the plan period to the existing settlements of Folkestone and Hythe. In addition, it references the provision of a new sustainable garden settlement to the south of the M20. Consideration is to be made for areas of flood risk, appropriate use of town centre locations and local place-shaping including preserving heritage features, encouraging sustainable construction measures and addressing the economic and social needs of the community.

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

- 8.28 The SA of the adopted Shepway Core Strategy (2013) reported that Policy SS3 would generate positive effects on the countryside and the historic environment, water quality, reducing flood risk, the efficient use of previously developed land, economic growth, the creation and maintenance of sustainable communities, reductions in inequality, social exclusion and deprivation, health and well-being and sustainable transport.

### Changes to the adopted policy in the Draft Core Strategy Review (March 2018)

- 8.29 The Draft Core Strategy Review (March 2018) updated Policy SS3 to include reference to the delivery of development at the new sustainable garden settlement south of the M20 near Westenhanger in addition to the delivery of development at the existing sustainable settlements within the District. The supporting text of the policy now identifies that the Places and Policies



Local Plan sets out detailed design policy to help ensure that good design can be achieved. This text also sets out that the new garden settlement is to be delivered to the highest standard. This is to be achieved in terms of design, landscape and townscape, providing local distinctiveness and character with consideration also made for the surrounding countryside, vernacular and historic environment.

#### **Changes to the Draft Core Strategy Review policy in the Proposed Submission Core Strategy Review (December 2018)**

- 8.30 Following publication of the Draft Core Strategy Review (March 2018), minor changes were made to the wording of this policy in the Proposed Submission Core Strategy Review (December 2018) to reflect the new NPPF (2018).

#### **Summary of the effects identified through the SA of the Proposed Submission Core Strategy Review (December 2018)**

- 8.31 It is expected that the amended Policy SS3 set out in the Proposed Submission Core Strategy Review would have broadly similar effects to those identified during the appraisal of the adopted Core Strategy Policy SS3. However, the significant increase in growth within the plan period and the location of this growth in a large new garden settlement in the open countryside and significant extensions to the village of Sellindge will generate more significant effects than those identified previously for the adopted Core Strategy (2013). The effects recorded for the updated Policy SS1 above are all considered to be relevant to Policy SS3.

### **Policy SS4 – Priority Centres of Activity Strategy Revisions**

- 8.32 Policy SS4 sets out the Priority Centres of Activity in Folkestone & Hythe, i.e. where development is to be encouraged, including major commercial development, setting out a hierarchy of settlements throughout the District, from Major Employment Sites down to Local Centres.

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

- 8.33 The SA of the adopted Core Strategy (2013) recorded positive effects for Policy SS4 in relation to reducing flood risk, the efficient use of previously developed land, economic growth, the creation and maintenance of sustainable communities and reductions in inequality, social exclusion and deprivation, education and sustainable transport.

#### **Changes to the adopted policy in the Draft Core Strategy Review (March 2018)**

- 8.34 The Draft Core Strategy Review updated Policy SS4 to include reference to the delivery of development at the new sustainable garden settlement in the Priority Centres of Activity Network set out in Table 4.4 (now renumbered Table 4.5 in the Core Strategy Review). Employment Sites at Lympne and at Hawkinge were identified in the 2013 Core Strategy as being Major Employment Sites within the North Downs Area, and new provision was made for a Major Employment Site within the new garden settlement within this hierarchy. All text included in the adopted Core Strategy (2013) Policy SS4 was retained. As per the original policy, a town centre first approach is adopted in line with national policy. Employment-generating uses which are beyond the scope of recognised town centre activities are to be directed to the designated Major Employment Sites. The Priority Centres of Activity Network is set out in the supporting text of the policy.

#### **Changes to the Draft Core Strategy Review policy in the Proposed Submission Core Strategy Review (December 2018)**

- 8.35 Following publication of the Draft Core Strategy Review (March 2018), minor changes were made to the wording of this policy in the Proposed Submission Core Strategy Review (December 2018) to reflect the wording of the new NPPF (2018). Provision was also made to recognise smaller centres within the new garden settlement in the Priority Centres of Activity Network as Local Centres within the hierarchy in Table 4.4 (now renumbered Table 4.5).

### Summary of the effects identified through the SA of the Proposed Submission Core Strategy Review (December 2018)

- 8.36 The development of the new garden settlement is required to be delivered in a manner that serves the need of new residents and to help retain local spend lost to other centres and should at the same time be of a scale that would not compete with the larger retail centres of Folkestone, Canterbury, Ashford and Dover and, more locally, Hythe. The positive effect on **SA objective 2 (employment)** for this policy is therefore expected to be significant, not least due to the potential for new job creation at the new garden settlement.
- 8.37 It is expected that the amended Policy SS4 set out in the Proposed Submission Core Strategy Review would have broadly similar effects to those identified during the appraisal of the adopted Core Strategy Policy SS4. However, the significant increase in growth within the plan period and the location of this growth in a large new settlement in the open countryside and significant extensions to the village of Sellindge will generate more significant effects than those identified previously for the adopted Core Strategy (2013). The effects recorded for the updated Policy SS1 above are all considered to be relevant to Policy SS4.

### Policy CSD1 Balanced Neighbourhoods for Folkestone & Hythe

- 8.38 Policy CSD1 sets out the Council's approach to the provision of balanced and popular neighbourhoods through high-quality design and the delivery of affordable housing needs. Subject to viability, all housing development should incorporate affordable units in accordance with the criteria of the policy.

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

- 8.39 The SA of the adopted Shepway Core Strategy (2013) reported that positive effects for Policy CSD1 would be generated in relation to reducing flood risk, the efficient use of previously developed land, housing, the creation and maintenance of sustainable communities and reductions in inequality, social exclusion and deprivation and health and well-being.

### Changes to the adopted policy in the Draft Core Strategy Review (March 2018)

- 8.40 The Draft Core Strategy Review (March 2018) updated Policy CSD1 to provide an approach to affordable housing which was in line with both changes to government legislation and the objectively assessed need set out in the District's Strategic Housing Market Assessment Part 2. The requirement for affordable housing has been reviewed from a minimum of 30% to a minimum of 22% for developments of 15+ dwellings or equal to and greater than 0.5ha.
- 8.41 There has also been adjustment to the policy in relation to the number of affordable homes which are required to be delivered on small sites which results in the policy being less onerous in its requirements. These changes reflect the written ministerial statement issued in November 2014 which prevented local planning authorities from seeking affordable housing on developments of 10 dwellings or fewer (or five or fewer dwellings in designated areas, such as Areas of Outstanding Natural Beauty). Development proposals for between 6 and 10 dwellings in the Kent Downs AONB must provide financial contributions towards the provision of affordable housing and proposals for between 11 and 14 dwellings anywhere in the District must provide at least two affordable dwellings. Proposals for 15+ dwellings must provide 70% of their affordable homes as affordable rent/social rent homes, with the remaining 30% being shared equity.

### Changes to the Draft Core Strategy Review policy in the Proposed Submission Core Strategy Review (December 2018)

- 8.42 Following publication of the Draft Core Strategy Review (March 2018), minor changes were made to the policy in the Proposed Submission Core Strategy Review (December 2018) for consistency purposes, to reflect the revised definition of affordable housing set out in the new NPPF (2018).
- 8.43 The Strategic Housing Market Assessment (SHMA) Part 2 – Objectively Assessed Need for Housing indicated that 139 new affordable homes are required a year in Folkestone & Hythe. Over the Core Strategy Review plan period (2018/19 to 2036/37) 139 affordable dwellings a year equates

to approximately 2,640 affordable dwellings in total. 139 affordable homes a year represents approximately 22 per cent of the overall housing delivery requirement of 676 new homes a year (discounting smaller sites which would not contribute to the total).

- 8.44 Following the order of the Court of Appeal 13 May 2016, updated Planning Practice Guidance and National Planning Policy Framework, development proposing (or capable of accommodating) 6 to 10 dwellings (net gain) within the Kent Downs Area of Outstanding Natural Beauty is required to provide financial contributions towards the provision of affordable housing.

#### **Summary of the effects identified through the SA of the Proposed Submission Core Strategy Review (December 2018)**

- 8.45 The effects of the revised policy following the Core Strategy Review are expected to be the same as those identified in the SA of the adopted Core Strategy Policy CSD1 in 2013. While the policy presents a less stringent approach to affordable housing requirements the provision required is in line with the established need for Folkestone & Hythe and is furthermore in line with national guidance, as introduced by the written ministerial statement of 2014. As such significant positive effects are still likely to result in terms of **SA objective 1 (Housing)** and **SA objective 14 (Community Vibrancy and Social Cohesion)**.

### **Policy CSD2 – District Residential Needs Revisions**

- 8.46 Policy CSD2 sets out the District’s residential needs, specifically the size and tenures of dwellings. It requires that new residential development is designed and located in line with the Spatial Strategy and meets the requirements of vulnerable or excluded groups.

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

- 8.47 The SA of the adopted Shepway Core Strategy (2013) Policy CSD2 identified a number of likely positive effects in relation to housing, the countryside and historic environment, the creation and maintenance of sustainable communities, reductions in inequality, social exclusion and deprivation and health and wellbeing.

#### **Changes to the adopted policy in the Draft Core Strategy Review (March 2018)**

- 8.48 Policy CSD2 was updated in the Draft Core Strategy Review (March 2018) to include targets for the percentage of residential development that should be delivered as owner occupied, private rented, shared ownership and socially rented homes over the plan period. The Council’s previous requirement for 50% of all new homes to be three bedrooms or larger has been removed and replaced by more detailed percentage figures for the number of one, two, three and four+ bedroom homes that must be provided for each tenure type.
- 8.49 In addition, the policy now requires the provision of specialist units for older people at strategic allocations in the new garden settlement in the North Downs Area as well as through the expansion of Sellindge.
- 8.50 The supporting text of the policy was revised to highlight that a new Gypsy and Traveller Accommodation Assessment is being produced following a change in national policy guidance and that the findings of the assessment will be reflected in the next iteration of the Core Strategy Review. Reference was also added in the supporting text to the role of neighbourhood plans in terms of allowing great flexibility in terms of acceptable rural uses.

#### **Changes to the Draft Core Strategy Review policy in the Proposed Submission Core Strategy Review (December 2018)**

- 8.51 Policy CSD2 has been updated since the publication of the Draft Core Strategy Review (March 2018). The Proposed Submission Core Strategy Review (December 2018) now includes housing numbers targets for the percentage of residential development that should be delivered as owner occupied, private rented and affordable tenures over the plan period. The percentage target for shared ownership has been removed and reference introduced to the Council’s Strategic Housing Market Assessment, as a starting point.

- 8.52 The policy includes updated percentage figures for the number of one bed, two to three bed and four+ bedroom homes that must be provided for each tenure type. The more detailed tenure categories referenced in the Draft Core Strategy Review (Shared Ownership and Social Rent/Affordable Rent) have been merged into two broad categories of 'Owner-occupied/private rent' and 'Affordable Tenures', for ease of application to different sizes of site.

#### **Summary of the effects identified through the SA of the Proposed Submission Core Strategy Review (December 2018)**

- 8.53 The effects of the revised policy following the Core Strategy Review are expected to be the same as those identified in the SA of the adopted Core Strategy Policy CSD2 in 2013. It is expected that the policy revisions will more positively address the residential tenure and size needs of the District and contribute to the development of vibrant, socially cohesive communities. Consequently significant positive effects are recorded against **SA objectives 1 (Housing)** and **SA Objective 14 (Community Vibrancy and social Cohesion)**.

### **Policy CSD5 – Water and Coastal Environmental Management Revisions**

- 8.54 Policy CSD5 seeks to protect and enhance the District's surface, ground and coastal waters from contamination and over abstraction through sustainable water resource management. The policy responds to climate change, the District's significant areas of flood risk and its location within a designated Water Scarcity Status Area. The value and maintenance of the District's coastal environment, specifically coastal ecological habitats, are emphasised.

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

- 8.55 Positive effects were identified for Policy CSD5 in the SA of the adopted Shepway Core Strategy (2013) in relation to biodiversity, water quality, flood risk reduction, sustainable communities and health and wellbeing.

#### **Changes to the adopted policy in the Draft Core Strategy Review (March 2018)**

- 8.56 The Draft Core Strategy Review updated Policy CSD5 to include a requirement for new dwellings to integrate water management features so as to maximise water efficiency and re-use and as a minimum meet the requirements of higher water efficiency standard under Regulation 36(3) of the Building Regulations which would result in a maximum use of 110 litres per person per day. An additional requirement for non-residential development to achieve BREEAM 'outstanding' standard in relation to water efficiency is required.

#### **Changes to the Draft Core Strategy Review policy in the Proposed Submission Core Strategy Review (December 2018)**

- 8.57 Following publication of the Draft Core Strategy Review (March 2018), additions have been added in the Proposed Submission Core Strategy Review (December 2018), specifically to the supporting text to policy CSD5 to clarify the target of the Water Framework Directive to aim for a 'good' status, including 'good' ecological potential and 'good' surface water chemical status for heavily modified water bodies and artificial water bodies, and to clarify that development on brownfield land includes an appropriate strategy for addressing past contamination.

#### **Summary of the effects identified through the SA of the Proposed Submission Core Strategy Review (December 2018)**

- 8.58 The effects of the revised policy following the Core Strategy Review are expected to be the same as those identified in the SA of the adopted Core Strategy Policy CSD5 in 2013. It is expected that the policy revisions will more positively address the District's acute flood risk and water scarcity more effectively with significant positive effects against **SA objective 8 (Water Quality)**.

## New Garden Settlement Policies SS6, SS7, SS8 and SS9

### Summary of SA of the reasonable alternatives

- 8.59 Following on from the SA of the options identified through the District's High Level Growth Options Study, the District Council identified two spatial options for the development of a new garden settlement to the south of the M20 at Otterpool, including significant growth around the existing settlements of Westenhanger and Lymgne. These two spatial options are appraised in **Chapter 7** above.
- 8.60 The findings of the SA of the two spatial options centred on Otterpool included significant positive effects in relation to housing (SA objective 1), employment (SA objective 2), green infrastructure (SA objective 6), energy efficiency (SA objective 10), water efficiency (SA objective 11), sustainable transport (SA objective 13) and access to services and facilities (SA objective 14). These significant positive effects were in recognition of the Garden Settlement Principles upon which the development is being planned. Significant negative effects were recorded for both options in relation to historic environment (SA Objective 4), green infrastructure (SA Objective 6), efficient use of land (SA objective 7), water quality (SA objective 8) and flood risk (SA objective 9) due to the significant area of greenfield land proposed for development.
- 8.61 Additional minor negative effects were identified for Option B in relation to employment (SA objective 2), sustainable transport (SA objective 13) and access to services and facilities (SA objective 14). These adverse effects reflect the extension of development in Option B towards Harringe Lane, a narrow rural road with little scope for improvement. Option B also scored an additional significant negative effect in relation to landscape (SA objective 3) due to the extension of development on to elevated land to the east of Harringe Lane, which would compromise the openness of the countryside in a narrow valley to the east of this position.
- 8.62 These SA findings were used alongside the Council's evidence base to inform the definition of the indicative spatial plan for the new garden settlement defined in the Core Strategy Review Policy SS6 and detailed policy requirements within Policy SS6, SS7, SS8 and SS9.
- 8.63 **Figure 8.1** illustrates the indicative spatial plan for the new garden settlement in the North Downs as included in the Core Strategy Review.

### Changes to the Draft Core Strategy Review policy in the Proposed Submission Core Strategy Review (December 2018)

- 8.64 Following the publication of the Draft Core Strategy Review in March 2018, Policies SS6, SS7, SS8 and SS9 were revised. Changes made to the policies in the Proposed Submission Core Strategy Review include:
- The minimum number of homes to be provided within the new garden settlement has been revised in Policy SS6 from 5,500 in the draft Core Strategy Review to 6,375. Additional text has been added to Policy SS6 requiring that a proportion of proposed dwellings shall be provided as self-build or custom-build plots, having regard to the need identified by the Council. This is reflected in the supporting text to the policies, which has been added to stating that the Council will actively review the requirement for self-build plots through the interest recorded on its self-build register to inform the proportion of plots to be released at each phase of the development of the new garden settlement. The Council has an aspiration for 10 per cent self-build over the course of the plan period. In addition, Policy SS6 now states that if such plots do not sell within 12 months they can be built out by developers instead.
  - In response to consultation comments on the Draft Core Strategy Review, additional text has been added to Policy SS6 requiring that the new garden settlement's distinctive townscape and outstanding accessible landscape must be informed by the historic character of the area, respond to its setting within the Kent Downs AONB landscape and the adjacent Lymgne Escarpment and mitigate impact in views from the scarp of the Kent Downs. Additional text has also been added to Policy SS7 requiring the new garden settlement's heritage strategy to include a comprehensive archaeology strategy and measures to conserve all heritage assets within and outside the allocation boundary, for example the existing buildings and barns at Westenhanger Castle. This is reflected in the supporting text to the policies, which has been

added to stating that the new garden settlement will demonstrate a landscape-led approach to development that respects the historic environment, including Westenhanger Castle, and its setting and other non-designated heritage assets, as well as the previously mentioned topography and views, and has particular regard to the impact on views from the AONB. The need to respect views from the Kent Downs AONB has also been added to Policies SS7 and SS8.

- Section 4c of Policy SS6 relating to the provision of education facilities within the new garden settlement has been rewritten to state that all school facilities within the town – primary, secondary, special and nursery – will be fully funded by the development, including the provision of land at nil cost and the safeguarding of additional land to allow for future expansion in accordance with forecast needs. This is reflected in the supporting text to the policies, which has been added to stating that the Council will require community infrastructure to be provided at the appropriate phase of development, defining community infrastructure as sport venues, open space (including accessible space for the elderly), cultural buildings, libraries, places of worship and public houses. The text included in the draft version of the policy in the Draft Core Strategy Review requiring *'four 2 forms of entry (2FE) primary schools and at least one secondary school...together with additional off-site investment in local secondary schools'* has been removed.
- Additional text has been added to Policy SS7 requiring that advanced woodland planting and habitat creation should be designed to relate to local landscape character as well as prevent the coalescence of the new settlement with Lymyne as well as neighbourhoods within the settlement itself. Furthermore, the policy requires clear net gains in biodiversity over and above residual losses through the enhancement and connection of ecological assets within and outside the allocation boundary, such as Harringe Brooks ancient woodland. Finally, Policy SS7 now also requires the preparation of a long term Green Infrastructure management plan which ensures community involvement and custodianship. These additions are reflected in the supporting text to the policies, which has been added to stating that the structural landscaping work associated with the new settlement will include habitat creation and that long term green infrastructure management plans are prepared to empower the local community, avoid fragmentation and degradation and ensure infrastructure associated with mitigation remains intact and functioning.
- Additional text has been added to Policy SS7 requiring that the new settlement's Access Strategy should seek to protect and enhance existing PRoW, and create new Public Rights of Way (PRoW), whilst balancing demands for public access with ecological and landscape protection, which the policy now acknowledges may necessitate the need for mitigation to be secured to alleviate recreation pressure on the Folkestone to Etchinghill Escarpment Special Area of Conservation.
- Additional text has been added to Policy SS8 to require that noise and air pollution mitigation measures, such as distance buffers and appropriate landscaping, are put in place.
- Additional text has been added to Policy SS9 requiring the long term management and maintenance of pedestrian and cycle pathways, public art and street furniture as well as the urban realm and open spaces.
- The supporting text to the policies has been added to include greater detail with regards to the type of minerals which are safeguarded within parts of the land allocated for the new garden settlement. Furthermore, reference is made to the need for the garden settlement allocation to include an 'Infrastructure Assessment' to assess whether or not the development would be compatible with waste facilities in the area, particularly in regards to noise, dust, light and air that may legitimately arise from the waste activities in close proximity to the new settlement. The assessment must also demonstrate that the future use of the safeguarded waste management facility would not be constrained by any incompatibility of the proposed development.
- Policy SS7 has been amended to include:
  - the term 'conserve';
  - that the heritage strategy be informed by a Conservation Management Plan for Westenhanger Castle, Manor and Barns; and

- that a Historic Environment Clerk of Works be appointed (to oversee the proper implementation of the heritage strategy, provide a single point of contact for the developers and to provide a consistent link between the developers/ contractors and regulators).
- Paragraph 2 in Policy SS6 has been amended to include reference to the Lympe Escarpment and an emphasis on creating a network of green and blue spaces. The final sentence in this paragraph now includes the term 'highly water efficient'
- Criterion 3 point (a) in Policy SS6 has been amended since the publication of the Retail and Leisure Needs Assessment (Lichfields, 2018) and the Employment Land Needs Assessment (Lichfields, 2018). The settlement shall now provide 36,760sqm net of employment floorspace (B use classes) by 2037 with a broad mix of office, manufacturing and distribution uses. Development beyond the plan period has the potential to provide for approximately 57,660sqm of employment floorspace in total within the site allocation area. A different delivery rate or quantum of employment development will need to demonstrate that employment provision aligns with population growth to ensure that the town grows in a sustainable way following garden town principles. Other employment opportunities will be created by the town centre development set out in Policy SS7(2)(b) as well as community uses.
- Criterion 3 point (c) in Policy SS6 has been amended to make reference to a phased employment development approach.
- Criterion 1 point (b)(i) in Policy SS7 now includes reference to community green space.
- Criterion 2 point (b) in Policy SS7 has been amended since the publication of the Retail and Leisure Needs Assessment (Lichfields, 2018) and now states that the new garden settlement can support approximately 3,150sqm (gross) of convenience retail floorspace to 2037. It also now states that the new garden settlement can support approximately 7,300sqm (gross) of comparison retail floorspace to 2037. A mix of other town centre uses should also be provided, including food and beverage space (approximately 2,450sqm gross) and non-retail and financial and professional services (approximately 2,600sqm gross).

### Summary of the effects identified through the SA of the Proposed Submission Core Strategy Review (December 2018)

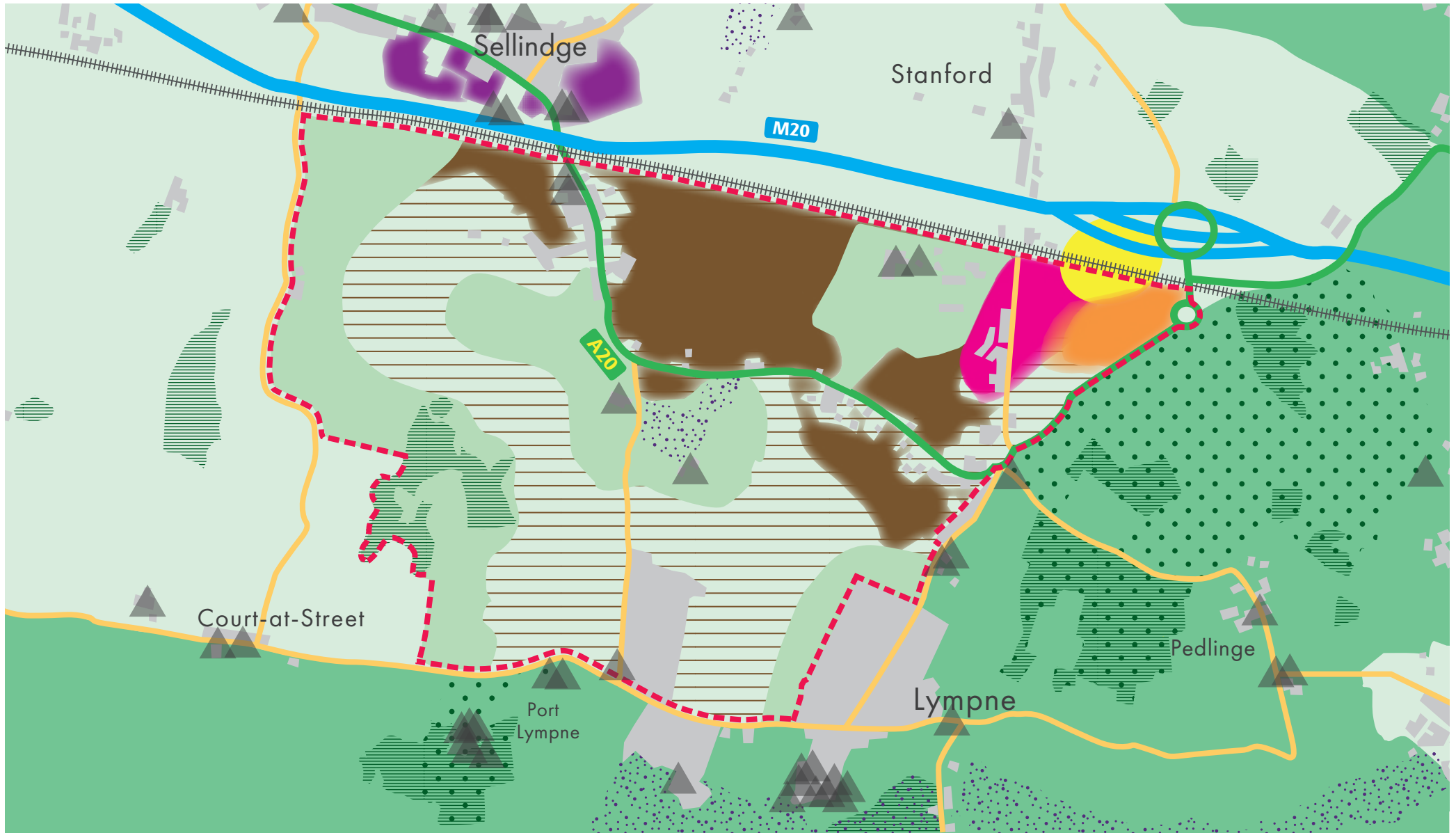
- 8.65 The Core Strategy Review avoids the westwards extension proposed in Spatial Option B towards Harringe Lane, reducing the potential for adverse effects in relation to **landscape (SA objective 3), employment (SA objective 2), sustainable transport (SA objective 13) and access to services and facilities (SA objective 14)**. In comparison to the earlier spatial options tested, larger areas are to be retained as strategic green and open space, maintaining key strategic gaps and views and limiting the loss of greenfield and agricultural land.
- 8.66 Policies SS6, SS7, SS8 and SS9 have been appraised collectively in one SA matrix included in **Appendix 5**. In summary, the new policies (SS6, SS7, SS8 and SS9), allocating, managing and delivering the new garden settlement have generally positive effects in relation to the SA objectives.
- 8.67 The only significant negative effect recorded is in relation to the **efficient use of land, soils and mineral reserves (SA objective 7)**. The garden settlement is largely located on greenfield land much of which contains higher quality agricultural soils (Grades 2 and 3) and safeguarded sandstone and limestone minerals. Despite the Core Strategy Review's concerted measures to minimise loss and position development to maximise the retention of greenfield, the new garden settlement will result in significant loss that cannot be mitigated.
- 8.68 The landscape-led Garden Town Principles upon which the new garden settlement has been planned has resulted in the definition of a new town which will contain large areas of open, green space and tree planting that will maintain and enhance the rural character of the area. The green open spaces will be connected by green and blue infrastructure network that enhances the area's ecological assets. Consequently, despite the acknowledgement that the significant loss of greenfield land will result in a loss of openness and a degree of urbanisation as well as some habitat loss and fragmentation, there is scope through application of the garden town principles for enhancement of the local landscape, ecology and green infrastructure network, as well as

minimising the noise generated by the M20 and Highspeed 1 railway line. A mixed effect (significant positive/minor negative) is recorded in relation to the provision and accessibility of **green infrastructure (SA objective 6)**. Similar mixed effects are recorded in relation to **landscape (SA objective 3)**, **biodiversity (SA objective 5)**, **water quality (SA objective 8)** and **flood risk (SA objective 9)**, but the positive effects are considered to be minor.

- 8.69 A minor negative effect was recorded in relation to **historic environment (SA objective 2)**. This score results from the the potential for development to result in physical and setting change to a number of heritage assets. The effect on the heritage assets is reduced/ offset by the heritage related requirements of the policies put forward.
- 8.70 The new garden settlement contains a significant number of new homes and associated new services and facilities, including a new innovation/business hub next to the new town centre. Significant positive effects have therefore been identified in relation to **housing (SA objective 1)** and **employment (SA objective 2)**.
- 8.71 All homes within the new settlement will be within 800m (walking distance) of a local centre. The new garden settlement's centre will contain a range of retail and food shopping services as well as a medical centre. New primary and secondary school facilities will be provided. Therefore, a significant positive effect has been recorded in relation to **access to services and facilities (SA objective 14)**.
- 8.72 The new garden settlement is located in close proximity to junction 11 of the M20 and Westenhanger railway station. Existing sustainable transport links are to be upgraded and priority given to cyclists and pedestrians as appropriate. Therefore, a significant positive effect is recorded in relation to **sustainable transport (SA objective 13)**.
- 8.73 The Garden Town Principles upon which the new garden settlement will be built will ensure that the design and layout of the new settlement is energy efficient, water efficient and encourages sustainable waste management. Therefore, significant positive effects are recorded in relation to **energy efficiency (SA objective 10)**, **water efficiency (SA objective 11)** and waste management (**SA objective 12**).
- 8.74 A minor positive effect is recorded against **SA objective 15 (Crime)** due to the garden town principles upon which the new settlement will be designed. Public, green and well-lit public realm will be provided throughout the settlement.



Figure 8.1: Policy SS6 Indicative Spatial Plan



**Policy SS6 - Garden Settlement North Downs - Indicative Strategy**

- |                      |                      |  |                  |                          |
|----------------------|----------------------|--|------------------|--------------------------|
| A Roads              | Policy SS6 Boundary  | Town Centre                              | Business Hub     | Historic Park/<br>Garden |
| Motorway             | Railway              | Westenhanger Station - Transport Hub     | SSSI             | Policy CSD9              |
| Minor Roads          | Strategic Open Space | Mixed-Use Neighbourhoods                 | Ancient Woodland |                          |
| Existing Built Areas | Kent Downs AONB      | Neighbourhoods with Landscape Mitigation | Heritage Assets  |                          |

8.75 A summary of the effects recorded for the Core Strategy Review policies SS6, SS7, SS8 and SS9 is set out in **Table 8.3** below.

**Table 8.3: Summary of effects following appraisal of Core Strategy Review Policies SS6, SS7, SS8 and SS9**

SA Objectives	Policies SS6-SS9
SA1. Improve the provision of homes, including affordable housing, having regard to the needs of all sections of society, including the elderly.	++
SA2. Support the creation of high quality and diverse employment opportunities.	++
SA3. Conserve, and where relevant enhance, the quality, character and local distinctiveness of the landscape and townscape.	+/-
SA4. Conserve and enhance the fabric and setting of historic assets.	-
SA5. Conserve and enhance biodiversity, taking into account the effects of climate change.	+/-
SA6. Protect and enhance green infrastructure and ensure that it meets strategic needs.	++/-
SA7. Use land efficiently and safeguard soils, geology and economic mineral reserves.	--
SA8. Maintain and improve the quality of groundwater, surface waters and coastal waters and the hydromorphological (physical) quality of rivers and coastal waters.	+/-
SA9. Reduce the risk of flooding, taking into account the effects of climate change.	+/-
SA10. Increase energy efficiency in the built environment and the proportion of energy use from renewable sources.	++
SA11. Use water resources efficiently	++
SA12. To reduce waste generation and disposal, and achieve the sustainable management of waste.	++
SA13. Reduce the need to travel, increase opportunities to choose sustainable transport modes and avoid development that will result in significant traffic congestion and poor air quality.	++
SA14. Promote community vibrancy and social cohesion; provide opportunities to access services, facilities and environmental assets for all ages and abilities and avoid creating inequalities of opportunity for access.	++
SA15. Reduce crime and the fear of crime.	+

## Policy CSD9 Sellindge Strategy

### Summary of SA of the reasonable alternatives

- 8.76 Following on from the SA of the options tested and identified through the District's High Level Growth Options Study, the District Council identified four spatial options for development in and around the existing village of Sellindge. These four spatial options are appraised in **Chapter 7** above.
- 8.77 All four options were considered to have negative effects in relation to the environmental SA objectives, specifically landscape (SA objective 3), historic environment (SA objective 4), biodiversity (SA objective 5), green infrastructure (SA objective 6), efficient use of land and resources (SA objective 7) and water efficiency (SA objective 8). These adverse effects were identified in acknowledgement of the fact that all four options would result in the development of large areas of greenfield land.
- 8.78 All four options recorded significant positive effects in relation to the provision of housing (SA objective 1) and employment land (SA objective 2). However, the significant positive effects expected in relation to employment for Options B and D were expected to be combined with a significant negative effect as the areas identified for development in these options would likely be constrained by the limited capacity of the road network to accommodate the traffic associated with the economic growth. Minor negative effects were identified for Options A and C in combination with the significant positive effects in acknowledgement of more minor road capacity issues.
- 8.79 Significant negative effects were recorded for Options C and D in relation to biodiversity (SA objective 5) due to their close proximity to Gibbin's Brook SSSI.
- 8.80 While all four options considered were expected to have negative effects in relation to sustainable transport (SA objective 13) and access to services and facilities (SA objective 14) these effects were expected to be more significant in relation to Options B and D where development would be closer to roads with limited capacity to accommodate additional road traffic and further away from the village's existing services and facilities.
- 8.81 These SA findings were used alongside the Council's evidence base to inform the definition of the indicative spatial plan for development at Sellindge defined in the Draft Core Strategy Review Policy CSD9.
- 8.82 The indicative spatial plan for Sellindge represents a combination of previously appraised spatial options A and C. However, the growth proposed in both of these locations is more confined than those appraised in **Chapter 7**, focussing growth around the existing centre of the settlement, locating employment land to the south east of the village to limit the need for associated traffic to travel through the village and along Harringe Lane and including significant landscaping and tree planting on the urban fringes.
- 8.83 **Figure 8.2** illustrates the indicative spatial plan for development in Sellindge as included in the Core Strategy Review.

### Changes to the Draft Core Strategy Review policy in the Proposed Submission Core Strategy Review (December 2018)

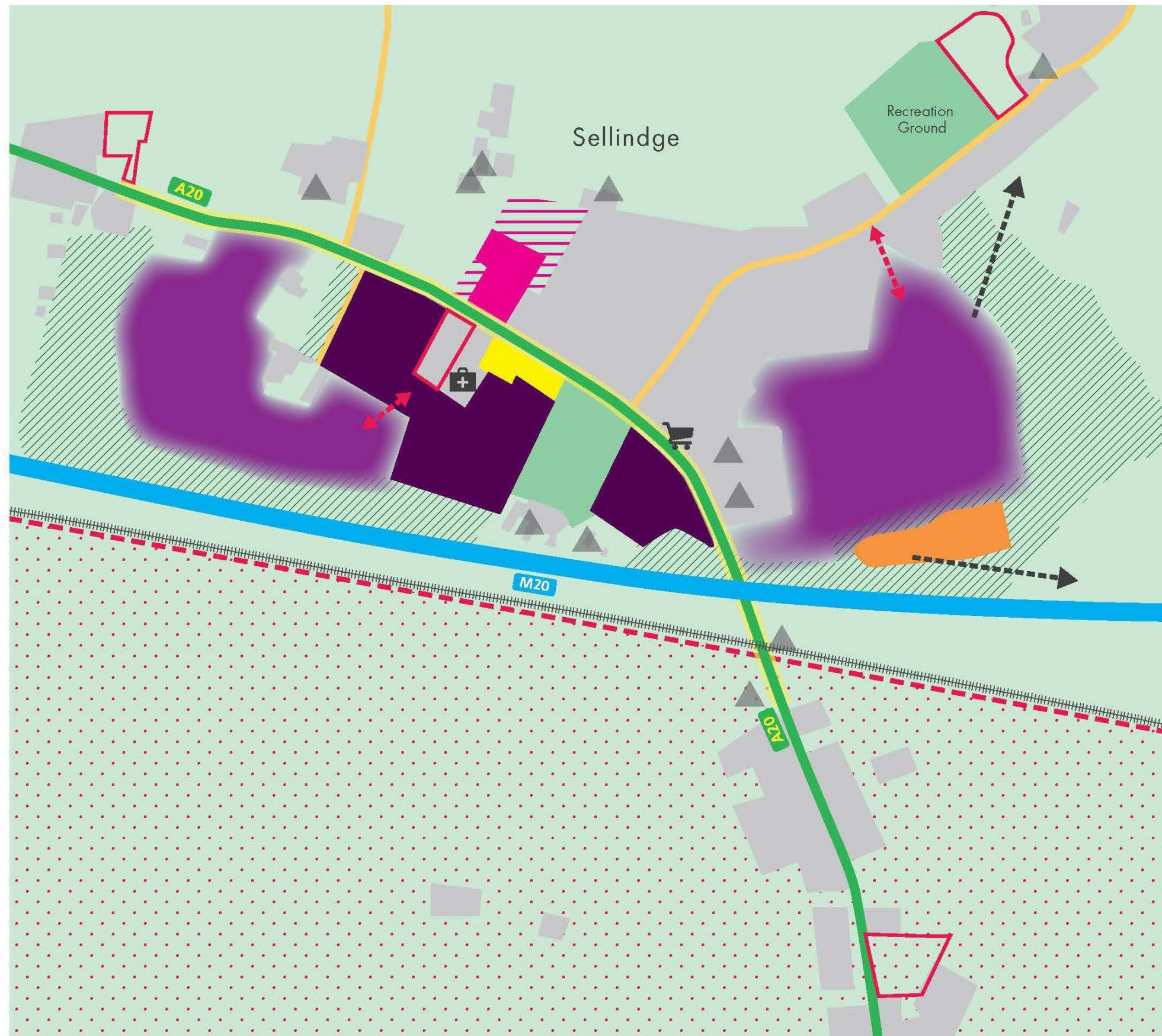
- 8.84 Following the publication of the Draft Core Strategy Review in March 2018, Policy CSD9 was revised further in the Proposed Submission version of the policy. Changes made to Policy CSD9 in the Proposed Submission Core Strategy Review include:
- The amendment of criterion 1c (originally criterion 1b) to remove the phrase 'shall not exceed' in relation to the number of homes that would be delivered through Phase 1 of the allocation; however the approximate number of homes has remained the same at 250 dwellings.
  - The amendment of criterion 2b to remove the phrase 'shall not exceed' in relation to the number of homes that would be delivered through Phase 1 of the allocation; however the approximate number of homes has remained the same at 350 dwellings.

- The amendment of criterion 2d to clarify that the total water usage per dwelling target of no more than 90 litres per person per day relates to potable water.
- The amendment of criterion 2g to include greater detail as to where within the allocation landscaping works, including woodland planting, are particularly required – specifically around the western boundary of Site A to retain the rural character and on the eastern boundary of Site B due to the possible visual impact on the setting of the AONB.
- The addition of a new criterion (criterion 2j) which states that Site A land to the west of Sellindge in Phase 2 must be masterplanned and the full area included in a single outline application. The masterplan must include the consideration of the setting of Grove House.
- The amendment of criterion 3d to require that noise and air pollution mitigation measures, such as distance buffers and appropriate landscaping, are put in place.
- The addition of a general requirement for both phases of the allocation requiring that wherever possible internal links within the site itself and external links to neighbouring sites to ensure there is ease of access for a range of transport modes to new and existing development/facilities within the village.
- The addition of a general requirement for both phases of the allocation requiring occupation of the development is phased to align with the delivery of sewage infrastructure, in liaison with the service provider.
- The addition of a general requirement for both phases of the allocation requiring future access to existing sewage infrastructure for maintenance and upsizing purposes.
- The addition of a general requirement for both phases of the allocation requiring a higher standard of design, siting and layout of development to reflect the sites proximity to the boundary of the Kent Downs AONB.
- The addition of a general requirement for consideration to be given to:
  - the setting of the nearby listed buildings and non-designated historic buildings in the masterplanning stage of development; and,
  - the requirement for archaeological evaluation and mitigation (in accordance with PPLP Policy HE4).

### Summary of the effects identified through the SA of the Proposed Submission Core Strategy Review (December 2018)

- 8.85 A detailed appraisal matrix for Policy CSD9 is presented in **Appendix 5**. In summary, the new Policy CSD9 will generally have positive effects in relation to the SA objectives.
- 8.86 The only significant negative effect recorded is in relation to the **efficient use of land, soils and mineral reserves (SA objective 7)**. This is due to the extension of Sellindge on to greenfield land recognised for its agricultural and mineral value. Despite the Core Strategy Review’s concerted measures to minimise loss and position development to maximise the retention of greenfield, the village extensions will result in significant loss that cannot be readily mitigated.
- 8.87 A minor negative effect is recorded in relation to the **historic environment (SA objective 4)**. This is due to the allocated area containing a number of designated and non-designated heritage assets and archaeological remains. Despite this, the policy requires the setting of nearby listed buildings and non-designated historic buildings to be considered during the masterplanning of the development.
- 8.88 A mixed effect (significant positive/minor negative) is recorded in relation to the provision and accessibility of **green infrastructure (SA objective 6)**; however, this effect will largely depend on successful long-term stewardship being secured and a robust blue/green strategy for the garden settlement. Similar mixed effects are recorded in relation to **landscape (SA objective 3)**, **biodiversity (SA objective 5)** and **water quality (SA objective 8)**, but positive effects are considered to be more minor. The negative effects acknowledge the significant area of greenfield land being lost and the effects this has on the openness and rural nature of the village and the wider countryside and the potential for habitat fragmentation.

Figure 8.2: Policy CSD9 Indicative Spatial Plan



Policy CSD9 - Sellindge Strategy

A Roads	Employment (B1)	Existing Primary School	Improved Connectivity	Heritage Assets
Road Improvements	New Community Facilities	Expansion of Primary School	New Cycle/Pedestrian links to Station	Railway
Motorway	Phase 1 Housing	PPLP Allocations	Landscaping	Policy SS6
Minor Roads	Phase 2 Housing	Existing Built Areas	Village Green	Convenience Store
				Existing GP Surgery & Village Hall

- 8.89 The positive effects acknowledged in relation to these objectives recognise the significant landscaping and enhancement measures planned within and around the new extensions to the village and the opportunities the new development presents for enabling enhancements to the open spaces, Public Rights of Way, and character of the village and its setting, local ecological assets, including Gibbin's Brook SSSI, and the quality of the local watercourses and water bodies.
- 8.90 The delivery of 600 new dwellings in total in the village in combination with up to 1,000 sqm of employment land, a new village green, a primary school extension, a doctor's surgery expansion and new Parish Council officers is acknowledged to have significant positive effects in relation to the provision of **housing (SA objective 1)**, **employment land (SA objective 2)** and **access to local services and facilities (SA objective 14)**. The amendments to the policy would deliver an additional 350 new dwellings to the 250 dwellings already planned for in the adopted 2013 Core Strategy Policy CSD9.
- 8.91 Further significant positive effects have been identified for Policy CSD9 in relation to **energy efficiency (SA objective 10)**, **water efficiency (SA objective 11)** and **sustainable transport (SA objective 13)**. The level of development supported through the policy would allow for high standards of energy and water efficiency to be sought. Due to the significant scale of the growth, a minor negative effect has been retained in relation to the potential for the new extensions to generate some road congestion issues for the relatively linear village, particularly around the junction of Ashford Road and Swan Lane. However, the location of the growth away from Harringe Lane to the west and close to the existing centre of the village will minimise these effects and provide scope to significantly improve pedestrian and cycle links to the village centre and Westenhanger railway station to the south. The delivery of new services and facilities as set out in the policy would further help to reduce the need to travel away from the village.
- 8.92 The supporting text to Policy CSD9 states there is potential for the new growth at Sellindge to be designed in such a way as to embrace waste reduction and sustainable waste management. The development proposed within Policy CSD9 is to be comprehensively masterplanned using high quality materials to improve and create new public areas, including a new village green which will include robust and durable lighting and furniture. This work will be designed through extensive community engagement. It is therefore expected that Policy CSD9 will generate minor positive effects in relation to **waste (SA objective 12)** and **crime (SA objective 15)**.
- 8.93 A summary of the effects recorded for the Proposed Submission Core Strategy Review Policy CSD9 is set out in **Table 8.4** below.

**Table 8.4: Summary of effects following appraisal of Core Strategy Review Policy CSD9**

SA Objectives	Policy CSD9
SA1. Improve the provision of homes, including affordable housing, having regard to the needs of all sections of society, including the elderly.	++
SA2. Support the creation of high quality and diverse employment opportunities.	++
SA3. Conserve, and where relevant enhance, the quality, character and local distinctiveness of the landscape and townscape.	+/-
SA4. Conserve and enhance the fabric and setting of historic assets.	-
SA5. Conserve and enhance biodiversity, taking into account the effects of climate change.	+/-
SA6. Protect and enhance green infrastructure and ensure that it meets strategic needs.	++/-
SA7. Use land efficiently and safeguard soils, geology and economic mineral reserves.	--
SA8. Maintain and improve the quality of groundwater, surface waters and coastal waters and the hydromorphological (physical) quality of rivers and coastal waters.	+/-
SA9. Reduce the risk of flooding, taking into account the effects of climate change.	0
SA10. Increase energy efficiency in the built environment and the proportion of energy use from renewable sources.	++
SA11. Use water resources efficiently	++
SA12. To reduce waste generation and disposal, and achieve the sustainable management of waste.	+
SA13. Reduce the need to travel, increase opportunities to choose sustainable transport modes and avoid development that will result in significant traffic congestion and poor air quality.	++/-
SA14. Promote community vibrancy and social cohesion; provide opportunities to access services, facilities and environmental assets for all ages and abilities and avoid creating inequalities of opportunity for access.	++
SA15. Reduce crime and the fear of crime.	+

## Cumulative Effects

- 8.94 **Table 8.2, Table 8.3 and Table 8.4** above present a summary of the scores for the significantly revised and new policies set out within the Core Strategy Review. This section considers these effects in-combination with the other policies within the Core Strategy Review that have not materially changed since the adoption of the Core Strategy in 2013. Consideration is also given to the in-combination effects of the Core Strategy Review and the District Council's Proposed Submission Places and Policies Local Plan (PPLP). Finally, the wider regional cumulative effects of delivering the growth set out in the Core Strategy Review and Proposed Submission PPLP in-combination with the planned growth in neighbouring authorities is considered.

### In-combination Effects of the Core Strategy Review

- 8.95 The effects recorded in the SA of the adopted Core Strategy broadly identified significant positive effects against the majority of the SA objectives, including Biodiversity, Historic Environment, Countryside, Efficient Use of Land, Economy, Housing, Communities, Inequality and Deprivation, Education, Health and Well-being and Sustainable Transport. Neutral effects were recorded in relation to Water Quality and Waste Management and uncertain effects recorded in relation to Climate Change Mitigation and Flood Risk.
- 8.96 The significant positive effects recorded in the SA of the adopted Core Strategy (2013) policies are broadly supported by the significant positive effects recorded in the SA of the significantly revised and new policies set out in the Core Strategy Review, specifically in relation to **SA objectives 1 (Housing), 2 (Employment), 13 (Sustainable Transport) and 14 (Community Cohesion, Services and Facilities)**.
- 8.97 However, the significant scale of the additional growth proposed on greenfield land at both Sellindge and at the location of the new garden settlement are considered to generate a significant negative effect in relation to **SA objective 7 (Efficient Use of land)**. Consequently, a mixed (significant positive/significant negative) cumulative effect is recorded overall in acknowledgement that the District has prioritised the development of brownfield land before greenfield land but that the additional growth required can only be accommodated on greenfield land, the loss of which cannot be mitigated.
- 8.98 The allocation of a significant area of greenfield land in addition the land previously allocated in the adopted Core Strategy (2013) increases the likelihood of negative effects on the District's landscape, biodiversity and water assets. However, the comprehensive mitigation and enhancement measures set out within the revised and new Core Strategy Review policies, largely associated with the Garden Town Principles upon which the new garden settlement has been planned, are designed to address the significance of the negative effects and maintain some of the positive effects previously identified against these issues during the SA of the adopted Core Strategy in 2013. Consequently, mixed (minor positive/minor negative) cumulative effects are recorded against **SA objectives 3 (Landscape), 5 (Biodiversity), 8 (Water Quality) and 9 (Flood Risk)**. A mixed (significant positive/minor negative) cumulative effect is recorded in relation to **SA objective 6 (Green Infrastructure)** in acknowledgement of the significant plans to improve habitat connectivity, community accessibility and integration with green spaces and the natural world; however, these effects will largely depend on successful long-term stewardship being secured and a robust blue/green strategy at Sellindge.
- 8.99 A minor negative cumulative effect is recorded in relation to **SA objective 4 (Historic Environment)** because of the potential for physical and setting change to designated and non-designated heritage assets (including archaeological remains), which the policies seek to conserve and enhance.
- 8.100 In acknowledgement of the Core Strategy Review's new policies to deliver a new garden settlement in the District, significant positive cumulative effects are recorded in relation to **SA objectives 10 (Energy Efficiency and Renewables) and 11 (Water Efficiency)**.
- 8.101 The cumulative effects against the remaining SA objectives 12 (Waste Management) and 15 (Crime) are considered to be relatively minor. Minor positive cumulative effects are recorded



overall for **SA objectives 12 (Waste Management)** and **15 (Crime)** in acknowledgement of the scope to incorporate good design in to the new strategic development allocations.

### **In-combination effects of the Core Strategy Review and Proposed Submission Places and Policies Local Plan**

- 8.102 The cumulative residual effects of the Proposed Submission PPLP policies are largely the same as those described above for the Core Strategy Review. In summary, the combined efforts of the plans to deliver the required level of housing, employment land, community services and infrastructure over the plan period generate significant cumulative positive effects against **SA objectives 1 (Housing), 2 (Employment), 13 (Sustainable Transport) and 14 (Community Cohesion, Services and Facilities)**.
- 8.103 Both plans maximise the use of brownfield land but allocate significant areas of greenfield land, resulting in mixed significant positive and negative effects against **SA objective 7 (Efficient Use of Land)**. The development of significant areas of greenfield land in both plans generates the same mixed (minor positive/minor negative) cumulative effects against **SA objectives 3 (Landscape), 5 (Biodiversity), 8 (Water Quality) and 9 (Flood Risk)**. Both Plans contain detailed development management policies to mitigate negative effects and maximise enhancements against these objectives.
- 8.104 The SA of the PPLP concluded a mixed (minor positive and significant negative) effect in relation to the historic environment. However, it acknowledged that the effects of new development on cultural heritage are to some extent uncertain until detailed proposals for particular sites come forward at the planning application stage. The SA of the Core Strategy Review concludes a minor negative effect in relation to SA objective 4 (Historic Environment). Given the policy safeguards with respect to the historic environment in the two Plans, it is considered that in-combination they will generate minor negative cumulative effects in relation to **SA objective 4 (Historic Environment)**.
- 8.105 The smaller scale of the development allocations listed in the PPLP, limits their potential to generate the same significant positive effects recorded by the new garden settlement proposals in relation to **SA objectives 6 (Green Infrastructure), 10 (Energy Efficiency and Renewables), 11 (Water Efficiency) and 12 (Waste Management)**, but their contribution to the overall cumulative effects against these SA objectives is positive. Both Plans are considered to generate minor positive effects in relation to **SA objective 15 (Crime)**.

### **Cross-boundary Cumulative Effects**

- 8.106 Folkestone & Hythe District is bordered by four neighbouring authorities each with their own spatial strategies for development:
- Ashford Borough (Kent County).
  - Canterbury City (Kent County).
  - Dover District (Kent County).
  - Rother District (East Sussex County).
- 8.107 Developments within these neighbouring authorities, close to the administrative boundary of Folkestone & Hythe, have the potential to generate cumulative significant negative effects through increased urbanisation, particularly in relation to **SA objectives 3 (Landscape), 5 (Biodiversity), 7 (Efficient Use of Land) and 9 (Flood Risk)**:
- 8.108 Furthermore, strategic employment and retail allocations along the region's main transport links could attract Folkestone & Hythe residents which has the potential to generate significant adverse effects on the viability of Folkestone & Hythe District's employment sites and town centres, with the potential for significant negative cumulative effects in relation to **SA objectives 14 (Community Cohesion, Services and Facilities) and 2 (Employment)**.
- 8.109 There is also the potential for synergistic significant positive cumulative effects on **SA objectives 2 (Employment) and 14 (Community Cohesion, Services and Facilities)** associated with the combined effects of multiple employment and retail allocations in the region helping East Kent to achieve a critical mass to attract and retain growth industries and higher skilled employees.

- 8.110 The Core Strategy Review and Proposed Submission PPLP are likely to generate significant positive cumulative effects on **SA objective 13 (Sustainable Transport)**. However, it is acknowledged that general growth in the District and in neighbouring authorities will result in an increase in the number of vehicles on the roads and an increased risk of traffic congestion plus associated traffic noise and air pollution. Work is currently being undertaken by Folkestone & Hythe District Council and neighbouring authorities to determine what the existing and projected future capacity of the highway networks in the area is and is likely to be.
- 8.111 Folkestone & Hythe District Council is working with its neighbouring authorities to mitigate the potential for the cumulative adverse effects and maximise the opportunities for cumulative benefits for the region.

## Mitigation

- 8.112 It is a requirement of Schedule 2(7) of the SEA Regulations that consideration is given to "*the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme*". For many of the potential negative effects identified in relation to the Core Strategy Review, mitigation will be provided through the implementation of other development management policies in the Proposed Submission Places and Policies Local Plan and the Core Strategy Review itself.
- 8.113 **Table 8.5** below identifies the development management policies set out in the Proposed Submission Places and Policies Local Plan and the strategic policies in the adopted Core Strategy (2013) carried forward into the Core Strategy Review that provide mitigation for the negative effects of other Core Strategy Review policies. Note that only those SA objectives for which potential negative effects were identified have been included in the table.
- 8.114 The only residual significant negative effect of the Core Strategy Review is generated by the allocation of significant areas of greenfield land, recognised for its agricultural and mineral quality (**SA objective 7 (Efficient Use of Land)**). The loss of such land in the District is not readily mitigated. However, it is acknowledged that the Council has prioritised the development of brownfield land over the development of greenfield land. In addition, policies in Kent County Council's Minerals and Waste Local Plan 2013-2030 (adopted July 2016) will also apply. As noted in **Table 8.5**, policies in the Minerals and Waste Local Plan mitigate the loss of mineral reserves by promoting mineral extraction in advance of surface development.

**Table 8.5: Mitigation of potential negative effects identified**

SA objectives	Other Local Plan policies providing possible mitigation	
	Proposed Submission Core Strategy Review	Places and Policies Local Plan
SA3. Conserve, and where relevant enhance, the quality, character and local distinctiveness of the landscape and townscape.	<p><b>SS1: District Spatial Strategy</b> identifies three character areas and the development considered appropriate to each. Within the North Downs Area a sustainable new settlement based on garden town principles is to be delivered through a landscape-led approach.</p> <p><b>SS7: New Garden Settlement - Place Shaping Principles</b> clarifies that the new garden settlement at Otterpool is to be guided by a landscape-led approach that respects topography and views, notably views from the Kent Downs AONB. This provision of new</p>	<p><b>HB1: Quality Places Through Design</b> encourages development which makes a positive contribution to its location and surroundings.</p> <p><b>HB2: Cohesive Design</b> promotes Building for Life 12 standards, including creating a place with a distinctive character.</p> <p><b>NE3: Protecting the District's Landscapes and Countryside</b> seeks to ensure that the quality and character of the District's landscapes are protected and enhanced and will apply to all new development including at the allocated sites.</p>

SA objectives	Other Local Plan policies providing possible mitigation	
	Proposed Submission Core Strategy Review	Places and Policies Local Plan
	<p>development is to be informed by a Landscape and Visual Impact Assessment.</p> <p><b>CSD3: Rural and Tourism Development of Shepway</b> states that buildings can only be converted if they will contribute to the character of their location.</p> <p><b>CSD9: Sellindge Strategy</b> states that appropriate landscaping should be provided at the rural edge of the extensions of the existing settlement.</p>	<p><b>NE1: Enhancing and Managing Access to the Natural Environment, NE2: Biodiversity and CC2: Sustainable Design and Construction</b> seeks to directly and indirectly promote improvements to the District’s green infrastructure network, which will help to maintain the green spaces and gaps which form an important part of the setting of the District’s towns and villages.</p> <p><b>CC2: Sustainable Design and Construction</b> also includes specific criteria relating to ensuring that the design and layout of new development is appropriate for the surroundings.</p>
SA4. Conserve and enhance the fabric and setting of historic assets.	<p><b>SS3: Place-Shaping and Sustainable Settlements Strategy</b>, clause e, seeks to respect and enhance key historic features of conservation interest in the District.</p> <p><b>SS7: New Garden Settlement - Place Shaping Principles</b> requires that new development at the new garden settlement is supported by a heritage strategy which is to identify how the development will conserve and enhance local heritage assets and their setting, both within and in proximity to the garden town. Specific safeguards with respect to the assets identified in the Historic Environment Assessment (LUC 2018) have also been included.</p> <p><b>CSD9: Sellindge Strategy</b> includes specific safeguards with respect to the assets identified in the Historic Environment Assessment (LUC 2018).</p>	<p><b>HB2: Cohesive Design</b> promotes Building for Life 12 standards, including creating a place with a distinctive character.</p> <p><b>HE1: Heritage Assets, HE2: Archaeology, HE3: Local List of Heritage Assets and HE4: Folkestone’s Historic Gardens</b> seek to protect and enhance heritage assets in the District and will apply to all new development including at the allocated sites (except where related to specific identified historic gardens).</p>

SA objectives	Other Local Plan policies providing possible mitigation	
	Proposed Submission Core Strategy Review	Places and Policies Local Plan
SA5. Conserve and enhance biodiversity, taking into account the effects of climate change.	<p><b>SS7: New Garden Settlement - Place Shaping Principles</b> requires that the landscape-led approach to the new garden settlement should be guided by a green infrastructure strategy which is to result in clear net biodiversity gains over and above residual losses.</p> <p><b>CDS4: Green Infrastructure of Natural Networks, Open Spaces and Recreation</b> seeks to achieve net gains in biodiversity, at the same time as safeguarding designated biodiversity sites from harm.</p> <p><b>CSD9: Sellindge Strategy</b> requires that new habitats for priority nature conservation species are provided at the new village green space as well as within the landscaping required at the rural edges of development.</p>	<p><b>HB1: Quality Places Through Design</b> encourages development which creates, enhances and integrates areas of public open space, green infrastructure and biodiversity.</p> <p><b>HB2: Cohesive Design</b> promotes Building for Life 12 standards, including creating a place which takes advantage of existing topography, landscape features (including watercourses), trees which contribute positively to the landscape and wildlife habitats.</p> <p><b>NE1: Enhancing and Managing Access to the Natural Environment</b> and <b>NE2: Biodiversity</b> seek to conserve and enhance biodiversity in the District.</p> <p><b>NE2: Biodiversity</b> includes specific criteria relating to ensuring that access to protected sites is improved, but also managed in sensitive areas.</p>
SA6. Protect and enhance green infrastructure and ensure that it meets strategic needs.	<p><b>SS1: District Spatial Strategy</b> seeks to secure new accessible public green space.</p> <p><b>SS7: New Garden Settlement - Place Shaping Principles</b> states that the landscape-led approach for the new garden settlement is to be guided by a green infrastructure strategy to enhance existing green and blue infrastructure assets. This is to be undertaken in line with the approach of Policy CSD4.</p> <p><b>CSD4: Green Infrastructure of Natural Networks, Open Spaces and Recreation</b> directly and indirectly promotes improvements to the District's green infrastructure, as well as the amount of space available. This will help to safeguard, maintain and expand access to local green spaces.</p> <p><b>CSD9: Sellindge Strategy</b> requires that a new village green space is provided over 1.5-2.0</p>	<p><b>HB1: Quality Places Through Design</b> encourages development which creates, enhances and integrates areas of public open space, green infrastructure and biodiversity.</p> <p><b>HB2: Cohesive Design</b> promotes Building for Life 12 standards, including creating a place which takes advantage of existing topography, landscape features (including watercourses), trees which contribute positively to the landscape and wildlife habitats.</p> <p><b>NE1: Enhancing and Managing access to the Natural Environment, NE2: Biodiversity</b> and <b>CC2: Sustainable Design and Construction</b> seeks to directly and indirectly promote improvements to the District's green infrastructure network, which will help to safeguard, maintain and expand access to local green spaces.</p> <p><b>C2: Safeguarding Community Facilitates, C3: Provision of</b></p>

SA objectives	Other Local Plan policies providing possible mitigation	
	Proposed Submission Core Strategy Review	Places and Policies Local Plan
	ha at Sellindge.	<p><b>Open Space and C4:</b> Children's Play Space promote the safeguarding and new provision of open spaces in the District.</p> <p><b>HW4: Promoting Active Travel</b> maintains access to the countryside and connects open and green spaces in the District.</p>
SA7. Use land efficiently and safeguard soils, geology and economic mineral reserves.	<p><b>SS1: District Spatial Strategy</b> states that beyond the new garden settlement at Otterpool and the extension of Sellindge priority is to continue to be given to previously developed land in the Urban Area in Folkestone.</p> <p><b>SS3: Place-Shaping and Sustainable Settlements Strategy</b> highlights that the principle of development is likely to be acceptable on previously developed land, within defined settlements, provided that it is not of high environmental value.</p> <p><b>SS8: New Garden Settlement - Sustainability and Healthy New Town Principles</b> states that any construction and landforming required at the new garden settlement to be delivered at Otterpool should be soil neutral to avoid any importing or exporting of earth and should also include measures for land remediation where necessary.</p>	<p><b>NE4: Equestrian Development, CC6: Solar Farms and HW3: Development that Supports Healthy, Fulfilling and Active Lifestyles</b> require proposals to avoid the loss of high quality agricultural land where possible.</p>
	<p><b>Minerals and Waste Local Plan 2013-2030</b></p> <p><b>CSM5: Land-won Mineral Safeguarding</b> sets out principles for the safeguarding of mineral deposits through the establishment of Mineral Safeguarding Areas for areas of brickearth, sharp sand and gravel, soft sand (including silica sand), ragstone and building stone.</p> <p><b>DM7: Safeguarding Mineral Resources</b> states that planning permission will be granted for non-minerals development that is incompatible with minerals safeguarding where it can be demonstrated that the extraction of the mineral would not be viable or practicable, or the mineral can be extracted satisfactorily prior to development.</p> <p><b>DM9: Prior Extraction of Minerals in Advance of Surface Development</b> states that planning permission for minerals extraction in advance of surface development will be granted where the resources would otherwise be permanently sterilised and where extraction would not cause unacceptable adverse impacts to the environment or communities.</p>	
SA9. Reduce the risk of	<b>SS3: Place-Shaping and</b>	<b>CC3: Sustainable Drainage</b>

SA objectives	Other Local Plan policies providing possible mitigation	
	Proposed Submission Core Strategy Review	Places and Policies Local Plan
flooding, taking into account the effects of climate change.	<p><b>Sustainable Settlements Strategy</b>, clause C, seeks to prevent development in areas at risk of flooding.</p> <p><b>SS7: New Garden Settlement - Place Shaping Principles</b> requires that to guide the development of the new garden settlement a green infrastructure strategy is put in place to enhance existing green and blue infrastructure assets. This is to include the delivery of SuDS to prevent downstream flooding of the East Stour River.</p>	<p><b>Systems (SuDS)</b> promotes the use of SuDS in new development which will help to mitigate the potential effects of development on greenfield land in relation to reduced infiltration.</p> <p><b>NE1: Enhancing and Managing Access to the Natural Environment, NE2: Biodiversity and CC2: Sustainable Design and Construction</b> directly and indirectly promote improvements to the District's green infrastructure network, which will help to reduce flood risk and alleviate the effects of climate change.</p>

## Recommendations

### Recommendations following the SA of the Draft Core Strategy Review (March 2018)

- 8.115 The SA Report prepared and published alongside the Draft Shepway Core Strategy Review in March 2018 identified the effects of the policies within the Draft Core Strategy Review. These effects were used alongside updates to the Council's evidence base to make changes to the policies in the Proposed Submission version of the Core Strategy Review. The recommendations of the Sustainability Appraisal Report were taken account of as follows:
- Additional criteria for noise and air pollution mitigation measures were included in Policy SS8: New Garden Settlement – Sustainability and Healthy New Town Principles and Policy CSD9: Sellindge Strategy (as set out in the March 2018 SA Report, paragraph 8.90).
  - Further work has been undertaken on heritage to inform this SA report and its conclusions (as set out in the March 2018 SA Report, paragraph 8.91).
- 8.116 In addition, the SA Report which accompanied the Draft Core Strategy Review concluded that, at the time, the effects of the new garden settlement on the District's historic environment and the measures required to mitigate and enhance these effects could not be fully determined without further evidence. It was therefore recommended that the sensitivities of the historic assets within and in close proximity to the new garden settlement be objectively studied in detail to inform the measures outlined in the 'Heritage Strategy' in Policy SS7 of the Core Strategy Review. A study of the historic environment within and in the immediate vicinity of the new garden settlement and the village of Sellindge was undertaken alongside the preparation of the Proposed Submission Core Strategy Review. This work has been used to inform the SA of the policies within the Proposed Submission Core Strategy Review and make recommendations as to how the policies might be improved to conserve the historic environment.

### Recommendations following the SA of the Proposed Submission Core Strategy Review (December 2018)

- 8.117 The Core Strategy Review allocates significantly more growth within the open countryside than the adopted Core Strategy (2013). Located on the edge of the Kent Downs AONB, considerable effort has been made to ensure that the spatial planning and design of this development is landscape led. Indeed, Folkestone & Hythe District Council's plans for a new settlement have been developed and designed in line with garden town principles with particular sensitivity to local landscape character and views from the Kent Downs AONB.

8.118 Additionally, consideration has been given to how the policies might be improved to conserve the historic environment. These recommendations are set out in the Historic Environment Assessment (LUC 2018) and were taken account of as follows:

- Policy CSD9 amended to include:
  - the setting of the nearby listed buildings and non-designated historic buildings in the masterplanning stage of development; and,
  - the requirement for archaeological evaluation and mitigation (in accordance with PPLP Policy HE4).
- Policy SS7 has been amended to include:
  - the term 'conserve';
  - that the heritage strategy be informed by a Conservation Management Plan for Westenhanger Castle, Manor and Barns; and
  - that a Historic Environment Clerk of Works be appointed (to oversee the proper implementation of the heritage strategy, provide a single point of contact for the developers and to provide a consistent link between the developers/ contractors and regulators).

8.119 While the mitigation and enhancement measures included within the Core Strategy Review Policies SS6-SS9 and CSD9 are comprehensive and detailed **it is recommended that implementation of the policies require ongoing consultation with the Kent Downs AONB and Natural England through the planning application process, including the definition and discharge of relevant planning conditions.**

## 9 Monitoring

Regulation 17 of the SEA Regulations states that:

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

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

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

*"a description of the measures envisaged concerning monitoring"*

- 9.1 The Planning Advisory Service guidance on SA states that it is not necessary to monitor everything. Instead, monitoring should be focused on the significant sustainability effects that may give rise to irreversible damage (with a view to identifying trends before such damage is caused) and the significant effects where there is uncertainty in the SA and where monitoring would enable preventative or mitigation measures to be taken. Given the scale of growth proposed within the Core Strategy Review and the importance of the policies' mitigation and enhancement measures in minimising the adverse effects generated by the development and maximising its benefits, monitoring measures have been proposed in this SA Report in relation to all of the SA objectives in the SA framework.
- 9.2 **Table 9.1** sets out a number of suggested indicators for monitoring the potential significant effects of implementing the Core Strategy Review. These indicators have informed those listed in Appendix 1 of the Proposed Submission Core Strategy Review.
- 9.3 The data used for monitoring in many cases will be provided by outside bodies. Information collected by other organisations (e.g. the Environment Agency) can also be used as a source of indicators. It is therefore recommended that the Council continues the dialogue with statutory environmental consultees and other stakeholders that has already been commenced, and works with them to agree the relevant sustainability effects to be monitored and to obtain information that is appropriate, up to date and reliable.



**Table 9.1: Monitoring Framework for the Core Strategy Review**

Ref.	SA Objective	Monitoring indicators
SA1	Improve the provision of homes, including affordable housing, having regard to the needs of all sections of society, including the elderly.	<ul style="list-style-type: none"> <li>• Affordable housing completions</li> <li>• Average house prices</li> <li>• Number of people in housing need (SHMA)</li> <li>• Annual housing completions – total houses built, types, sizes and tenures</li> <li>• Total vacant dwellings</li> <li>• Number of permanent Gypsy and Traveller Pitches delivered</li> <li>• Number of statutory homeless people</li> <li>• Number or proportion of local authority homes meeting Lifetime Homes/Decent Homes Standards</li> </ul>
SA2	Support the creation of high quality and diverse employment opportunities.	<ul style="list-style-type: none"> <li>• Amount of new employment land delivered</li> <li>• Extent of employment land lost to residential development</li> <li>• Number of people claiming Jobseekers' Allowance/Universal Credit</li> <li>• Qualifications of the working age population</li> <li>• Extent and speed of broadband coverage</li> </ul>
SA3	Conserve, and where relevant enhance, the quality, character and local distinctiveness of the landscape and townscape.	<ul style="list-style-type: none"> <li>• Percentage of new development taking place on brownfield/previously developed land</li> <li>• Number of new proposals in the AONB and other 'sensitive landscape areas'</li> </ul>
SA4	Conserve and enhance the fabric and setting of historic assets.	<ul style="list-style-type: none"> <li>• Number of entries on the Heritage at Risk Register</li> </ul>
SA5	Conserve and enhance biodiversity, taking into account the effects of climate change.	<ul style="list-style-type: none"> <li>• Amount of greenfield land lost to development</li> <li>• Change in condition of SSSIs</li> <li>• Number of Local Wildlife Sites</li> <li>• Amount of development that takes place on Local Green Spaces, open spaces and other outdoor sports facilities.</li> </ul>
SA6	Protect and enhance green infrastructure and ensure that it meets strategic needs.	<ul style="list-style-type: none"> <li>• Extent of new and loss of green, open space and sport and recreation facilities</li> </ul>
SA7	Use land efficiently and safeguard soils, geology and economic mineral reserves.	<ul style="list-style-type: none"> <li>• Percentage of development taking place on brownfield/previously developed land</li> <li>• Number of planning applications approved within a Minerals Consultation Area or Mineral Safeguarding Area</li> <li>• Quantity of minerals extracted prior within Mineral Safeguarding Areas prior to surface development</li> <li>• Amount of development that takes place on best and most versatile agricultural land</li> </ul>

Ref.	SA Objective	Monitoring indicators
SA8	Maintain and improve the quality of groundwater, surface waters and coastal waters and the hydromorphological (physical) quality of rivers and coastal waters.	<ul style="list-style-type: none"> <li>Amount of greenfield land lost to development</li> <li>Water Framework Directive status of the District's water bodies, watercourses and coastal waters</li> </ul>
SA9	Reduce the risk of flooding, taking into account the effects of climate change.	<ul style="list-style-type: none"> <li>Number of properties built in areas of flood zones 2 and 3</li> <li>Number of planning permissions granted contrary to EA advice</li> <li>Number of new developments incorporating SUDS</li> </ul>
SA10	Increase energy efficiency in the built environment and the proportion of energy use from renewable sources.	<ul style="list-style-type: none"> <li>Number of new developments incorporating low carbon technologies</li> <li>Installed renewable energy capacity</li> <li>Number of Air Quality Management Areas declared</li> </ul>
SA11	Use water resources efficiently	<ul style="list-style-type: none"> <li>Number of new developments incorporating water efficiency technologies</li> <li>Water consumption per head of population</li> </ul>
SA12	To reduce waste generation and disposal, and achieve the sustainable management of waste.	<ul style="list-style-type: none"> <li>Volume of waste generated per head of population</li> <li>Proportion of household waste recycled</li> <li>Proportion of commercial waste recycled</li> <li>Proportion of waste sent to landfill</li> </ul>
SA13	Reduce the need to travel, increase opportunities to choose sustainable transport modes and avoid development that will result in significant traffic congestion and poor air quality.	<ul style="list-style-type: none"> <li>Proportion of people who travel to work by public transport</li> <li>Railway Station footfall</li> <li>Bus patronage levels</li> <li>Number of Travel Plans implemented with new development</li> <li>Number of users of cycle paths</li> <li>Number of junctions at or exceeding capacity</li> <li>Number of Air Quality Management Areas declared</li> </ul>
SA14	Promote community vibrancy and social cohesion; provide opportunities to access services, facilities and environmental assets for all ages and abilities and avoid creating inequalities of opportunity for access.	<ul style="list-style-type: none"> <li>New education and/or training facilities permitted (sqm)</li> <li>Extent of new and loss of community facilities (sqm)</li> <li>Amount of additional 'town centre use' floorspace provided in Folkestone and Hythe town centres</li> <li>Amount of open space and sport and recreation facilities</li> <li>Percentage of people living in fuel poverty</li> <li>Number of people claiming Jobseekers' Allowance / Universal Credit</li> <li>Affordable home completions</li> </ul>
SA15	Reduce crime and the fear of crime.	<ul style="list-style-type: none"> <li>Number of crimes committed</li> </ul>

# 10 Conclusions

- 10.1 The Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) process has been shaped by the definition of the SA Scoping Report consulted upon in December 2016. The planning policy context (**Chapter 3** and **Appendix 2**), Plan baseline (**Chapter 4**) and consultation comments received in relation to the Scoping Report (**Appendix 1**) were used to define the SA Framework (**Chapter 5**). The SA Framework has been used to appraise high level growth options (**Chapter 6** and **Appendix 3**) and spatial options (**Chapter 7** and **Appendix 4**) for accommodating the District's development needs up to 2037. This work has informed the definition and content of the updated and new policies in the Core Strategy Review. The significantly updated and new policies in the Core Strategy Review are appraised in **Chapter 8**. Consideration is also given to the cumulative effects of the Core Strategy Review in combination with the Proposed Submission Places and Policies Local Plan and the growth planned in neighbouring authorities. Detailed SA matrices for the new policies within the Core Strategy Review can be found in **Appendix 5**. Further details on the SA process to date can be found in **Chapters 1** and **2** which set out the structure of the SA Report and the SA Methodology applied.
- 10.2 The adopted Core Strategy (2013) plans to deliver a target of 8,000 new homes (with a minimum requirement for 7,000 new homes) and associated employment opportunities, services, facilities and infrastructure between 2006 and 2026. The Core Strategy Review plans to deliver a minimum of 12,845 new homes and associated employment opportunities, services, facilities and infrastructure over the revised Plan period of 2018/19 to 2036/37. All of the strategic allocations set out within the original adopted Core Strategy have been retained in the Core Strategy Review, with the exception of the growth planned at the village of Sellindge which has been expanded to deliver 600 homes instead of the original 250 homes (see new Policy CSD9). The remaining growth required over the new Plan period (a minimum of 6,375 new homes) is to be accommodated in a new garden settlement in the North Downs Area, with scope for an additional 1,500-3,500 new homes to be delivered beyond the Plan period. New policies SS6, SS7, SS8 and SS9 set out the indicative spatial plan, place-shaping principles and development management and delivery requirements for the new garden settlement in the North Downs Area.
- 10.3 Almost all of the additional growth planned for within the Core Strategy Review is to be located on greenfield land recognised for its agricultural, mineral and ecological value. Its development will result in the loss and fragmentation of these important natural resources. Furthermore, the scale of this strategic development in the countryside will reduce its openness and historic rural character. The urbanisation of the open countryside will also increase the area of impermeable hardstanding in the District. Consequently, the Core Strategy Review has the potential to generate adverse effects on the environmental SA objectives, including landscape (SA Objective 3), the historic environment (SA objective 4), biodiversity (SA objective 5), green infrastructure (SA objective 6), water quality (SA objective 8) and flood risk (SA objective 9). However, once design principles and mitigation proposed in the Core Strategy Review and development management policies included in the Proposed Submission Places and Policies Local Plan are taken into account, **residual significant adverse effects** are only considered to be generated in relation to the loss of greenfield land (**SA objective 7 – Efficient Use of Land**). While the loss of greenfield land cannot be mitigated, it is acknowledged that Folkestone & Hythe District Council has considered reasonable alternatives for accommodating strategic scale growth in the District and prioritised the allocation and development of brownfield land before greenfield land.
- 10.4 Significant adverse effects are not considered to be generated against the other environmental objectives due to the comprehensive mitigation and enhancement measures set out within the revised and new Core Strategy Review policies. The new garden settlement within which the vast majority of Folkestone and Hythe's additional growth is to be provided has been planned in line Garden Town Principles, with a particular emphasis on integrating the new settlement into the existing landscape and green infrastructure network. In fact the place-making enhancement measures set out within the Core Strategy Review are, at the very least, likely to generate minor positive effects on the same environmental SA objectives. In addition, aspirations to make the

new garden settlement as self-sufficient and sustainable as possible will generate significant positive effects in relation to the District's goals to become **energy** and **water efficient** and resilient to the effects of **climate change (SA objectives 6, 10 and 11)**.

- 10.5 The majority of the growth planned within the original adopted Core Strategy and taken forward within the Core Strategy Review will be delivered within and adjacent to the existing urban areas of the District, notably in Hythe and Folkestone, ensuring that new residents are in close proximity the District's established centres of employment, education, health and well-being and recreation. The additional growth planned in the Core Strategy Review will be located within and in close proximity to a new self-sufficient and sustainable garden settlement. Because the majority of additional growth in the Core Strategy Review is being proposed in a new settlement, there is greater potential to incorporate sustainable design features from the outset, which can often prove more difficult to achieve with smaller more dispersed development or incremental urban extensions. All new homes will be within 800m of a new local centre; education, retail and medical facilities will be provided to meet new resident's needs; cyclists and pedestrians will be given priority in the planning and management of the settlement's transport network and the existing sustainable transport links provided by the local bus services and Westenhanger railway station will be upgraded, providing access to the District's and wider County's other economic and social centres, as well as London. Consequently, **significant positive effects** are recorded in relation to the provision of a new vibrant settlement with its own character and sense of place, with **new homes (SA objective 1)**, **employment opportunities (SA objective 2)**, **sustainable transport infrastructure (SA objective 13)** and **cohesive communities** with sustainable access to **services and facilities (SA objective 14)**.

## Next Steps

- 10.6 This SA Report will be available for consultation alongside the Proposed Submission Core Strategy Review in December 2018. When the consultation has finished, responses from the consultees in relation to the SA process will be addressed through the examination process and in the subsequent stages of the SA.

LUC

December 2018

**Appendix 1**

Consultation Representations on Core Strategy Review  
SA Scoping Report

**Table A1 1: Consultation comments received in relation to the Sustainability Appraisal Scoping Report for the Core Strategy Local Plan Review (December 2016)**

Consultee	Consultation comments – summarised where appropriate	Response and any action taken to address consultation comment in the updated SA Report
<p><b>Natural England</b></p>	<p>Overall, the scope and framework of the SA appear comprehensive and sufficient to assess the review of the CS against key sustainability factors.</p>	<p>Noted</p>
	<p>As a general note, Natural England has advised that the following types of plans relating to the natural environment should be considered:</p> <ul style="list-style-type: none"> <li>• Green infrastructure strategies</li> <li>• Biodiversity plans</li> <li>• Rights of Way Improvement Plans</li> <li>• Shoreline management plans</li> <li>• Coastal access plans</li> <li>• River basin management plans</li> <li>• AONB and National Park management plans.</li> <li>• Relevant landscape plans and strategies</li> </ul> <p>With regard to the National Planning Policy Framework (NPPF), Natural England have also suggested the requirement for conserving and enhancing protected landscapes is included, which is to be addressed by objective SA3.</p>	<p>Noted. These types of plan have been reviewed and where appropriate included within Appendix 1 of the SA Report.</p> <p>The Review of Policies, Plans and Programmes in Appendix 1 has been updated to contain the following:</p> <ul style="list-style-type: none"> <li>• The Green Infrastructure Report (2011)</li> <li>• Green Infrastructure and the Urban Fringe (Natural England, 2009)</li> <li>• Biodiversity 2020: A Strategy for England’s Wildlife and Ecosystem Services (DEFRA, 2011)</li> <li>• Working with the grain of nature – A Biodiversity Strategy for England (2011)</li> <li>• Kent Biodiversity 2020 and beyond – a strategy for the natural environment 2015-2025</li> <li>• Countryside and Coastal Access Improvement Plan (2013)</li> <li>• Kent Downs AONB management plan (2014-2019)</li> </ul>
	<p>Overall the information provided in Chapter 3 appears suitable as a baseline for the SA.</p>	<p>Noted</p>
	<p>At paragraph 3.39 the text should be amended to specifically address the Kent Downs AONB and <u>its setting</u> which is a special quality for which the AONB is designated and that these are protected <u>and enhanced</u> as in accordance with the adopted policy CSD4.</p>	<p>Noted and the <i>Landscape</i> section of the baseline has been updated in relation to the sustainability issues and relevance of this issue to the Local Plan in the SA Report.</p>
	<p>In relation to paragraph 3.98 it should be acknowledged that major development</p>	<p>Paragraph 3.98 acknowledges that locations</p>

Consultee	Consultation comments – summarised where appropriate	Response and any action taken to address consultation comment in the updated SA Report
	<p>(e.g. Otterpool Park) could result in increased air pollution which may be harmful to European designated sites close to major traffic routes. This issue will be addressed in more detail in the forthcoming Habitat Regulations Assessment (HRA) of the Review of the CS. Depending on the assessment, mitigation measures may not be restricted just to promoting the use of sustainable transport modes.</p>	<p>targeted for large scale development could experience significant increases in road traffic from residents and/or employees, resulting in localised adverse effects, in urban areas such as Folkestone and along major roads such as the A20.</p>
	<p>In terms of the natural environment, the scope identifies several key issues (such as landscape, biodiversity, soils, climate change) which may be affected by new development. Natural England have suggested that access to nature is also considered (open spaces, public rights of way, the North Downs Way National Trail). These issues may, or may not, be positively addressed by new development; Natural England would expect the SA to identify both positive and negative effects as appropriate.</p>	<p>Noted. The SA considers access to nature through open spaces, public rights of way and the North Downs Way National Trail, specifically through the appraisal of options against SA Objectives:</p> <ul style="list-style-type: none"> <li>• 5 – Conserve and enhance biodiversity, taking into account the effects of climate change;</li> <li>• 6 – Protect and enhance green infrastructure and ensure that it meets strategic needs; and</li> <li>• 14 - Promote community vibrancy and social cohesion; provide opportunities to access services, facilities and environmental assets for all ages and abilities and avoid creating inequalities of opportunity for access.</li> </ul>
	<p>Overall Natural England are satisfied with the objectives contained in the framework, particularly in relation to landscape, biodiversity, green infrastructure, soils and access to nature. The wording of the objectives appear sufficient to ensure the review of the CS and site allocations are assessed appropriately against these key sustainability factors.</p>	<p>Noted.</p>
	<p>Natural England have noted that the proposed SA framework does not yet include indicators for monitoring the performance of the reviewed CS against the SA Objectives. As set out in Planning Practice Guidance, the significant environmental effects of implementing the plan should be monitored. This should include indicators for effects of the plan on biodiversity (NPPF para 117). A number of potential biodiversity indicators have been suggested by Natural England.</p>	<p>As detailed in the Proposed Structure of the SA Report from paragraph 4.16, the next iteration of the SA contains proposals for monitoring. These attempt to address environmental effects of the Plan (including biodiversity) and Natural England’s suggested indicators have been considered</p>

Consultee	Consultation comments – summarised where appropriate	Response and any action taken to address consultation comment in the updated SA Report
	<p>Natural England has provided further general advice on sources of local plan evidence on the natural environment in an annex of their response to the SA Scoping Report.</p> <p>Paragraphs 1.14 and 3.37 should be amended to read Kent Downs AONB instead of North Downs.</p>	<p>at this next stage.</p> <p>Noted. These sources of information were considered when we updated the baseline section of the next iteration of the SA.</p> <p>Noted. The reference at paragraph 3.37 relates to the North Downs NCA however the reference at paragraph 1.14 requires correction and has been updated in the SA Report.</p>
<b>Historic England</b>	<p>Historic England, due to the high volume of consultations being received, has prepared generic guidance with regards involvement at the scoping stage of the SA. Where further information which is of relevance to this SA scoping report may be required this has been noted in the rows below.</p> <p>It is suggested that the <i>Review of relevant plans, programmes and policies</i> include the following documents which have been omitted to date:</p> <p><i>International/European</i></p> <ul style="list-style-type: none"> <li>• UNESCO World Heritage Convention</li> <li>• The Convention for the Protection of the Architectural Heritage of Europe</li> </ul> <p><i>National</i></p> <ul style="list-style-type: none"> <li>• Planning (Listed Buildings and Conservation Areas) Act 1990</li> <li>• Ancient Monuments and Archaeological Areas Act 1979</li> <li>• Marine and Coastal Access Act 2009</li> </ul> <p><i>Local</i></p> <ul style="list-style-type: none"> <li>• Marine Plans</li> </ul>	<p>Noted. In response to the below comments received by Historic England, LUC has carried out a detailed historic environment assessment to inform the Sustainability Appraisal of the spatial options and site allocation policies in the Proposed Submission Core Strategy Review Local Plan.</p> <p>Noted. These sources of information were considered in Appendix 1 of the SA Report.</p> <p>The Review of Policies, Plans and Programmes in Appendix 1 was updated to include consideration of the following:</p> <ul style="list-style-type: none"> <li>• UNESCO World Heritage Convention</li> <li>• The Convention for the Protection of the Architectural Heritage of Europe</li> <li>• Planning (Listed Buildings and Conservation Areas) Act 1990</li> <li>• Ancient Monuments and Archaeological Areas Act 1979</li> <li>• Marine and Coastal Access Act 2009</li> </ul> <p>The South Marine Plan is yet to be submitted to the Secretary of State for Environment, Food and Rural Affairs for approval and adoption.</p>



Consultee	Consultation comments – summarised where appropriate	Response and any action taken to address consultation comment in the updated SA Report
	<p>Historic England’s <i>Good Practice Advice note 1</i> contains advice on relevant sources of evidence relevant to update the baseline section of the SA report.</p>	<p>Noted.</p>
	<p>Historic England have identified that the current condition of heritage assets and any related observable trends can help in drawing conclusions as to the likely environmental trajectory without the plan (key sustainability issues). Baseline information can be used to identify sustainability issues relating to the historic environment. Sustainability issues may include:</p> <ul style="list-style-type: none"> <li>• Heritage assets at risk from neglect, decay, or development pressures;</li> <li>• Areas where there is a threat or likelihood of further significant loss or erosion of landscape/seascape/townscape character or quality, or where development has had or potentially may have significant impact (direct and or indirect) upon the historic environment and/or people’s enjoyment of it;</li> <li>• Traffic congestion, air quality, noise pollution and other problems affecting the historic environment;</li> <li>• Conserving and enhancing designated and non-designated heritage assets and the contribution made by their settings.</li> </ul>	<p>Noted. The current condition of heritage assets has been reviewed using Historic England’s Risk Register and the findings incorporated into the baseline and key sustainability issues sections of the SA Report.</p> <p>The sustainability issues raised were considered through the appraisal of options against SA Objectives:</p> <ul style="list-style-type: none"> <li>• 3 - Conserve, and where relevant enhance, the quality, character and local distinctiveness of the landscape and townscape;</li> <li>• 4 - Conserve and enhance the fabric and setting of historic assets; and</li> <li>• 13 - Reduce the need to travel, increase opportunities to choose sustainable transport modes and avoid development that will result in significant traffic congestion and poor air quality.</li> </ul>
	<p>Historic England have identified that where the historic environment clearly underpins the character, economy or cultural resource of a place, it may warrant inclusion in other objectives such as regeneration, tourism, access to services, quality of life, landscape and townscape. This can be particularly true where there are areas of inter-relationship, for example between the historic environment and economic development. As such a number of objectives have been suggested for consideration to be included in the SA framework:</p> <p><i>Environmental Objectives</i></p> <ul style="list-style-type: none"> <li>• Protect, enhance and manage the character and appearance of landscapes/seascapes/townscapes, maintaining and strengthening local distinctiveness and sense of place</li> </ul>	<p>Noted. The SA Framework has been reviewed to consider whether all the issues addressed here will be appropriately covered in the appraisal of options. It is considered that these issues have been addressed under the following SA Objectives:</p> <ul style="list-style-type: none"> <li>• 3 - Conserve, and where relevant enhance, the quality, character and local distinctiveness of the landscape and townscape;</li> <li>• 4 - Conserve and enhance the fabric</li> </ul>

Consultee	Consultation comments – summarised where appropriate	Response and any action taken to address consultation comment in the updated SA Report
	<ul style="list-style-type: none"> <li>• Protect, manage and improve local environmental quality</li> <li>• Achieve high quality sustainable design for buildings, spaces and the public realm</li> </ul> <p><i>Social Objectives</i></p> <ul style="list-style-type: none"> <li>• Improve and broaden access to the local historic environment</li> <li>• Provide better opportunities for people to understand local heritage and participate in cultural and leisure activities</li> </ul> <p><i>Economic Objectives</i></p> <ul style="list-style-type: none"> <li>• Foster heritage-led regeneration and address heritage at risk</li> <li>• Optimise the use of previously developed land, buildings and existing infrastructure</li> <li>• Promote heritage-led sustainable tourism</li> <li>• Support the sustainable use of historic farmsteads</li> </ul> <p>Historic England has also provided some examples of the key heritage issues which might be incorporated into the SA framework so that likely effects on the historic environment are properly assessed. These include:</p> <p><i>Environmental - will the policy or proposal:</i></p> <ul style="list-style-type: none"> <li>• Conserve and/or enhance heritage assets, their setting and the wider historic environment?</li> <li>• Contribute to the better management of heritage assets and tackle heritage at risk?</li> <li>• Improve the quality and condition of the historic environment?</li> <li>• Respect, maintain and strengthen local character and distinctiveness?</li> <li>• Promote high quality design?</li> <li>• Integrate climate change mitigation and adaptation measures into the historic environment sensitively?</li> <li>• Alter the hydrological conditions of water-dependent heritage assets, including organic remains?</li> </ul> <p><i>Social - will the policy or proposal:</i></p>	<ul style="list-style-type: none"> <li>• and setting of historic assets;</li> <li>• 5 - Conserve and enhance biodiversity, taking into account the effects of climate change;</li> <li>• 13 - Reduce the need to travel, increase opportunities to choose sustainable transport modes and avoid development that will result in significant traffic congestion and poor air quality.</li> <li>• 7 - Use land efficiently and safeguard soils, geology and economic mineral reserves; and</li> <li>• 2 - Support the creation of high quality and diverse employment opportunities.</li> </ul> <p>Where appropriate minor amendments have been made.</p> <p>Noted. The SA Framework has been reviewed and amended to address these issues under the following SA Objectives:</p> <ul style="list-style-type: none"> <li>• 4 - Conserve and enhance the fabric and setting of historic assets;</li> <li>• 5 - Conserve and enhance biodiversity, taking into account the effects of climate change; and</li> <li>• 7 - Use land efficiently and safeguard soils, geology and economic mineral reserves.</li> </ul>

Consultee	Consultation comments – summarised where appropriate	Response and any action taken to address consultation comment in the updated SA Report
	<ul style="list-style-type: none"> <li>• Increase the social benefit (e.g. education, participation, citizenship, health and well-being) derived from the historic environment?</li> <li>• Improve the satisfaction of people with their neighbourhoods as places to live?</li> <li>• Engage communities in identifying culturally important features and areas?</li> <li>• Provide for increased access to and enjoyment of the historic environment?</li> <li>• Provide for increased understanding and interpretation of the historic environment?</li> <li>• Provide new leisure, recreational, or cultural activities?</li> <li>• Support and widen community uses through shared facilities?</li> </ul> <p><i>Economic - will the policy or proposal</i></p> <ul style="list-style-type: none"> <li>• Increase the economic benefit derived from the historic environment?</li> <li>• Promote heritage-led regeneration?</li> <li>• Lead to the repair and adaptive re-use of a heritage asset and encourage high quality design?</li> <li>• Make the best use of existing buildings and physical infrastructure?</li> <li>• Promote heritage based sustainable tourism?</li> <li>• Ensure that repair and maintenance is sympathetic to local character?</li> <li>• Help to reduce the number of vacant buildings through adaptive re-use?</li> </ul> <p>Historic England has included advice on the selection of indicators and appropriate monitoring for the SA process. The datasets included in Heritage Counts have been suggested as being useful in looking at the comparative range, importance and condition of heritage assets and identifying possible objectives, trends and targets. For the later assessment or monitoring of the significant effects of a plan, indicators which will clearly demonstrate the impact(s) of the plan on the historic environment are more likely to be useful in giving an accurate picture of the potential impacts.</p> <p>A robust monitoring framework for the historic environment must be included to meet the requirements of SEA/SA in terms of:</p> <ul style="list-style-type: none"> <li>• identifying any unforeseen adverse effects of implementing the plan and enabling appropriate remedial action to be taken</li> <li>• testing the accuracy of predictions made in the appraisal and improving future practice;</li> </ul>	<p>At this stage in the SA process, a monitoring framework for the residual effects of the Core Strategy Review has not been proposed. An SA monitoring framework was included in the final iteration of the SA Report to be submitted alongside the Core Strategy Review Plan. Historic England’s comments were incorporated into the monitoring framework at that time.</p>

Consultee	Consultation comments – summarised where appropriate	Response and any action taken to address consultation comment in the updated SA Report
	<ul style="list-style-type: none"> <li>determining whether the plan is contributing to the achievement of the desired objectives and targets for the historic environment</li> <li>checking the delivery and performance of mitigation measures</li> </ul>	
<b>Dover District Council</b>	<p>At paragraph 1.25 the list of protected sites appears to be confusing, not helped by the NE/JNCC/MAGIC websites that seem to have two names for the SPA covering Dungeness to Pett Level.</p> <p>Also Ramsar sites should be given the same protection as European sites (NPPF para 118) and should, therefore, be included in any HRA.</p>	Noted and updated in paragraph 1.50 in SA Report.
	<p>At paragraph 3.24 - the Battle of Britain Memorial is within Dover District.</p>	Hawkinge hosts the Battle of Britain Museum. Reference has been corrected to Battle of Britain Museum in the <i>Economy and labour market</i> section (at paragraph 3.24) of the baseline in the SA Report.
	<p>At paragraph 3.38 - Heritage Lottery Fund funded 'Up on the Downs' Landscape Partnership Scheme predated the AONB Management Plan. It has been running since 2012.</p>	Noted and corrected in the <i>Landscape</i> (at paragraph 3.38) section of the updated baseline in the SA Report.
	<p>At paragraph 3.40 - Rising population without a Local Plan will give rise to direct pressures on wildlife as well as reducing the opportunity for a coordinated spatial approach to the development of open green spaces/green networks for ... wildlife.</p>	Noted. Reference at paragraph 3.40 has been made to the potential for direct pressures on wildlife as well as reducing the opportunity for a coordinated spatial approach.
	<p>Parkgate Downs SAC should be included within the list of habitats included at paragraph 3.47.</p>	Noted and has been included in the <i>Biodiversity</i> section (at paragraph 3.48) of the updated baseline in the next iteration of the SA Report.
	<p>As stated at paragraph 3.53 there are brownfield sites within the District that support nationally and internationally important invertebrate Communities – is this correct?</p>	Information at paragraph 3.53 in the SA Report has been updated as per information from the Kent Biodiversity Action Plan.
	<p>Paragraph 3.54 states that "There are two Marine Conservation Zones designated along the Districts Coastline; the Folkestone Pomerania was designated in November 2013 and more recently, after much controversy in January 2016, the Dover to Folkestone MCZ was designated." It is unclear what benefit the phrase "after much controversy" adds to the baseline.</p>	Noted. The words 'after much controversy' have been removed from paragraph 3.55 of the updated baseline.
	<p>Paragraph 3.58 states that the NPPF may afford some protection to "may afford some protection to the SSSIs and local designations in the District" however it may</p>	Noted. The <i>Biodiversity</i> section of the baseline has been updated.

Consultee	Consultation comments – summarised where appropriate	Response and any action taken to address consultation comment in the updated SA Report
	be more appropriate to reference paragraph 118 of the NPPF at this point which is not reflected at this point of the baseline.	
	The text at paragraph 3.58 should also be updated to include reference to the fact that “the Habitats and Birds Directives provide protection to the internationally designated biodiversity sites <u>and certain species</u> ”.	Noted. The <i>Biodiversity</i> section of the baseline has been updated.
	The consideration of biodiversity on brownfield sites at paragraph 3.64 is supported.	Noted.
	At paragraph 3.125 in relation to “reasonable suggestions for open space will be appraised alongside other reasonable alternatives” it is uncertain what is “reasonable” in this context.	Noted. The <i>Open Space</i> section of the baseline (at paragraph 3.127) has been updated in the SA Report.
	There is an error in the text at paragraph 4.5.	Noted. A correction has been made relating to the reference to Table 4.1.
	Appendix 1 (p. 41) refers to Article 3 of the Birds Directive however Article 2 refers to the maintenance of the population of Article 1 species and this has planning implications for any SPA bird interest that utilises non-SPA areas.	Appendix 1 in the SA Report references Article 1 and 2 of the Birds Directive, considering their implications for the SA process.
	In Appendix 1 (p. 62) should refer to the Kent Downs AONB Management Plan 2014 – 2019 and not the Management Plan 2009-2014. Should the implications which have been identified in relation to the SA be stronger?	<p>Noted and the <i>Review of policies, plans and programmes</i> Appendix has been updated in the next iteration of the SA. The Kent Downs AONB Management Plan 2014 – 2019 identifies that pressures (including those which relate to development for growth and infrastructure, as well as intensive agricultural practices, forestry, traffic and recreation) are now greater in the AONB. However the objective of the Management Plan remains to ensure that the natural beauty of the landscape and vitality of the communities of the Kent Downs AONB are recognised, valued and strengthened well into the future.</p> <p>Specifically, SA Objective 3 seeks to “conserve and where relevant enhance the quality, character and local distinctiveness of the landscape and townscape”. The</p>

Consultee	Consultation comments – summarised where appropriate	Response and any action taken to address consultation comment in the updated SA Report
		appraisal of options considers whether areas of the highest landscape sensitivity (i.e. Kent Downs AONB) are being protected from adverse impacts on character and setting?"
<b>Kent County Council</b>	<p><b><u>Chapter 2:</u></b></p> <p>Paragraph 2.9 (page 9) refers to the National Planning Policy Framework and this is set out in Appendix 1 (pages 45-46) containing a reference to, "Facilitating the use of sustainable <u>materials</u>". This should be amended to, "Facilitating the use of sustainable <u>minerals</u>" in the interests of factual accuracy.</p> <p>Paragraph 2.13 (page 9) refers to relevant sub regional plans and programmes with greater detail provided at Appendix 1. The Kent and Medway Growth and Infrastructure Framework and the Commissioning Plan for Education Provision in Kent 2016-2020 should be included within the <i>Sub-National/ Regional</i> category identified in Appendix 1 (page 59). The Local Transport Plan for Kent 2011-2016 has been referred to on page 60. This will be superseded by the Local Transport Plan 4: Delivering Growth without Gridlock 2016-2031 which is due to be adopted by the County Council in July 2017 and therefore this is the Local Transport Plan which the District Council should have regard to. It is suggested that this element of Appendix 1 is updated.</p> <p><b><u>Chapter 3:</u></b></p> <p><i>Biodiversity</i></p> <p>This chapter should take Habitats and Species of Principal Importance into consideration. Information in relation to Habitats of Principal Importance is available following the Assessing Regional Habitat Change (ARCH) project which carried out an updated Kent Habitat Survey between 2010 and 2012. The Kent Biodiversity Action Plan (BAP) was replaced in 2015 with Kent Biodiversity 2020 and beyond – a strategy for the natural environment 2015-2025 and therefore references in paragraph 3.52 (page 18) and Appendix 1 (page 61) should be updated accordingly.</p> <p><i>Soil and minerals</i></p>	<p>Noted. The <i>Policy Context</i> and supporting <i>Review of policies, plans and programmes</i> (Appendix 1) of the SA Report has been updated.</p> <p>Reference to the Kent Biodiversity 2020 and beyond – a strategy for the natural environment 2015-2025 has been added to the updated baseline in the SA Report, replacing reference to the Kent Biodiversity Action Plan (BAP). The SA Report at Chapter 3 also considers information on Broad Habitats.</p> <p>Footnotes 53 and 54 have been updated in the baseline of the SA Report with regards to the Kent Minerals and Waste Local Plan 2013-30 (KMWLP) which has been adopted.</p>

Consultee	Consultation comments – summarised where appropriate	Response and any action taken to address consultation comment in the updated SA Report
	<p>The recognition of the Kent Minerals and Waste Local Plan (KMWLP) 2013-30 is welcomed however it was adopted in July 2016 and comprises part of the development plan for the District. Footnotes 53 and 54 should therefore be updated accordingly. The most relevant policies of the KMWLP) in relation to the Strategic Environmental Assessment and review of the Core Strategy Local Plan have been listed as:</p> <ul style="list-style-type: none"> <li>• Policy CSM 5: Land-won Mineral Safeguarding</li> <li>• Policy CSM 6: Safeguarded Wharves and Rail Depots</li> <li>• Policy CSM 7: Safeguarding Other Mineral Plant Infrastructure</li> <li>• Policy CSW 16: Safeguarding of Existing Waste Management Facilities</li> <li>• Policy DM 7: Safeguarding Mineral Resources</li> <li>• Policy DM 8: Safeguarding Minerals Management, Transportation, Production and Waste Management Facilities</li> <li>• Policy DM 9: Prior Extraction of Minerals in Advance of Surface Development</li> </ul> <p><b><u>Chapter 4:</u></b></p> <p><i>SA Objectives 2 and 14</i></p> <p>Both objectives refer to education however the phrasing of SA Objective 2 is ambiguous. While it is recognised that providing new and improving existing education facilities thereby helping skills development over the next 20 years which should lead to greater entrepreneurial spirit and thus employment opportunities the focus of the question is on, "... participation in further and higher education". It is contended that new and improved facilities will not directly lead to participation in further and higher education.</p> <p>KCC has suggested that the questions are separated. For example:</p> <ul style="list-style-type: none"> <li>• "Does the plan lead to new and improved education facilities which will support raising attainment and the development of skills, leading to a work ready population of school and college leavers?"</li> <li>• "Does the plan promote the development of education services which retain young people through further and higher education in order to develop and</li> </ul>	<p></p> <p>Noted. Additional questions were added to SA Objective 2 in the SA Framework of the SA Report:</p> <ul style="list-style-type: none"> <li>• "New and improved education facilities which will support raising attainment and the development of skills, leading to a work ready population of school and college leavers?"</li> <li>• "The promotion of the development of education services which retain young people through further and higher education in order to develop and diversify the skills needed to make Folkestone and Hythe prosper?"</li> </ul> <p>To replace:</p> <ul style="list-style-type: none"> <li>• "Provide new and improve existing</li> </ul>

Consultee	Consultation comments – summarised where appropriate	Response and any action taken to address consultation comment in the updated SA Report
	<p>diversify the skills needed to make Folkestone &amp; Hythe prosper?"</p> <p><i>SA Objective 10</i></p> <p>SA Objective 10 refers to increasing energy efficiency and energy from renewable sources however there is no reference to mineral identification, safeguarding mineral resources and infrastructure or recycled/ secondary materials. KCC has recommended the inclusion of minerals within this objective to provide consistency with Appendix 1 (page 46) or alternatively a discrete objective may be more appropriate.</p> <p><i>SA Objectives 7 and 12</i></p> <p>Appendix 1 (pages 59-60) refers to the implications of the KMWLP stating that:</p> <p>"Local Plan documents should take into [sic] the mineral supply and waste hierarchies and ensure mineral supply is not compromised. Take account of mineral safeguarding areas, new primary extraction facilities and safeguarded existing facilities during the selection of land for development. The SA framework should include objectives which consider the safeguarded sites and areas for future minerals supply. [Addressed by SA Objectives 7 and 12]"</p> <p>Neither SA Objectives 7 or 12 address safeguarding of existing minerals and/ or waste facilities, and infrastructure and therefore KCC has suggested that these objectives are expanded to recognise and incorporate safeguarding of existing minerals and/ or waste facilities, and infrastructure. Alternatively a discrete SA Objective is suggested.</p> <p><i>SA Objectives 5 and 6</i></p> <p>SA Objective 5 asks if the plan/option will create:</p> <p>"Opportunities for people to come into contact with resilient wildlife places whilst encouraging respect for and raising awareness of the sensitivity of these sites?"</p> <p>Given the sensitivity of certain biodiversity to recreational pressures KCC has suggested that this appraisal question is reviewed for ecological designated sites</p>	<p>education facilities to promote skills development and diversification through participation in further and higher education?"</p> <p>The reference at Appendix 1 in relation to SA Objective 10 was updated to refer to SA Objective 7 which already covers the efficient use of minerals and avoidance of mineral sterilisation.</p> <p>The safeguarding of minerals is addressed in SA Objective 7, and SA Objective 12 addresses waste reduction and disposal. SA Objective 7 contains the question:</p> <ul style="list-style-type: none"> <li>• "Development that avoids sterilising local mineral reserves and can be accommodated by existing or planned local mineral reserves?"</li> </ul> <p>which addresses mineral safeguarding. A further question (as detailed below) was added in relation to SA Objective 12 to address the safeguarding of waste facilities and infrastructure.</p> <ul style="list-style-type: none"> <li>• "Will it protect existing waste facilities and infrastructure or support the delivery of new facilities or infrastructures of this kind?"</li> </ul> <p>SA Objective 5 acknowledges the issue of recreational pressure, however revision to the sub question as below was included to further highlight the need for protection specifically in relation to recreational pressures:</p>



Consultee	Consultation comments – summarised where appropriate	Response and any action taken to address consultation comment in the updated SA Report
	<p>and to ensure that recreational impacts are a matter of discussion to ensure that they are not to the detriment of ecologically designated sites. This is highlighted of particular concern given that encouragement of visitors to internationally/ national designated wildlife sites should be managed particularly in light of for example the RSPB’s decision to cap visitor total at 40,000 per annum at Dungeness Nature Reserve (an SPA) to limit disturbance.</p>	<ul style="list-style-type: none"> <li>• “Opportunities for people to come into contact with resilient wildlife places whilst encouraging respect for and raising awareness of the sensitivity of these sites?”</li> <li>• “Opportunities for people to come into contact with resilient wildlife places whilst protecting such sites from the adverse impacts of recreational pressures and encouraging respect for and raising awareness of the sensitivity of these sites?”</li> </ul>
<b>Southern Water</b>	No comments to make at this time.	Noted.
<b>Highways England</b>	<p>The SA should take account of the Stanford West lorry area throughout, particularly its relationship with existing and potential nearby new development</p>	<p>Noted and included in <i>Transport</i> section of the updated baseline in the SA Report.</p> <p>The cumulative effects of the Stanford West lorry area were also considered in the assessment. Particularly for the landscape (SA Objective 3), heritage (SA Objective 4) and biodiversity (SA Objective 5) objectives.</p>
	<p>Highways England welcomes SA Objective 13, namely to “reduce the need to travel, increase opportunities to choose sustainable transport modes and avoid development that will result in significant traffic congestion and poor air quality”.</p>	Noted.
	<p>The document highlights that an update of the Folkestone &amp; Hythe Transport Model is currently being undertaken by URS (note that URS Corporation has merged with AECOM), and that details of the model update and update of the Folkestone &amp; Hythe Transport Study are to be incorporated into the baseline of the SA once they have been published. Highways England have been liaising with Folkestone &amp; Hythe’s Transport Consultants AECOM regarding the update of the model, and will continue to work with SBC regarding the production of the necessary evidence base. While, in accordance with NPPF and PPG policy, the prime responsibility for evidence base production lies with the local planning authorities, HE stands ready to provide assistance and commentary throughout the process.</p>	<p>Noted and included in the <i>Transport</i> section of the updated baseline in the next iteration of the SA if the updates have been published.</p>

**Table A1.2: Regulation 18 consultation comments received in relation to the SA for the Folkestone & Hythe Core Strategy Local Plan Review (March 2018)**

Consultee	Consultation comments – summarised where appropriate	Response and any action taken to address consultation comment in the updated SA Report
<p><b>Natural England</b></p>	<p><b>Policy SS6 garden settlement (Otterpool Park)</b></p> <p>With regard to the Policy SS6 garden settlement indicative strategy, as depicted in Figure 8.1 and conclusions set out in Table 8.3, Natural England notes the SA findings of both minor positive and negative effects for landscape (SA3) and biodiversity (SA5), and minor/ major positive effects for GI (SA6).</p> <p>For biodiversity, improvements could be achieved if net gain can be secured for the site, over and above residual losses which are accounted for and addressed. Natural England has asked for the policy wording to be strengthened in this respect.</p> <p>With regard to landscape, Natural England considers the settlement is likely to have significant impacts on the views from the Kent Downs AONB escarpment, which will have serious implications for decisions on location, density and height of buildings. Substantial and innovative avoidance and mitigation measures will be required, which will not just be restricted to structural planting and landscaping, which will be significant and to be completed in advance, but also choice of colours of walls and roofs, and the use of vegetated 'green' roofs and walls which would also provide additional habitat.</p> <p>As such, Natural England suggests the SA findings for SA3 be amended to reflect possible major negative effects on landscape, and to reflect this in its commentary, to add caution to what can be realistically achieved for the development. We note the mitigation section (Table 8.5) refers to the need for a detailed Landscape and Visual Impact Assessment (LVIA), to inform the landscape-led design of the settlement.</p>	<p>The effects recorded against SA objective 3 during the appraisal of the six Character Areas and associated Character Area 4 sub areas (see Appendix 2) drew on the findings of the District's High Level Landscape Appraisal (2017).</p> <p>The effects recorded against SA objective 3 during the appraisal of the more detailed spatial options at Otterpool and Sellindge (see Appendix 3) drew on the findings of the District's supplementary high level landscape sensitivity survey work (2017).</p> <p>The subsequent appraisal of the draft policies set out in the Draft Core Strategy Review (March 2018), including Policy SS6, drew on the same evidence acknowledging that <i>"the development of the new settlement would occur on mostly undeveloped greenfield land and as such would have an adverse impact on the openness and rural character of the countryside"</i>.</p> <p>In response to these concerns raised by both Natural England and the Kent Downs AONB Unit, additional text has been added to policies within the Proposed Submission version of the Core Strategy Review. Policy SS6 now requires that the new garden town's distinctive townscape and</p>

Consultee	Consultation comments – summarised where appropriate	Response and any action taken to address consultation comment in the updated SA Report
		outstanding accessible landscape must be informed by the historic character of the area, respond to its setting within the Kent Downs AONB landscape and mitigate impact in views from the scarp of the Kent Downs. Similar text has been added to policies SS7, SS9 and CSD9 (Sellindge).
	For Green Infrastructure (GI), beneficial effects will largely depend on successful long-term stewardship being secured, of a robust blue/green strategy for the site. Natural England suggests the SA adequately reflects this in its commentary on GI.	Noted. The SA Report has been updated accordingly.
	<p><b>Policy CSD9 Sellindge Strategy</b></p> <p>Natural England concurs with the findings drawn in the SA, of both minor positive and negative effects for landscape (SA3) and biodiversity (SA5), and minor/major positive effects for GI (SA6), and the associated commentary.</p>	Support noted.
	There is a reference to footnote 74 regarding the <i>Water Resources Management Plan</i> but it is the incorrect plan. There is a reference to the correct document in a footnote on page 127 of the Core Strategy Local Plan Review Consultation Document.	The footnote has been updated as requested.
<b>Kent Downs AONB Unit</b>	The Kent Downs AONB Unit disagrees with many of the scores assigned in relation to the North Downs Character Area, and it is considered that the impacts of strategic scale development on SA Objective 3 (landscape) are significantly underestimated in respect of potential impacts on the Kent Downs AONB.	Noted. See response to Natural England’s Consultation Comments set out in the first row above.
<b>Member of the general public (ref. 1157838)</b>	<p>Several of the SA Objectives are of concern, as they contradict themselves, may not be achievable, may not have a wide enough scope and, in some cases, have not been achieved in current plans and developments within key areas already started.</p> <p><b>SA1: Improve the provision of homes, including affordable housing having regard to the needs of all sections of society, including the elderly</b></p> <p>General concern expressed over the provision of affordable housing within the</p>	<p>The SA objectives are designed to help analyse and compare the likely environmental and sustainability effects of a Plan, they do not represent conflicting targets.</p> <p>Paragraphs 5.1-5.4 of the SA Report state that the SA objectives have been developed</p>

Consultee	Consultation comments – summarised where appropriate	Response and any action taken to address consultation comment in the updated SA Report
	<p>District. The Council have not clearly defined affordable housing and there is no mention of social housing. Furthermore, the SHMA highlights the fact that indexed mean house prices in the District are amongst the highest in Kent and above the national average, whilst affordability in the District is amongst the lowest in Kent, albeit higher than both the national average and Dover.</p>	<p>from the review of plans, policies and programmes, the collection of baseline information and the identification of the key sustainability issues set out in Chapters 3 and 4 of the SA Report and a review of the SA objectives used for the SA of the Places and Policies Local Plan. The total number of SA objectives has increased from 14 in the Places and Policies Local Plan SA to 15, with the inclusion of strategic waste management SA objective. The review of the SA objectives has sought to avoid duplication and any single SA objective covering too many issues (as this would result in mixed effects always being identified for that SA objective). Consultation with the statutory consultees and duty to cooperate partners was carried out on the SA objectives for the Core Strategy Review SA at the Scoping Stage.</p> <p>The baseline section of the SA Report (Chapter 4) acknowledges the high demand for affordable homes in the District, drawing on data from the Housing Strategy and the Council’s Strategic Housing Market Assessment.</p>
	<p><b>SA3: Conserve, and where relevant enhance, the quality, character and local distinctiveness of the landscape and townscape</b></p> <p>According to the SA, four of the Character Areas will have a significant negative effect on this objective, I assume due to the Otterpool Park development. It is therefore unclear why the Council are pushing this development to such a scale. Developers should not have the ability to cause significant harm to the character and landscape of the District. The red boxes in Table 7.1 must be addressed before</p>	<p>Paragraph 6.5 of the SA Report states Chapter 6 of the SA tested and built upon this high level growth options work undertaken by the Council by appraising the six Character Areas and four sub-areas within Character Area 4 defined by AECOM against the SA Framework to determine the likely significant effects of providing</p>

Consultee	Consultation comments – summarised where appropriate	Response and any action taken to address consultation comment in the updated SA Report
	<p>anything is approved. Table 7.2 contains even more red boxes.</p> <p>Natural England point out that SA3 addresses the NPPF requirement for conserving and enhancing protected landscapes.</p>	<p>strategic scale development within different parts of the District. Following the appraisal of these higher-level options, consideration was given to more specific spatial options for development at Otterpool and Sellindge in Chapter 7, before policies for inclusion in the Core Strategy Review were appraised in Chapter 8.</p>
	<p><b>SA4: Conserve and enhance the fabric and setting of heritage assets</b></p> <p>Concern expressed over the soundness of the SA when there is no Heritage Strategy in place. It's not clear how you determine what buildings and structures beyond those nationally listed are of local importance, without a Local List. Furthermore, members of the public were not allowed to see the draft Heritage Strategy until a few months ago. The PPLP was prepared without either a Heritage Strategy or Local List, but made many references to heritage and archaeology. These references were vague and without proper structure concerning credible procedures for dealing with archaeological finds.</p> <p>It is noted in the SA that three Character Areas will have a significant negative effect on this objective, with Historic England advising strategic scale development being unsuitable in them, and the other Character Areas will still have negative effects.</p>	<p>LUC has now carried out a detailed historic environment assessment to inform the Sustainability Appraisal of the spatial options and site allocation policies in the Proposed Submission Core Strategy Review Local Plan.</p>
	<p><b>SA6: Protect and enhance green infrastructure and ensure that it meets strategic needs</b></p> <p>Paragraph 6.18 states that a minor positive effect has been recorded for all Character Areas for this SA objective, whereas Table 7.2 shows that significant negative effects are likely under all options for Sellindge. Furthermore, the table for Character Area 3 states <i>"It should be noted that strategic scale development in this Character Area would also be likely to involve the development of a large area of greenfield land which would result in the increase of impermeable surfaces and contribute to local flood risk."</i> However, if a large area of greenfield land is potentially to be developed then why is it not mentioned under SA6? The table instead shows a minor positive effect in this area under SA6 because <i>"providing</i></p>	<p>Paragraph 6.18 refers to the six character areas that fall under the high-level growth options whereas Table 7.2 refers to the SA scores for the four Sellindge spatial options (A, B, C and D). The six character areas are much larger than the spatial options. Due to their larger-scale, it is assumed that each Character Area will protect and enhance the District's green infrastructure to meet the strategic needs of the District's wildlife, thus resulting in minor positive effects. Although</p>

Consultee	Consultation comments – summarised where appropriate	Response and any action taken to address consultation comment in the updated SA Report
	<p><i>strategic scale development within the District is expected to allow for opportunities for the appropriate incorporation of new open spaces, green corridors and other important elements of green infrastructure to meet the needs of the District's wildlife and residents". The document is contradicting itself.</i></p>	<p>it is acknowledged that these beneficial effects will largely depend on successful long-term stewardship being secured and a robust blue/green strategy for the areas of development.</p> <p>However, it is also acknowledged that there is potential for green infrastructure to be lost through development. Therefore, the scores recorded against SA objective 6 for Character Areas 1, 2, 3, 4, 5 and 6 and the associated Character Area 4 sub-areas A, B, C and D have been revised from minor positive effects to mixed, minor positive/minor negative effects.</p> <p>The greater detail provided within the Sellindge spatial options allows for a greater level of scrutiny. As the Sellindge spatial options did not include any new open spaces, resulting in a net loss of accessible green infrastructure around Sellindge. Thus a significant negative effect is likely.</p>
	<p><b>SA7: Use land efficiently and safeguard soils, geology and economic mineral reserves</b></p> <p>Paragraph 6.19 states that, particularly in three of the Character Areas, "<i>the provision of strategic scale development in Shepway has the potential to result in the loss of high quality agricultural land as well as access to and sterilisation of important local mineral resources.</i>" It then goes on to state that these areas have large areas of Grade 1 and Grade 2 quality agricultural land. However, it fails to state whether there is expected to be a negative effect on the areas, or how severe. Conversely, it mentions another area as being expected to have a minor positive effect, Tables 7.1, 7.2, 8.2 (partial), 8.3 and several other tables illustrate that significant negative effects are likely in those three Character Areas.</p>	<p>Although not stated in para 6.19, the three character areas referenced in this paragraph all received significant negative effects with regard to SA7 (see Table 6.2 and Appendix 3). The six high-level spatial options also received a significant negative effect with regard to SA7.</p> <p>The Character Areas cover significant areas of land. Consequently, only broad patterns in land use, as well as key designations and other sensitivities have been identified to</p>

Consultee	Consultation comments – summarised where appropriate	Response and any action taken to address consultation comment in the updated SA Report
	<p>Furthermore the table for Character Area 2 fails to mention that there are two sites within the area that were previously gas works. The land remains contaminated and has been for over a century. As such, the document has failed to provide key information and is, therefore, not fit for purpose.</p>	<p>inform the strategic assessment.</p> <p>The SA does not identify site options; however, paragraph 6.19 does state that “a minor positive effect is expected for this SA objective for Character Area 2: Folkestone and Surrounding Area as it is mostly developed and there a number of larger vacant building and previously developed sites present which may present opportunities for redevelopment.”</p>
	<p><b>SA9: Reduce the risk of flooding, taking into account the effects of climate change</b></p> <p>General concern that the Council is not heeding warnings by the Environment Agency (EA) with regard to flooding. For example, the S73 amendment Y17/1099/SH to the Folkestone seafront development called for undercroft car parking. Yet the proposed Flood Condition mentioned “all semi-basement and basement car parking”, suggesting that the developer proposed underground car parking. However, the EA stated that basement parking “could be considered to be aiding the introduction of a risk to life that would not otherwise exist”. Furthermore, the table for Character Area 2 states that areas within close proximity to Folkestone Harbour are at residual risk of tidal flooding. High-rise buildings up to 41.5 metres should therefore not have been approved by the Council on the beach and former harbour area.</p>	<p>The Folkestone &amp; Hythe Core Strategy Review makes no changes to the Folkestone seafront strategic allocation.</p>
	<p><b>SA10: Increase energy efficiency in the built environment and the proportion of energy use from renewable sources</b></p> <p>The Core Strategy Review is all about housing but does not look at local infrastructure. It considers the construction of new, greener housing. However, it’s not clear how existing properties will benefit from renewable energy and be more efficient, and what the Council is doing to encourage use of solar panels and other renewable sources. The respondent also questions what the Council is doing to encourage greener fuel sources.</p>	<p>The adopted Shepway Core Strategy (2013) sets out the strategic planning policy framework and strategic site allocations for the District to March 2031. The Core Strategy Local Plan will soon be supplemented by the Places and Policies Local Plan (PPLP) which is programmed for adoption later in 2018. Once adopted the PPLP will sit alongside the adopted Core</p>

Consultee	Consultation comments – summarised where appropriate	Response and any action taken to address consultation comment in the updated SA Report
		<p>Strategy allocating small and medium-sized sites for development and containing detailed development management policies to guide planning applications in the District, including energy efficiency and renewable energy policies.</p> <p>The driver for the Core Strategy Review is the District’s future housing need, which will be unmet unless new growth initiatives are brought forward, hence the focus on accommodating new housing growth. Policy SS8, for example, requires that the new garden settlement “<i>demonstrate how the development takes a fabric-first approach, makes the maximum use of passive solar gain, as well as energy generation from the latest technologies in and on buildings and structures. All community buildings shall seek to meet zero carbon standards as exemplars, with an aspiration for the development to achieve carbon neutrality.</i>”</p>
	<p><b>SA11: Use water resources efficiently</b></p> <p>This SA objective has not been carefully considered because whilst it is good that efficient water use is being encouraged, this is harder to police in practice. There is an overreliance on people to change their habits. Furthermore, targets are often not achievable.</p>	<p>The SA objectives are designed to help analyse and compare the likely environmental and sustainability effects of a Plan, they do not represent targets.</p> <p>It is acknowledged that changing habits with regard to the efficient use of water is hard; however the Local Plan can encourage sustainable design and construction that minimises water use by developers and inhabitants.</p>
	<p><b>SA13: Reduce the need to travel, increase opportunities to choose</b></p>	<p>The SA objectives are designed to help</p>



Consultee	Consultation comments – summarised where appropriate	Response and any action taken to address consultation comment in the updated SA Report
	<p><b><i>sustainable transport modes and avoid development that will result in significant traffic congestion and poor air quality</i></b></p> <p>It is good to see encouragement of walking and cycling, and presumably a return to local shopping rather than out-of-town commercial parks that necessitate driving. However, this contradicts SA objective 14 with regard to equality in term of access. The disabled, elderly and those with children are often unable to walk far or cycle, so must have good public transportation, road access and parking.</p>	<p>analyse and compare the likely environmental and sustainability effects of a Plan, they do not represent targets.</p> <p>Reference is made to the need to reduce the need to travel in acknowledgement of the fact that travel is necessary by a full range of modes. The reference to sustainable transport modes includes good public transport links.</p>
	<p><b><i>SA14: Promote community vibrancy and social cohesion; provide opportunities to access services, facilities and environmental assets for all ages and abilities and avoid creating inequalities of opportunity for access</i></b></p> <p>Whilst the idea of local self-sufficient communities is good, there is fear that projects such as the Folkestone seafront development will become gated communities. The seafront should be enjoyed by all, including the elderly and disabled.</p> <p>Additionally, the CCG favours a large town centre health centre over smaller GP surgeries, and wants to merge several practices into this. This will have a negative effect on those who require these services the most, namely the elderly and disabled, because they will have to travel long distances. This goes against the ethos of having facilities within walking distance.</p> <p>This objective contradicts itself, and other objectives contradict it too.</p>	<p>The SA objectives are designed to help analyse and compare the likely environmental and sustainability effects of a Plan, they do not represent targets.</p> <p>The SA objective does not distinguish between consolidated new local centres and disseminated local services and facilities. Both are important.</p>
	<p><b><i>SA15: Reduce crime and the fear of crime</i></b></p> <p>It is not clear how future design could reduce crime and anti-social behaviour when there is no longer a Crime Reduction and Architectural Liaison Officer in Kent Police.</p>	<p>The overall planning and detailed design of developments can help reduce crime and anti-social behaviour through implementing principles of best practice. The council has adopted the Kent Design Guide as a Supplementary Planning Document, which contains detailed guidance on safe and secure layouts and 'Secured by Design'. Further advice is provided by the Designing</p>

Consultee	Consultation comments – summarised where appropriate	Response and any action taken to address consultation comment in the updated SA Report
		Out Crime Officer Team based at Kent Police Headquarters.
<b>Member of the general public (ref. 549694)</b>	Paragraphs 8.80 and 8.81 of the SA identify significant adverse effects when looking at the cumulative effect of development in the District and neighbouring districts. Para 8.84 just states that Folkestone & Hythe District Council is working with the neighbouring authorities to mitigate this. Without knowing if any mitigation is proposed, it is impossible to say if the Core Strategy Review is sustainable.	Noted.

# Appendix 2

## Review of Policies, Plans and Programmes

Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Folkestone & Hythe District Council Local Plan
<b>INTERNATIONAL</b>		
<b>European</b>		
EU Seventh Environmental Action Plan (2002-2012)	<p>The EU's objectives in implementing the programme are:</p> <ul style="list-style-type: none"> <li>(a) to protect, conserve and enhance the Union's natural capital;</li> <li>(b) to turn the Union into a resource-efficient, green and competitive low-carbon economy;</li> <li>(c) to safeguard the Union's citizens from environment-related pressures and risks to health and wellbeing;</li> <li>(d) to maximise the benefits of the Union's environment legislation;</li> <li>(e) to improve the evidence base for environment policy;</li> <li>(f) to secure investment for environment and climate policy and get the prices right;</li> <li>(g) to improve environmental integration and policy coherence;</li> <li>(h) to enhance the sustainability of the Union's cities;</li> <li>(i) to increase the Union's effectiveness in confronting regional and global environmental challenges.</li> </ul>	Include sustainability objectives to protect and enhance the natural environment and promote energy efficiency. [Addressed by SA objectives 5, 6, 9 and 10].
SEA Directive 2001 Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment	<p>Provide for a high level of protection of the environment and contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development.</p> <p>The Directive must be applied to plans or programmes whose formal preparation begins after 21 July 2004 and to those already in preparation by that date.</p>	Requirements of the Directive must be met in Sustainability Appraisals.
The Industrial Emissions Directive 2010 Directive 2010/75/EU on industrial emissions (integrated pollution prevention and control)	This Directive lays down rules on integrated prevention and control of pollution arising from industrial activities. It also lays down rules designed to prevent or, where that is not practicable, to reduce emissions into air, water and land and to prevent the generation of waste, in order to achieve a high level of protection of the environment taken as a whole.	<p>Local Plan documents should take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF.</p> <p>Include SA objective for reducing pollution. [Addressed by SA objectives 10 and 13].</p>
Energy Performance of Buildings Directive 2010 on the energy performance of buildings 2010/31/EU	<p>The Directive aims to promote the energy performance of buildings and building units.</p> <p>It requests that member states adopt either national or regional methodology for calculating energy performance and minimum requirements for energy performance.</p>	<p>Local Plan documents should take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF.</p> <p>Include SA objective relating to the energy performance/efficiency of existing and proposed buildings. [Addressed by SA objective 10].</p>
The Birds Directive 2009 Directive 2009/147/EC is a codified version of Directive 79/409/EEC as	Article 1 and 2 of the Directive require that Member States take the requisite measures to maintain the population of all species of naturally occurring birds in the wild state in the European territory at a level which	Local Plan documents should make sure that the upkeep of recognised habitats is maintained and not damaged from development.

Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Folkestone & Hythe District Council Local Plan
amended	<p>corresponds in particular to ecological, scientific and cultural requirements, while taking account of economic and recreational requirements, or to adapt the population of these species to that level.</p> <p>Article 3 of the Directive requires that the preservation, maintenance, and re-establishment of biotopes and habitats shall include the following measures:</p> <ul style="list-style-type: none"> <li>• Creation of protected areas.</li> <li>• Upkeep and management in accordance with the ecological needs of habitats inside and outside the protected zones.</li> <li>• Re-establishment of destroyed biotopes.</li> <li>• Creation of biotopes.</li> </ul>	Avoid pollution or deterioration of habitats or any other disturbances effecting birds. [Addressed by SA objective 5 and 6.]
The Waste Framework Directive 2008 Directive 2008/98/EC on waste	Prevention or reduction of waste production and its harmfulness. The recovery of waste by means of recycling, re-use or reclamation. Recovery or disposal of waste without endangering human health and without using processes that could harm the environment.	Local Plan documents should take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF.  Include SA objectives that minimise waste production as well as promote recycling. [Addressed by SA objective 12].
The Floods Directive 2007 Directive 2007/60/EC on the assessment and management of flood risk	Establish a framework for the assessment and management of flood risk, aiming at the reduction of the adverse consequences for human health, the environment, cultural heritage and economic activity associated with floods.	Local Plan documents should take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF.  Include SA objectives that relate to flood management and reduction of risk. [Addressed by SA objective 9].
The Water Framework Directive 2000 Directive 2000/60/EC establishing a framework for community action in the field of water policy	Protection of inland surface waters, transitional waters, coastal waters and groundwater.	Local Plan documents should take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF.  Include SA objectives to protect and minimise the impact on water quality. [Addressed by SA objective 8].
The Environmental Noise Directive 2002 Directive 2002/49/EC relating to the assessment and management of environmental noise	<p>Defines a common approach to avoid, prevent and reduce the adverse effects due to the exposure to environmental noise.</p> <p>It also provides a basis for developing European wide measures to deal with noise emitted by road and rail vehicles, infrastructure, aircraft and outdoor, industrial and mobile machinery.</p>	Local Plan documents should take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF.  Include SA objectives to manage and reduce the impacts of noise. [Addressed by SA objectives 5, 6, 13 and 14].

Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Folkestone & Hythe District Council Local Plan
	<p>Principles of the directive include:</p> <ul style="list-style-type: none"> <li>• Monitoring the environmental problems.</li> <li>• Informing and consulting the public.</li> <li>• Addressing local noise issues</li> <li>• Developing a long-term EU strategy</li> </ul>	
<p>The Landfill Directive 1999 Directive 99/31/EC on the landfill of waste</p>	<p>Prevent or reduce negative effects on the environment from the landfilling of waste by introducing stringent technical requirements for waste and landfills.</p> <p>Reduce the amount of biodegradable waste sent to landfill to 75% of the 1995 level by 2010. Reduce this to 50% in 2013 and 35% by 2020.</p>	<p>Local Plan documents should take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF.</p> <p>Include SA objectives to increase recycling and reduce the amount of waste. [Addressed by SA objective 12].</p>
<p>The Drinking Water Directive 1998 Directive 98/83/EC on the quality of water intended for human consumption</p>	<p>Protect human health from the adverse effects of any contamination of water intended for human consumption by ensuring that it is wholesome and clean.</p> <p>Member States must set values for water intended for human consumption.</p>	<p>Local Plan documents should take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF. [Addressed by SA objectives 8 and 11].</p>
<p>The Air Quality Framework Directive 1996 Directive 96/62/EC on ambient air quality assessment and management</p>	<p>Avoid, prevent and reduce harmful effects of ambient air pollution on human health and the environment.</p>	<p>Local Plan documents should take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF. [Addressed by SA objectives 10 and 13].</p>
<p>Air Quality Directive 2008 Directive 2008/50/EC on ambient air quality and cleaner air for Europe</p>	<p>This directive sets legally binding limits for:</p> <ul style="list-style-type: none"> <li>• Lead</li> <li>• Nitrogen dioxide</li> <li>• Sulphur dioxide</li> <li>• Benzene</li> <li>• Carbon Monoxide</li> <li>• Arsenic</li> <li>• Cadmium</li> <li>• Nickel</li> <li>• Benzo(a)pyrene</li> </ul>	<p>Local Plan documents should take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF.</p> <p>Include SA objectives to maintain and enhance air quality. [Addressed by SA objective 10 and 13].</p>

Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Folkestone & Hythe District Council Local Plan
	<ul style="list-style-type: none"> <li>• Polycyclic aromatic hydrocarbons</li> <li>• Ozone</li> <li>• Particulate matter</li> </ul>	
<p>The Packaging and Packaging Waste Directive 1994</p> <p>Directive 94/62/EC on packaging and packaging waste</p>	<p>Harmonise the packaging waste system of Member States. Reduce the environmental impact of packaging waste.</p> <p>By June 2001 at least 50% by weight of packaging waste should have been recovered, at least 25% by weight of the totality of packaging materials contained in packaging waste to be recycled with a minimum of 15% by weight for each packaging material.</p>	<p>Local Plan documents should take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF.</p> <p>Include SA objectives to minimise the environmental impact of waste and promote recycling. [Addressed by SA objective 12].</p>
<p>The Habitats Directive 1992</p> <p>Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora</p>	<p>Promote the maintenance of biodiversity taking account of economic, social, cultural and regional requirements. Conservation of natural habitats and maintain landscape features of importance to wildlife and fauna.</p>	<p>Local Plan documents should take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF.</p> <p>Include SA objectives to protect and maintain the natural environment and important landscape features. [Addressed by SA objectives 4, 5 and 6].</p>
<p>The Nitrates Directive 1991</p> <p>Directive 91/676/EEC on nitrates from agricultural sources.</p>	<p>Reduce water pollution caused or induced by nitrates from agricultural sources and prevent further such pollution.</p> <p>Identification of vulnerable areas.</p>	<p>Local Plan documents should take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF.</p> <p>Include SA objectives to reduce water pollution. [Addressed by SA objectives 8].</p>
<p>The Urban Waste Water Directive 1991</p> <p>Directive 91/271/EEC concerning urban waste water treatment</p>	<p>Protect the environment from the adverse effects of urban waste water collection, treatment and discharge, and discharge from certain industrial sectors.</p>	<p>Develop policies that take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF.</p> <p>Include sustainability objectives to reduce water pollution. [Addressed by SA objective 8].</p>
<p>European Spatial Development Perspective (1999)</p>	<p>Economic and social cohesion across the community. Conservation of natural resources and cultural heritage. Balanced competitiveness between different tiers of government.</p>	<p>Local Plan documents should take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF.</p> <p>Include SA objectives to conserve natural resources and cultural heritage. [Addressed by SA objectives 3, 4 and 5].</p>
<p>European Landscape Convention (Florence, 2002)</p>	<p>The convention promotes landscape protection, management and planning.</p>	<p>Local Plan documents should take account of the Convention.</p> <p>Include SA objectives to protect the urban and rural landscape and identify opportunities for enhancement. [Addressed by SA objective 3].</p>

Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Folkestone & Hythe District Council Local Plan
<p>European Convention on the Protection of the Archaeological Heritage (Valletta, 1992)</p> <p>Revision of the 1985 Granada Convention</p>	<p>Protection of the archaeological heritage, including any physical evidence of the human past that can be investigated archaeologically both on land and underwater.</p> <p>Creation of archaeological reserves and conservation of excavated sites.</p>	<p>Local Plan documents should take account of the Convention.</p> <p>Include SA objectives to protect the archaeological heritage. [Addressed by SA objective 4].</p>
<b>Other International</b>		
<p>Johannesburg Declaration on Sustainable Development (2002)</p>	<ul style="list-style-type: none"> <li>• Commitment to building a humane, equitable and caring global society aware of the need for human dignity for all.</li> <li>• Renewable energy and energy efficiency.</li> <li>• Accelerate shift towards sustainable consumption and production.</li> <li>• Greater resource efficiency.</li> <li>• New technology for renewable energy.</li> </ul>	<p>Local Plan documents should take account of the Declaration.</p> <p>Include SA objectives to enhance the natural environment, promote renewable energy and energy efficiency and sustainable use of natural resources. [Addressed by SA objective 10].</p>
<p>Aarhus Convention (1998)</p>	<p>Established a number of rights of the public with regard to the environment. Local authorities should provide for:</p> <ul style="list-style-type: none"> <li>• The right of everyone to receive environmental information</li> <li>• The right to participate from an early stage in environmental decision making</li> <li>• The right to challenge in a court of law public decisions that have been made without respecting the two rights above or environmental law in general.</li> </ul>	<p>Local Plan documents should take account of the Convention.</p> <p>Ensure that public are involved and consulted at all relevant stages of SA production.</p>
<p>Convention for the Protection of the Architectural Heritage of Europe (1985)</p>	<p>The convention defines 'architectural heritage' and requires that the signatories maintain an inventory of it and take statutory measures to ensure its protection. Conservation policies should also be integrated into planning systems and other spheres of government influence as per the text of the convention.</p>	<p>Local Plan documents should take account of the Convention.</p> <p>Include SA objectives to protect architectural heritage in Folkestone &amp; Hythe. [Addressed by SA objective 4].</p>
<p>International Convention on Wetlands (Ramsar Convention) (1976)</p>	<p>International agreement with the aim of conserving and managing the use of wetlands and their resources.</p>	<p>The development plan should conserve, enhance and manage the use of wetlands and their resources.</p> <p>Include an SA objective to conserve enhance the natural environment.</p>
<p>UNESCO World Heritage Convention (1972)</p>	<p>Aims to promote cooperation among nations to protect heritage around the world that is of such outstanding universal value that its conservation is</p>	<p>Local Plan documents should take account of the Convention.</p>



Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Folkestone & Hythe District Council Local Plan
	important for current and future generations.	There are currently no World Heritage Sites in Folkestone & Hythe but if any were to be declared there would require special consideration.
<b>NATIONAL</b>		
National Planning Policy Framework (NPPF) (MHCLG, 2018)	Presumption in favour of sustainable development. Delivering sustainable development by:	Local Plan documents must be in conformity with the NPPF.
	Building a strong, competitive economy.	Set out clear economic visions for that particular area. [Addressed by SA objective 2].
	Ensuring vitality of town centres.	Recognise town centres as the heart of their communities. [Addressed by SA objectives 2 and 14].
	Promoting sustainable transport.	To implement sustainable transport modes depending on nature/location of the site, to reduce the need for major road transport infrastructure. [Addressed by SA objective 13].
	Supporting high quality communications infrastructure.	Enhance the provision of local community facilities and services by supporting the expansion of electronic communications networks. [Addressed by SA objective 14].
	Delivering a sufficient supply of high quality homes.	Identify size, type, tenure and range of housing that is required in particular locations. [Addressed by SA objective 1].
	Requiring good design.	Establish a strong sense of place to live, work and visit. [Addressed by all SA objectives].
	Promoting healthy communities.	Promote safe and accessible environments with a high quality of life and community cohesion. [Addressed by SA objectives 6 and 14].
	Protecting Green Belt Land.	To prevent the coalescence of neighbouring towns. [Addressed by SA objective 3]. (There is no Green Belt land within Folkestone & Hythe District.)
	Meeting the challenge of climate change, flooding, and coastal change.	Use opportunities offered by new development to reduce causes/impacts of flooding. [Addressed by SA objectives 9 and 10].
	Conserving and enhancing the natural environment.	Recognise the wider benefits of biodiversity. [Addressed by SA objective 5 and 6].
Conserving and enhancing the historic environment.	Sustain and enhance heritage assets and put them to viable uses consistent with their conservation.	

Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Folkestone & Hythe District Council Local Plan
		<p>A plan may be considered unsound if there has been no proper assessment of the significance of heritage assets in the area, and the plan does not contain a positive strategy for the conservation, enhancement and enjoyment of the historic environment. [Addressed by SA objective 4].</p>
	Facilitating the use of sustainable minerals.	<p>Include policies which identify and safeguard mineral resources and associated infrastructure and promote the use of recycled/secondary materials prior to the extraction of primary materials. [Addressed by SA objective 10].</p>
<b>White Papers</b>		
<p>Housing White Paper 2016, <i>Fixing our broken housing market</i></p>	<p>The White Paper sets out ways to address shortfall in affordable homes and boost housing supply. The White Paper focuses on the following:</p> <ul style="list-style-type: none"> <li>• Planning for the right homes in the right places – Higher densities in appropriate areas, protecting the green belt while making more land available for housing by maximising the contribution from brownfield and surplus public land, regenerating estates, releasing more small and medium-sized sites, allowing rural communities to grow and making it easier to build new settlements</li> <li>• Building homes faster – Improved speed of planning cases, ensuring infrastructure is provided and supporting developers to build out more quickly.</li> <li>• Diversifying the Market – Backing small and medium-sized house builders, custom-build, institutional investors, new contractors, housing associations.</li> </ul> <p>Helping people now – supporting home ownership and providing affordable housing for all types of people, including the most vulnerable.</p>	<p>Include sustainability objectives/appraisals that relate to providing the right mix of housing and recognise the sustainability advantages of development on brownfield land.</p> <p>Allocate sites that will fulfil the aims of the White Paper, including development on smaller/medium sized sites, brownfield land and sites capable of achieving higher densities.</p>
<p>Natural Environment White Paper, 2011 The Natural Choice: securing the value of nature (HM Government, 2011)</p>	<ul style="list-style-type: none"> <li>• Protecting and improving our natural environment.</li> <li>• Growing a green economy.</li> <li>• Reconnecting people and nature.</li> </ul>	<p>Local Plan documents should protect the intrinsic value of nature and recognise the multiple benefits it could have for communities. [Addressed by SA objective 10].</p>
<p>Electricity Market Reform White Paper 2011, Planning our Electric Future: A White Paper for Secure, Affordable and Low-Carbon Electricity (DECC, 2011)</p>	<p>This White Paper sets out the Government’s commitment to transform the UK’s electricity system to ensure that our future electricity supply is secure, low-carbon and affordable.</p> <p>15 per cent renewable energy target by 2020 and 80 per cent carbon reduction target by 2050.</p>	<p>Local Plan documents should support renewable energy generation and encourage greater energy efficiency.</p> <p>Include sustainability objectives to reduce carbon emissions and increase proportion of energy generated from renewable sources. [Addressed by SA objective 10].</p>

Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Folkestone & Hythe District Council Local Plan
The Future of Transport White Paper 2004: A network for 2030 (DfT, 2004)	<ul style="list-style-type: none"> <li>• Ensure we can benefit from mobility and access while minimising the impact on other people and the environment, now and in the future.</li> <li>• Get the best out of our transport system without damaging our overall quality of life.</li> <li>• Develop strategies that recognise that demand for travel will increase in the future.</li> <li>• Work towards a transport network that can meet the challenges of a growing economy and the increasing demand for travel but can also achieve the government’s environmental objectives.</li> </ul>	<p>Local Plan documents should provide for an increase in demand for travel whilst minimising impact on the environment. Policies also needed to promote public transport use rather than increasing reliance on the car.</p> <p>Include sustainability objectives to reduce the need to travel and improve choice and use of sustainable transport modes. [Addressed by SA objective 13].</p>
Energy White Paper: Our Energy Future (2003)	<p>There are four key aims in this document:</p> <p>To put ourselves on a path to cut the United Kingdom carbon dioxide emissions- the main contributor to global warming- by some 60 % by about 2050, with real progress by 2020;</p> <p>To maintain the reliability of energy supplies;</p> <p>To promote competitive markets in the United Kingdom and beyond, helping to raise the rate of sustainable economic growth and to improve our productivity; and</p> <p>To make sure that every home is adequately and affordably heated.</p>	<p>The Local Plan and its policies need to promote development that is energy efficient and increases the use and/ or availability of renewable energy. [Addressed by SA objective 10].</p>
Water White Paper, 2011 Water for Life	<p>Objectives of the White Paper are to:</p> <ul style="list-style-type: none"> <li>• Paint a clear vision of the future and create the conditions which enable the water sector and water users to prepare for it;</li> <li>• Deliver benefits across society through an ambitious agenda for improving water quality, working with local communities to make early improvements in the health of our rivers by reducing pollution and tackling unsustainable abstraction;</li> <li>• Keep short and longer term affordability for customers at the centre of decision making in the water sector;</li> <li>• Protect the interests of taxpayers in the policy decisions that we take;</li> <li>• Ensure a stable framework for the water sector which remains attractive to investors;</li> <li>• Stimulate cultural change in the water sector by removing barriers to</li> </ul>	<p>Include sustainability objectives that relate to water quality and quantity. [Addressed by SA objectives 8 and 11].</p>

Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Folkestone & Hythe District Council Local Plan
	<p>competition, fostering innovation and efficiency, and encouraging new entrants to the market to help improve the range and quality of services offered to customers and cut business costs;</p> <ul style="list-style-type: none"> <li>• Work with water companies, regulators and other stakeholders to build understanding of the impact personal choices have on the water environment, water resources and costs; and</li> <li>• Set out roles and responsibilities – including where Government will take a stronger role in strategic direction setting and assessing resilience to future challenges, as well as clear expectations on the regulators.</li> </ul>	
<p>Urban White Paper 2000, Our Towns and Cities: The Future – delivering an urban renaissance (ODPM, 2000)</p>	<p>Provide for new sustainable homes that are attractive, safe and practical. Retain people in urban areas by, for example, making them more desirable places to live. Improve quality of life, opportunity and economic success through tailored solutions in towns and cities.</p> <p>3.8 million more homes needed by 2021. Local strategies needed to meet the needs of local people developed through partnerships. Sets targets for development on brownfield sites and through conversion of existing buildings now superseded by the NPPF.</p>	<p>Local Plan documents should seek to deliver better towns and cities taking into account the key aims of the White Paper.</p> <p>Include sustainability objectives to ensure that the majority of new development is built on brownfield sites and aim to improve the quality of life of residents in towns and cities. [Addressed by SA objective 7].</p>
<p>Heritage Protection for the 21st Century: White Paper (2007)</p>	<p>The proposals in this White Paper reflect the importance of the heritage protection system in preserving our heritage for people to enjoy now and in the future. They are based around three core principles:</p> <ul style="list-style-type: none"> <li>• Developing a unified approach to the historic environment;</li> <li>• Maximising opportunities for inclusion and involvement; and</li> <li>• Supporting sustainable communities by putting the historic environment at the heart of an effective planning system</li> </ul>	<p>The new Folkestone &amp; Hythe Review of the Core Strategy policies will need to ensure that they protect the District’s heritage assets. [Addressed by SA objective 4].</p>
<p>Rural White Paper 2000, Our Countryside: The Future – a fair deal for rural England (ODPM, 2000)</p>	<ul style="list-style-type: none"> <li>• Facilitate the development of dynamic, competitive and sustainable economies in the countryside.</li> <li>• Maintain and stimulate communities and secure access to services for those who live and work in the countryside.</li> <li>• Conserve and enhance rural landscapes.</li> <li>• Increase opportunities for people to get enjoyment from the countryside.</li> </ul>	<p>Local Plan documents should help increase employment and services in the rural parts of the District whilst conserving the landscape. [Addressed by SA objectives 2 and 3].</p>

Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Folkestone & Hythe District Council Local Plan
<b>Policies and Strategies</b>		
National Planning Practice Guidance, MHCLG, 2018	<p>The National Planning Practice Guidance provides technical guidance on topic areas in order to support policies set out within the NPPF. It aims to allow for sustainable development as guided by the NPPF. Notably topics include:</p> <ul style="list-style-type: none"> <li>• Air quality</li> <li>• Climate change</li> <li>• Conserving and enhancing the historic environment</li> <li>• Flood risk and coastal change</li> <li>• Health and well being</li> <li>• Housing and economic land availability assessment</li> <li>• Natural environment</li> <li>• Minerals</li> <li>• Rural housing</li> <li>• Open space, sports and recreation facilities, public rights of way and local green space</li> <li>• Transport evidence bases in plan making and decision taking</li> <li>• Waste</li> <li>• Water supply, wastewater and water quality</li> </ul>	The NPPG sets out a range of social, economic and environmental considerations for the preparation of the Local Plan. It also includes information on undertaking sustainability appraisals which can be taken into consideration. [Addressed by all SA objectives].
National Policy Statement EN1: Overarching Energy Policy Statement (2011)	This policy document sets out government policy for the delivery of major planning applications for energy development. The document also specifies the criteria for waste management, traffic and transport, water quality and quantity, noise and vibration, open spaces and green infrastructure, the landscape, visual impact, dust, flood risk, historic environment, odour, light, smoke/steam, insects, coastal change, aviation, biodiversity and geodiversity.	The new Review of the Core Strategy will need to be consistent with the National Policy Statement. [Addressed by SA objective 10].
National Policy Statement EN3: Renewable Energy Infrastructure (2011)	The statement provides the primary basis for decisions on major applications for nationally significant renewable energy infrastructure; this includes biomass and waste combustion and onshore and offshore wind.	The new Review of the Core Strategy will need to be consistent with the National Policy Statement [Addressed by SA objective 10].
National Policy Statement EN4: National Policy Statement for Gas Supply Infrastructure and Gas Oil pipelines	Taken with the overarching national policy statement for energy, the statement provides the primary basis for decisions on major applications for gas supply infrastructure and gas and oil pipelines.	The Local Plan will need to consider and be consistent with the policies and objectives of the National Policy Statement where applicable.

Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Folkestone & Hythe District Council Local Plan
(2011)		[Addressed by SA objective 10].
EN5: National Policy Statement for Electricity for Electricity Networks (2011) Infrastructure	This statement provides the primary basis for decisions on major applications for electricity networks infrastructure.	The Local Plan will need to consider and be consistent with the policies and objectives of the National Policy Statement where applicable. [Addressed by SA objective 10].
National Policy Statement EN6: Nuclear Power Generation (2011)	This statement provides the primary basis for decisions on major planning applications for Nuclear Power infrastructure.	The Local Plan will need to consider and be consistent with the policies and objectives of the National Policy Statement where applicable. [Addressed by SA objective 10].
National Planning Policy for Waste (2014)	<p>Key planning objectives are identified within National Planning Policy for Waste, requiring planning authorities to:</p> <ul style="list-style-type: none"> <li>• help deliver sustainable development through driving waste management up the waste hierarchy</li> <li>• Ensure waste management is considered alongside other spatial planning concerns</li> <li>• provide a framework in which communities take more responsibility for their own waste</li> <li>• help secure the recovery or disposal of waste without endangering human health and without harming the environment,</li> <li>• ensure the design and layout of new development supports sustainable waste management</li> </ul>	Include sustainability objective that relates to waste reduction. [Addressed by SA objective 12].
National Policy Statement: Waste Water (2012)	The National Policy Statement sets out Government Policy for the provision of major waste water infrastructure. It will be used by the decision makers as the primary basis for deciding development consent that fall within the definition of Nationally Significant Infrastructure projects as defined in the Planning Act 2008.	The Local Plan will need to consider and be consistent with the policies and objectives of the National Policy Statement where applicable. [Addressed by SA objectives 8 and 11].
Door to Door: A Strategy for Improving Sustainable Transport Integration (DfT, 2013)	<p>The strategy focuses on four core areas which need to be addressed so that people can be confident in choosing greener modes of transport:</p> <ul style="list-style-type: none"> <li>• Accurate, accessible and reliable information about different transport options</li> <li>• Convenient and affordable tickets</li> <li>• Regular and straightforward connections at all stages of the journey and between different modes of transport</li> </ul>	<p>Local Plan documents should take into account their role in addressing the four core areas outlined in the Strategy.</p> <p>Include SA objectives relating to high quality, efficient sustainable transport systems. [Addressed by SA objective 13].</p>

Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Folkestone & Hythe District Council Local Plan
<p>Planning Policy for Traveller Sites (DCLG, 2015)</p>	<ul style="list-style-type: none"> <li>• Safe and comfortable transport facilities</li> </ul> <p>This document sets out the Government’s planning policy for traveller sites, replacing ODPM Circular 01/2006: Planning for Gypsy and Traveller Caravan Sites and Circular 04/2007: Planning for Travelling Showpeople. It sets out the Government’s aims in respect of Traveller’s sites, including:</p> <ul style="list-style-type: none"> <li>• To ensure that local planning authorities, working collaboratively, develop fair and effective strategies to meet need through the identification of land for sites.</li> <li>• To encourage local planning authorities to plan for sites over a reasonable timescale.</li> <li>• That plan-making and decision-taking should protect Green Belt from inappropriate development.</li> <li>• For local planning authorities to ensure that their Local Plan includes fair, realistic and inclusive policies.</li> <li>• To increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply.</li> <li>• To reduce tensions between settled and traveller communities in plan making and planning decisions.</li> <li>• To enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure.</li> <li>• For local planning authorities to have due regard to the protection of local amenity and local environment.</li> </ul>	<p>The Review of the Core Strategy Policies will need to be in conformity with this document which sets out national policy for planning for Traveller sites.</p> <p>Include a sustainability objective relative to supply of housing available to all. [Addressed by SA objective 1].</p>
<p>DECC (2011) UK Renewable Energy Roadmap (updates setting out progress and changes to the strategy dated 2013 and 2013)</p>	<ul style="list-style-type: none"> <li>• Make the UK more energy secure</li> <li>• Help protect consumers from fossil fuel price fluctuations.</li> <li>• Help drive investment in new jobs and businesses in the renewable energy sector.</li> </ul>	<p>Include objectives relating to renewable energy generation and energy efficiency. [Addressed by SA objective 10].</p>
<p>Biodiversity 2020: A Strategy for England’s Wildlife and Ecosystem Services (DEFRA, 2011)</p>	<p>The aim of the Strategy is to guide conservation efforts in England up to 2020. Moving further on from 2020, the ambition is to move from a net biodiversity loss to gain.</p> <p>The strategy includes 22 priorities which include actions for the following</p>	<p>Local Plan documents should take into account their role in seeking to prevent the degradation of biodiversity and ecosystem services within Folkestone &amp; Hythe. Local Plan documents should also recognise their contribution to securing a net</p>

Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Folkestone & Hythe District Council Local Plan
	sectors: <ul style="list-style-type: none"> <li>• Agriculture</li> <li>• Forestry</li> <li>• Planning and Development</li> <li>• Water Management</li> <li>• Marine Management</li> <li>• Fisheries</li> <li>• Air Pollution</li> </ul>	gain in biodiversity. Include SA objective relating to the protection and enhancement of the natural environment. [Addressed by SA objective 5 and 6].
Laying the Foundations: A Housing Strategy for England (DCLG, 2011)	Aims to provide support to deliver new homes and improve social mobility.	Local Plan documents should encourage development of residential properties. [Addressed by SA objective 1].
Securing the Future: Delivering UK Sustainable Development Strategy (DEFRA, 2005)	Enable all people throughout the world to satisfy their basic needs and enjoy a better quality of life without compromising the quality of life for future generations. There are 4 shared priorities: <ul style="list-style-type: none"> <li>• sustainable consumption and production;</li> <li>• climate change and energy;</li> <li>• natural resource protection and environmental enhancement; and</li> <li>• sustainable communities.</li> </ul> Sets out indicators to give an overview of sustainable development and priority areas in the UK. They include 20 of the UK Framework indicators and a further 48 indicators related to the priority areas.	Local Plan documents should meet the aims of the Sustainable Development Strategy. Include SA objectives to cover the shared priorities. [Addressed by SA objectives 5, 6, 7, 8, 9, 10, 11, 12, 13 and 14].
The UK Renewable Energy Strategy (DECC, 2009)	<ul style="list-style-type: none"> <li>• Increase our use of renewable electricity, heat and transport, and help tackle climate change.</li> <li>• Build the UK low-carbon economy, promote energy security and take action against climate change.</li> <li>• 15% of energy from renewable sources by 2020.</li> </ul>	Local Plan documents should encourage developments that would support renewable energy provision including electricity, heat and transport. Include SA objectives relating to increasing energy provided from renewable sources. [Addressed by SA objective 10].



Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Folkestone & Hythe District Council Local Plan
The Energy Efficiency Opportunity in the UK (DECC, 2012)	<ul style="list-style-type: none"> <li>Reduce the UK's emissions of CO<sub>2</sub> by over 750 million tonnes by 2030.</li> </ul> <p>This is an Energy Efficiency Strategy aiming to realise the wider energy efficiency potential that is available in the UK economy.</p> <p>The Strategy identifies four barriers to energy efficiency which need to be overcome which include:</p> <ul style="list-style-type: none"> <li>Embryonic markets.</li> <li>Information.</li> <li>Misaligned financial incentives.</li> <li>Undervaluing energy efficiency.</li> </ul> <p>The Strategy draws attention to maximising the potential of existing dwellings by implementing 21<sup>st</sup> century energy management initiatives on 19<sup>th</sup> century homes.</p>	<p>Local Plan documents should seek to address the barriers identified within the Strategy and improve the existing building stock through appropriate adaptation measures.</p> <p>Include SA objectives relating to energy efficiency and adaptation of the existing building stock. [Addressed by SA objective 10].</p>
UK Bioenergy Strategy (2012)	<p>The UK Government has a responsibility to ensure that its policies only support bioenergy use in the right circumstances. This strategy is based on four principles which will act as a framework for future government policy on bioenergy.</p> <p>In summary the four principles state that:</p> <ul style="list-style-type: none"> <li>Policies that support bioenergy should deliver genuine carbon reductions that help meet UK carbon emissions objectives to 2050 and beyond.</li> <li>Support for bioenergy should make a cost effective contribution to UK carbon emission objectives in the context of the overall energy goals.</li> <li>Support for bioenergy should aim to maximise the overall benefits and minimise costs (quantifiable and non-quantifiable) across the economy.</li> <li>At regular time intervals and when policies promote significant additional demand for bioenergy in the UK, beyond that envisaged by current use, policy makers should assess and respond to the impacts of this increased deployment on other areas, such as food security and biodiversity.</li> </ul>	<p>The principles of the Bioenergy Strategy 2012 will need to be reflected within the new Review of the Core Strategy policies. [Addressed by SA objective 10].</p>
The National Adaptation Programme – Making the Country Resilient to a Changing Climate (Defra, 2013)	<p>The report sets out visions for the following sectors:</p> <ul style="list-style-type: none"> <li>Built Environment – “buildings and places and the people who live and work in them are resilient to a changing climate and extreme weather and organisations in the built environment sector have an increased capacity to address the risks and take the opportunities from climate change”.</li> </ul>	<p>Local Plan documents should take account of the visions set out in the Programme.</p> <p>Include SA objectives which seek to promote the implementation of adaptation measures to make Folkestone &amp; Hythe more resilient to a changing climate. [Addressed by SA objectives 6 and 9].</p>

Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Folkestone & Hythe District Council Local Plan
	<ul style="list-style-type: none"> <li>• Infrastructure – “an infrastructure network that is resilient to today’s natural hazards and prepared for the future changing climate”.</li> <li>• Healthy and resilient communities – “a health service, a public health and social care system which are resilient and adapted to a changing climate. Communities and individuals, including the most vulnerable, are better prepared to cope with severe weather events and other impacts of climate change. Emergency services and local resilience capability take account of and are resilient to, a changing climate”.</li> <li>• Agriculture and Forestry – “profitable and productive agriculture and forestry sectors that take the opportunities from climate change are resilient to its threats and contribute to the resilience of the natural environment by helping maintain ecosystem services and protect and enhance biodiversity”.</li> <li>• Natural Environment – “the natural environment, with diverse and healthy ecosystems, is resilient to climate change, able to accommodate change and valued for the adaptation services it provides”.</li> <li>• Business – “UK businesses are resilient to extreme weather and prepared for future risks and opportunities from climate change”.</li> <li>• “Local government plays a central in leading and supporting local places to become more resilient to a range of future risk and to be prepared for the opportunities from a changing climate”.</li> </ul>	
Healthy Lives, Healthy People: our Strategy for public health in England (Department of Health, 2010)	Protect the population from serious health threats; helping people live longer, healthier and more fulfilling lives; and improving the health of the poorest, fastest. Prioritise public health funding from within the overall NHS budget.	Policies within the Local Plan documents should reflect the objectives of the strategy where relevant. [Addressed by SA objectives 6 and 14].
The Air Quality Strategy for England, Scotland, Wales and Northern Ireland (DEFRA, 2007)	<ul style="list-style-type: none"> <li>• Make sure that everyone can enjoy a level of ambient air quality in public spaces, which poses no significant risk to health or quality of life.</li> <li>• Render polluting emissions harmless.</li> <li>• Sets air quality standards for 13 air pollutants.</li> </ul>	Local Plan documents should take account of the likely impact on air quality from development. Include SA objectives to protect and improve air quality. [Addressed by SA objective 6 and 13].
Future Water: The Government’s Water Strategy for England (DEFRA, 2008)	Sets out how the Government want the water sector to look by 2030 and an outline of the steps which need to be taken to get there.	Local Plan documents should aim to contribute to the vision set out in this Strategy. Include SA objectives which seek to protect,

Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Folkestone & Hythe District Council Local Plan
	<p>The vision for 2030 is one where we, as a country have:</p> <ul style="list-style-type: none"> <li>• “improved the quality of our water environment and the ecology it supports, and continue to maintain high standards of drinking water quality from taps;</li> <li>• Sustainably managed risks from flooding and coastal erosion, with greater understanding and more effective management of surface water;</li> <li>• Ensure a sustainable use of water resources, and implement fair, affordable and cost-reflective water charges;</li> <li>• Cut greenhouse gas emissions, and;</li> <li>• Embed continuous adaptation to climate change and other pressures across the water industry and water users”.</li> </ul>	<p>manage and enhance the water environment. [Addressed by SA objective 8 and 11].</p>
<p>Water for People and the Environment: Water Resources Strategy for England and Wales (Environment Agency, 2009)</p>	<p>The Strategy vision for water resource “is for there to be enough water for people and the environment, meeting legitimate needs”.</p> <p>Its aims include:</p> <ul style="list-style-type: none"> <li>• To manage water resource and protect the water environment from climate change.</li> <li>• Restore, protect, improve and value species and habitats that depend on water.</li> <li>• To contribute to sustainable development through good water management.</li> <li>• People to understand how water and the water environment contribute to their quality of life.</li> </ul>	<p>Policies within the Local Plan should reflect the aims of the strategy where relevant.</p> <p>Include SA objective which seeks to promote water management and efficiency. [Addressed by SA objective 11].</p>
<p>The National Flood and Coastal Erosion Risk Management Strategy for England (Environment Agency, 2011)</p>	<p>This Strategy sets out the national framework for managing the risk of flooding and coastal erosion. It sets out the roles for risk management authorities and communities to help them understand their responsibilities.</p> <p>The strategic aims and objectives of the Strategy are to:</p> <ul style="list-style-type: none"> <li>• Manage the risk to people and their property;</li> <li>• Facilitate decision-making and action at the appropriate level – individual, community or local authority, river catchment, coastal cell or national;</li> <li>• Achieve environmental, social and economic benefits, consistent with</li> </ul>	<p>Local Plan documents should seek to reduce and manage the risk of all type of flooding.</p> <p>The SA framework should include objectives/indicators which seek to reduce the risk and manage flooding sustainably. [Addressed by SA objective 9].</p>

Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Folkestone & Hythe District Council Local Plan
	the principles of sustainable development.	
Waste Strategy for England 2007 (DEFRA, 2007)	<p>Future of waste management – the government commitment.</p> <ul style="list-style-type: none"> <li>• Tackle the amount of waste produced, by breaking the link between economic growth and waste production.</li> <li>• Put waste which is produced to good use through substantial increases in re-use, recycling, composting, and recovery of energy.</li> </ul>	Local Plan documents should encourage the minimisation of waste production and the maximisation of recycling and re-use of materials. [Addressed by SA objective 12].
Waste Management Plan for England (2013)	The Waste Management Plan follows the EU principal of waste hierarchy. This requires that prevention of waste, preparing for reuse and recycling should be given priority order in any waste legislation and policy. From this principle a key objective of The Plan is to reduce the level of waste going to landfill and to encourage recycling. The Plan also requires that larger amounts of hazardous waste should be disposed of at specially managed waste facilities.	The Review of the Core Strategy policies will be required to incorporate the objectives of the national waste policy. In order to encourage the reduction of waste and the reuse of materials. [Addressed by SA objective 12].
National Policy Statement: Hazardous Waste (2013)	Without sustainable management, hazardous waste may pose a risk to human health and the environment. We also need to manage our hazardous waste in a more sustainable way and ensure that where possible, we recycle and recover hazardous waste rather than sending it for disposal. The NPS was published by the Secretary of State and sets out the strategic need justification of government policy for the provision of such infrastructure. It will be used to guide decisions made by the planning inspectorate.	The Local Plan will need to consider and be consistent with policies and objectives of the National Policy Statement. [Addressed by SA objective 12].
The Carbon Plan: Delivery our Local Carbon Future (2011)	<p>The Carbon Plan sets out the government’s plans for achieving the emissions reductions it committed to in the first four carbon budgets.</p> <p>Emissions in the UK must, by law, be cut by at least 80% of 1990 by 2050. The UK was first to set its ambition in law and the Plan sets out progress to date.</p>	The Review of the Core Strategy will need to include policies that reflect the targets within the Carbon Plan. [Addressed by SA objective 10].
National Infrastructure Plan 2014	The Infrastructure Plan allows for long term public funding certainty for key infrastructure areas such as: roads, rail, flood defences and science. All elements highlighted in the Plan represent firm commitment by government to supply the funding levels stipulated. The Plan also highlights what steps the government will take to ensure effective delivery of its key projects.	The Folkestone & Hythe Review of the Core Strategy objectives and policies should support the delivery of infrastructure to support new development. [Addressed by SA objective 13 and 14].
English Heritage Historic England Corporate Plan 2015 to 2018 (2015)	<p>The plan sets out its three purposes as to:</p> <ul style="list-style-type: none"> <li>• Secure the preservation of ancient monuments and historic buildings;</li> <li>• Promote the preservation and enhancement of the character and appearance of conservation areas; and</li> <li>• Promote the public’s enjoyment of, and advance their knowledge of,</li> </ul>	The local plan should contain a planning framework which safeguards the historic environment. [Addressed by SA objective 4].

Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Folkestone & Hythe District Council Local Plan
	ancient monuments and historic buildings.	
Safeguarding our Soils- A Strategy for England (2011)	Current practices focus on protecting English soils and the important ecosystem services they provide. Research is focused on addressing evidence gaps to adapt and refine these policies in order to strengthen protection and their resilience as the climate changes. A Soil Strategy for England sets out the current policy context on soils and a number of core objectives for policy and research.	The Review of the Core Strategy will need to include policies on the safeguarding of soils. [Addressed by SA objective 7].
Lifetime Neighbourhoods (2011)	This document is a national strategy for housing in an ageing society. It seeks to support residents to develop lifetime neighbourhoods in terms of resident empowerment, access, services and amenities, built and natural environment, social networks/well-being and housing.	The policies and site allocations will need to reflect the requirements set out within the national strategy. [Addressed by SA objective 14].
The Plan for Growth implementation update (2013)	<p>The plan for growth, published alongside Budget 2011, and as part of the Autumn Statement 2011, announced a programme of structured reforms to remove barriers to growth for businesses and equip the UK to compete in the global race. These reforms span a range of policies including improving UK infrastructure, cutting red tape, root and branch reform of the planning system and boosting trade and inward investment, to achieve the government's four ambitions for growth:</p> <ul style="list-style-type: none"> <li>• Creating the most competitive tax system in the G20</li> <li>• Encouraging investment and exports as a route to a more balanced economy</li> <li>• Making the UK the best place in Europe to start, finance and grow a business</li> <li>• Creating a more educated workforce that is the most flexible in Europe.</li> </ul>	The Review of the Core Strategy policies will need to reflect the ambitions set out within the Plan for Growth 2013. [Addressed by SA objectives 2 and 14].
Green Infrastructure and the Urban Fringe (Natural England, 2009)	Promotes the concept of multifunctionality – the integration and interaction of different activities on the same parcel of land. The Countryside In and Around Towns programme acknowledges Green Infrastructure as a key mechanism for delivering regional and local change. The strategy promotes regional coalitions to pool resources, regional stocktakes to examine the extent, state and potential of the GI, influencing RSS and LDFs, putting forward exemplar projects as examples of good practice to learn from.	Review of the Core Strategy Policies and Site Allocations to deliver new green infrastructure and enhancement of existing assets in and around new developments to contribute to better quality, multifunctional environments. [Addressed by SA objective 6].
Working with the grain of nature – A Biodiversity Strategy for England (2011)	This Strategy seeks to protect and improve the rural, urban, marine and global environment and lead on the integration of these with other policies across Government and internationally.	<p>Reversing the long-term decline in the number of farmland birds by 2020, as measured annually against underlying trends.</p> <p>Minimise loss of biodiversity when allocating sites for development. [Addressed by SA objective 5].</p>
Water for Life and Livelihoods: A Strategy	This document set out the Environment Agency's strategy to implement the	Folkestone & Hythe Local Plan policies should

Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Folkestone & Hythe District Council Local Plan
for River Basin Planning (Environment Agency, 2006)	European Water Framework Directive (WFD) by managing water based on river basin planning. The document aims to reduce pollution, prevent deterioration and improve the condition of aquatic ecosystems including wetlands.	promote efficient use of water in new developments and good management of water resources. [Addressed by SA objective 8].
Industrial Strategy: Building a Britain for the future (2017)	<p>This document sets out Britain’s Industrial Strategy over the next 10 years. Key policies include:</p> <ul style="list-style-type: none"> <li>• Increase in research and development investment.</li> <li>• Improve technical education.</li> <li>• Improve national productivity.</li> <li>• Encourage innovation.</li> <li>• Agree Local Industrial Strategies</li> </ul>	Folkestone & Hythe Local Plan policies should promote industrial growth and diversity to deliver jobs and economic security in the District. [Addressed by SA objective 8].
<b>Legislation</b>		
Housing Act 2004	Protect the most vulnerable in society and help create a fairer and better housing market. Strengthen the Government’s drive to meet its 2010 decent homes target.	Ensure that site allocations and policies will help to create a fairer and better housing market. Include sustainability objectives to improve access to good quality and affordable housing. [Addressed by SA objective 1].
Housing and Planning Act (2016)	The Act makes widespread changes to housing policy at the national level. Measures introduced in the Act relate to starter homes, and permitting the sale of higher value local authority homes. Starter homes are the new affordable housing product designed by the government to specifically meet the housing needs of younger generations and to allow them to access home-ownership. The overarching aim of the Act is to promote home ownership and increase levels of house building.	Ensure the delivery of housing is included in the SA Framework. The Core Strategy will need to take account of the provisions of the Act in relation to housing provision.
Flood and Water Management Act (2010)	The Act aims to reduce the flood risk associated with extreme weather. It provides for better, more comprehensive management of flood risk for people, homes and businesses, helps safeguard community groups from unaffordable rises in surface water drainage charges, and protects water supplies to the consumer.	Ensure that there is an SA objective that encourages flood risk and water management. The Core Strategy should protect existing and future development as well as residents from flood risk.
Localism Act (2011)	<p>The Localism Act introduces a number of measures to decentralise decision making process to the local level, creating space for Local Authorities to lead and innovate, and giving people the opportunity to take control of decisions that matter to them. The Localism Act includes a number of important packages.</p> <p>The new act makes it easier for local people to take over the amenities they love and keep them part of local life;</p>	The Local Plan will need to reflect the principles of Localism as identified in the document. The Local Plan will need to incorporate the concept of Neighbourhood Planning, with the intention of giving neighbourhoods far more ability to determine the shape of the places in which people live.

Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Folkestone & Hythe District Council Local Plan
	<p>The act makes sure that local social enterprises, volunteers and community groups with a bright idea for improving local services get a chance to change how things are done.</p> <p>The act places significantly more influence in the hands of local people over issues that make a big difference to their lives.</p> <p>The act provides appropriate support and recognition to communities who welcome new development.</p> <p>The act reduces red tape, making it easier for authorities to get on with the job of working with local people to draw up a vision for their area's future.</p> <p>The act reinforces the democratic nature of the planning system passing power from bodies not directly to the public, to democratically accountable ministers.</p> <p>The act enables Local Authorities to make their own decisions to adapt housing provision to local needs, and make the system fairer and more effective.</p> <p>The act gives Local Authorities more control over the funding of social housing, helping them plan for the long- term.</p> <p>In relation to planning, the Localism Act enables the Government to abolish regional spatial strategies, introduce Neighbourhood Plans and Local Referendums.</p>	
Marine and Coastal Access Act (2009)	Provides the legal mechanism to help ensure clean, healthy, safe, productive and biologically diverse oceans and seas by putting in place a system for improved management and protection of the marine and coastal environment.	Local Plan documents should consider this Act to ensure the protection of oceans and coastal areas including biodiversity at such locations. [Addressed by SA objectives 5 and 6].
The Climate Change Act (2008)	<p>The Climate Change Act was passed in 2008 and established a framework to develop an economically credible emissions reduction path. It also strengthened the UK's leadership internationally by highlighting the role it would take in contributing to urgent collective action to tackle climate change under the Kyoto Protocol.</p> <p>The Climate Change Act includes the following:</p> <ul style="list-style-type: none"> <li>• <b>2050 target.</b> The act commits the UK to reducing emissions by at least 80% in 2050 from 1990 levels. This target was based on advice from the CCC report: Building a Low- carbon Economy. The 80% target includes GHG emissions from the devolved administrations, which currently accounts for around 20% of the UK's total emissions.</li> <li>• <b>Carbon Budgets.</b> The Act requires the Government to set legally binding 'carbon budgets'. A carbon budget is a cap on the amount of</li> </ul>	The Review of the Core Strategy policies must reflect the objectives of The Climate Change Act, in order to contribute to reducing UK carbon emissions. [Addressed by SA objective 10].

Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Folkestone & Hythe District Council Local Plan
	greenhouse gases emitted in the UK over a five-year period. The first four carbon budgets have been put into legislation and run up to 2027.	
Energy Act (2008)	<p>The Act works towards a number of policy objectives including carbon emissions reduction, security of supply, and competitive energy markets. Objectives: Electricity from Renewable Sources: changes to Renewables Obligation (RO), designed to increase renewables generation, as well as the effectiveness of the RO.</p> <p>Feed in tariffs for small scale, low carbon generators of electricity. Smart meters: the Act mandates a roll-out of smart meters to medium sized businesses over the next five years.</p> <p>Renewable heat incentives: the establishment of a financial support mechanism for those generating heat from renewable sources.</p>	Review of the Core Strategy Policies and Site Allocations will have to ensure a positive contribution in meeting the climate change challenge by capitalising on renewable and low carbon energy opportunities and adaptation measures which reduce the threat of climate change. [Addressed by SA objective 10].
Ancient Monuments and Archaeological Areas Act (1979)	The Act makes provision for the investigation, preservation and recording of matters of archaeological or historical interest.	Local Plan documents should consider this Act to ensure Ancient Monuments and Archaeological Areas are protected in the Plan. [Addressed by SA objective 4].
Planning (Listed Buildings and Conservation Areas) Act (1990)	Legislation for the protection of Listed Buildings and Conservation Areas.	Local Plan documents should consider this Act to ensure Listed Buildings and Conservation Areas are protected in the Plan. [Addressed by SA objective 4].
<b>SUB-NATIONAL/REGIONAL</b>		
Kent and Medway Growth and Infrastructure Framework (2018)	<p>The Framework sets out a picture over the Local Plan period to 2031 of the following:</p> <ul style="list-style-type: none"> <li>• housing and economic growth planned to 2031 across Kent and Medway;</li> <li>• the fundamental infrastructure needed to support this growth;</li> <li>• the cost of this infrastructure;</li> <li>• the potential funding sources across the public and private sector funding during this period: and</li> <li>• the likely public sector funding gap and work towards solutions.</li> </ul>	<p>Local Plan documents should take into account expected delivery of homes and economic development over the plan period as well as the infrastructure which will be needed across Kent and Medway to support this level of growth.</p> <p>The SA framework should include objectives which seek to support the delivery of new homes and employment opportunities in the District. [Addressed by SA objectives 1 and 2].</p>
Commissioning Plan for Education Provision in Kent 2018-2022	The Plan details the future need for education provision in Kent and sets out how it will be ensured that there are sufficient places of high quality, in the right places for all learners. At the same time the County Council as the Strategic Commissioner of Education Provision in Kent will seek to fulfil its responsibilities to raise education standard and secure other provisions such	<p>Local Plan documents should address the aim of improved education provision in the District.</p> <p>The SA framework should include objectives which address improved access to education facilities and overall educational attainment in the District.</p>



Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Folkestone & Hythe District Council Local Plan
	as training and apprenticeships.	[Addressed by SA objectives 2 and 14].
Kent Minerals and Waste Plans 2013-2030	<p>Set out the vision and strategy for mineral provision and waste management in Kent</p> <p>Contain a number of development management policies for evaluating minerals and waste planning applications</p> <p>Consider strategic site provision for all minerals and waste management facilities, and</p> <p>Plan to the year 2030.</p>	<p>Local Plan documents should take into the mineral supply and waste hierarchies and ensure mineral supply is not compromised. Take account of mineral safeguarding areas, new primary extraction facilities and safeguarded existing facilities during the selection of land for development.</p> <p>The SA framework should include objectives which consider the safeguarded sites and areas for future minerals supply. [Addressed by SA objectives 7 and 12].</p>
Local Transport Plan 4: Delivering Growth without Gridlock 2016-2031	<p>The strategic transport priorities of the plan are:</p> <ul style="list-style-type: none"> <li>• A new Lower Thames Crossing;</li> <li>• Bifurcation of port traffic;</li> <li>• Transport infrastructure to support growth in the Thames Estuary including Crossrail extension to Ebbsfleet;</li> <li>• A solution to Operation Stack;</li> <li>• Provision for overnight lorry parking;</li> <li>• Journey time improvements and Thanet Parkway Railway Station;</li> <li>• Ashford International Station signalling;</li> <li>• Rail improvements;</li> <li>• Bus improvements.</li> </ul>	<p>The Folkestone &amp; Hythe Review of the Core Strategy should take into the strategic priorities as well as the proposed outcomes for transport in the plan and ensure they are not compromised.</p> <p>SA objectives/indicators should seek to improve access to sustainable high quality modes of transport, ensure safety on the network is enhanced and reduce congestion. [Addressed by SA objective 13].</p>
East Kent Local Investment Plan 2011-2026	<p>The Local Investment Plan (LIP) family of publications present the East Kent Local Strategic Partnership's (LSP) proposals to deliver its vision:</p> <p>By 2030, East Kent will have blended the best of its coastal location, landscape, culture and heritage to build a lasting beacon of success for the benefit of all its communities.</p>	<p>Local Plan documents should take into account their role in addressing the key themes and priorities identified within the Investment Plan.</p> <p>The SA framework should include objectives/indicators which consider a range of social, economic and environmental matters. [Addressed by all SA objectives].</p>
Lighting the way to success The EKLSP Sustainable Community Strategy (2009)	<p>"Lighting the Way to Success" is a long-term vision – it looks forward more than 20 years to 2030. By 2030, East Kent will have blended the best of its coastal location, landscape, culture and heritage to build a lasting beacon of success for the benefit of all its communities.</p>	<p>The Folkestone &amp; Hythe Review of the Core Strategy should take into account its role in achieving the objectives set out in the East Kent Community Strategy.</p> <p>The SA framework should include</p>

Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Folkestone & Hythe District Council Local Plan
		objectives/indicators which consider a range of social, economic and environmental matters. [Addressed by all SA objectives].
A Living Landscape for the South East	Vision for the South East ecological network.	The Folkestone & Hythe Review of the Core Strategy should take into account its role in promoting the green network across the area.  The SA framework should include objectives/indicators which seek to maintain and enhance the green network. [Addressed by SA objective 6].
East Kent Gypsy and Traveller Accommodation Assessment Report (2014)	Assess the accommodation needs of Gypsies and Travellers in the sub-region from 2013 – 2027.	The Folkestone & Hythe Places and Policies Local Plan should take into account its role in allocating and Review of the Core Strategy safeguarding sites for Gypsy and traveller accommodation.  The SA framework should include objectives/indicators which seek to preserve the rights of gypsy and travellers and improve their integration into the local community. [Addressed by SA objectives 1 and 14].
Growing the Garden of England: A strategy for environment and economy in Kent (2011)	<p>The 2011 strategy has three themes:</p> <ul style="list-style-type: none"> <li>• Living well within our environmental limits.</li> <li>• Rising to the climate change challenge.</li> <li>• Valuing our natural, historic and living environment.</li> </ul> <p>It is one of a suite of strategies, developed in 2010, that supports a revised Vision for Kent to deliver social, economic and environmental wellbeing for Kent's communities over the next 20 years. The 2011 strategy sets out how we will achieve a high-quality Kent environment, low carbon, resilient to climate change, and that has a thriving 'green economy' at its heart.</p>	The Folkestone & Hythe Review of the Core Strategy should take into account its role in protecting, managing and maximising the benefits of the District's Ecosystem Services without compromising the environment.  The SA framework should include objectives/indicators which seek to maximise the benefits of the District's Ecosystem Services without compromising the environment. [Addressed by SA objectives 5 and 6].
Kent Biodiversity 2020 and beyond – a strategy for the natural environment 2015-2025□	Identifies the priorities for the natural environment in Kent and Medway, coordinates, facilitates and supports work that contributes to the objectives of the Strategic Framework for the Natural Environment, and ensures that this work is reported to capture the contribution that is being made in Kent and Medway to the England Biodiversity Strategy.	The Folkestone & Hythe Review of the Core Strategy should protect the intrinsic value of the identified habitats and seek to improve them where possible.  The SA framework should include an objective/indicator which seeks to conserve and enhance the identified habitats and species. [Addressed by SA objectives 5 and 6].
Kent Design Initiative (and Guide)	Initiative to create a showcase of great buildings, memorable and attractive new places that reinforce Kent's distinctive character.	The Folkestone & Hythe Review of the Core Strategy should contain development management policies that are consistent with the content of the Kent

Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Folkestone & Hythe District Council Local Plan
		<p>Design Guide.</p> <p>The SA framework should include an objective/indicator which seeks to retain the character of the District built environment and promote its qualities in new developments. [Addressed by SA objective 3, 4 and 10].</p>
Kent Health and Affordable Warmth Strategy	Fuel poverty is linked to general poverty. Strategy aimed at leading to the eradication of fuel poverty in Kent.	Local Plan documents should take into account their role in providing local communities with more opportunities to improve their health and wellbeing and reduced inequality.
Active Lives: 2007-2016, Kent Adult Social Services	A picture of how Kent Adult Social Services will look in 10 years' time.	<p>The SA framework should include objectives/indicators which consider a range of social and environmental matters, including health and wellbeing and affordable warmth. [Addressed by SA objectives 13 and 14].</p>
Kent Downs AONB management plan (2014-2019)	The ultimate goal of the Management Plan remains to ensure that the natural beauty of the landscape and vitality of the communities of the Kent Downs AONB are recognised, valued and strengthened well into the future.	<p>Local Plan should take account of the special qualities of the Kent Downs AONB and ensure that its policies are compatible with those outlined within the management plan.</p> <p>The SA framework should include objectives/indicators which consider landscape and ecological matters. [Addressed by SA objectives 3 and 5].</p>
Kent Renewable Energy Action Plan (2013)	The plan takes forward actions recommended by the County Council's Renewable Energy Select Committee and the priorities set out in the Kent Environment Strategy and builds on the actions of the County's recent renewable energy capacity study. The plan champions the growth and diversification of the County and its constituent Districts' renewable and low carbon energy generation capacity through joint working.	<p>The Folkestone &amp; Hythe Review of the Core Strategy should encourage the incorporation of renewable and low carbon energy generation technologies within planned allocations.</p> <p>SA objectives should encourage the incorporation of such technologies within allocations at a strategic and local scale. [Addressed by SA objective 10].</p>
Strategic Housing Market Assessment: Parts 1 and 2 (2017)	<p>The OAN for Folkestone &amp; Hythe is 633 dpa over the period (12,030 dwellings). This number has been revised upwards to reflect a market signals adjustment.</p> <p>The total annual affordable housing need in Folkestone &amp; Hythe is 139 households per year. This represents 23.2% of the annual projected household growth in the District between 2014 and 2033 (601 households per year as identified within the full OAN calculations).</p>	<p>The Folkestone &amp; Hythe Review of the Core Strategy should provide sites for high quality, affordable homes with an appropriate range of tenures, layouts and designs and encourage the refurbishment of empty homes in the District.</p> <p>SA objectives should improve access to good quality and affordable housing. [Addressed by SA objective 1].</p>
<u>East Kent Homelessness Prevention</u>	Major considerations include homelessness prevention, temporary	The Folkestone & Hythe Review of the Core Strategy should take into account its role in supplying and

Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Folkestone & Hythe District Council Local Plan
<u>Strategy (2014-2019)</u>	accommodation and long-term housing solutions.	safeguarding accommodation for the homeless.  SA should consider use of District wide homelessness data as an indicator. [Addressed by SA objective 1].
Countryside and Coastal Access Improvement Plan (2013)	The plan sets out an approach to providing access to Kent's countryside for the benefit of all of Kent's residents.	The Folkestone & Hythe Review of the Core Strategy should take into account its role in helping to protect and where possible improve public rights of way.  SA should address potential losses of public rights of way. [Addressed by SA objective 13]
Kent Joint Health and Wellbeing Strategy (2014-2017) – extended to 2021	The strategy aims to: <ul style="list-style-type: none"> <li>• Tackle key health issues where Kent is performing worse than the England average</li> <li>• Tackle health inequalities</li> <li>• Tackle the gaps in provision</li> <li>• Transform services to improve outcomes, patient experience and value for money</li> </ul>	Local Plan documents should take into account their role in addressing the key themes and priorities identified within the Strategy.  The SA framework should include objectives relating to health and wellbeing matters. [Addressed by SA objective 14].
Kent Health Weight Strategy (2015-2020)	The strategy is organised around four themes: <ul style="list-style-type: none"> <li>• Take action on the environmental and social causes of unhealthy weight.</li> <li>• Give every child the best start in life and into adulthood</li> <li>• Develop a confident workforce skilled in promoting healthy weight</li> <li>• Provide support to people who want to lose weight, prioritising those from specific groups</li> </ul>	Local Plan documents should take into account their role in addressing the key themes and priorities identified within the Strategy.  The SA framework should include objectives relating to health and wellbeing matters. [Addressed by SA objective 14].
<b>LOCAL</b>		
Shepway Rural Services Study (2011)	This study aims to review the current position of rural areas within Folkestone & Hythe by combining existing data sources and officer field studies to aid in the assessment of Local Plan policies and inform the direction of future policy.	The Folkestone & Hythe Review of the Core Strategy should take into account the needs and opportunities of the District's rural economy.  The SA framework should consider the needs and opportunities of the District's rural economy and communities. [Addressed by SA objective 2].
Shepway District Local Brownfield Strategy (2011)	The key aim of Folkestone & Hythe's Brownfield Land Strategy is to develop an understanding of the brownfield land in the area and to establish how this can be brought back into productive and beneficial use.	The Folkestone & Hythe Review of the Core Strategy should maximise the use of brownfield before allocating land on greenfield sites.  The SA framework should consider the need to

Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Folkestone & Hythe District Council Local Plan
		maximise the efficiency of land use in the District by using brownfield land before greenfield land. [Addressed by SA objective 7].
Population Forecasts 2006 - 2036	Forecasts/ projections have been produced for the District as a whole and for individual wards within the District.	The Folkestone & Hythe Review of the Core Strategy should take into account its role in supplying accommodation and employment opportunities for its growing population.  SA should consider the use of accurate and up-to-date population data as an indicator. [Addressed by SA objective 1 and 2].
Shepway Employment Land Review (2017)	Employment land review to inform the preparation of the District's planning policies.	The Folkestone & Hythe Review of the Core Strategy should provide sites for a range of high quality employment sites with an appropriate range of use classes.  SA objectives should improve access to good quality, easily accessible employment opportunities. [Addressed by SA objective 2].
Folkestone Town Centre Spatial Strategy (2011)	Key objective of the study is to improve the quality and functionality of the public realm through identifying: <ul style="list-style-type: none"> <li>• opportunities to re-model the highway network to reduce its dominance and improve legibility;</li> <li>• improvements to accessibility and connectivity for pedestrians, particularly from the station to the town centre and seafront;</li> <li>• opportunities to enhance the character and public realm of the town centre.</li> </ul>	The Folkestone & Hythe Review of the Core Strategy should take into account the existing visions for Folkestone & Hythe's town centres and contribute to the regeneration of Folkestone town centre.  The SA framework should consider regeneration of key areas within Folkestone & Hythe District. [Addressed by SA objective 7, 14 and 15].
Shepway Town Centres Study (2015)	The Study reviews the District's town centres and makes the following recommendations: <ul style="list-style-type: none"> <li>• There is a need to deliver more floor space within the District's town centres for larger retail units, particularly in Folkestone.</li> <li>• Folkestone is also in need of an improved 'evening economy' provision, including 'family dining' restaurants and a cinema.</li> </ul>	
Windfalls, Housing Supply and Policy Update (2012)	Evidence supporting modifications put forward by Folkestone & Hythe District Council to its Core Strategy Local Plan [G15] in October 2012.	The Folkestone & Hythe Review of the Core Strategy should provide high quality, affordable homes with an appropriate range of tenures, layouts and designs and encourage the refurbishment of empty homes in the District.  SA objectives should improve access to good quality and affordable housing. [Addressed by SA objective

Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Folkestone & Hythe District Council Local Plan
		1].
CIL and Whole Plan Economic Viability Assessment (2014)	A District-wide affordable housing viability assessment for housing delivery over the lifetime of the Core Strategy.	The Folkestone & Hythe Review of the Core Strategy should provide high quality, affordable homes and encourage the refurbishment of empty homes in the District.  SA objectives should improve access to good quality and affordable housing. [Addressed by SA objective 1].
Strategic Housing Land Availability Assessment (SHLAA) (2009-2010) and Update (2011-2012)	The Folkestone & Hythe SHLAA has produced a very large amount of information. However the conclusions are clear: the identified pool of possible housing sites is more than sufficient to allow a genuine range of strategic options to be considered.	The Folkestone & Hythe Review of the Core Strategy should provide sites for high quality, affordable homes with an appropriate range of tenures, layouts and designs and encourage the refurbishment of empty homes in the District.  SA objectives should improve access to good quality and affordable housing. [Addressed by SA objective 1].
Shepway Green Infrastructure Report (2011)	This report comprises the evidence base in respect of Green Infrastructure (GI), which is essentially the network of multi-functional green space which supports natural and ecological processes and is integral to the health and quality of life of sustainable communities.	The Folkestone & Hythe Review of the Core Strategy should take into account its role in promoting the green network across the area.  The SA framework should include objectives/indicators which seek to maintain and enhance the green network. [Addressed by SA objective 6].
Shepway Strategic Flood Risk Assessment (SFRA) (2009) and Strategic Flood Risk Assessment (SFRA) Update (2015)	This study provides an analysis of the main sources of flood risk to the District, together with a detailed means of appraising development allocations and existing planning policies against the risks posed by coastal flooding over this coming century.	Policies within the Local Plan should reflect the actions identified within the assessment where relevant.  Include SA objective which seeks to promote flood risk management. [Addressed by SA objective 9].
Shepway Water Cycle Study (2011)	This report examines the issues relating to water within the context of the District and the physical characteristics of its hydrology. One of the primary reasons for producing this report was to investigate the potential impact of new growth proposed under the Core Strategy. The report provides a simple analysis of the hydrology of the District in the context of the South East of England, a résumé of existing planning legislation and an overview of the Water Framework Directive, the primary piece of legislation that exists to protect the quantity and quality of water in the natural environment.	Policies within the Local Plan should reflect the actions identified within the study where relevant.  Include SA objective which seeks to promote water management and efficiency. [Addressed by SA objective 8 and 11].
Shepway Transport Strategy (2011) Appendices and Update Highways Impact	The remit of the Transport Strategy is to include and consider both transport matters which relate to the existing District area, as well as those relating to the potential Strategic Site allocations which have been made for	The Folkestone & Hythe Review of the Core Strategy should consider transport matters relating to its strategic site allocations for future domestic,

Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Folkestone & Hythe District Council Local Plan
Report (2012) – to be updated.	future development.	economic and mixed-use developments.  SA objectives/indicators should seek to improve access to sustainable high quality modes of transport, ensure safety on the network is enhanced and reduce congestion. [Addressed by SA objective 13].
Shepway Cycle Plan (2011)	The Cycle Plan aims to: <ul style="list-style-type: none"> <li>• Connect Selected Links</li> <li>• Enhance Road Crossing Facilities</li> <li>• Enhance Signage</li> <li>• Promote Parking Facilities at Destinations</li> <li>• Consider Cycle Hire</li> <li>• Promote Safety Awareness</li> </ul>	The Folkestone & Hythe Review of the Core Strategy should consider the delivery and management of sustainable travel infrastructure.  SA objectives/indicators should seek to improve access to sustainable high quality modes of transport, ensure safety on the network is enhanced and reduce congestion. [Addressed by SA objective 13].
Shepway Economic Development Strategy (2015-2020)	This strategy provides a framework for the economic development of Folkestone & Hythe over the coming years and followed the Council's Corporate Plan 2015-2020 which sets out to support the growth and sustainability of the economy to increase prosperity.	The Folkestone & Hythe Review of the Core Strategy should seek to promote economic growth through an appropriate allocation of mixed-use developments and town centre regeneration in line with the vision and priorities set out in the strategy.  The SA framework should include objectives/indicators which consider a range of social, economic and environmental matters. [Addressed by all SA objectives].
Shepway Healthier Housing Strategy 2018-2023 (Draft)	There are approximately 50,000 residential dwellings in the Folkestone & Hythe District. Overall the housing market within Folkestone & Hythe is essentially similar to other district housing markets across South East England. Owner-occupation is the dominant form of tenure. The key differences for the Folkestone & Hythe District are the relatively high proportion of private rented accommodation and the relatively low proportion of council and housing association rented accommodation.	The Folkestone & Hythe Review of the Core Strategy should provide high quality, affordable homes and encourage the refurbishment of empty homes in the District.  SA objectives should improve access to good quality and affordable housing. [Addressed by SA objective 1].
Shepway Crime and Disorder Reduction Strategy (2005-2008)	Aims to build safer communities by addressing key causal factors of crime by fostering good partnerships between the voluntary, private and public sectors and the local community.	The Folkestone & Hythe Review of the Core Strategy should ensure measures are secured which enhance community safety and reduce the fear of crime.  Include a sustainability objective which seeks to make Folkestone & Hythe a safer place. [Addressed by SA objective 15].
Shepway Contaminated Land Strategy	Requirement of Environmental Protection Act 1990. Sets out the approach to identification of contaminated land across Folkestone & Hythe and how	The Folkestone & Hythe Review of the Core Strategy should ensure that contaminated land is taken into

Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Folkestone & Hythe District Council Local Plan
(2016-2021)	certain sites will be designated special sites. Particular focus is given to 'category 1' sites which are deemed to be high risk sites.	<p>account when selecting sites for development and in consideration of appropriate mitigation.</p> <p>The SA framework should include an objective/indicator which considers soils, including the potential for pollution of soils (e.g. from sources of contaminated land). [Addressed by SA objective 7].</p> <p>The SA framework should include an objective/indicator which considers the benefits of sport and recreation facilities (particularly open space) in improving the health and wellbeing of the District's residents. [Addressed by SA objective 14].</p>
Shepway Sports and Physical Activity Strategy (2004)	Encourage residents to participate in sporting activity, to improve the health and well-being of local residents in line with key national targets/initiatives, to ensure access to sports facilities for all and develop a wide variety of sport in Folkestone & Hythe.	The Folkestone & Hythe Review of the Core Strategy should ensure new developments provide or enhance an appropriate sport and recreation facilities in close proximity. [Addressed by SA objective 14].
Shepway Playing Pitch Strategy (2004) and Update (2011)	Ensuring future provision of pitches is balanced, meets the needs of the community and is protected for future generations.	<p>The Folkestone &amp; Hythe Review of the Core Strategy should take into account its role in protecting formal playing pitches from inappropriate development and ensuring the supply of formal playing pitches meets the demand.</p> <p>Include a sustainability objective relating to the protection, enhancement, increasing provision of, increasing participation in and improving access to the District's sports pitches and facilities. [Addressed by SA objective 14].</p>
Shepway Open Space Strategy (2017)	<p>The strategy reviews the current quality and distribution of open space provision and makes the following recommendations for improving it:</p> <ul style="list-style-type: none"> <li>• Larger sub-regional open spaces in the urban areas should be enhanced alongside local scale open spaces in areas of the greatest deprivation.</li> <li>• Opportunities should be sought to provide allotments and/or community gardens within the coastal margins in Folkestone.</li> <li>• Deficiencies of open space in the North Downs need to be addressed.</li> <li>• There are a number of notable green corridors in Romney March that require improvements.</li> </ul>	<p>The Folkestone &amp; Hythe Review of the Core Strategy should take into account its role in protecting, expanding and enhancing open spaces throughout the District, particularly in areas of current deficiency and deprivation.</p> <p>Include a sustainability objective relating to the protection, enhancement, increasing provision of open and green spaces. [Addressed by SA objectives 6 and 14].</p>
Beachy Head to south Foreland SMP (2006)	Coastal defence management plan for Beachy Head to south Foreland to provide a 'route map' for decision makers to move from the present situation towards a more sustainable future.	<p>Policies within the Local Plan should reflect the actions identified within the management plan.</p> <p>Include SA objective which seeks to promote flood</p>



Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Folkestone & Hythe District Council Local Plan
Folkestone to Cliff End Flood and Erosion Management Plan	The Folkestone to Cliff End Flood and Erosion Management Strategy sets out our plan to manage flood and erosion risks along this coastline.	and erosion risk management. [Addressed by SA objective 9].
Shepway CIL and Local Plan Viability Study	Analyses what level of requirements the Local Plan can place on developers (e.g. for sustainable building design) without threatening financial viability.	A residential CIL range of between £0 and £125/m <sup>2</sup> has set out in the charging schedule over four CIL charging rate zones:
Shepway CIL Charging Schedule	<p>The CIL Charging Schedule for Folkestone &amp; Hythe came into effect from 1<sup>st</sup> August 2016. The document sets out:</p> <ul style="list-style-type: none"> <li>• The background and regulations governing CIL;</li> <li>• Its relationship to the delivery of the Local Plan;</li> <li>• The viability methodology used to arrive at the proposed CIL rates;</li> <li>• The rates that developers will need to pay when undertaking different types of development in different parts of the District as well as exception to paying the charge;</li> <li>• Strategic and Key Development Sites which are highlighted to be liable to pay £0/m<sup>2</sup> where s106 has been considered more appropriate; and</li> <li>• An indication of how CIL receipts will be allocated in support of the infrastructure (in line with the Council's Regulation 123 list) required to support development of the area.</li> </ul>	<p>The charging schedule also sets out charges for retail developments with those proposals within Town Centre Area for convenience and comparison retail and other development akin to retail not liable for payment. At the rest of the District supermarkets, superstores, and retail warehousing as well as other larger scale development akin to retail are liable for payment at £100/m<sup>2</sup> when over 280sqm. Other retail development and developments akin to retail up to 280sqm would not be liable for any CIL payment.</p>
Draft Shepway Heritage Strategy (2017)	<p>The Strategy identifies eleven broad priorities:</p> <ul style="list-style-type: none"> <li>• Develop capacity to manage, enhance, promote and champion Folkestone &amp; Hythe's heritage.</li> <li>• Manage and conserve the heritage assets of the District and to help guide and inform.</li> <li>• Develop ways to identify and understand the significance of Folkestone &amp; Hythe's undesignated heritage assets.</li> <li>• The heritage of Folkestone &amp; Hythe plays a key role in helping to create new places, in development and in regeneration.</li> <li>• Thematic development of Folkestone &amp; Hythe's outstanding Napoleonic period defence heritage, linking and connecting heritage assets, co-ordinating promotion and activity and consider development of a thematic hub at Shorncliffe.</li> <li>• Develop the connectivity of the Harbour, Lees and Town areas of</li> </ul>	<p>Policies within the Local Plan should reflect the priorities of the strategy.</p> <p>Include SA objective which seeks to conserve, enhance and improve access and interpretation of the District's historic environment. [Addressed by SA objective 4].</p>

Plan, programme or policy	Objectives or requirements	Implications for the SA and/or Folkestone & Hythe District Council Local Plan
	<p>Folkestone bringing a co-ordinated approach to the heritage of these areas to help link them.</p> <ul style="list-style-type: none"> <li>• Consider, develop and promote the District's heritage in a thematic way to provide greater opportunities to link assets and co-ordinate activities.</li> <li>• Ensure that the cultural offer of the District capitalises on Folkestone &amp; Hythe's rich heritage.</li> <li>• Ensure that the correct balance between capitalising on Folkestone &amp; Hythe's heritage and its conservation is maintained.</li> <li>• Co-ordination, linking and support of the numerous heritage related groups and activities in Folkestone &amp; Hythe.</li> <li>• Develop a project that demonstrates the ways in which Folkestone &amp; Hythe's heritage can be used to improve public health.</li> </ul>	

# Appendix 3

## High Level Growth Options Appraisal Matrices

# Character Areas

## Character Area 1 (Kent Downs)

SA Objectives	SA Score	
SA1. Improve the provision of homes, including affordable housing, having regard to the needs of all sections of society, including the elderly.	++	Providing strategic scale development within the District is expected to allow for opportunities for the construction of a significant number of new affordable homes to help meet need in the District and the needs of the wider region's growing diverse population. District's High Level Options Report (2016) shows that Character Area 1 also has the highest house prices in Folkestone & Hythe, indicating a mismatch between supply and demand. As such the delivery of new homes as part of any proposed strategic scale development would help to meet local requirements within this Character Area. A significant positive effect is therefore expected on this SA objective.
SA2. Support the creation of high quality and diverse employment opportunities.	-	<p>Character Area 1 contains the Service Centre and District Centre of Hawkinge to the south east and the Rural Centres of Lymping and Elham which are located within the Character Area's central portion. Hawkinge has strong connections with Folkestone (more than 1,300 people commute from Hawkinge to Folkestone). Folkestone is within 1.4km of Hawkinge and within 460m of the south eastern boundary of Character Area 1. Commuting flows from Hawkinge are less strong to important centres outside of the District such as Ashford (over 220 commuters recorded), Dover (over 200 commuters recorded), Canterbury (over 150 commuters recorded), and London (20 commuters recorded). Inward commuter flows at Hawkinge and at Lymping and Elham confirm the economic connections of this Character Area with most inward commuting resulting between these settlements or to Folkestone. Relatively high commuter flows have been recorded from Dover to Hawkinge (approximately 80 commuters) and also from Ashford and Canterbury to Lymping and Elham (approximately 75 and 45 commuters respectively).</p> <p>Data from the Census 2011 shows that the Character Area has a relatively lower density of employment compared to more urban parts of Folkestone &amp; Hythe. Given the mostly undeveloped nature of Character Area 1 it is unsurprising that there are few existing employment sites within its boundaries. The Core Strategy designates one site at Hawkinge as a Major Employment Site to protect existing and provide further industrial premises. The closest employment sites beyond the Character Area are within Folkestone to the south.</p> <p>The A260 runs through the eastern portion of the site allowing for strong links to Folkestone and also provides a link to Canterbury which is located within 7km of the northern boundary. The A20 passes into this Character Area briefly to the south of Hawkinge and also to the north west of Folkestone where it provides access to the M20 motorway. The rest of the Character Area contains only B roads, and the relatively limited existing road infrastructure may act to restrict future economic development as this Character Area is fairly large. There are no train stations within the Character Area the closest being provided within Folkestone at Folkestone Central or Folkestone West.</p> <p>Character Area 1 is average in terms of deprivation relative to the other character areas identified in Folkestone &amp; Hythe. Access to education facilities within the Character Area is relatively poor, however. Currently primary schools are only provided at Hawkinge, Elham and Lymping and the villages of Stowting and Bodsham. The closest secondary schools to the Character Area are within Folkestone.</p> <p>Overall Character Area 1 does not have particularly strong commuting links with surrounding important economic centres beyond the District. The road network is also relatively weak outside of its eastern portion with only one employment site currently within its boundaries. Strategic scale development at this location and any associated services and employment opportunities this might include would not be addressing a particularly high level of deprivation although it is noted that education facilities are presently relatively weak. A minor negative effect is therefore expected on this SA objective.</p>

SA Objectives	SA Score	
SA3. Conserve, and where relevant enhance, the quality, character and local distinctiveness of the landscape and townscape.	--	<p>Character Area 1 is located within the Kent Downs AONB. Kent Downs AONB has stated that any development other than small-scale provision in villages would be contrary to legislation and Natural England has stated that the entire area is sensitive in landscape terms.</p> <p>Character Area 1 falls within the overarching North East Kent character area as defined in the Landscape Assessment of Kent 2004. It is also within the North Downs Character Area as defined in the Core Strategy 2013. Within the North Downs Character Area, the Core Strategy states that new development should be accommodated outside of the AONB without material impact on its setting. As such new development should be located mainly at Hawkinge and the other better served settlements.</p> <p>The District's High Level Landscape Appraisal (2017) highlights that this Character Area contains LCAs 01 (Elmsted Valley), 02 (Elhampark Wood), 03 (Elham Valley), 04 (Hawkinge) and 07 (Tolsford Hill), and parts of LCAs 05 (Postling Vale), 08 (North Downs Ridge), 10 (M20 and HS1 Corridor) and 16 (Hythe and Saltwood Wooded Valleys). Of these LCAs 01, 02, 03, 05, 07, 08 and 16 are described as having high landscape value and high landscape susceptibility.</p> <p>Strategic scale development is unlikely to be appropriate within Character Area 1 given the sensitivity of this designated landscape to change. Input from Natural England and the Kent Downs AONB further suggests that such development would not be suitable. A significant negative effect is therefore expected on this SA objective.</p>
SA4. Conserve and enhance the fabric and setting of historic assets.	--	<p>Character Area 1 contains five Conservation Areas at the villages Elham, Newington, Frogholt, Etchinghill and Postling. Many of the Listed Buildings in this Character Area are located within these Conservation Areas. The larger Scheduled Monuments in Character Area 1 include the motte and bailey castle 200m north-west of Stowting Church in close proximity to Stowting, the three bowl barrows in Elhampark Wood and the two bowl barrows 400m north of Milgate Farm in Reinden Wood to the south of Densole. Kent County Council has stated that Stone Street, a Roman road connecting Durovernum (Roman Canterbury) and Stutfall Castle, runs north-south through this Character Area. The Council has also stated that along the crest-line north of Folkestone there is an important military landscape related to World War II. Historic England considers this Character Area a less suitable area for development.</p> <p>Given the higher number of heritage assets which might be adversely effected by strategic scale development in this Character Area and considering the judgement of English Heritage in relation to the suitability of the Character Area for the provision of new development a significant negative effect is expected on this SA objective.</p>
SA5. Conserve and enhance biodiversity, taking into account the effects of climate change.	-	<p>Character Area 1 contains two SACs at Parkgate Down towards its northern boundary and at the Folkestone to Etchinghill Escarpment which extends to the north west from Folkestone. These areas are also SSSIs. Further SSSIs have been designated at Lynsore Bottom and Yockletts Banks, as well as at Alkham, Lydden and Swingfield Woods. Large swathes of ancient woodland are scattered through this Character Area, particularly throughout its north western portion. The largest areas of ancient woodlands are at Asholt or Ashley Wood (north of Folkestone), Elhampark Wood, Park Wood (both north-west of Elham), Reinden Wood (north of Hawkinge), West Wood (west of Elham) and Lynbridge Green Wood (to the north west of Lyminge). Many of these areas have also been designated as Local Wildlife Sites. The largest Local Wildlife Sites in this Character Area are Acrise Wood and Park (east of Densole), Lyminge Forest (west of Elham), Reinden Wood, Tolsford and Summerhouse Hills (north-west of Folkestone). There are a number of BAP priority habitats within this Character Area with many of them focussed towards its southern portion. Semi-natural dry grasslands are the most widespread of these habitats. Kent County Council has stated that the Character Area provides an important ecological buffer between the M20 and M2 corridor.</p> <p>As such, considering the relatively high number of biodiversity sites located within Character Area 1 which may be adversely affected by strategic scale development as a result of habitat loss or fragmentation and/or recreational and transport pressures, a minor negative effect is expected on this SA objective.</p>
SA6. Protect and enhance green infrastructure and ensure that it meets	+/-	<p>Providing strategic scale development within the District is expected to allow for opportunities for the appropriate incorporation of new open spaces, green corridors and other important elements of green infrastructure to meet the needs of the District's wildlife and residents. However, development may also result in the loss of established green infrastructure. Therefore, overall a mixed minor positive/minor negative effect is expected on this SA objective.</p>

SA Objectives	SA Score	
strategic needs.		
SA7. Use land efficiently and safeguard soils, geology and economic mineral reserves.	--	<p>Character Area 1 mostly consists of Grade 3 Agricultural Land, however there are numerous large pockets of Grade 2 Agricultural Land, and smaller pockets of Grade 4 Agricultural Land. The most notable areas of Grade 3 Agricultural Land are to the north west by Stelling Minnis and to the north east by Selstead and Swingfield. There are no areas of Grade 1 Agricultural Land within the Character Area. Much of the land is undeveloped with only smaller settlements present.</p> <p>The adopted Kent Minerals and Waste Local Plan 2013 – 2030 (MWLP) identifies Mineral Safeguarding Areas (MSA) in Folkestone &amp; Hythe to ensure that minerals of economic interest are not needlessly sterilised by non-mineral development. Within Character Area 1 land has been designated as Mineral Safeguarding Areas for brickearth mostly to the north with some Mineral Safeguarding Areas for sub-alluvial river terrace deposits towards the central portion of the Character Area by the Nail Bourne river.</p> <p>Given that strategic scale development within this Character Area has the potential to result in the loss of both 'very good quality' (Grade 2) and 'good quality' (Grade 3) agricultural land and sterilisation of important mineral deposits a significant negative effect is expected for this SA objective.</p>
SA8. Maintain and improve the quality of groundwater, surface waters and coastal waters and the hydromorphological (physical) quality of rivers and coastal waters.	--	<p>Six separate SPZ1 areas cover Character Area 1. These are in turn surrounded by SPZ2 and all of the areas covered are linked within a SPZ3. SPZ1 areas include: around Skeet, Ottinge to Yew Tree Cross, north of Elham, east of Elham up to the west of Wootton, around Drellingore, and northeast of Swingfield Minnis. The majority of the Character Area is also located within surface water Drinking Water Safeguard Zones (SGZ). Character Area 1 is not located within a Nitrate Vulnerable Zone (NVZ).</p> <p>The District's Water Cycle Study (2011) states the settlements of Folkestone &amp; Hythe broadly have a good level of coverage from waste water treatment works (WWTWs). Most of them have a current or planned capacity sufficient to meet planned growth although there is potentially insufficient capacity in the strategic wastewater connection between the Westenhanger area and the Sellindge WWTW. This area lies to the south of Character Area 1 within approximately 650m.</p> <p>Given that much of the Character Area is located within an SPZ there is potential for particular risks to be posed to the quality or quantity of water obtained, should certain development take place nearby. As such a significant negative effect is expected on this SA objective.</p>
SA9. Reduce the risk of flooding, taking into account the effects of climate change.	-	<p>Character Area 1 contains some relatively small areas of Flood Zone 3. The most notable areas are around the Nail Bourne river which passes close to the settlements of Elham and Lyminge, around the Petham Bourne river by the settlement of Bodsham and around the Seabrook Stream Main river to the north west of Folkestone. The Character Area is not within an area of 'extreme' or 'significant' flood risk as per the District Council's Strategic Flood Risk Assessment (2015). It should be noted however that strategic scale development in this Character Area would be likely to involve the development of a large area of greenfield land which would result in the increase of impermeable surfaces and contribute to local flood risk. As such a minor negative effect is expected on this SA objective.</p>
SA10. Increase energy efficiency in the built environment and the proportion of energy use from renewable sources.	+	<p>Providing strategic scale development within the District is likely to generate the economies of scale to incorporate high levels of energy efficient design, such as district heating and renewable energy schemes. A minor positive effect is therefore expected on this SA objective.</p>
SA11. Use water resources efficiently	+	<p>Providing strategic scale development within the District is likely to allow for opportunities to incorporate high levels of design which encourage water efficiency, such as low flush toilets or the enactment of Water Efficiency Improvement Action Plans at new development. A minor positive effect is therefore expected on this SA objective.</p>

SA Objectives	SA Score	
SA12. To reduce waste generation and disposal, and achieve the sustainable management of waste.	+	Providing strategic scale development within the District is expected to allow for opportunities for the provision of developments making use of sustainable and responsible construction practices and in the medium to long term through the incorporation of sustainable waste management facilities. A minor positive effect is therefore expected on this SA objective.
SA13. Reduce the need to travel, increase opportunities to choose sustainable transport modes and avoid development that will result in significant traffic congestion and poor air quality.	--	<p>Transport routes within Character Area 1 are mostly low order. The A260 is located within the eastern portion of the Character Area. Serving Hawkinge, the A260 connects the settlement to the A20 to the south, and Canterbury and Folkestone to the south. The M20 motorway passes briefly into the southern portion of the Character Area to the north west of Folkestone which is within 460m of the southern boundary. Operation Stack has potential to impact adversely upon transport along the M20 when there is disruption to services across the English Channel. Further consideration should be given for Dover Traffic Assessment Project (TAP), a temporary traffic management system which queues port-bound lorries in the left lane of the A20 after the Roundhill Tunnel.</p> <p>Regional Cycle Route 17 runs from Hawkinge to Paddleworth before heading north to Elham and Bossingham. Bus route 17 links Folkestone and Canterbury, via Etchinghill, Lyminge, Elham and North Elham. Kent Count Council have noted that the area also contains a National Trail (North Downs Way) and other public bridleways, which is a scarce resource locally. Despite the availability of some more active and sustainable modes of transport, the majority of travel within the Character Area is undertaken by private vehicle.</p> <p>The District's High Level Options Report (2016) highlights that there is relatively low capacity to accommodate increases in traffic in the District. Junctions in and around Hawkinge are considered to be more vulnerable to congestion. It should be noted that the AONB designation within which Character Area 1 falls would place limitations upon improvements which would be acceptable to the M20 motorway and other portions of the road network.</p> <p>Considering the current low order of the local road infrastructure, the relatively limited potential for journeys to be undertaken by more active and sustainable modes of transport in Character Area and the potential constraints which the designation of AONB places upon future improvements to the M20 and other locally important road infrastructure a significant negative effect is expected on this SA objective.</p>
SA14. Promote community vibrancy and social cohesion; provide opportunities to access services, facilities and environmental assets for all ages and abilities and avoid creating inequalities of opportunity for access.	--	<p>Character Area 1 contains the Service Centre of Hawkinge, the Rural Centres of Elham and Lyminge and the Secondary Villages of Densole, Etchinghill and Stelling Minnis as set out in the Core Strategy (2013).</p> <p>Current education facilities within the Character Area are limited to primary schools at Hawkinge, Elham and Lyminge and the villages of Stowting and Bodsham, with no secondary schools currently present. Four Post Offices are provided within the Character Area at Lyminge, Elham, Stelling Minnis and Densole respectively. Health services in the Character Area consist of two surgeries within Lyminge and another within Hawkinge. There is also an NHS dentist within Hawkinge. The largest outdoor sports facility is provided to the south of Lympinge at Etchinghill Golf Course with further provision also made at Hawkinge and Elham. Open spaces which are used by residents in this Character Area are mostly focussed around the settlements identified above with the most notable being Hawkinge Cemetery, Kettle Drive Park in Hawkinge, King George V Playing Field in Elham, and Tayne Field and Jubilee Field in Lympinge. The District's Rural Services Study (2011) notes that although Hawkinge is one of the more populated rural parishes, it lacks 'traditional' services such as a petrol station. This study also notes that Swinfield parish to the north east of the Character Area has a relatively large population but lacks a food shop and health services.</p> <p>Strategic scale development within the Character Area would put pressure on the existing services and facilities within these relatively small scale settlements, and the location of the Character Area within the AONB is likely to reduce the potential for the creation of new local centres/employment areas to meet future needs.</p>

SA Objectives	SA Score	
		Overall Character Area 1 currently contains a limited number of services and facilities and the potential for new services and facilities to be added at existing or new local centres is limited given the size of the settlements and presence of the AONB designation. It is likely therefore that new residents in this area would be required to travel outside of the Character Area to access at least some services and facilities. A significant negative effect is therefore expected on this SA objective.
SA15. Reduce crime and the fear of crime.	+	Providing strategic scale development within the District is expected to allow for opportunities to incorporate the principle of 'designing out' crime at new developments for example through the suitable design of open spaces and the inclusion of appropriate lighting. A minor positive effect is therefore expected on this SA objective.



## Character Area 2 (Folkestone and Surrounding Area)

SA Objectives	SA Score	
SA1. Improve the provision of homes, including affordable housing, having regard to the needs of all sections of society, including the elderly.	+/-	Providing strategic scale development within the District is expected to allow for opportunities for the construction of a significant number of new affordable homes to help meet need in the District and the needs of the wider region's growing diverse population. The District's High level Option Report (2016) shows that the majority of Character Area 2 however has low house prices. Overall this Character Area has the fifth lowest house prices of the Character Areas considered although it is noted that the CIL and Whole Plan Economic Viability Assessment (2014) has shown that high residential values (above £3,350 per sqm) are present in Harvey West and Sandgate Wards. As such although the delivery of new homes would help to meet the housing needs of Folkestone & Hythe District and the wider Kent and south east areas it is not considered that a higher level of need currently exists within this Character Area. An overall mixed effect (minor positive/minor negative) is therefore expected on this SA objective.
SA2. Support the creation of high quality and diverse employment opportunities.	++	<p>Character Area 2 contains the main Town Centre for Folkestone &amp; Hythe at Folkestone (this settlement is also recognised as a Sub-Regional Town) as well as the Local Centre of Sandgate. Much of the Character Area is developed and it is dominated by the settlement of Folkestone. Folkestone has strong connections with the nearby economic centres within Folkestone and Hythe particularly given that it is the largest settlement in the District. Economic connections with Hythe (which is located within 3.5km to the west) are particularly important with more than over 400 people commuting from Folkestone to Hythe and over 600 people commuting in the opposite direction. Outside of Folkestone &amp; Hythe commuter flows to Ashford in particular and to Dover and Canterbury to a lesser extent are important. The inward flow of commuters from these settlements is less than the number of commuters leaving Folkestone.</p> <p>Data from the Census 2011 shows that the Character Area has a relatively higher density of employment compared to more rural parts of Folkestone &amp; Hythe. A number of employment sites which are set through the saved policies E1 from the 2006 Folkestone &amp; Hythe District Local Plan Review are located within Folkestone. This settlement has been identified as a Major Employment Site and a Town Centre in the Core Strategy to protect existing and provide further industrial premises and also to accommodate the majority of Folkestone &amp; Hythe's identified needs for retail, office and leisure uses through new development.</p> <p>Character Area 1 has good strategic road access with the M20, A20, A259 and A2033 all running through it. Access to Dover is provided by the A20 within 7km to the east and to Ashford by the M20 within 16km to the north west. Folkestone Central and Folkestone West train stations offer good access to and from the town.</p> <p>Character Area 2 is the third most deprived Character Area of those considered. Deprivation in the Character ranges from 0-80%, with South and North Folkestone within the 0-20% most deprived. The Core Strategy identifies Central Folkestone, Cheriton and Northern/Eastern Folkestone as priority communities for regeneration and these are within Character Area 2. Access to education facilities within the Character Area is quite strong. Ten primary schools are accessible within or at the boundaries of this Character Area with a further three secondary schools and one special school also within its boundaries.</p> <p>Overall Character Area 2 has relatively strong commuting links with surrounding important economic centres both within and beyond District. The road network is particularly strong across Character Area 2 with the M20 and other A-routes providing access to important settlements outside its boundaries. Rail access is also provided within Folkestone and this settlement has been highlighted as an important area for future economic and retail growth over the plan period. It is expected that growth and services and employment opportunities provided at this location would also help to address the high level of deprivation in the Character Area. A significant positive effect is therefore expected for this SA objective.</p>
SA3. Conserve, and where relevant enhance, the quality, character and local distinctiveness of the landscape and	-	Character Area 2 is included partially within the Kent Downs AONB designation to the north and east which has been set against much of Folkestone's boundaries to these directions. This Character Area is notably the most urban of the six Character Areas however the level of development which currently exists means that opportunities for new development are likely to be small scale. New development might potentially be accommodated as urban extensions to the existing town of Folkestone, thus more sustainable development supported by paragraph 82 of the NPPF, however there would be a need to avoid coalescence with Hythe to the west and also to a lesser degree Hawkinge and Newington to the north. The Core Strategy has noted that Seabrook Valley, immediately to the

SA Objectives	SA Score	
townscape.		<p>west of Folkestone, is characterised by a green wedge that at present separates Folkestone from Hythe. A defensible boundary to development is currently in place at the north west of Folkestone at the M20 motorway and infrastructure relating to the Eurotunnel. A partially wooded scarp slope along the northern boundary of the area, which forms the northern edge of Folkestone is another prominent feature at the edge of the Character Area.</p> <p>Character Area 2 beyond the developed area of Folkestone falls within the overarching North East Kent character area as defined in the Landscape Assessment of Kent 2004. It is also within the Urban District Character Area as defined in the Core Strategy 2013. The AECOM Report of the District's High Level Landscape Appraisal (2017) highlights that this Character Area contains LCAs 14 (The Warren Cliffs) and 15 (Folkestone), and parts of LCAs 08 (North Downs Ridge), and 10 (M20 and HS1 Corridor). Of these LCAs 08 and 14 are described as having high landscape value and high landscape susceptibility. LCA 15 comprises much of the urban area of Folkestone and as such it has been identified as being of low landscape sensitivity as a result of its limited conservation interests, reduced perceptual aspects, and low susceptibility to development.</p> <p>The location of Character Area 2 to the south of the majority of the AONB into which this landscape designation partially encroaches will mean strategic scale development is likely to be physically constrained. To the east any development should be considered in terms of potential for coalescence with the settlement of Hythe and as such larger development proposals may also be constrained in this direction. The developed character of Folkestone means it has low sensitivity to development; however this area is physically confined in terms of landmass meaning it is unlikely that strategic scale development could be facilitated here. A minor negative effect is therefore expected on this SA objective.</p>
SA4. Conserve and enhance the fabric and setting of historic assets.	-	<p>Character Area 2 contains three Conservation Areas towards its southern edge in the coast area at Sandgate - The Esplanade, Sandgate - High Street and Folkestone Leas and Bayle. The majority of the Listed Buildings within this Character Area are also located towards the southern edge by the seafront coastal area. The Grade I Listed Buildings Church of St Martin on Horn Street and Sandgate Castle are located to the west and to the south on Castle Road respectively. Grade II* Listed Buildings with Character Area 2 include Spade house, Church of the Holy Trinity, Folkestone War Memorial, Parish Church Of St Mary And St Eanswythe and 18 and 220 Church Street. More significant Scheduled Monuments within the Character Area include a Medieval ringwork with bailey and approach causeway, incorporating a bowl barrow on Castle Hill to the north, Shorncliffe Redoubt, Shorncliffe Camp to the south west and an unenclosed Iron Age urnfield and Roman villa, 60m ESE of No.64 Wear Bay Road to the east.</p> <p>Kent County Council has stated that the town's sea-front area contains an extensive military landscape of Martello Towers, the Shorncliffe Redoubt and the Royal Military Canal meaning that there may be vulnerability if high levels of growth were to be permitted as part of any strategic scale development. Historic England however considers that Folkestone is more favourable for development in terms of reducing the potential for adverse impacts on the historic environment.</p> <p>Overall a minor negative is expected on this SA objective considering both the high number of heritage assets which are mostly focussed towards the southern sea front area of Character Area 2 and Historic England's comment relating to potential suitability of this Character Area relative to the other Character Areas considered.</p>
SA5. Conserve and enhance biodiversity, taking into account the effects of climate change.	0	<p>The Character Area is more developed than the other Character Areas and the main biodiversity sites are located at the edges of Folkestone. Folkestone to Etchinghill Escarpment SAC passes into Character Area 2 to the north west and then runs parallel to its northern boundary towards the east. Folkestone Warren forms a large Local Nature Reserve to the east of Folkestone where its eastern edge is bounded by East Wear Bay. These areas are also SSSIs. Hills Reservoir Local Wildlife Site is located at the northern edge of this Character Area to the north of the M20. The coastline from Folkestone to Dover which partially falls within Character Area 1 has been designated as Heritage Coast. The more developed nature of much of this Character Area means that there are no areas of Ancient Woodland within its boundaries and that no BAP priority habitats have been identified.</p> <p>It is considered that there are a reduced number of biodiversity features within Character Area 2 which might be adversely impacted upon by strategic scale development in terms of habitat loss or fragmentation or other development associated pressures such as those posed by recreational activities or increased car use. Given its highly developed character these designations are also located mostly</p>

SA Objectives	SA Score	
		towards the edges of the Character Area meaning new development might be provided as to avoid impinging upon them. A negligible effect is therefore expected on this SA objective.
SA6. Protect and enhance green infrastructure and ensure that it meets strategic needs.	+/-	Providing strategic scale development within the District is expected to allow for opportunities for the appropriate incorporation of new open spaces, green corridors and other important elements of green infrastructure to meet the needs of the District's wildlife and residents. However, development may also result in the loss of established green infrastructure. Therefore, overall a mixed minor positive/minor negative effect is expected on this SA objective.
SA7. Use land efficiently and safeguard soils, geology and economic mineral reserves.	+	<p>Character Area 2 contains most urban and developed land which makes up the settlement of Folkestone. As such most of this land has a low agricultural value with only small areas of Grade 2, Grade 3 and Grade 5 Agricultural Land to the north west and north of the settlement. Any strategic scale development would be required to proceed as an urban extension in line with national planning policy paragraph 82 of the NPPF although this is likely to be constrained by the lack of physical space for any future development.</p> <p>The adopted Kent Minerals and Waste Local Plan 2013 – 2030 (MWLP) identifies Mineral Safeguarding Areas (MSA) in Folkestone &amp; Hythe to ensure that minerals of economic interest are not needlessly sterilised by non-mineral development. Within Character Area 2 only small areas of land have been designated as Mineral Safeguarding Areas for sub-alluvial river terrace deposits and silica sand/ construction sand towards the central area of Folkestone by the Pent Stream and also for storm beach gravel and limestone (Kentish ragstone) towards the southern edge of this settlement.</p> <p>Work undertaken by AECOM in the High Level Options Report (2016) has also identified that a number of larger vacant buildings and previously developed sites are present within Folkestone which might present opportunities for redevelopment if new growth was focussed within this area potentially as part of any new urban extensions. These areas include Risborough Barracks and the land adjacent as well as the port area by Folkestone Seafront to the south east.</p> <p>Strategic scale development has reduced potential to result in the loss of higher quality agricultural land and loss of access to or sterilisation of Mineral Safeguarding Areas in this Character Area considering the more developed nature of Folkestone. Focussing strategic scale development in this Character Area may also present increased opportunities to allow for the re-use of previously developed land within this settlement. As such a minor positive effect is expected on this SA objective.</p>
SA8. Maintain and improve the quality of groundwater, surface waters and coastal waters and the hydromorphological (physical) quality of rivers and coastal waters.	0	<p>Western and northern parts of Character Area 2 are located within a Source Protection Zone (SPZ). Areas of SPZ 1, 2 and 3 all lie within the Character Area. These areas are west of the A420 in area of Moorhall and Cheriton and to the north of beyond the Channel Tunnel Sidings. Throughout the northern section of this Character Area the groundwater is not classified as vulnerable. Much of the central and southern areas are however dominated by groundwater of high vulnerability (associated with chalk). The rest of this area is generally a mixture of high, intermediate and low vulnerability aquifers. The Character Area is not located within a drinking water safeguard zone or a Nitrate Vulnerable Zone (NVZ).</p> <p>As per information from the District's Water Cycle Study (2011) the settlements of Folkestone and Hythe broadly have a good level of coverage from waste water treatment works (WWTWs). Most of them have a current or planned capacity sufficient to meet planned growth although there is potentially insufficient capacity in the strategic wastewater connection between the Westenhanger area and the Sellindge WWTW. This area lies to the west of Character Area 2 within approximately 5.1km.</p> <p>Only parts of the Character Area are located within a SPZ where there is greater risk of negative effects on the quality or quantity of water obtained, should certain development take place nearby. It is expected that future development could be directed to avoid the areas in which development might posed a risk to local water quality. As such a negligible effect is expected on this SA objective.</p>
SA9. Reduce the risk of flooding, taking into account the effects of climate	-	Character Area 2 contains areas of Flood Zone 3 associated with both fluvial and tidal flooding. Areas of high fluvial flood risk are associated with the main rivers in the centre of this Character Area and to the west. Mostly notably Pent Stream and Enbrook Stream form a linear area of high flood risk (Flood Zone 3) from the English Channel through Folkestone towards the north west. Areas of high tidal flood risk (Flood Zone 3) are predominantly restricted to cliff areas which surround Folkestone. The District Council's Strategic

SA Objectives	SA Score	
change.		Flood Risk Assessment (2015) indicates that beyond areas in close proximity to Folkestone Harbour this Character Area is not at residual risk of tidal flooding. The Strategic Flood Risk Assessment also notes that overtopping has previously resulted in tidal flooding which has been localised to Sandgate in the south western portion of this Character Area. It should be noted that strategic scale development in this Character Area would be likely to involve the development of a large area of greenfield land which would result in the increase of impermeable surfaces and contribute to local flood risk. A minor negative effect is therefore expected on this SA objective.
SA10. Increase energy efficiency in the built environment and the proportion of energy use from renewable sources.	+	Providing strategic scale development within the District is likely to generate the economies of scale to incorporate high levels of energy efficient design, district heating and renewable energy schemes. A minor positive effect is therefore expected on this SA objective.
SA11. Use water resources efficiently	+	Providing strategic scale development within the District is likely to allow for opportunities to incorporate high levels of design which encourage water efficiency, such as low flush toilets or the enactment of Water Efficiency Improvement Action Plans at new development. A minor positive effect is therefore expected on this SA objective.
SA12. To reduce waste generation and disposal, and achieve the sustainable management of waste.	+	Providing strategic scale development within the District is expected to allow for opportunities for the provision of developments making use of sustainable and responsible construction practices and in the medium to long term through the incorporation of sustainable waste management facilities. A minor positive effect is therefore expected on this SA objective.
SA13. Reduce the need to travel, increase opportunities to choose sustainable transport modes and avoid development that will result in significant traffic congestion and poor air quality.	++	<p>Character Area 2 is served by a number of Folkestone and Hythe's more important transport links. The A260 Folkestone to Canterbury, the B2011 Folkestone to Dover and the M20/A20 Folkestone to Ashford have all been identified as Primary External Connections in the Core Strategy (2013). The A259 Folkestone to Hythe has been identified as a Main Internal Link in the Core Strategy. It has also been identified in the Core Strategy that three further Key Highway Improvements are likely to occur at Folkestone. Folkestone is currently served by two rail stations at Folkestone West and Folkestone Central and the Core Strategy identifies Folkestone as location for two Main Railway Station Upgrades. Rail services in this Character Area currently provide access to London Charing Cross as well as to St Pancras International within 55 minutes with High Speed 1. The Eurotunnel terminus is also located within Character Area 2 to the north of Folkestone. Any strategic scale development to be proposed should be considered with regards to potential impacts upon car parking in Folkestone town centre as well as the impact of traffic routing through the town centre and to/from the M20 and the capacity of local infrastructure to accommodate travel by means other than private vehicle.</p> <p>Although infrastructure to support journeys made by private vehicle is strong it should also be noted that NCN 2, a long distance cycle route from Dover to Brighton, passes along Folkestone seafront towards Hythe and that there are also a number of signed cycle routes within Folkestone. The town is additionally a hub for bus services with important routes to Ashford (route 10), Canterbury (route 16 and 17) and Dover (routes 91, 101 and 102) well served.</p> <p>A significant positive effect is therefore expected on this SA objective.</p>
SA14. Promote community vibrancy and social cohesion; provide opportunities	++/--	Character Area 2 contains the District's only Sub-Regional Town as identified in the Core Strategy (2013). The Core Strategy identifies that this settlement is suitable for expansion from their current built limits through managed growth sufficient to meet strategic needs. The creation of new local centres/employment areas is likely to be limited considering that the area is constrained physically due to it

SA Objectives	SA Score	
to access services, facilities and environmental assets for all ages and abilities and avoid creating inequalities of opportunity for access.		<p>more developed and smaller nature.</p> <p>Kent County Council have stated that new school sites would be required if additional major development was to be allocated within the town. There are three Post Offices within the Character Area at Black Bull Road, Sandgate Road and Cheriton High Street respectively. Health services in the Character Area consist of eight surgeries at Cheriton Road, Dover Road, Guildhall Street, Manor Road, Alder Road, Sandgate Road, Canterbury Road and Cheriton High Street respectively. The railway embankment and Folkestone Shoreline and Folkestone Beach form extensive green corridors through this Character Area. The Warren (which is used as a Country Park), Morehall Recreation Ground, Radnor Park and Kingsnorth Gardens are large semi-natural and natural greenspaces or parks and gardens within Folkestone. Folkestone also provides access to three areas of allotments. Overall Kent County Council notes that this Character Area provides a good level of access to green infrastructure.</p> <p>Overall Character Area 1 would provide good access to a good range of existing services and facilities. However, more strategic scale development within and adjacent to the town will put the existing services and facilities under pressure, with limited space for new facilities and services to be provided within the existing urban area of the town. Therefore, overall, a mixed effect (significant positive/significant negative) is expected on this SA objective.</p>
SA15. Reduce crime and the fear of crime.	+	<p>Providing strategic scale development within the District is expected to allow for opportunities to incorporate the principle of 'designing out' crime at new developments for example through the suitable design of open spaces and the inclusion of appropriate lighting. A minor positive effect is therefore expected on this SA objective.</p>

### Character Area 3 (Hythe and Surrounding Area)

SA Objectives	SA Score	Justification
SA1. Improve the provision of homes, including affordable housing, having regard to the needs of all sections of society, including the elderly.	+	Providing strategic scale development within the District is expected to allow for opportunities for the construction of a significant number of new affordable homes to help meet need in the District and the needs of the wider region's growing diverse population. As per information from AECOM's High Level Option Report (2016) the majority of Character Area 3 has average house prices for Folkestone and Hythe. The village of Saltwood to the north of Hythe displays the high residential values (above £3,350 per sqm) for this Character Area as shown in the CIL and Whole Plan Economic Viability Assessment (2014). A proportion of the local housing need is expected to be met at a new residential development by Nickolls Quarry. As such although the delivery of new homes would help to meet the housing needs of Folkestone & Hythe District and the wider Kent and south east areas this Character Area does not currently display a particularly high requirement for residential development and development already planned for within this Character Area at Nickolls Quarry is already expected to help to contribute to the meeting of local housing needs. As such a minor positive effect is expected on this SA objective.
SA2. Support the creation of high quality and diverse employment opportunities.	+/-	<p>Character Area 3 contains the Strategic Town of Hythe as well as the Primary Village of Saltwood. This Character Area is relatively developed but is less urban than Character Area 2. Hythe has strong connections with the nearby economic centres within Folkestone &amp; Hythe particularly with Folkestone which is located within 3.5km to the east and Lympne which is located within 2.6km to the north west. Economic connections with Folkestone allow for net flow of commuters towards Hythe with more than 400 people commuting from Folkestone to Hythe and over 600 people commuting in the opposite direction. A high number of commuters (approximately 310) travel from Lympne to Hythe and Saltwood with the number of commuters who travel the opposite way much less (approximately 145) thereby demonstrating the importance of Hythe as a local employment centre. Of those employment centres outside of the District Ashford plays the most important role for commuters from Hythe with approximately 90 commuters travelling to Ashford. The flow of commuters from Ashford to Hythe is much less with less than 10 commuters recorded as making this journey for work. This demonstrates the town's lack of importance as an employment centre in the south east region beyond Folkestone &amp; Hythe.</p> <p>Data from the Census 2011 shows that the Character Area has a moderate density of employment. This density of employment is lower than that demonstrated within Folkestone but higher than the rural areas of Folkestone &amp; Hythe. Three employment sites which are set through the saved policies E1 from the 2006 District Local Plan Review are located within Hythe and to the west of Hythe. The settlement of Hythe has been identified as a Major Employment Site and a Town Centre in the Core Strategy to protect existing and provide further industrial premises and also to accommodate the majority of Folkestone &amp; Hythe's identified needs for retail, office and leisure uses through new development.</p> <p>Character Area 3 has a relatively good level of access to the local road network with the A259 and A261 running through it. The A259 provides access to Folkestone via Sandgate to the east. The Character Area is not served directly by the M20 motorway however it is accessible within 1.2km to the north via Bargrove. Hythe station serves the Character Area however this is not a mainline train station and this transport node provides access to only the coastal villages to the south west towards Dungeness.</p> <p>Character Area 3 is the least deprived Character Area of those considered although importantly it should be noted that the Core Strategy identifies western Hythe as priority community for regeneration. Beyond the more urbanised areas within Hythe deprivation in the Character ranges from being within the 60-100% least deprived. Access to education facilities within the Character Area is limited to three primary schools. There are three primary schools and one secondary school located within approximately 300m of the northern Character Area boundary however at the northern edge of Saltwood and Lympne respectively.</p> <p>Overall Character Area 3 plays a relatively important role in terms of its economic contribution particularly within the District considering its more developed nature and Hythe's high order within the Core Strategy's settlement hierarchy. Its role within the wider Kent and south east region is relatively reduced however. The road network is particularly strong towards the southern coastline where the A259 is present towards Folkestone. Access to rail travel is provided in the area however its current capacity to support future growth is limited given that Hythe station is not a mainline station and provides light rail services only towards the southern villages. Character 3 as a whole has not been identified as an area which is currently experiencing high levels of deprivation where future</p>

SA Objectives	SA Score	Justification
		growth might help to address an immediate concern with this regard. An overall mixed effect (minor positive/minor negative) is therefore expected for this SA objective.
SA3. Conserve, and where relevant enhance, the quality, character and local distinctiveness of the landscape and townscape.	-	<p>Character Area 3 includes small portions of the Kent Downs AONB designation to the north east and east. This Character Area is mostly urban with the settlements of Hythe and Saltwood developed towards Folkestone to the north east. New development might potentially be accommodated as urban extensions to the existing town of Hythe, thus allowing for more sustainable development supported by paragraph 82 of the NPPF, however there would be a need to avoid coalescence with Folkestone. The Core Strategy has noted that Seabrook Valley, immediately to the west of Folkestone, is characterised by a green wedge that at present separates Folkestone from Hythe. The prominent Hythe Escarpment is within the Character Area in the west and at higher ground in the north and this forms the northern edge of Hythe before the land falls away to the English Channel in the south.</p> <p>Character Area 3 beyond the developed area of Hythe falls within the overarching Kent Downs and Romney Marshes character areas as defined in the Landscape Assessment of Kent 2004. It is also within the Urban District Character Area as defined in the Core Strategy 2013. Parts of the Character Area along the northern boundary outside the built-up area of Hythe are within the North Downs Special Landscape Area. The District's High Level Landscape Appraisal (2017) highlights that this Character Area contains LCAs 17 (Hythe Wooded Hills), 18 (Hythe Coast) and 19 (Hythe Ranges) and parts of LCAs 13 (Greensand Ridge), 16 (Hythe and Saltwood Wooded Valleys) and 21 (Romney Marsh Proper Farmlands). Of these LCAs 13, 16 and 21 described as having high landscape value and high landscape susceptibility.</p> <p>The location of Character Area 3 to the south of the majority of the AONB into which this landscape designation partially impinges will mean strategic scale development is likely to be physically constrained. There are areas of high landscape sensitivity away from developed areas around Hythe and Saltwood. To the east any development should be considered in terms of potential for coalescence with the settlement of Folkestone and as such larger development proposals may also be constrained in this direction. The developed character of Hythe means it has low sensitivity to development; however this area is physically confined in terms of landmass meaning it is unlikely that strategic scale development could be facilitated here. A minor negative effect is therefore expected on this SA objective.</p>
SA4. Conserve and enhance the fabric and setting of historic assets.	--	<p>Character Area 3 contains one Conservation Area at Hythe town centre. Saltwood Conservation Area falls outside of Character Area 3 however it abuts a small section of the Character Area to the north. The majority of the Listed Buildings within this Character Area are located within Hythe town centre. Listed Buildings located within the Character Area include Grade I The Parish Church of St Leonard in Hythe, Grade II* Hythe Town Hall and Grade II* Centuries building (all at the centre of Hythe), and Grade I Church of St Martin (to the west of Folkestone). The Royal Military canal runs through this Character Area from east to west and has been designated as a Scheduled Monument. Other important Scheduled Monuments in Character Area 3 include Martello Tower 9 to the west of Sandgate and Dymchurch Redoubt to the south west of Palmmarsh.</p> <p>Kent County Council has stated that this Character Area would be less suitable for new development given the importance of the surrounding military landscape including the aforementioned Scheduled Monuments and Shorncliffe Camp. In addition Historic England has stated that there is very limited site availability within Character Area 3 that would not result in adverse impacts on heritage assets and historic sites, including those of high archaeological potential.</p> <p>Overall a significant negative effect is expected on this SA objective considering the presence across much of the Character Area of heritage assets which might be impacted upon in terms of their significance or that of their setting. Comments from Kent County Council and Historic England reinforce this negative effect.</p>
SA5. Conserve and enhance biodiversity, taking into account the effects of climate	-	Given the more developed character of this Character Area the larger biodiversity sites are located towards the edges of Hythe. Lympne Escarpment passes within the Character Area to the south east of Lympne and runs to the north of Palmmarsh towards Saltwood and Hythe. Significant areas of land which have been designated as Local Wildlife Sites include sections of the Royal Military Canal, Paraker Wood and Seabrook Stream, Shorncliffe and Hythe Ranges along the southern coast to the west of Hythe. Kent Wildlife Trust have noted that there has been increasing recreational pressure on the Local Wildlife Areas surrounding Shorncliffe. Areas of Ancient

SA Objectives	SA Score	Justification
change.		<p>Woodland are present within Character Area 3 towards the north east of Hythe at Paraker Wood and Scene Wood. Larger areas of BAP priority habitats within this Character Area include rank calcareous grassland to the north west of Hythe and shingle heathland communities towards the southern coastline to the south west of Hythe.</p> <p>This Character Area has a number of biodiversity designations which might be adversely impacted upon by strategic scale development in terms of habitat loss or fragmentation or other development associated pressures such as those posed by recreational activities or increased car use. Although many of these designations are also located mostly towards the edges of the Character Area much of the south western portion of Character Area 3 is covered by Hythe Ranges Local Wildlife Site and the Local Wildlife Sites designated along sections of the Royal Military Canal extend through much of the developed areas of Hythe as well as into the less developed areas to the west. It is also noted that recreational pressures might affect biodiversity designations around Shorncliffe in particular as highlighted by the Wildlife Trust. A minor negative effect is therefore expected on this SA objective.</p>
SA6. Protect and enhance green infrastructure and ensure that it meets strategic needs.	+/-	<p>Providing strategic scale development within the District is expected to allow for opportunities for the appropriate incorporation of new open spaces, green corridors and other important elements of green infrastructure to meet the needs of the District's wildlife and residents. However, development may also result in the loss of established green infrastructure. Therefore, overall a mixed minor positive/minor negative effect is expected on this SA objective.</p>
SA7. Use land efficiently and safeguard soils, geology and economic mineral reserves.	0	<p>Character Area 3 contains mostly urban, non-agricultural and developed land which makes up the settlements of Hythe and Saltwood. As such most of this land has a low agricultural value with only a small pocket of Grade 2 Agricultural Land to the west of the settlement. Areas of Grade 3 and 4 Agricultural Land are also located within this Character Area towards the west and north east of Hythe.</p> <p>The adopted Kent Minerals and Waste Local Plan 2013 – 2030 (MWLP) identifies Mineral Safeguarding Areas (MSA) in Folkestone &amp; Hythe to ensure that minerals of economic interest are not needlessly sterilised by non-mineral development. Within Character Area 3 there are areas identified to be safeguarded for sandstone, limestone (Kentish Ragstone), and silica sand/construction sand all to the north of Hythe with areas identified for storm beach gravel to the east and west of Hythe.</p> <p>Work undertaken by AECOM in the High Level Options Report (2016) has identified that a number of smaller vacant buildings and previously developed sites are present within Hythe which might present some smaller opportunities for redevelopment if new growth was focussed within this area potentially as part of any new urban extensions. These areas include Fisherman's Beach at Range Road and the land at Princes Parade to the south east of the town.</p> <p>Strategic scale development has reduced potential to result in the loss of higher quality agricultural land and loss of access to or sterilisation of Mineral Safeguarding Areas in this Character Area considering that most of the area is already developed and contains urban and non-agricultural land. Focussing strategic scale development in this Character Area may present a small number of opportunities to re-use previously developed sites and vacant buildings. As such a negligible effect is expected on this SA objective.</p>
SA8. Maintain and improve the quality of groundwater, surface waters and coastal waters and the hydromorphological (physical) quality of rivers and coastal waters.	-	<p>Character Area 3 is not located within a Source Protection Zone (SPZ). The south coast section of this Character Area has been designated as a minor aquifer with high vulnerability as a result of the storm beach deposits and other superficial deposits. Also within this Character Area to the north of the Royal Military Canal there are combinations of high and intermediate vulnerability present. The central portion of Character Area 3 has not been assigned a groundwater vulnerability rating. The Character Area is potentially located within a drinking water safeguard zone by its northern boundary towards Lympne. The western portion of the Character Area is also located within a Nitrate Vulnerable Zone (NVZ).</p> <p>As per information from the District's Water Cycle Study (2011) the settlements of Folkestone and Hythe broadly have a good level of coverage from waste water treatment works (WWTWs). Most of them have a current or planned capacity sufficient to meet planned growth although there is potentially insufficient capacity in the strategic wastewater connection between the Westenhanger area and the Sellindge WWTW. This area lies to the north of Character Area 3 within approximately 2.7km.</p>



SA Objectives	SA Score	Justification
		As this Character Area does not lie within an SPZ there are not expected to be risks in relation to the quality or quantity of water obtained, should certain development take place nearby. Vulnerabilities to aquifers have been identified within this Character Area however and there are also areas which are within drinking water safeguard zones and NVZs. As such these areas are already identified as having land uses present which are likely to cause pollution to local raw water sources and also waters which could become polluted by nitrates. Given that pressures on water quality currently exist in this Character Area a minor negative effect is expected on this SA objective.
SA9. Reduce the risk of flooding, taking into account the effects of climate change.	--	Character Area 3 contains large areas of Flood Zone 3 associated with both fluvial and tidal flooding. Much of the town of Hythe is located within Flood Zone 3, given its proximity to the English Channel and water bodies which pass through the town including Brockhill Stream and Seabrook Stream. The western portion of the Character Area is located entirely within Flood Zone 3. The District Council's Strategic Flood Risk Assessment (2015) indicates that there are significant risk areas along the southern coastline which affect the most southern areas of Hythe. To the west of Hythe there are large significant and extreme risk areas which take in portions of Palmarsh. This risk is likely to become more extensive up to the year 2115. This western area benefits from flood defences however there are areas of undefended Flood Zone 3 land within Hythe itself to the east. As such there is recent historic evidence of causing localised flooding in Hythe. It should be noted that strategic scale development in this Character Area would also be likely to involve the development of a large area of greenfield land which would result in the increase of impermeable surfaces and contribute to local flood risk. A significant negative effect is therefore expected on this SA objective.
SA10. Increase energy efficiency in the built environment and the proportion of energy use from renewable sources.	+	Providing strategic scale development within the District is likely to generate the economies of scale to incorporate high levels of energy efficient design, district heating and renewable energy schemes. A minor positive effect is therefore expected on this SA objective.
SA11. Use water resources efficiently	+	Providing strategic scale development within the District is likely to allow for opportunities to incorporate high levels of design which encourage water efficiency, such as low flush toilets or the enactment of Water Efficiency Improvement Action Plans at new development. A minor positive effect is therefore expected on this SA objective.
SA12. To reduce waste generation and disposal, and achieve the sustainable management of waste.	+	Providing strategic scale development within the District is expected to allow for opportunities for the provision of developments making use of sustainable and responsible construction practices and in the medium to long term through the incorporation of sustainable waste management facilities. A minor positive effect is therefore expected on this SA objective.
SA13. Reduce the need to travel, increase opportunities to choose sustainable transport modes and avoid development that will result in significant traffic congestion and poor	+	Character Area 3 is served by a number of A roads which are of particular importance within the District. The A259 to Folkestone to the east and to New Romney to the west and the A261 towards the M20 motorway are both identified as Main Internal Links in the Core Strategy (2013). The Core Strategy has also identified Hythe as the location for Key Highway Improvements over the plan period. There are currently no Primary External Connections to the Character Area, however. Rail access in the Character Area is provided at Hythe station which allows light rail access towards Dungeness connecting to smaller villages along the coast in this direction. This service is used by tourists as well as providing school access for students in the District. Mainline rail services are however not accessible via this route. Bus connections are available within the Character Area however and these provide access to Folkestone and other areas within Kent. Hythe is connected to Folkestone, Hastings and Dover by bus route 101/102. Further connections on to the important centres of Ashford and Canterbury are available from these hubs.

SA Objectives	SA Score	Justification
air quality.		<p>Although infrastructure to support journeys made by private vehicle is relatively strong within the locality, it should also be noted that NCN 2, a long distance cycle route from Dover to Brighton, passes through Hythe town centre and along the Royal Military Canal. This route also allows for access to Folkestone.</p> <p>A minor positive effect is therefore expected on this SA objective.</p>
SA14. Promote community vibrancy and social cohesion; provide opportunities to access services, facilities and environmental assets for all ages and abilities and avoid creating inequalities of opportunity for access.	+/-	<p>Character Area 3 contains one of the District's Strategic Towns at Hythe as identified in the Core Strategy (2013). The Core Strategy identifies that significant development is to be accommodated at this settlement to be appropriate to maintain the viability of local transport hubs, town centres and higher-order tourism, employment and public services. Saltwood as a Primary Village is to have a reduced role in terms of facilitating new development but should still support rural business and community facilities. Considering that much of the Character Area already contains the urban area of Hythe, the potential for coalescence with Folkestone to the east and the smaller villages to the west there is limited potential to provide new local centres/employment areas in the area.</p> <p>At present there are only three primary schools within the Character Area with the nearest secondary school provided to the north in the ward of Tolsford. Kent County Council has stated that new school sites would be required for any increase in development in Character Area 3. There is only one Post Office within the Character Area at High Street in Hythe town centre. Hythe is the second-largest centre in the District and has a retail offer which is significantly different to that offered in Folkestone. The focus of the town centre uses is on retail, but the offer is largely orientated towards independent retailers with a more specialist product offer, particularly in respect of comparison goods. The retail units are situated along the High Street, which is closed to vehicular traffic during the day. The centre is popular and well-supported, and pedestrian flows are strong throughout the centre – partly due to the position of large anchor foodstores at either end of (although slightly disconnected from) the High Street (Waitrose to the west, Sainsbury's to the east), as well as Aldi at the centre. Health services in the Character Area consist of two surgeries at Sun Lane and Stade Street both of which are located within Hythe. Larger areas of outdoor sports facilities in the Character Area include Sene Park Golf Course and Brockhill School playing fields to the edge of the settlements' boundaries for Hythe and Saltwood. Within the more developed areas of the Character Area the Royal Military Canal provides a green corridor from east to west. A further green corridor is located at Hythe Beach. There are also areas of natural and semi-natural green space at Eaton Lands Quarry towards the centre of Hythe with further such provision at east of the settlement by the Hospital Hill Escarpment and Horn Street. Parks and gardens can be accessed towards the centre of Hythe at South Road Recreation Ground and The Green.</p> <p>Overall Character Area 3 would currently provide access to a reasonably good number of services and facilities although there may be potential deficiencies in school places. The potential for new services and facilities particularly at new local centres is most likely to be limited by the confinement of space available within the Character Area given the higher level of development and large areas which are within high flood risk areas. Overall a mixed effect (minor positive/minor negative) is therefore expected on this SA objective.</p>
SA15. Reduce crime and the fear of crime.	+	<p>Providing strategic scale development within the District is expected to allow for opportunities to incorporate the principle of 'designing out' crime at new developments for example through the suitable design of open spaces and the inclusion of appropriate lighting. A minor positive effect is therefore expected on this SA objective.</p>

## Character Area 4 (Sellindge and Surrounding Area)

SA Objectives	SA Score	Justification
SA1. Improve the provision of homes, including affordable housing, having regard to the needs of all sections of society, including the elderly.	++	Providing strategic scale development within the District is expected to allow for opportunities for the construction of a significant number of new affordable homes to help meet need in the District and the needs of the wider region's growing diverse population. As per information from Folkestone & Hythe's High Level Option Report (2016) Character Area 4 has the second highest house prices of all Character Areas considered. The CIL and Whole Plan Economic Viability Assessment (2014) shows medium (£2,300-£2,450 per sqm) residential values in Lympne and Saltwood and high residential values (above £3,350 per sqm) in Sellindge, Stanford and Westenhanger. As such the information available indicates that there is a mismatch between supply and demand for housing in this Character Area. As such a significant positive effect is expected on this SA objective.
SA2. Support the creation of high quality and diverse employment opportunities.	+	<p>Character Area 4 contains the Rural Centre of Sellindge towards the north west and the Primary Villages of Lympne and Stanford/Westenhanger towards the south and north respectively. Considering the low order of these settlements this Character Area is considered to be mostly rural. Lympne is the most important employment centre in Character Area 4. Hythe is located within 2.6km of this settlement to the south east. Approximately 145 commuters travel from Hythe and Saltwood to this location. A higher number of commuters (approximately 310) travel from Lympne to Hythe and Saltwood, however. There are also important connections between Lympne and Folkestone which is located within 7.9km to the east. Over 380 commuters travel from Lympne to parts of Folkestone with 260 travelling in the opposite direction. As such it can be seen that although Lympne plays an important role within the District its less developed nature means that employment opportunities are more prevalent at the larger settlement. Links to Ashford for economic purposes are less developed; however approximately 115 commuters travel to Ashford from Lympne with approximately 40 commuters travelling in the opposite direction.</p> <p>Data from the Census 2011 shows that the Character Area has a higher density of employment for a rural location and this is mainly due to the presence of Lympne Industrial Estate. One employment site which is set through the saved policy E1 from the 2006 District Local Plan Review is located to west of Lympne. The site has been identified in Lympne as a Major Employment Site in the Core Strategy to protect existing and provide further industrial premises.</p> <p>Character Area 4 has access to a number of A-roads (the A20/A261 towards Hythe) as well as the M20 motorway which runs through it from south east to north west. Junction 11 of the M20 is located within this Character Area. Rail access is provided at Westenhanger and Sandling. These stations link to London Charing Cross to the north west and Dover to the east.</p> <p>Character Area 4 is average in terms of deprivation relative to the other character areas identified in Folkestone &amp; Hythe. The majority of this Character Area is within the 60-80% least deprived areas. Access to primary schools within the Character Area is provided at Sellindge, Lympne, and at the northern edge of Saltwood. A secondary school is also provided at the northern edge of Saltwood.</p> <p>Overall Character Area 4 plays a more important employment role than might otherwise be expected considering its relatively undeveloped character. Lympne acts an important centre for employment opportunities however this role is mostly confined to commuters within the District. Access to the M20 motorway means that the road network is particularly strong through much of the Character Area. Access is also provided to the mainline rail services. Character Area 4 as a whole has been identified as an area which is currently experiencing average levels of deprivation meaning there may be potential for future growth to address concerns with this regard. A minor positive effect is therefore expected for this SA objective.</p>
SA3. Conserve, and where relevant enhance, the quality, character and local distinctiveness of the landscape and	--	Character Area 4 is enclosed by the Kent Downs AONB designation to the north, south and east and this important landscape passes into the Character Area along its boundaries in each of these directions. Land to the south and east of Lympne as well as an area to the north of Sellindge fall within the AONB. This Character Area is a gently undulating landform in the north rising towards the steep Hythe Escarpment falling away prominently to the south. Notable development or land uses within this Character Area with visual impacts include the M20 motorway and High Speed 1 railway line which run through the area, electricity transmission infrastructure, Folkestone Racecourse, and the industrial estate to the west of Lympne.

SA Objectives	SA Score	Justification
townscape.		<p>The Kent Downs AONB has stated that the setting of the Kent Downs has great value and was one of the reasons why the Kent Downs AONB was designated. Natural England has made comment that that the majority of the non-AONB area is within the AONB setting.</p> <p>Character Area 4 is divided between the overarching Kent Downs, Greensand Belt and Low Weald character area as defined in the Landscape Assessment of Kent 2004. It is also within the North Downs District Character Area as defined in the Core Strategy 2013. The District's High Level Landscape Appraisal (2017) highlights that this Character Area contains LCAs 06 (Stanford), 09 (Sellindge), 11 (Lympne) and 12 (Brockhill), and parts of LCAs 05 (Postling Vale), 10 (M20 and HS1 Corridor) and 13 (Greensand Ridge). Of these LCAs 05, 12 and 13 are described as having high landscape value and high landscape susceptibility. Of the remaining LCAs 10 is described as having low sensitivity and having less susceptibility to development with LCAs within the Character Area (06, 09 and 11) described as being of medium sensitivity and moderate susceptibility to development.</p> <p>Character Area 4 is bordered on three sides by the AONB, meaning strategic scale development is likely to be physically constrained. Parts of the Character Area have been identified as having high sensitivity to development in the High Level Landscape Appraisal. Given that both Kent Downs AONB and Natural England have highlighted the importance of the area in relation to the setting of the AONB the potential adverse impact on the local landscape setting is likely to be amplified. A significant negative effect is therefore expected on this SA objective.</p>
SA4. Conserve and enhance the fabric and setting of historic assets.	-	<p>Character Area 4 contains two Conservation Areas at Saltwood to the south east and at Lympne to the south. Listed Buildings are spread across the Character Area with those of note including Grade I Saltwood Castle (north-east of Saltwood), Grade I Bastions and Curtain Wall about 10m south east of Saltwood Castle (north-east of Saltwood), Grade I Lympne Castle (south Lympne), Grade I Church of St Stephen (south Lympne), Grade I Westenhanger Manor (north-west of Westenhanger), Grade I Barns at Westenhanger Manor (north-west of Westenhanger), Grade I Church of St Mary (north-west of Sellindge) and Grade I Monks Horton Priory (north of Sellindge). Important Scheduled Monuments within the Character Area include Westenhanger Castle (to the west of Westenhanger), Saxon Shore fort (to the south of Lympne) and Horton Priory (to the north of Moorstock). The southern boundary of the Character Area is formed by the Royal Military Canal Scheduled Monument to the south west of Lympne. There are Registered Parks and Gardens within the Character Area at Port Lympne and Sandling Park.</p> <p>Kent County Council has stated that there is some potential for sympathetic larger scale development within the Character Area however any such development should look to secure positive benefits for the historic environment.</p> <p>Overall a minor negative is expected on this SA objective considering the presence across much of the Character Area of heritage assets which might be impacted upon in terms of their significance or that of their setting, but also in acknowledgement that Kent County Council have stated that there may be some potential for the provision of sympathetic larger scale development in this area.</p>
SA5. Conserve and enhance biodiversity, taking into account the effects of climate change.	-	<p>There are no European biodiversity sites (Ramsar, SACs or SPAs) within Character Area 4. A SSSI has been designated towards the southern boundary of the Character Area at Lympne Escarpment to the south of Lympne. Further SSSIs have been designated at Otterpool Quarry to the south of Folkestone Race Course and at Gibbins Brook to the east of Sellindge. There are also numerous Local Wildlife Sites within the Character Area however these are mostly confined to the southern portion at Harringe Brooks Wood by Sellindge, at Pasture and Woods Below Court-At-Street by Lympne, at Folks Wood by Pedlinge, at Brockhill Country Park by Saltwood and at Saltwood Valley by Hythe. A portion of the Royal Military Canal Local Wildlife Site to the south west of Lympne forms part of the southern boundary of this Character Area. The most sizeable Local Wildlife Site in the northern portion of Character Area is Horton Wood which is to the south of Stowting. Areas of Ancient Woodland are present across Character Area 4 however these are in the majority limited to smaller parcels most notably at Folks Wood to the east of Lympne, at Harringe Brooks Wood to the north of Court-at-Street and at Lympne Park Wood to the south of Lympne. BAP priority habitats have been identified within this Character Area to the east of Saltwood for lowland dry acid grassland and for broadleaved, mixed, and yew woodland to the north of Sellindge.</p> <p>Although this Character Area does not contain any European Sites, the presence of SSSI and Local Wildlife Sites will act as constraints to development beyond the established villages, given their distribution. There is potential for strategic scale development to have adverse impacts on the identified biodiversity designations as a result of habitat loss or fragmentation and/or recreational and transport</p>

SA Objectives	SA Score	Justification
		pressures and therefore a minor negative effect is expected on this SA objective
SA6. Protect and enhance green infrastructure and ensure that it meets strategic needs.	+/-	Providing strategic scale development within the District is expected to allow for opportunities for the appropriate incorporation of new open spaces, green corridors and other important elements of green infrastructure to meet the needs of the District's wildlife and residents. However, development may also result in the loss of established green infrastructure. Therefore, overall a mixed minor positive/minor negative effect is expected on this SA objective.
SA7. Use land efficiently and safeguard soils, geology and economic mineral reserves.	--	<p>As Character Area 4 contains only smaller villages much of the landscape is undeveloped. It therefore contains large areas of undeveloped land which has been identified as being of higher quality in terms of its agricultural value. Most of the Character Area contains Grade 2 Agricultural Land with areas of Grade 3 Agricultural Land towards the edges. An area of Grade 4 Agricultural Land extends along the southern boundary of the Character Area and to the north by Saltwood. There are only small areas of non-agricultural and urban land within the Character Area most notably around the industrial estate by Sellindge.</p> <p>The adopted Kent Minerals and Waste Local Plan 2013 – 2030 (MWLP) identifies Mineral Safeguarding Areas (MSA) in Folkestone &amp; Hythe to ensure that minerals of economic interest are not needlessly sterilised by non-mineral development. Most of Character Area 4 has been identified for safeguarding for silica sand/construction sand, for sandstone and for limestone. There are also smaller areas which have been identified for sub-alluvial river terrace deposits interspersed.</p> <p>As such most of the Character Area is covered by agricultural land which has been identified as being of 'very good quality' (Grade 2) and being of potential value for future mineral extraction. It is therefore expected that strategic scale development has a high potential to result in the loss of higher quality agricultural land and loss of access to or sterilisation of Mineral Safeguarding Areas. As such a significant negative effect is therefore expected on this SA objective.</p>
SA8. Maintain and improve the quality of groundwater, surface waters and coastal waters and the hydromorphological (physical) quality of rivers and coastal waters.	--	<p>Character Area 4 is not located within a Source Protection Zone (SPZ). The Character Area contains mainly major aquifers with intermediate vulnerability. Vulnerability has been recorded as being high within the more central locations of Character Area 4 however. Towards the mostly northern section of the Character Area by the hamlet of Broad Street, no groundwater vulnerability classification has been assigned. The Character Area is within a surface water safeguard zone and the western portion is within a surface water Nitrate Vulnerable Zone (NVZ).</p> <p>As per information from the Folkestone &amp; Hythe District Water Cycle Study (2011) the settlements of Folkestone and Hythe broadly have a good level of coverage from waste water treatment works (WWTWs). Most of them have a current or planned capacity sufficient to meet planned growth although there is potentially insufficient capacity in the strategic wastewater connection between the Westenhangar area and the Sellindge WWTW which lies in the southern portion of this Character Area.</p> <p>As this Character Area does not lie within an SPZ there are not expected to be risks in relation to the quality or quantity of water obtained, should certain development take place nearby. Vulnerabilities to aquifers have been identified within this Character Area however and there are also areas which are within surface water safeguard zones and NVZs. As such these areas are already identified as having land uses present which are likely to cause pollution to local raw water sources and also waters which could become polluted by nitrates. The Character Area may also be affected by potential water treatment infrastructure capacity issues towards Westenhangar and Sellindge which may compound issues. It is however anticipated that strategic scale development would be supported by adequate improvements to address such issues. Given that pressures on water quality and potential water treatment capacity currently exist in this Character Area a significant negative effect is expected on this SA objective.</p>
SA9. Reduce the risk of flooding, taking into account the effects of climate change.	-	Character Area 4 contains some relatively small areas of Flood Zone 3. The most notable areas are around the River East Stour and its tributaries to the south of Sellindge where it passes west towards Ashford and to the east towards the M20 motorway. There are smaller areas of Flood Zone 3 to the south east of the Character Area where the Brockhill Stream and Seabrook Stream are present around Saltwood. The Character Area is not within an area of 'extreme' or 'significant' flood risk as per the District Council's Strategic Flood Risk Assessment (2015). It has also been identified that the Royal Military Canal at the southern boundary forms a barrier to

SA Objectives	SA Score	Justification
		flood waters occurring from breach/overtopping events to the south within Character Areas 3 and 5. It should be noted that strategic scale development in this Character Area would however be likely to involve the development of a large area of greenfield land which would result in the increase of impermeable surfaces and contribute to local flood risk. As such a minor negative effect is expected on this SA objective.
SA10. Increase energy efficiency in the built environment and the proportion of energy use from renewable sources.	+	Providing strategic scale development within the District is likely to generate the economies of scale to incorporate high levels of energy efficient design, district heating and renewable energy schemes. A minor positive effect is therefore expected on this SA objective.
SA11. Use water resources efficiently	+	Providing strategic scale development within the District is likely to allow for opportunities to incorporate high levels of design which encourage water efficiency, such as low flush toilets or the enactment of Water Efficiency Improvement Action Plans at new development. A minor positive effect is therefore expected on this SA objective.
SA12. To reduce waste generation and disposal, and achieve the sustainable management of waste.	+	Providing strategic scale development within the District is expected to allow for opportunities for the provision of developments making use of sustainable and responsible construction practices and in the medium to long term through the incorporation of sustainable waste management facilities. A minor positive effect is therefore expected on this SA objective.
SA13. Reduce the need to travel, increase opportunities to choose sustainable transport modes and avoid development that will result in significant traffic congestion and poor air quality.	++	<p>Character Area 4 provides access to a number of A roads (the A20/A261 towards Hythe) as well as the M20 motorway which runs through it from south east to north west. Junction 11 of the M20 is located within this Character Area. The Core Strategy has identified the M20/A20 Ashford to Folkestone as a Primary External Connection and the Junction 11 on the M20 as a Main Internal Link. The Core Strategy also identifies the A20/A261 junction at Newingreen as a location for Key Highway Improvements over the plan period. Operation Stack has potential to impact adversely upon transport along the M20 when there is disruption to services across the English Channel.</p> <p>Rail access in the Character Area is provided at Westenhanger and Sandling. These stations link to the mainline service to London Charing Cross to the north west and Dover to the east. Bus route 10 provides a service from Sellindge and Lympne towards Folkestone and Ashford however beyond this service bus services to the rural areas are limited. A local cycle route runs from Lympne along Stone Street to Newingreen, continuing on the A20 to Ashford Road. There is also a Sustrans National Route at the southern boundary of the Character Area where it runs along the Royal Military Canal to Hythe to the east.</p> <p>Kent County Council has stated that there is good access to transport infrastructure with the Character Area, however it will be necessary to consider the potential impacts of development on the A20, A261 Hythe Road, Stone Street, and A20 Ashford Road junction.</p> <p>A significant positive effect is therefore expected on this SA objective.</p>
SA14. Promote community vibrancy and social cohesion; provide opportunities to access services,	++/-	Character Area 4 contains only low order settlements as identified in the Core Strategy (2013). Sellindge has been identified as a Rural Centre and Local Centre and Lympne and Stanford/Westenhanger have been identified as the Primary Villages. The Core Strategy identifies that development at Local Centres should protect crucial services and accommodate development that maintains their viability for residents and visitors. Lympne and Saltwood/Westenhanger as Primary Villages are to have a reduced role in terms of facilitating new development but should still support rural business and community facilities. The more rural and undeveloped nature of

SA Objectives	SA Score	Justification
<p>facilities and environmental assets for all ages and abilities and avoid creating inequalities of opportunity for access.</p>		<p>this Character Area means that there may be potential to provide new local centres/employment areas however.</p> <p>Access to primary schools within the Character Area is provided at Sellindge, Lympne, and at the northern edge of Saltwood. A secondary school is also provided at the northern edge of Saltwood. There are currently no healthcare facilities within the Character Area, the closest being provided at Hythe within 940m. Hythe also provides the closest access to a Primary Shopping Area as set out in the Core Strategy. There is one Post Office present in the Character Area at Belcaire Close in Lympne. More sizeable outdoor sports facilities in the Character Area are at Brockhill School playing fields at Saltwood, at the Recreation Ground in Lympne and at Swan Lane in Sellindge. Brockhill Country Park provides access to open space by Saltwood. Other areas of accessible open space are limited mainly to St Mary the Virgin Churchyard in Sellindge, the semi-natural and natural greenspace at the Ridgeway Trim Trail to the north of Hythe and St Stephen's Churchyard in Lympne.</p> <p>Overall Character Area 4 would currently provide access to a lower number of services and facilities at the smaller villages within its boundaries. There is potential for new local centres and employment areas to be established given its undeveloped nature, the relative lack of physical constraints and the high order of the local transport network. Overall a mixed effect (significant positive/minor negative) is therefore expected on this SA objective.</p>
<p>SA15. Reduce crime and the fear of crime.</p>	<p>+</p>	<p>Providing strategic scale development within the District is expected to allow for opportunities to incorporate the principle of 'designing out' crime at new developments for example through the suitable design of open spaces and the inclusion of appropriate lighting. A minor positive effect is therefore expected on this SA objective.</p>

## Character Area 5 (Romney Marsh and Walland Marsh)

SA Objectives	SA Score	Justification
SA1. Improve the provision of homes, including affordable housing, having regard to the needs of all sections of society, including the elderly.	+	Providing strategic scale development within the District is expected to allow for opportunities for the construction of a significant number of new affordable homes to help meet need in the District and the needs of the wider region's growing diverse population. As per information from the District's High Level Option Report (2016) Character Area 5 has average house prices for Folkestone & Hythe. The CIL and Whole Plan Economic Viability Assessment (2014) shows low residential values (below £2,150 per square metre) in Burmarsh, Dymchurch and St Mary's Bay, medium residential values (£2,300-£2,450 per sqm) in Brenzett and high residential values (above £3,350 per sqm) in Brookland, Ivychurch and Newchurch. As such, although the delivery of new homes would help to meet the housing needs of Folkestone & Hythe District and the wider Kent and south east areas, this Character Area does not currently display a particularly high requirement for residential development. As such a minor positive effect is expected on this SA objective
SA2. Support the creation of high quality and diverse employment opportunities.	+/--	<p>Character Area 5 is the largest of the Character Areas and contains smaller settlements being particularly undeveloped in western Romney Marsh area away from the coastline. The Character Area contains Dymchurch which has been identified as a Rural Centre and local Centre in the Core Strategy (2013) as well as St Mary's Bay, Brookland and Brenzett which have been identified as Primary Villages. The Secondary Villages of Burmarsh, Ivychurch and Newchurch are also within this Character Area. Given the undeveloped character of this Character Area commuting information is limited to the area around Dymchurch and St Mary's Bay. The strongest flow of inward commuters (approximately 120) is from New Romney which is located within 3.0km to the south west. A lower number of inward commuters have been recorded from Lympne (approximately 80) and Hythe (approximately 60). These locations are considered the most important for outward commuting from the Character Area given their proximity with approximately 200 commuters recorded as travelling to New Romney and approximately 180 commuters recorded as travelling to Lydd. Commuters from the Character Area are also recorded as travelling in relatively high numbers to Hythe, Folkestone and Ashford.</p> <p>Data from the Census 2011 shows that the Character Area has a lower density of employment compared to more urban parts of Folkestone &amp; Hythe. No employment sites which are set through the saved policy E1 from the 2006 District Local Plan Review are within this Character Area. The closest of these sites is at New Romney which is at the south western boundary of Character Area 5.</p> <p>Character Area 5 contains sections of A-roads at the A259 and the A2070 however access to these roads is fairly limited given its larger size. These routes provide access particularly along the coastal villages towards New Romney then westerly towards Brenzett with rural low order roads present beyond. There are railway stations at Dymchurch, Burmarsh Road and St Mary's Bay which link to the local light rail system however access is not provided to a mainline service.</p> <p>Character Area 5 is the joint most deprived of all six considered. The majority of this Character Area is within the 20-40% most deprived areas. Towards the coastline it is less deprived with a small area within the 40-60% most deprived areas. Access to primary schools within the Character Area is provided at Brookland, Brenzett and Dymchurch. There is no secondary school within this Character Area, with the closest located within New Romney to the south east within 700m.</p> <p>Character Area 5 is mostly undeveloped particularly away from the eastern coastline. The reduced scale of the local road network is particularly evident due to the larger size of this Character Area. Many residents commute out of the area for employment opportunities with the number of those commuting inwardly greatly reduced. Character 5 as a whole has been identified as an area which is currently experiencing higher levels of deprivation than much of the District, meaning there are likely to be opportunities for local economic growth to address specific issues with this regard. An overall mixed effect (minor positive/significant negative) is therefore expected for this SA objective.</p>
SA3. Conserve, and where relevant enhance, the quality, character and local distinctiveness of the	--	<p>Character Area 5 contains a small part of the Kent Downs AONB towards its northern boundary. The western portion of the Character Area is highly rural and undeveloped with the smaller settlements to the east along the coastline. Character Area 5 is part of the broad flat low-lying landscape of the Romney Marshes. The area has very limited tree cover with an expansive, flat and open character, which might be compromised by strategic-scale urban development.</p> <p>Character Area 5 falls within the overarching Romney Marshes character area as defined in the Landscape Assessment of Kent 2004. It</p>



SA Objectives	SA Score	Justification
landscape and townscape.		<p>is also within the Romney Marsh Character Area as defined in the Core Strategy 2013. Part of this Character Area is within the North Downs Special Landscape Area. The District's High Level Landscape Appraisal (2017) highlights that this Character Area contains LCAs 21 (Romney Marsh Proper Farmlands), 23 (The Dowels Farmlands) and 24 (Highknock Channel Farmlands) and parts of LCAs 20 (Romney Marsh Coast), 22 (Brookland Farmlands) and 25 (Walland Marsh Farmlands). Of these LCAs 21, 23, 24 and 25 are described as having high landscape value and high landscape susceptibility. LCA 20 has been described as having medium sensitivity and moderate susceptibility to development, while LCA 22 has been described as having high sensitivity and moderate susceptibility to development.</p> <p>Natural England has stated that the Character Area is visible from, and forms part of the setting for, the Kent Downs AONB, making it less suitable for development.</p> <p>The location of Character Area 5 to the south of the majority of the AONB into which this landscape designation partially impinges will mean strategic scale development is likely to be physically constrained. This is particularly likely given that Natural England has stated that the Character Area forms part of the setting of the AONB. The western portion of the Character Area is mainly undeveloped and flat and therefore strategic scale development is likely to be less appropriate at this location. A significant negative effect is therefore expected on this SA objective.</p>
SA4. Conserve and enhance the fabric and setting of historic assets.	--	<p>Character Area 5 contains Conservation Areas at Brookland, Old Romney, Newchurch, Dymchurch High Street and the crossroads of the A259 and Mill Road in Dymchurch. Listed Buildings are spread throughout the Character Area with clusters present within the Conservation Areas. Important Listed Buildings include Grade I Church of St Peter and St Paul located at Newchurch, Grade I Church of St Mary the Virgin at St Mary in the Marsh, Grade I Church of St George at Ivychurch, Grade I Church of St Clement in central Old Romney, Grade I Church of St Thomas A Becket and mounting block attached (west of area), Grade I Church of St Augustine and detached belfry at the centre of Brookland. Important Scheduled Monuments within the Character Area include the moated site and associated fields to the north of St Mary in the Marsh, the moat and associated closes at Marshall's Bridge to the west of Dymchurch, the medieval farmstead at Pilchers to the north Brenzett and part of the Rhee Wall, a medieval canal which is to the north west of Snargate. The northern boundary of the Character Area is formed by the Royal Military Canal Scheduled Monument to the south west of Lympe</p> <p>Kent County Council has stated that the area is less suitable for development because of Martello towers and 20th century defences along the coastline, and inland, due to the presence of a number of historic sea walls and drainage systems as well as medieval and post-medieval high status sites. Historic England has also stated that this area would be unsuitable for development due to its historic landscape and character.</p> <p>Overall a significant negative effect is expected on this SA objective considering the presence across much of the Character Area of heritage assets which might be impacted upon in terms of their significance or that of their setting. Comments from Kent County Council and Historic England reinforce this negative effect given that there has been a conclusion that new development is likely to be unsuitable at this location.</p>
SA5. Conserve and enhance biodiversity, taking into account the effects of climate change.	--	<p>Much of the western and south western portion of Character Area 5 is covered by European sites. Dungeness, Romney Marsh and Rye Bay Ramsar and SPA sites extend along much of and within the western boundary of the Character Area. Much of these areas have also been designated as SSSIs. There are also two Local Wildlife Sites at Midley Chapel Pasture, Hawthorn Corner to the north of Lydd and at Pasture, Ditches and Pond to the west of Dymchurch. A Local Nature Reserve has been designated at Romney Warren to the east of New Romney. There are no areas of Ancient Woodland within the Character Area. BAP priority habitats have been identified within this Character Area to the south west by Walland Marsh which contains neutral grassland and arable field margins. Similar areas of BAP priority habitats also exist in the north eastern portion of the Character Area to the north of Dymchurch.</p> <p>Kent County Council has stated that this area is the most ecologically important of those considered.</p> <p>This Character Area contains a number of important European sites as well as national and local designations which will act as</p>

SA Objectives	SA Score	Justification
		constraints to development across the area particularly to the west and south west. There is potential for strategic scale development to have adverse impacts on the identified biodiversity designations as a result of habitat loss or fragmentation and/or recreational and transport pressures and therefore a significant negative effect is expected on this SA objective.
SA6. Protect and enhance green infrastructure and ensure that it meets strategic needs.	+/-	Providing strategic scale development within the District is expected to allow for opportunities for the appropriate incorporation of new open spaces, green corridors and other important elements of green infrastructure to meet the needs of the District's wildlife and residents. However, development may also result in the loss of established green infrastructure. Therefore, overall a mixed minor positive/minor negative effect is expected on this SA objective.
SA7. Use land efficiently and safeguard soils, geology and economic mineral reserves.	--	<p>As Character Area 5 contains only smaller villages much of the landscape is undeveloped. It therefore contains large areas of undeveloped land which have been identified as being of higher quality in terms of their agricultural value. Most of the Character Area away from the coastline towards Romney Marsh and Walland Marsh contains areas of Grade 1 Agricultural Land surrounded by Grade 2 Agricultural Land. The areas which take in Dymchurch are the only areas identified as urban land. Areas of Grade 3 Agricultural land are to the north and south of Dymchurch. There are pockets of Grade 4 Agricultural Land to the north west and south west.</p> <p>The adopted Kent Minerals and Waste Local Plan 2013 – 2030 (MWLP) identifies Mineral Safeguarding Areas (MSA) in Folkestone &amp; Hythe to ensure that minerals of economic interest are not needlessly sterilised by non-mineral development. Most of Character Area 5 has not been identified for safeguarding. Only small pockets of sub-alluvial river terrace deposits are present to the west.</p> <p>As such most of the Character Area is covered by agricultural land which has been identified as being of 'excellent quality' (Grade 1) or 'very good quality' (Grade 2). It is therefore expected that strategic scale development has a high potential to result in the loss of higher quality agricultural land. As such a significant negative effect is therefore expected on this SA objective.</p>
SA8. Maintain and improve the quality of groundwater, surface waters and coastal waters and the hydromorphological (physical) quality of rivers and coastal waters.	-	<p>Character Area 5 is not located within a Source Protection Zone (SPZ). Groundwater vulnerability within this Character Area is minor due to the presence of an aquifer of high and intermediate vulnerability associated with the bedrock Secondary A aquifer and the Secondary A aquifer of the superficial deposits (alluvium and occasional peat) where these are present. The Character Area is not within a drinking water safeguard zone but is within a Surface Water Nitrate Vulnerable Zone (NVZ) towards the centre and west.</p> <p>As per information from the District's Water Cycle Study (2011) the settlements of Folkestone and Hythe broadly have a good level of coverage from waste water treatment works (WWTWs). Most of them have a current or planned capacity sufficient to meet planned growth although there is potentially insufficient capacity in the strategic wastewater connection between the Westenhanger area and the Sellindge WWTW which lies to the north of the Character Area within 3.3km.</p> <p>As this Character Area does not lie within an SPZ there are not expected to be risks in relation to the quality or quantity of water obtained, should certain development take place nearby. Vulnerabilities to aquifers have been identified within this Character Area however and there are also areas which are within NVZs. As such these areas are already identified as having land uses present which are likely to cause pollution to local raw water sources and also waters which could become polluted by nitrates. Given that pressures on water quality currently exist in this Character Area a minor negative effect is expected on this SA objective.</p>
SA9. Reduce the risk of flooding, taking into account the effects of climate change.	--	<p>Almost all of Character Area 5 is located within Flood Zone 3. Areas of 'extreme' or 'significant' flood risk are present along waterbodies within the Character Area to the north and also to the east by Dymchurch at the coast as per the District Council's Strategic Flood Risk Assessment(2015). Southern areas of Walland March are also areas of 'extreme' or 'significant' flood risk. The majority of Area 5 is in an 'Area Benefitting from Flood Defences' meaning that flood risk is considered to be residual however with consideration for climate change (up to 2115) large areas are at risk from breach/overtopping of defences. There are small areas around Brenzett, Brookland, Snargate and Ivychurch which are not at residual risk from tidal flooding and any future development should be focused here where possible. These areas are considered to be too small for strategic-scale development and it should also be noted that strategic scale development in this Character Area would be likely to involve the development of a large area of greenfield land which would result in the increase of impermeable surfaces and contribute to local flood risk. As such a significant negative effect is expected on this SA</p>

SA Objectives	SA Score	Justification
		objective.
SA10. Increase energy efficiency in the built environment and the proportion of energy use from renewable sources.	+	Providing strategic scale development within the District is likely to generate the economies of scale to incorporate high levels of energy efficient design, district heating and renewable energy schemes. A minor positive effect is therefore expected on this SA objective.
SA11. Use water resources efficiently	+	Providing strategic scale development within the District is likely to allow for opportunities to incorporate high levels of design which encourage water efficiency, such as low flush toilets or the enactment of Water Efficiency Improvement Action Plans at new development. A minor positive effect is therefore expected on this SA objective.
SA12. To reduce waste generation and disposal, and achieve the sustainable management of waste.	+	Providing strategic scale development within the District is expected to allow for opportunities for the provision of developments making use of sustainable and responsible construction practices and in the medium to long term through the incorporation of sustainable waste management facilities. A minor positive effect is therefore expected on this SA objective.
SA13. Reduce the need to travel, increase opportunities to choose sustainable transport modes and avoid development that will result in significant traffic congestion and poor air quality.	--	<p>Character Area 5 contains sections of A-roads at the A259 and the A2070 however access to these roads is fairly limited given its larger size. The Core Strategy (2013) has identified the A259 New Romney to Rye and A2070/A259 New Romney to Ashford as Primary External Connections. The A259 Hythe to New Romney has been identified as a Main Internal Link. The A roads in Character Area 5 provide access particularly along the coastal villages towards New Romney to the south and towards Folkestone to the north. A-road access is also provided to the west towards Brenzett with rural low order roads present beyond.</p> <p>Although there is access to local light rail system within the Character Area at Burmarsh Road, Dymchurch and St Mary's Bay this service does not connect to a mainline service and merely serves those coastal settlements in the local area as far south as Dungeness. The closest mainline service station is located at the western boundary of the Character Area at Appledore within the District of Ashford. Bus routes in Character Area 5 are limited, particularly in the rural area towards the west. Tourists and students make use of the local light rail service as an alternative means of transport however there are bus services (routes 100, 101 and 102) from Dymchurch to Folkestone, Dover and Hastings. Cycle routes in this Character Area include NCN 2 which runs through this area to the east of Newchurch, southerly towards St Mary in the Marsh, and south easterly towards Old Romney and then towards Lydd. Cycle route NCN 11 joins Midley Wall south of Old Romney and runs northwest to Brookland and Fairfield.</p> <p>Rother Council has stated that transport links to the west of the Character Area are poor.</p> <p>A significant negative effect is therefore expected on this SA objective.</p>
SA14. Promote community vibrancy and social cohesion; provide opportunities to access services, facilities and environmental assets for all ages and	--	<p>Character Area 5 contains only low order settlements as identified in the Core Strategy (2013). Dymchurch has been identified as a Rural Centre and Local Centre and St Mary's Bay, Brookland and Brenzett have been identified as the Primary Villages. Burmarsh, Newchurch and Ivychurch have been identified as Secondary Villages. The Core Strategy identifies that development at Local Centres should protect crucial services and accommodate development that maintains their viability for residents and visitors. Primary Villages are to have a reduced role in terms of facilitating new development but should still support rural business and community facilities. Secondary Villages should be limited to providing crucial rural facilities to visitors and their own residents. Although the Character Area is highly rural and undeveloped, meaning that there may be potential to provide new local centres/employment areas, opportunities are likely to be constrained by the high level of flood risk and poor transport infrastructure. Flood risk mitigation through the</p>

SA Objectives	SA Score	Justification
abilities and avoid creating inequalities of opportunity for access.		<p>incorporation of flooding/drainage infrastructure is difficult to implement in this Character Area due to flat topography of the area.</p> <p>Access to primary schools within the Character Area is provided at Brookland, Brenzett and Dymchurch. There is no secondary school within this Character Area with the closest located within New Romney to the south east within 700m. Kent County Council has however noted that there is currently some educational capacity at Brenzett. There is a GP surgery within Dymchurch on Chapel Road. Post Offices are accessible within Benzett, Ivychurch, Newchurch, St Mary's Bay and Dymchurch. New Romney within 510m to the south east provides the closest access to a Primary Shopping Area as set out in the Core Strategy. Areas of outdoor sports facilities are confined to the settlements of this Character Area and the more notable sites include Brookland Cricket Club, Brenzett Cricket Ground, Dymchurch Recreation Ground, and Burmarsh Recreation Ground. Dymchurch and St Mary's Beach provide access to a green corridor along the length of the villages on the eastern coastline. Further areas of open space are also limited to mainly the eastern portion of the Character Area at St Peter and St Paul's Churchyard and parkland at Jefferstone Lane.</p> <p>Overall Character Area 5 would currently provide access to a lower number of services and facilities at the smaller villages within its boundaries. The potential to provide new local centres and employment areas is also likely to be reduced given the high flood risk and poor local transport infrastructure currently present. As such a significant negative is therefore expected on this SA objective.</p>
SA15. Reduce crime and the fear of crime.	+	<p>Providing strategic scale development within the District is expected to allow for opportunities to incorporate the principle of 'designing out' crime at new developments for example through the suitable design of open spaces and the inclusion of appropriate lighting. A minor positive effect is therefore expected on this SA objective.</p>

## Character Area 6 (Lydd, New Romney and Dungeness)

SA Objectives	SA Score	Justification
SA1. Improve the provision of homes, including affordable housing, having regard to the needs of all sections of society, including the elderly.	+/-	Providing strategic scale development within the District is expected to allow for opportunities for the construction of a significant number of new affordable homes to help meet need in the District and the needs of the wider region's growing diverse population. As per information from the District's High Level Option Report (2016) Character Area 6 has the lowest house prices of all those considered. The CIL and Whole Plan Economic Viability Assessment (2014) shows low residential values (below £2,150 per square metre) in Lydd with medium residential values (£2,300-£2,450 per sqm) in Greatstone-on-Sea, Littlestone and New Romney. As such, although the delivery of new homes would help to meet the housing needs of Folkestone & Hythe District and the wider Kent and south east areas, it is not considered that a higher level of need currently exists within this Character Area. As such an overall mixed effect (minor positive/minor negative) is expected on this SA objective
SA2. Support the creation of high quality and diverse employment opportunities.	+/--	<p>Character Area 6 contains the Strategic Centre and Town Centre at New Romney as identified in the Core Strategy (2013). The Character Area also contains Lydd which has been identified as a District Centre and Service Centre. These settlements also contain Major Employment Sites set in the Core Strategy. Greatstone-on-Sea has been identified as a Primary Village in the Core Strategy. Commuter flows show strong connections with St Mary's Bay, Hythe and Folkestone within the District from New Romney and Lydd. Lydd and New Romney in particular are of importance to commuters from St Mary's Bay given the close proximity of this settlement and considering that these locations contain employment sites. Over 200 commuters have been recorded as travelling from St Mary's Bay to New Romney and approximately 180 commuters have been recorded as travelling from St Mary's Bay to Lydd. There are also strong flows of commuters between Lydd and New Romney with the net flow occurring towards New Romney. Ashford is an important employment centre for the Character Area outside the District. Over 260 commuters travel towards Ashford from New Romney and over 230 commuters travel from Lydd. The flows in the opposite direction are greatly reduced.</p> <p>Data from the Census 2011 shows that the Character Area has a relatively lower density of employment compared to more urban parts of Folkestone &amp; Hythe with the exception of Dungeness Nuclear Power Station. There are employment sites which have been set through the saved policy E1 from the 2006 District Local Plan Review present at Lydd, New Romney and Dungeness. Dungeness B power plant is due to be decommissioned in 2028 with no replacement planned while Dungeness A is also in the lengthy process of decommissioning. Further employment opportunities may be provided at Lydd Airport though the expansion of the airport.</p> <p>Character Area 6 contains a small section of A-road at the A259 however this runs only briefly into New Romney then out of the Character Area. The B-road B2075 is the most significant route beyond this A-road and this links from New Romney to Lydd to the south. There are railway stations at Romney, Greatstone-on-Sea (Romney Sands) and Dungeness which link to the local light rail system, however access is not provided to a mainline service.</p> <p>Character Area 6 is the joint most deprived of all six considered. The majority of this Character Area is within the 20-40% most deprived areas. Towards the south east at Lydd-on-Sea an area has been identified as being less deprived and is within the 40-80% most deprived. Access to primary schools within the Character Area is provided at Lydd, New Romney and Greatstone-on-Sea. A secondary school is also provided in New Romney and these facilities have recently been upgraded as part of a redevelopment.</p> <p>Character Area 6 is mostly undeveloped, with Lydd and New Romney, however, important for commuters within nearby smaller settlements in particular. Dungeness power station is another important current employment site however this is due to be decommissioned. Commuters travel outside the Character Area particular towards Ashford for employment opportunities with the number of commuters travelling the opposite way greatly reduced. The local road network consists mostly of low order routes and there are no mainline train services. Character Area 6 as a whole has been identified as an area which is currently experiencing higher levels of deprivation than much of the District meaning there are likely to be opportunities for local economic growth to address specific issues with this regard. An overall mixed effect (minor positive/significant negative) is therefore expected for this SA objective.</p>
SA3. Conserve, and where relevant	--	This Character Area is currently not overly developed however there is potential for coalescence to occur between New Romney and St Mary's Bay to the north along the coastline in particular. Notable built development or land uses within this Character Area with visual

SA Objectives	SA Score	Justification
enhance, the quality, character and local distinctiveness of the landscape and townscape.		<p>impacts include Dungeness Nuclear Power Station on the south coast and its associated electricity transmission infrastructure, Lydd Ranges, which are part of the MOD Defence Training Estate, and New Romney Industrial Estate at New Romney.</p> <p>Character Area 6 falls within the overarching Romney Marshes character area as defined in the Landscape Assessment of Kent 2004. It is also within the Romney Marsh Character Area as defined in the Core Strategy 2013. The coastline in the south of the Character Area is within the Dungeness Special Landscape Area (SLA) as designated under Saved Policy CO4 and development which is in conflict with the objective of protecting or enhancing the natural beauty of the area will not normally be permitted. The AECOM High Level Landscape Appraisal (2017) highlights that this Character Area contains LCA 26 (Dungeness) and parts of LCAs 20 (Romney Marsh Coast), 22 (Brookland Farmlands), and 25 (Walland Marsh Farmlands). Of these LCAs 25 and 26 are described as having high landscape value and high landscape susceptibility. LCA 20 is described as having medium sensitivity and moderate susceptibility and LCA 22 is described as having high sensitivity and moderate susceptibility.</p> <p>This Character Area is mostly undeveloped in character. Most of the Character Area falls within LCA 25 which is considered to have high sensitivity and susceptibility to development. Much of Character Area 6 is also within the Dungeness SLA meaning that strategic scale development would be unlikely to be appropriate. A significant negative effect is therefore expected on this SA objective.</p>
SA4. Conserve and enhance the fabric and setting of historic assets.	--	<p>Character Area 6 contains five Conservation Areas at Dungeness, Lydd, Littlestone and New Romney (at High Street and Cannon Street). Listed Buildings are spread through the Character Area with clusters present within the Conservation Areas. Most of the Listed Buildings in the Character Area are contained within these Conservation Areas particularly in Lydd and New Romney. Notable Listed Buildings include Church of All Saints (Grade I) in Lydd, Church of St Nicholas (Grade I) at New Romney and Dungeness Lighthouse (Grade II*). There are three Scheduled Monuments designated within the Character Area. These include three acoustic early warning devices 2360m east of Jack's Court and Lade Fort towards the east and part of a Cistercian grange (known as Romney Priory) towards the centre of New Romney.</p> <p>Kent County Council has stated that the area is less suitable for development due to several areas of archaeological importance associated with the early development of Romney Marsh and its settlements, in particular New and Old Romney and Lydd. Towards Dungeness there are a number of important military sites including Lade Fort and a number of post-medieval batteries as well as numerous maritime heritage assets. Historic England has stated that this area would be less suitable for development due to historic landscape and character.</p> <p>Overall a significant negative effect is expected on this SA objective. Many of the identified heritage assets are located in clusters particularly at the settlements of New Romney and Lydd, as well as at Dungeness and Greatstone-on-Sea to a lesser extent, meaning it might be possible to provide development away from these areas thereby protecting their significance and that of their settings. Both Kent County Council and Historic England however have identified that the Character Area is less suitable for development given its character and considering the issue of archaeology.</p>
SA5. Conserve and enhance biodiversity, taking into account the effects of climate change.	--	<p>Much of the eastern and southern portion of Character Area 6 is covered by European sites. Dungeness, Romney Marsh and Rye Bay Ramsar and SPA sites and Dungeness SAC extend along much of the coastline and extend into the Character Area up towards Lydd in the south and taking up much of the land of the headland at Dungeness. Dungeness, Romney Marsh and Rye Bay SSSI covers much of the same land as the European site designations and extends further inland from the coastline with only a small area of land outside the developed locations of the Character Area not designated as such. Romney Warren Local Nature Reserve is located at the northern boundary of Character Area 6 within close proximity of New Romney. Lydd Common and Pastures Local Wildlife Site is located at the northern edge of Lydd. Dungeness National Nature Reserve takes up much of the headland of Dungeness to the south eastern coastal edge. There is also a RSPB Reserve at Dungeness and a Marine Special Protection Area is present from Dungeness to Pett Level. BAP priority habitats have been identified within this Character Area to the south east due to the presence of shingle heathland communities.</p> <p>Much of the land within this Character Area is covered by European or national biodiversity designations. There is an overlapping network of these designations resulting in Lydd being particularly enclosed on its north, west and southern edges with New Romney</p>

SA Objectives	SA Score	Justification
		enclosed to a lesser extent towards the east and north. As such there are significant environmental constraints upon development in Character Area 6. There is potential for strategic scale development to have adverse impacts on the identified biodiversity designations as a result of habitat loss or fragmentation and/or recreational and transport pressures and therefore a significant negative effect is expected on this SA objective.
SA6. Protect and enhance green infrastructure and ensure that it meets strategic needs.	+/-	Providing strategic scale development within the District is expected to allow for opportunities for the appropriate incorporation of new open spaces, green corridors and other important elements of green infrastructure to meet the needs of the District's wildlife and residents. However, development may also result in the loss of established green infrastructure. Therefore, overall a mixed minor positive/minor negative effect is expected on this SA objective.
SA7. Use land efficiently and safeguard soils, geology and economic mineral reserves.	-	<p>The majority of the land in Character Area 6, particularly towards the south, is non-agricultural. Areas of Grade 4 Agricultural Land and 3 Agricultural Land are present towards the centre and west of the Character Area with an extent of the north western edge Grade 2 Agricultural Land. There is a small area of Grade 1 Agricultural Land towards the Character Area boundary to the east of Lydd.</p> <p>The adopted Kent Minerals and Waste Local Plan 2013 – 2030 (MWLP) identifies Mineral Safeguarding Areas (MSA) in Folkestone &amp; Hythe to ensure that minerals of economic interest are not needlessly sterilised by non-mineral development. Much of Character Area 6 has been identified for safeguarding due to the presence of storm beach gravel with small areas of sub-alluvial river terrace deposits present to the south and east of Lydd.</p> <p>As such most of the Character Area is covered by non-agricultural land. Much of this land where development might be more acceptable to prevent the loss of higher quality agricultural soils however has been identified for safeguarding and therefore development at these areas may be considered to be less appropriate. It is therefore expected that strategic scale development has potential to result in the loss of higher quality agricultural land or the loss of access to or sterilisation of mineral sites in the District. As such a minor negative effect is therefore expected on this SA objective.</p>
SA8. Maintain and improve the quality of groundwater, surface waters and coastal waters and the hydromorphological (physical) quality of rivers and coastal waters.	--	<p>Character Area 6 contains areas of Source Protection Zone (SPZ) 1, 2 and 3 in the area around Denge Marsh. There are at least 15 individual SPZ1 designations within the Character Area and these are located mostly towards the south eastern coastline. Groundwater vulnerability within this Character Area is generally that of a minor aquifer with high vulnerability (associated with both the superficial and bedrock). The section around Lydd and to the north is of intermediate groundwater vulnerability. The Character Area is not within a drinking water safeguard zone but is within a Surface Water Nitrate Vulnerable Zone (NVZ) towards its north-western edge to the west of Lydd.</p> <p>As per information from the District's Water Cycle Study (2011) the settlements of Folkestone and Hythe broadly have a good level of coverage from waste water treatment works (WWTWs). Most of them have a current or planned capacity sufficient to meet planned growth although there is potentially insufficient capacity in the strategic wastewater connection between the Westenhanger area and the Sellindge WWTW which lies to the north of the Character Area within 7.5km.</p> <p>Given that a sizeable portion of the Character Area is located within an SPZ there is potential for particular risks to be posed to the quality or quantity of water obtained, should certain development take place nearby. As such a significant negative effect is expected on this SA objective.</p>
SA9. Reduce the risk of flooding, taking into account the effects of climate change.	--	Much of Character Area 6 is located within Flood Zone 3. Sections of land towards the headland at Dungeness are the largest areas which are not within Flood Zone 3. Risk is primarily from tidal flooding however main rivers are present and these are also likely to pose a risk. The majority of Character of Area 6 is in an 'Area Benefiting from Flood Defences' and therefore flood risk is considered residual in the event of a breach or overtopping of defences. Areas to the south of Dungeness Road are shown to be at low to significant hazard in the event of a breach or overtopping event up to 2015 as per the Folkestone & Hythe District Council Strategic Flood Risk Assessment (2015). The majority of New Romney including an area to the north has not been shown to be at residual risk from tidal flooding, whilst some areas to the south are only shown to be at low to moderate flood hazard, these areas however are still

SA Objectives	SA Score	Justification
		located within Flood Zone 3. It should also be noted that strategic scale development in this Character Area would be likely to involve the development of a large area of greenfield land which would result in the increase of impermeable surfaces and contribute to local flood risk. As such a significant negative effect is expected on this SA objective.
SA10. Increase energy efficiency in the built environment and the proportion of energy use from renewable sources.	+	Providing strategic scale development within the District is likely to generate the economies of scale to incorporate high levels of energy efficient design, district heating and renewable energy schemes. A minor positive effect is therefore expected on this SA objective.
SA11. Use water resources efficiently	+	Providing strategic scale development within the District is likely to allow for opportunities to incorporate high levels of design which encourage water efficiency, such as low flush toilets or the enactment of Water Efficiency Improvement Action Plans at new development. A minor positive effect is therefore expected on this SA objective.
SA12. To reduce waste generation and disposal, and achieve the sustainable management of waste.	+	Providing strategic scale development within the District is expected to allow for opportunities for the provision of developments making use of sustainable and responsible construction practices and in the medium to long term through the incorporation of sustainable waste management facilities. A minor positive effect is therefore expected on this SA objective.
SA13. Reduce the need to travel, increase opportunities to choose sustainable transport modes and avoid development that will result in significant traffic congestion and poor air quality.	--	<p>Character Area 6 contains a small section of A-road at the A259 however this runs only briefly into New Romney then out of the Character Area. The B-road B2075 is the most significant route beyond this A-road and this links from New Romney to Lydd to the south. Roads beyond this are of a low order. The Core Strategy (2013) has identified the A259 New Romney to Rye and A2070/A259 New Romney to Ashford as Primary External Connections. The B2075 New Romney to Lydd has been identified as a Main Internal Link. The Core Strategy identifies New Romney as location for Key Highway Improvements over the plan period.</p> <p>There are railway stations at Romney, Greatstone-on-Sea (Romney Sands) and Dungeness which link to the local light rail system however access is not provided to a mainline service. The closest mainline service stations are located at Rye within the District of Rother 8.8km to the west and Appledore within the District of Ashford 8.9km to the west. Bus route 102 provides a service between Lydd and Dover, and linking Lydd-on-Sea, New Romney, Dymchurch, Hythe, Folkestone and Dover. Cycle routes in this Character Area include NCN 2 which runs through this area from the north west before passing into Lydd and then continuing to the south west into Rother District.</p> <p>Kent County Council has stated that the Character Area has poor transport connections. Rother District Council has stated that links towards the west outside the District are also poor. A significant negative effect is therefore expected on this SA objective.</p>
SA14. Promote community vibrancy and social cohesion; provide opportunities to access services, facilities and environmental assets for all ages and abilities and avoid	--	Character Area 6 contains the Strategic Centre and Town Centre at New Romney as identified in the Core Strategy (2013). The Character Area also contains Lydd which has been identified as a District Centre and Service Centre. Greatstone-on-Sea has been identified as a Primary Village in the Core Strategy. The Core Strategy identifies that significant development is to be accommodated at Strategic Centres, appropriate to maintain the viability of local transport hubs, town centres and higher-order tourism, employment and public services. At District centres development should be allowed so as to maintain the mix of uses and improve vitality, viability and the public realm. Primary Villages are to have a reduced role in terms of facilitating new development but should still support rural business and community facilities. Much of the Character Area is undeveloped, so that there may be potential to provide new local centres/employment area opportunities. However it is likely that outside the already developed locations, new strategic scale development would be constrained by the high level of flood risk and poor transport infrastructure. Flood risk mitigation through the



SA Objectives	SA Score	Justification
creating inequalities of opportunity for access.		<p>incorporation of flooding/drainage infrastructure is difficult to implement in this Character Area due to the flat topography of the area. Additionally the Romney Marshes Area Internal Drainage Board has raised concern that the accumulation of small scale development would make the management of surface water and drainage difficult.</p> <p>Access to primary schools within the Character Area is provided at Lydd, New Romney and Greatstone-on-Sea. A secondary school is also provided in New Romney and these facilities have recently been upgraded as part of a redevelopment. Access to GP surgeries is provided at New Romney on Church Lane and High Street and at Lydd on Bleak Road. A Post Office is accessible within these two settlements. The Rural Services Study (2011) has noted that New Romney has a good range of retail services and that Lydd has a more limited choice of shops in comparison. In terms of new service and infrastructure provision in the Character Area, the Core Strategy identifies potential Climate Change Mitigation Measures for the coastline as well as Romney Marsh Rye and Rye Bay Habitat as a Strategic Green Infrastructure Opportunity. The more significant areas of open space and outdoor sports facilities include a green corridor along the extent of the coastline at Greatstone Beach, Romney Warren and Lydd golf courses, the school playing fields at the Marsh Academy in New Romney, the Rype amenity greenspace and Lydd Cemetery in Lydd and allotments at both New Romney and Lydd.</p> <p>Overall Character Area 3 would currently provide for services and facilities confined mainly to the more developed settlements of Lydd and New Romney. The local transport network is relatively poor and opportunities for the provision of new local centres and employment areas are likely to be constrained by the high level of flood risk and biodiversity designations in the Character Area. As such a significant negative is therefore expected on this SA objective.</p>
SA15. Reduce crime and the fear of crime.	+	<p>Providing strategic scale development within the District is expected to allow for opportunities to incorporate the principle of 'designing out' crime at new developments for example through the suitable design of open spaces and the inclusion of appropriate lighting. A minor positive effect is therefore expected on this SA objective.</p>

## Character Area 4 Sub-areas

### Area A (North and East Sellindge)

SA Objectives	SA Score	Area A (North and East Sellindge)
SA1. Improve the provision of homes, including affordable housing, having regard to the needs of all sections of society, including the elderly.	++	Providing strategic scale development within the District is expected to allow for opportunities for the construction of a significant number of new affordable homes to help meet need in the District and the needs of the wider region's growing diverse population. The District's High Level Options Report (2016) shows that Character Area 4, within which Area A falls, has the second highest house prices of all Character Areas considered, indicating a mismatch between supply and demand. Based on the size of the area alone, the Area A has the potential to accommodate hundreds, if not thousands of homes, which would have a significant positive effect on this objective. A significant positive effect is therefore expected on this SA objective.
SA2. Support the creation of high quality and diverse employment opportunities.	++/-	<p>Area A lies to the north of the M20 motorway and the settlement of Sellindge which has been identified as a Rural Centre in the Core Strategy (2013). In addition, Area A also borders the smaller settlement of Stanford/Westenhanger, which is identified as a Primary Village. The B2068 provides access to the M20 at Junction 11 to the south east of Stanford. Westenhanger has a railway station that provides mainline services to London and Dover. The HS1 service makes use of the rail line. While the railway station is within roughly 400m of the Area, it lies on the southern side of the M20.</p> <p>The Growth Options Study Phase Two Report (2017) identifies the eastern portion of Area A as particularly suitable for employment led development given its proximity to Junction 11 of the M20 and the reduced potential for adverse impacts on the character of the village Stanford. However, the B2068 has limited capacity to accommodate heavy goods vehicles and the current rural character of the area is sensitive to significant changes in development density and land use. The Study concludes that employment uses as part of a mixed development (including up to 250 homes and associated social infrastructure) as a northern extension to Sellindge would be more appropriate.</p> <p>Information relating to Indices of Multiple Deprivation shows that Area A is not significantly deprived. The western portion around Sellindge is however slightly more deprived (within the 40%-60% percentile on the indices). Economic development in this area may better help to address deprivation in Folkestone &amp; Hythe through the provision of employment opportunities and local services and facilities for inhabitants in the immediate vicinity.</p> <p>Overall a mixed effect (significant positive/minor negative) is expected on this SA objective. The negative effect is recorded given that although much of Area A would provide access to good transport links (at the A20 and M20) and would be near to the Rural Centre of Sellindge where a northern extension may be acceptable, limited capacity to accommodate heavy goods vehicles has been noted to the east at the B2068. In addition transport links in the western portion of Area A are considerably weaker and transportation improvements required would likely be in contrast to the current rural character of the area.</p>
SA3. Conserve, and where relevant enhance, the quality, character and local distinctiveness of the landscape and townscape.	--	<p>Area A sits directly adjacent to the villages of Sellindge and Stanford. Stanford is a well-contained linear village, whereas Sellindge is more dispersed, spreading along many of the roads into and out of the village.</p> <p>Area A sits within the setting of the Kent Downs AONB which follows the northern and eastern boundaries of the Area. The land within the Area is at a lower topography than the AONB, consisting of foothills and a gently rolling landform. In general within the area extensive flat land is present in close proximity to the AONB boundary and these areas form the foreground of views from it.</p> <p>The western portion of Area A is more enclosed than the more open landform to the east with partial tree cover around the settlement of Sellindge and the surrounding roads. As such some of this Area would be likely to have reduced potential to impact upon local landscape sensitivity as well as the setting of the AONB. The District's High Level Landscape Appraisal (2017) highlights that this Area contains parts of LCAs 05 (Postling Vale), 06 (Stanford), and 09 (Sellindge). Of these LCAs 05 is described as having high landscape sensitivity</p>

SA Objectives	SA Score	Area A (North and East Sellindge)
		<p>meaning it is less suitable for strategic level development. LCAs 06 and 09 have been identified as having medium landscape sensitivity.</p> <p>Overall, given the large portion of the area which is considered to be unsuitable for strategic scale development in terms of landscape sensitivity and the close proximity and interrelationship with the AONB a significant negative effect is expected on this SA objective.</p>
SA4. Conserve and enhance the fabric and setting of historic assets.	--	<p>Area A contains three Grade II Listed Buildings: Moorstock House to the west by Moorstock and farmhouses at Lower Cock Ash and Hyham Hill to the north of Sellindge. The most notable heritage assets in close proximity to Area A are the Scheduled Monument and Grade I Listed Building at Monks Horton Priory to the north of Moorstock. It is noted in the Growth Options Report Phase Two (2017) however that much of Monks Horton Priory is screened from the land to the south of Moorstock Lane by a hedge and tree cover. In addition, the Grade II Listed Hayton Manor Farm sits at the edge of the Area to the north. However, it is noted that these properties have an enclosed setting which does not extend much further than the road.</p> <p>The Growth Options Report Phase Two (2017) concludes that land around these heritage assets is less suitable for strategic scale development. Therefore, a significant negative effect is expected on this SA objective.</p>
SA5. Conserve and enhance biodiversity, taking into account the effects of climate change.	-	<p>Area A contains a small portion of Gibbins Brook SSSI to the east of Sellindge. An Impact Risk Zone (IRZ) has been set for this SSSI reflecting the particular sensitivities of the features for which it is notified. All of Area A lies within this IRZ and Natural England has advised that the key issue for the Gibbins Brook SSSI IRZ would be pollution of watercourses running into the SSSI. The local topography therefore suggests that development would be less suitable on the marshy land to the immediate north of Gibbins Brook with land to the south of the SSSI less likely to be affected by this issue.</p> <p>Postling Wents Woods Local Wildlife Site is situated outside the boundary of Area A to the east. There are also notable areas of Ancient Woodland within this Area at Great Priory Wood to the north of Sellindge and at Butcher Wood and Perry Wood to the north of Junction 11 on the M20 motorway.</p> <p>While all of Area A is located within this IRZ it is considered likely that strategic-scale development could be accommodated within a portion of the Area without significant adverse impacts occurring on the SSSI, taking advice from Natural England into consideration, particularly in relation to increases in recreational pressures and traffic levels. Overall, a minor negative effect is therefore expected on this SA objective.</p>
SA6. Protect and enhance green infrastructure and ensure that it meets strategic needs.	+/-	<p>Providing strategic scale development within the District is expected to allow for opportunities for the appropriate incorporation of new open spaces, green corridors and other important elements of green infrastructure to meet the needs of the District's wildlife and residents. However, development may also result in the loss of established green infrastructure. Therefore, overall a mixed minor positive/minor negative effect is expected on this SA objective.</p>
SA7. Use land efficiently and safeguard soils, geology and economic mineral reserves.	--	<p>Area A is largely made-up of greenfield land recognised as Grade 2 Agricultural Land. However, areas of Grade 3 Agricultural Land are located along the B2068 north of M20 Junction 11, along the southern edge of the AONB in the vicinity of Bartholomew's Wood, at the hamlet of Stone Hill and its surroundings and at Hyham Hill.</p> <p>The adopted Kent Minerals and Waste Local Plan 2013 - 2030 (MWLP) identifies Mineral Safeguarding Areas (MSA) in Folkestone &amp; Hythe to ensure that minerals of economic interest are not needlessly sterilised by non-mineral development. The majority of Area A has been identified for safeguarding for sandstone or for silica sand/construction sand.</p> <p>Given that strategic scale development within Area A has the potential to result in the loss of a significant area of 'very good quality' (Grade 2) agricultural land as well as the sterilisation of important mineral deposits, a significant negative effect is expected for this SA objective.</p>
SA8. Maintain and	--	<p>Area A is not located within a Source Protection Zone (SPZ).</p>

SA Objectives	SA Score	Area A (North and East Sellindge)
improve the quality of groundwater, surface waters and coastal waters and the hydromorphological (physical) quality of rivers and coastal waters.		<p>Character Area 4, within which Area A falls, contains mainly major aquifers with intermediate vulnerability. Vulnerability has been recorded as being high within the more central locations of Character Area 4, which is likely to include areas surrounding Sellindge. Towards the mostly northern section of the Character Area 4 by the hamlet of Broad Street, which is at the edge of Area A, no groundwater vulnerability classification has been assigned. Character Area 4 is within a surface water safeguard zone and the western portion is within a surface water Nitrate Vulnerable Zone (NVZ) and this is likely to impact upon Area A towards Moorstock.</p> <p>As per information from the District's Water Cycle Study (2011) the settlements of Folkestone and Hythe broadly have a good level of coverage from waste water treatment works (WWTWs). Most of them have a current or planned capacity sufficient to meet planned growth although there is potentially insufficient capacity in the strategic wastewater connection between the Westenhanger area and the Sellindge WWTW which lies in the southern portion of Area A.</p> <p>Given the potential for insufficient capacity in the strategic wastewater connection at Sellindge in particular a significant negative effect is expected on this SA objective.</p>
SA9. Reduce the risk of flooding, taking into account the effects of climate change.	0	A small portion of Area A sits within Flood Zone 3 towards the north east of Stanford. The River East Stour and its tributaries form additional small areas of Flood Zone 3 to the south of Sellindge and north west of Moorstock; however these pockets fall outside Area A. None of Area A is located within an area of 'significant' or 'extreme' flood risk as per the District Council's Strategic Flood Risk Assessment (2015). Therefore, a negligible effect is expected on this SA objective.
SA10. Increase energy efficiency in the built environment and the proportion of energy use from renewable sources.	+	Providing strategic scale development within the District is likely to generate the economies of scale to incorporate high levels of energy efficient design, such as district heating and renewable energy schemes. A minor positive effect is therefore expected on this SA objective.
SA11. Use water resources efficiently	+	Providing strategic scale development within the District is likely to allow for opportunities to incorporate high levels of design which encourage water efficiency, such as low flush toilets or the enactment of Water Efficiency Improvement Action Plans at new development. A minor positive effect is therefore expected on this SA objective.
SA12. To reduce waste generation and disposal, and achieve the sustainable management of waste.	+	Providing strategic scale development within the District is expected to allow for opportunities for the provision of developments making use of sustainable and responsible construction practices and in the medium to long term through the incorporation of sustainable waste management facilities. A minor positive effect is therefore expected on this SA objective.
SA13. Reduce the need to travel, increase opportunities to choose sustainable transport modes and avoid development that will result in	++/-	<p>Area A lies to the north of the M20 motorway and the settlement of Sellindge which has been identified as a Rural Centre in the Core Strategy (2013). In addition, Area A also borders the smaller settlement of Stanford/Westenhanger, which is identified as a Primary Village. The B2068 provides access to the M20 at Junction 11 to the south east of Stanford. Westenhanger has a railway station that provides mainline services to London and Dover. The HS1 service makes use of the rail line. While the railway station is within roughly 400m of the Area, it lies on the southern side of the M20.</p> <p>The Growth Options Study Phase Two Report (2017) identified that there is limited capacity at the B2068 to accommodate heavy goods vehicles. Many of the routes through this Area are smaller and currently constrained (most notably Hyham Hill, Moorstock Lane and Blindhouse Lane) with little feasibility in terms of their improvement. However the report highlights that the south western portion of the</p>

SA Objectives	SA Score	Area A (North and East Sellindge)
significant traffic congestion and poor air quality.		<p>Area, which benefits from access to the A20 would not be as constrained and would therefore be more suitable for strategic development.</p> <p>There are currently no bus services that pass through this area. However, the 10/10A bus service runs through Sellindge directly to the south along the A20 Ashford Road and the 18 bus service operates along Ashford Road towards the eastern boundary of the area giving public access to Hythe and Canterbury.</p> <p>There are currently no cycle routes through Area A, however there are a number of public footpaths which run through the more rural parts.</p> <p>Overall a mixed effect (significant positive/minor negative) is expected on this SA objective.</p>
SA14. Promote community vibrancy and social cohesion; provide opportunities to access services, facilities and environmental assets for all ages and abilities and avoid creating inequalities of opportunity for access.	+/-	<p>Sellindge (identified as a Rural centre in the Core Strategy (2013) which is located directly to the south of the western half of the Area provides access to a number of services and facilities, including a GP surgery, a primary school, a village shop with integrated Post Office, a village hall, a residents' association, a sports and social club, a farm shop and a public house. There are outdoor sports facilities provided on Swan Lane. However, many of the local services within Sellindge are currently at capacity and future development would have to address this.</p> <p>Services in the eastern parts of the Area are relatively poor, with only a public house presently provided at Stanford.</p> <p>The Area has excellent access to green spaces, including Gibbins Brook (SSSI), Great Priory Wood, Hayton Wood, Perry Wood, Bartholomew's Wood and Butcher Wood.</p> <p>Overall, a mixed effect (minor positive/minor negative) is therefore expected on this SA objective.</p>
SA15. Reduce crime and the fear of crime.	+	<p>Providing strategic scale development within the District is expected to allow for opportunities to incorporate the principle of 'designing out' crime at new developments for example through the suitable design of open spaces and the inclusion of appropriate lighting. A minor positive effect is therefore expected on this SA objective.</p>

## Area B (South of M20)

SA Objectives	SA Score	Area B (South of M20)
SA1. Improve the provision of homes, including affordable housing, having regard to the needs of all sections of society, including the elderly.	++	Providing strategic scale development within the District is expected to allow for opportunities for the construction of a significant number of new affordable homes to help meet need in the District and the needs of the wider region's growing diverse population. The District's High Level Options Report (2016) shows that Character Area 4, within which Area B falls, has the second highest house prices of all Character Areas considered, indicating a mismatch between supply and demand. Based on the size of the area alone, the Area B has the potential to accommodate hundreds, if not thousands of homes, which would have a significant positive effect on this objective. A significant positive effect is therefore expected on this SA objective.
SA2. Support the creation of high quality and diverse employment opportunities.	++/-	<p>Area B lies to the south of the M20 motorway and this route acts as a barrier between the area to the settlement of Sellindge which has been identified as a Rural Centre in the Core Strategy (2013). This area also borders the smaller settlements of Stanford/Westenhanger and Lympne, which are identified as Primary Villages. The A20 runs through the eastern portion of Area B from the south of Sellindge and along the eastern boundary of the area. This A-road provides access to the M20 at Junction 11 to the south east of Stanford. The B2067 Otterpool Lane provides a north-south connection between the A20 Ashford Road and Aldington Road at which Lympne sits. Westenhanger has a railway station which is adjacent to this area to the north west. This station provides mainline services to London and Dover. The HS1 service makes use of the rail line. The transport infrastructure to the west and south in this area is weaker with the rural road of Harrington Lane acting as a sole linear route from north to south towards the B2067 at the western boundary.</p> <p>The Growth Options Study Phase Two Report (2017) identifies that although Lympne Industrial Estate is adjacent to the area to the south the District Council Employment Land Review 2017 indicates that there is far greater demand for new B use class employment in Folkestone than at such a rural location. The north eastern portion of Area B is also considered a potential location for employment led development by Folkestone Services given its current employment and retail uses and proximity to Junction 11 and Westenhanger railway station.</p> <p>Information relating to Indices of Multiple Deprivation shows that Area A is not significantly deprived. The northern portion around Sellindge is however slightly more deprived (within the 40%-60% percentile on the indices). Economic development in this area may better help to address deprivation in Folkestone &amp; Hythe through the provision of employment opportunities and local services and facilities for inhabitants in the immediate vicinity.</p> <p>Overall a mixed effect (significant positive/minor negative) is expected on this SA objective. The negative effect is recorded given that although much of Area B would provide access to excellent transport links (at Westenhanger station, the A20 and M20) and would be near to existing employment uses at Lympne Industrial Estate and Folkestone Services, demand for employment provision has been identified to be much higher in Folkestone. In addition transport links in the western portion of Area A are considerably weaker.</p>
SA3. Conserve, and where relevant enhance, the quality, character and local distinctiveness of the landscape and townscape.	-	<p>Area B sits adjacent to the settlements of Barrowhill and Westenhanger to the north and the settlement of Lympne to the south. Lympne Industrial Park is located to the west of Lympne. Development at Barrowhill and Westenhanger is linear and of small scale. Beyond this, development in Area B consists of small-scale settlement and farmsteads predominantly located along the A20 and the Greensand Ridge.</p> <p>Area B is bordered by the Kent Downs AONB to the south and east. The area is part of a wider dip-slope landform that gently undulates downhill towards the HS1 railway corridor. Lympne Industrial Estate currently comprises substantial development within the setting of the AONB. The Growth Options Study Phase Two Report (2017) states that land within Area B located west of Barrowhill, between Barrowhill and Westenhanger on the site of the former racecourse, and within a triangle of flatter land south of the A20 as it passes the racecourse site would be suitable strategic development without need for extensive mitigation. There is also potential in this area for softening development in landscape terms to minimise visual impact on the AONB, as well as opportunity to mitigate the existing landscape impact of Junction 11 along the lines proposed by the AONB Unit.</p>

SA Objectives	SA Score	Area B (South of M20)
		<p>The District's High Level Landscape Appraisal (2017) highlights that this Area is located within LCA 11 (Lympne). This LCA is described as having medium landscape sensitivity meaning impact on landscape character and visual impact will not necessarily be an obstacle to strategic scale development.</p> <p>Overall, a minor negative effect is expected on this SA objective.</p>
SA4. Conserve and enhance the fabric and setting of historic assets.	-	<p>Area B contains two Grade I Listed Buildings at Westenhanger Manor and its associated barns both of which are located within Westenhanger Castle Scheduled Monument towards the north east of the area. The castle represents the most sensitive heritage asset within Area B. However, there may be potential to improve the setting of this asset which relate mostly to enhancing the open character of this area and through the creation of new green infrastructure. To the east and south of Westenhanger Sandling Park (a Registered Park and Garden) and the Grade II Listed Buildings at Berwick House, Little Berwick and the Royal Oak Public House are further heritage constraints to strategic scale development. The Growth Options Study Phase Two Report (2017) states that mitigation at Sandling Park could be achieved without significant issues while protecting the setting of Berwick House and Little Berwick would require appropriate buffering. Land which is to the south and west of the A20, which provides the settings of Otterpool Manor and Upper Otterpool, acts as a heritage constraint towards the central portion of Area B but it is considered that this issue could be overcome through intervening planting/screening. Further constraints relating to heritage assets are at the southern edge of Area B at Port Lympne Registered Park and to the south west of the area at Court-at-Street Scheduled Monument.</p> <p>As such a minor negative effect is expected on this SA objective.</p>
SA5. Conserve and enhance biodiversity, taking into account the effects of climate change.	-	<p>Area B surrounds Otterpool Quarry SSSI. As such portions of the area fall within the Impact Risk Zones (IRZs) for Otterpool Quarry SSSI as well as the IRZ for Gibbins Brook and Lympne Escarpment SSSI which have been set to reflect the particular sensitivities of the features for which each site is notified. The IRZs for Gibbins Brook and Lympne Escarpment SSSI are much more extensive than that for Otterpool Quarry SSSI and they cover much of the north and south of Area B respectively. Otterpool Quarry SSSI IRZ is limited to covering only 50 metres around the edge of the quarry site. Natural England has advised that the Otterpool Quarry SSSI IRZ should not be considered a significant constraint to development given its designation for geological reasons and its inaccessibility to the public.</p> <p>Harringe Brooks Wood Local Wildlife Site is also surrounded by Area B towards its central portion to the east of Otterpool Quarry. There is also a sizeable area of ancient woodland to the west of the area at Burch's Rough.</p> <p>While most of Area B is located within one of the aforementioned IRZs it is considered likely that strategic-scale development could be accommodated within a portion of the area without significant adverse impacts occurring on the SSSI, taking advice from Natural England into consideration. Overall, a minor negative effect is therefore expected on this SA objective.</p>
SA6. Protect and enhance green infrastructure and ensure that it meets strategic needs.	+/-	<p>Providing strategic scale development within the District is expected to allow for opportunities for the appropriate incorporation of new open spaces, green corridors and other important elements of green infrastructure to meet the needs of the District's wildlife and residents. However, development may also result in the loss of established green infrastructure. Therefore, overall a mixed minor positive/minor negative effect is expected on this SA objective.</p>
SA7. Use land efficiently and safeguard soils, geology and economic mineral reserves.	--	<p>Most of Area B comprises Grade 2 agricultural land. A small portion of Grade 3 agricultural land is present in the north-west and to the east of the area. There is a small portion of non-agricultural land in the south-east edge of the area.</p> <p>The adopted Kent Minerals and Waste Local Plan 2013 – 2030 (MWLP) identifies Mineral Safeguarding Areas (MSA) in Folkestone &amp; Hythe to ensure that minerals of economic interest are not needlessly sterilised by non-mineral development. The majority of Area B has been identified for safeguarding for sandstone or for limestone.</p> <p>Given that strategic scale development within Area B has the potential to result in the loss of a significant area of 'very good quality'</p>

SA Objectives	SA Score	Area B (South of M20)
		(Grade 2) agricultural land as well as the sterilisation of important mineral deposits, a significant negative effect is expected for this SA objective.
SA8. Maintain and improve the quality of groundwater, surface waters and coastal waters and the hydromorphological (physical) quality of rivers and coastal waters.	--	<p>Area B is not located within a Source Protection Zone (SPZ).</p> <p>Character Area 4, within which Area B falls, contains mainly major aquifers with intermediate vulnerability. Vulnerability has been recorded as being high within the more central locations of Character Area 4, which is likely to include areas surrounding Barrowhill. Character Area 4 is within a surface water safeguard zone and the western portion is within a surface water Nitrate Vulnerable Zone (NVZ) and this is likely to impact upon Area B westerly of Barrowhill.</p> <p>As per information from the District's Water Cycle Study (2011) the settlements of Folkestone and Hythe broadly have a good level of coverage from waste water treatment works (WWTWs). Most of them have a current or planned capacity sufficient to meet planned growth although there is potentially insufficient capacity in the strategic wastewater connection between the Westenhanger area and the Sellindge WWTW which lies to the north of Area B.</p> <p>Given the potential for insufficient capacity in the strategic wastewater connection at Westenhanger in particular a significant negative effect is expected on this SA objective.</p>
SA9. Reduce the risk of flooding, taking into account the effects of climate change.	0	A small portion of Area B sits within Flood Zone 3 at the River East Stour and its tributaries towards the hamlet of Barrowhill. None of Area B is located within an area of 'significant' or 'extreme' flood risk as per the District Council's Strategic Flood Risk Assessment (2015). Therefore, a negligible effect is expected on this SA objective.
SA10. Increase energy efficiency in the built environment and the proportion of energy use from renewable sources.	+	Providing strategic scale development within the District is likely to generate the economies of scale to incorporate high levels of energy efficient design, such as district heating and renewable energy schemes. A minor positive effect is therefore expected on this SA objective.
SA11. Use water resources efficiently	+	Providing strategic scale development within the District is likely to allow for opportunities to incorporate high levels of design which encourage water efficiency, such as low flush toilets or the enactment of Water Efficiency Improvement Action Plans at new development. A minor positive effect is therefore expected on this SA objective.
SA12. To reduce waste generation and disposal, and achieve the sustainable management of waste.	+	Providing strategic scale development within the District is expected to allow for opportunities for the provision of developments making use of sustainable and responsible construction practices and in the medium to long term through the incorporation of sustainable waste management facilities. A minor positive effect is therefore expected on this SA objective.
SA13. Reduce the need to travel, increase opportunities to choose sustainable transport modes	++/-	Area B lies to the south of the M20 motorway and the settlement of Sellindge, which has been identified as a Rural Centre in the Core Strategy (2013). This area also borders the smaller settlements of Stanford/Westenhanger and Lymgne, which are identified as Primary Villages. The A20 runs through the eastern portion of Area B from the south of Sellindge and along the eastern boundary of the area and this route provides access to Junction 11 of the M20. Road infrastructure is weaker to the west and south in this area where Harrington Lane is the sole rural route from north to south towards the B2067. Westenhanger railway station lies within 135m of the



SA Objectives	SA Score	Area B (South of M20)
and avoid development that will result in significant traffic congestion and poor air quality.		<p>area to the north and this transport node provides mainline services to London and Dover. The HS1 service makes use of the rail line.</p> <p>The Growth Options Study Phase Two Report (2017) has identified that there is limited capacity crossing HS1 and the M20 via this route at Harringe Bridge, meaning that a costly and complex upgrade of the bridge would be needed by Sellindge to support development in this portion of Area B. The report also states that while much of the rest of Area B performs favourably in terms of current transport infrastructure the land west of Barrowhill currently provides a logical limit to potential development locations with regards to this consideration. It is also noted that the north east and centre-east portions of Area B perform the most favourably in terms of transport infrastructure, given their access to Westenhanger railway station and Junction 11 of the M20 and the A20 respectively.</p> <p>Area B is currently served by bus route 10/10A which operates along Aldington Road, Otterpool Lane, A20 Ashford Road and Stone Street. Connections are provided to Ashford, Sellindge, Hythe and Folkestone via this service.</p> <p>A local cycle route runs from Lympe along Stone Street to Newingreen before continuing on the A20 towards Sandling. There are footpaths through Area B, however the density of this provision is quite low while provision is weaker to the western and southern portions of the area.</p> <p>Overall a mixed effect (significant positive/minor negative) is expected on this SA objective.</p>
SA14. Promote community vibrancy and social cohesion; provide opportunities to access services, facilities and environmental assets for all ages and abilities and avoid creating inequalities of opportunity for access.	+ +/-	<p>Sellindge (identified as a Rural centre in the Core Strategy (2013) provides access to a number of services and facilities, including a GP surgery, a primary school, a village shop with integrated Post Office, a village hall, a residents' association, a sports and social club, a farm shop and a public house. This settlement is however to the north of the M20. Additionally many of the local services within Sellindge are currently at capacity. Lympe has been identified as a Primary Village and contains a limited number of services at present including a village shop with integrated Post Office, a primary school (Lympe Church of England Primary School), a village hall and a public house.</p> <p>Away from these settlements' services there is a lack of existing service provision. The Growth Options Study Phase Two Report (2017) notes that the potential scale of new development presents an opportunity to provide new services, facilities and supporting infrastructure alongside housing for existing as well as new residents.</p> <p>The area has a good level of access to green infrastructure including Harringe Brooks Wood, Burch's Wood, Park Wood, Rabbits Wood and Lympe Escarpment, as well as wider access to the Kent Downs AONB to the south and east.</p> <p>Overall, a mixed effect (significant positive/minor negative) is therefore expected on this SA objective. This combined effect has been recorded given the close proximity of this area to some existing services at Sellindge and Lympe as well as the location of the area which may help to optimise the provision of new services and facilities alongside new housing. The minor negative effect is expected given that some of the services identified are currently at capacity and also considering that Sellindge is separated from the area by the M20 which will reduce the accessibility of services and facilities particularly by walking and cycling.</p>
SA15. Reduce crime and the fear of crime.	+	<p>Providing strategic scale development within the District is expected to allow for opportunities to incorporate the principle of 'designing out' crime at new developments for example through the suitable design of open spaces and the inclusion of appropriate lighting. A minor positive effect is therefore expected on this SA objective.</p>

## Area C (South and West of Sellindge)

SA Objectives	SA Score	Area C (South and West of Sellindge)
SA1. Improve the provision of homes, including affordable housing, having regard to the needs of all sections of society, including the elderly.	++	Providing strategic scale development within the District is expected to allow for opportunities for the construction of a significant number of new affordable homes to help meet need in the District and the needs of the wider region's growing diverse population. The District's High Level Options Report (2016) shows that Character Area 4, within which Area C falls, has the second highest house prices of all Character Areas considered, indicating a mismatch between supply and demand. Based on the size of the area alone, Area C has the potential to accommodate hundreds, if not thousands of homes, which would have a significant positive effect on this objective. A significant positive effect is therefore expected on this SA objective.
SA2. Support the creation of high quality and diverse employment opportunities.	+/-	<p>Area C lies to the south of the A20 and to the north of the M20 motorway which act as boundaries around the land to south and west of the settlement of Sellindge. This settlement has been identified as a Rural Centre in the Core Strategy (2013). Only the narrow country lane of Harringe Lane runs through this area north to south providing access to the A20 directly to the north and to the B2067 approximately 2.6km to the south. While the railway line runs adjacent to the area to the south, Westenhanger station is located approximately 2.7km to the south east and existing access to the M20 is provided 3.4km also to the south east. The Growth Options Study Phase Two Report (2017) identifies that Area C would be less suitable for large-scale employment uses as lorries associated with large-scale employment would have to pass through the village centre of Sellindge given the current location of access to the M20. The provision of further employment uses would also be constrained by the limited road access in the area.</p> <p>Information relating to Indices of Multiple Deprivation shows that Area C is not significantly deprived although the entire area is located within the 40%-60% percentile on the indices. Economic development in this area may better help to address deprivation in Folkestone &amp; Hythe through the provision of employment opportunities and local services and facilities for inhabitants throughout this area.</p> <p>Overall a mixed effect (minor positive/minor negative) is expected on this SA objective. The negative effect has been recorded given the limited capacity for larger-scale employment uses in this area as a result of the limited road network and the requirement for lorries to pass through the centre of Sellindge.</p>
SA3. Conserve, and where relevant enhance, the quality, character and local distinctiveness of the landscape and townscape.	0	<p>Area C consists mostly of farmland with some farms and houses dispersed throughout the generally flat but slightly undulating landform. There are areas of hedgerow and tree cover present which act to enclose the area in places and this is particularly notable at the western end of the area which is enclosed to the north, west and south. Although the visual impact of the M20 is limited at the southern edge, the noise of traffic at this location disrupts tranquillity. The Growth Options Study Phase Two Report (2017) concludes that the area is well-concealed in terms of views from the Kent Downs AONB considering the undulating surrounding landform, intervening development at Sellindge, and woodland or tree belts giving it a relatively contained zone of visual influence.</p> <p>The District's High Level Landscape Appraisal (2017) highlights that this Area is located within LCA 09 (Sellindge). This LCA is described as having medium landscape sensitivity meaning impact on landscape character and visual impact will not necessarily be an obstacle to strategic scale development.</p> <p>Overall, a negligible effect is expected on this SA objective.</p>
SA4. Conserve and enhance the fabric and setting of historic assets.	-	<p>Area C contains one designated heritage asset: the Grade I Listed Building at Church of St Mary is in the northern portion of the area at the edge of Sellindge. However, the church is heavily screened by tree cover with views most prominent to the east along the A20 and to the south.</p> <p>As such a minor negative effect is expected on this SA objective.</p>
SA5. Conserve and enhance	-	Area C does not contain any local or national biodiversity designations. The eastern portion of the area however falls within the Impact Risk Zone (IRZ) for Gibbins Brook SSSI which has been set to reflect the particular sensitivities of the features for which each site is

SA Objectives	SA Score	Area C (South and West of Sellindge)
biodiversity, taking into account the effects of climate change.		<p>notified. Gibbins Brook SSSI is common access land and therefore there may be a need to mitigate the potential impacts of higher numbers of visitors to this location.</p> <p>Overall, a minor negative effect is therefore expected on this SA objective.</p>
SA6. Protect and enhance green infrastructure and ensure that it meets strategic needs.	+/-	<p>Providing strategic scale development within the District is expected to allow for opportunities for the appropriate incorporation of new open spaces, green corridors and other important elements of green infrastructure to meet the needs of the District's wildlife and residents. However, development may also result in the loss of established green infrastructure. Therefore, overall a mixed minor positive/minor negative effect is expected on this SA objective.</p>
SA7. Use land efficiently and safeguard soils, geology and economic mineral reserves.	--	<p>All of Area C comprises Grade 2 agricultural land apart from a very small portion to the north west which is Grade 3 agricultural land.</p> <p>The adopted Kent Minerals and Waste Local Plan 2013 - 2030 (MWLP) identifies Mineral Safeguarding Areas (MSA) in Folkestone &amp; Hythe to ensure that minerals of economic interest are not needlessly sterilised by non-mineral development. The entirety of Area C has been identified for safeguarding for sandstone or for limestone.</p> <p>Given that strategic scale development within Area C has the potential to result in the loss of a significant area of 'very good quality' (Grade 2) agricultural land as well as the sterilisation of important mineral deposits, a significant negative effect is expected for this SA objective.</p>
SA8. Maintain and improve the quality of groundwater, surface waters and coastal waters and the hydromorphological (physical) quality of rivers and coastal waters.	--	<p>Area C is not located within a Source Protection Zone (SPZ).</p> <p>Character Area 4, within which Area C falls, contains mainly major aquifers with intermediate vulnerability. Vulnerability has been recorded as being high within the more central locations of Character Area 4, which is likely to include areas surrounding Sellindge. Character Area 4 is within a surface water safeguard zone and the western portion is within a surface water Nitrate Vulnerable Zone (NVZ) and this is likely to impact upon Area C westerly of Sellindge.</p> <p>As per information from the District's Water Cycle Study (2011) the settlements of Folkestone and Hythe broadly have a good level of coverage from waste water treatment works (WWTWs). Most of them have a current or planned capacity sufficient to meet planned growth although there is potentially insufficient capacity in the strategic wastewater connection between the Westenhanger area and the Sellindge WWTW which lies immediately to the east and north of Area C.</p> <p>Given the potential for insufficient capacity in the strategic wastewater connection at Sellindge in particular a significant negative effect is expected on this SA objective.</p>
SA9. Reduce the risk of flooding, taking into account the effects of climate change.	0	<p>None of the land within Area C is located within Flood Zone 2 or 3. River East Stour and its tributaries form areas of Flood Zone 2 and 3 to the south and north of the area, however these areas are beyond the A20 and M20 which act as barriers to development at Area C's edges. None of Area C is located within an area of 'significant' or 'extreme' flood risk as per the District Council's Strategic Flood Risk Assessment (2015). Therefore, a negligible effect is expected on this SA objective.</p>
SA10. Increase energy efficiency in the built environment and the proportion of energy use from	+	<p>Providing strategic scale development within the District is likely to generate the economies of scale to incorporate high levels of energy efficient design, such as district heating and renewable energy schemes. A minor positive effect is therefore expected on this SA objective.</p>

SA Objectives	SA Score	Area C (South and West of Sellindge)
renewable sources.		
SA11. Use water resources efficiently	+	Providing strategic scale development within the District is likely to allow for opportunities to incorporate high levels of design which encourage water efficiency, such as low flush toilets or the enactment of Water Efficiency Improvement Action Plans at new development. A minor positive effect is therefore expected on this SA objective.
SA12. To reduce waste generation and disposal, and achieve the sustainable management of waste.	+	Providing strategic scale development within the District is expected to allow for opportunities for the provision of developments making use of sustainable and responsible construction practices and in the medium to long term through the incorporation of sustainable waste management facilities. A minor positive effect is therefore expected on this SA objective.
SA13. Reduce the need to travel, increase opportunities to choose sustainable transport modes and avoid development that will result in significant traffic congestion and poor air quality.	+/-	<p>Area C lies to the south of the A20 and to the north the M20 motorway borders the area. The settlement of Sellindge is to the north and east of Area C. Only the narrow country lane of Harringe Lane runs through this area north to south providing access to the A20 directly to the north and to the B2067 approximately 2.6km to the south. Although the railway line runs adjacent to the area to the south the closest railway station is accessible within approximately 2.7km at Westenhanger to the south east. This station provides mainline access to London and Dover. The HS1 service makes use of the rail line. Access to the M20 is currently provided within 3.4km also to the south east.</p> <p>The eastern portion of Area C is within walking and cycling distance of Sellindge village centre and local facilities. This report also highlights however that a network of off-road paths and cycle ways would be needed to access services and facilities in Sellindge by means other than the private car if development was provided at the west of Harringe Lane.</p> <p>Area B is currently served by bus route 10/10A which operates along the A20 Ashford Road with bus stops present in the north of Area C along the A20. This service provides access to Ashford, Sellindge, Hythe and Folkestone.</p> <p>There are currently no cycle routes in the area. Area C is crossed by numerous footpaths which become denser towards the centre and east with coverage more limited to the west.</p> <p>Overall a mixed effect (minor positive/minor negative) is expected on this SA objective.</p>
SA14. Promote community vibrancy and social cohesion; provide opportunities to access services, facilities and environmental assets for all ages and abilities and avoid creating inequalities of opportunity for access.	+/-	<p>Sellindge (identified as a Rural centre in the Core Strategy (2013)) provides access to a number of services and facilities, including a GP surgery, a primary school, a village shop with integrated Post Office, a village hall, a residents' association, a sports and social club, a farm shop and a public house. This settlement is adjacent to the area to the north and east. Many of the local services within Sellindge are however currently at capacity. Area C to the east is also located adjacent to the Sellindge broad development zone identified through Core Strategy Policy CSD9 and therefore development at this location would provide opportunities to improve and increase the range of social infrastructure at the village potentially through extension of the village centre.</p> <p>The western portion of Area C provides more limited access to existing services and facilities but access to Sellindge is provided along the A20. Development in this portion of Area C could however provide opportunities to deliver new services and facilities.</p> <p>The area generally has a poor level of access to green infrastructure. The cemetery at St Mary the Virgin Churchyard in Sellindge is currently the only identified open space within Area C.</p> <p>Overall, a mixed effect (minor positive/minor negative) is therefore expected on this SA objective.</p>
SA15. Reduce crime and the fear of	+	Providing strategic scale development within the District is expected to allow for opportunities to incorporate the principle of 'designing out' crime at new developments for example through the suitable design of open spaces and the inclusion of appropriate lighting. A

SA Objectives	SA Score	Area C (South and West of Sellindge)
crime.		minor positive effect is therefore expected on this SA objective.

## Area D (East of Stone Hill)

SA Objectives	SA Score	Area D (East of Stone Hill)
SA1. Improve the provision of homes, including affordable housing, having regard to the needs of all sections of society, including the elderly.	++	Providing strategic scale development within the District is expected to allow for opportunities for the construction of a significant number of new affordable homes to help meet need in the District and the needs of the wider region's growing diverse population. The District's High Level Options Report (2016) shows that Character Area 4, within which Area D falls, has the second highest house prices of all Character Areas considered, indicating a mismatch between supply and demand. Based on the size of the area alone, Area D has the potential to accommodate hundreds, if not thousands of homes, which would have a significant positive effect on this objective. A significant positive effect is therefore expected on this SA objective.
SA2. Support the creation of high quality and diverse employment opportunities.	--	<p>Area D lies to the north and north east of the hamlet of Stone Hill which separates it from the A20 located within 270m to the south. The closest village is Sellindge, recognised as a Rural Centre in the Core Strategy (2013). This village is located within 600m to the south west and is accessible via the rural lanes of Southenay Lane and Stone Hill which link to the A20. Southenay Lane is the main route through Area D from south west to north east, with a handful of smaller lanes emerging from this route to private and farm properties. This route links to the hamlet of Monks Horton to the north east. This area does not provide access to the M20 or to rail services and it is generally considered that public transport accessibility is poor in the area. The Growth Options Study Phase Two Report (2017) identifies that the limited nature of the current transport infrastructure particularly in the north would limit the potential for delivering employment generating uses.</p> <p>Information relating to Indices of Multiple Deprivation shows that Area D is not significantly deprived although the entire area is located within the 50% percentile on the indices. Economic development in this area may better help to address deprivation in Folkestone &amp; Hythe through the provision of employment opportunities and local services and facilities for inhabitants throughout this area.</p> <p>Overall a significant negative effect is expected on this SA objective. This significant negative effect has been recorded given both the poor public transport provisions at this location and the current poor general transport infrastructure which would limit the potential for future economic growth in the area.</p>
SA3. Conserve, and where relevant enhance, the quality, character and local distinctiveness of the landscape and townscape.	--	<p>Area D is rural and enclosed with tree cover in the south west becoming increasingly open to the north east where there are important visual links to the North Downs Ridge. The landform is strongly undulating and generally raised. The fields display a transition between pastoral farmland in the south-west and arable farmland in the north-east. The north, east and centre of Area D are prominent in the middle ground of views south from the North Downs Way National Trail which is within the Kent Downs AONB. As such it is considered that the area forms an integral part of the setting of the AONB.</p> <p>The District's High Level Landscape Appraisal (2017) highlights that this Area is located within LCA 09 (Sellindge). This LCA is described as having medium landscape sensitivity. Much of the rest of the area to the south has been identified as having distinct high quality rural characteristics and it is considered that the effects of strategic scale development on these qualities would prove difficult to mitigate in landscape terms.</p> <p>Overall, a significant negative effect is expected on this SA objective.</p>
SA4. Conserve and enhance the fabric and setting of historic assets.	--	Area D has a number of Listed Buildings within its boundaries along the northern section of Southenay Lane. Southenay Cottage and Farmhouse and Barn are all Grade II Listed Buildings. The settings of Southenay Cottage and Southenay Farmhouse are restricted to the north and to the south respectively. Within the village of Stone Hill to the south west of the area a number of Listed Buildings have settings which are screened towards Area D. Horton Priory which has been designated as a Scheduled Monument and contains a Grade I listed Building is located at the north eastern edge of Area D however land within this area's boundaries does not appear to lie within these heritage assets' visual settings. It is considered that the northern portion of the area is more suitable for development in terms of the historic environment at locations away from the settings of the identified heritage assets.

SA Objectives	SA Score	Area D (East of Stone Hill)
		<p>Towards the south of Area D, historic fields and other historic features readable from historic maps are visible. As such this area contributes to a historic landscape important in heritage terms thereby making the southern portion of Area D unsuitable for strategic scale development.</p> <p>Therefore a significant negative effect is expected on this SA objective.</p>
SA5. Conserve and enhance biodiversity, taking into account the effects of climate change.	-	<p>Beyond a sizeable pocket of ancient woodland to the north west Area D does not contain any local or national biodiversity designations. The eastern portion of the area however falls within the Impact Risk Zone (IRZ) for Gibbins Brook SSSI which has been set to reflect the particular sensitivities of the features for which each site is notified.</p> <p>Overall, a minor negative effect is therefore expected on this SA objective.</p>
SA6. Protect and enhance green infrastructure and ensure that it meets strategic needs.	+/-	<p>Providing strategic scale development within the District is expected to allow for opportunities for the appropriate incorporation of new open spaces, green corridors and other important elements of green infrastructure to meet the needs of the District's wildlife and residents. However, development may also result in the loss of established green infrastructure. Therefore, overall a mixed minor positive/minor negative effect is expected on this SA objective.</p>
SA7. Use land efficiently and safeguard soils, geology and economic mineral reserves.	--	<p>Area D consists mostly of Grade 2 agricultural land. There are small pockets of Grade 3 agricultural land to the north east and south west.</p> <p>The adopted Kent Minerals and Waste Local Plan 2013 - 2030 (MWLP) identifies Mineral Safeguarding Areas (MSA) in Folkestone &amp; Hythe to ensure that minerals of economic interest are not needlessly sterilised by non-mineral development. Almost all of Area D has been identified for safeguarding for silica sand/construction sand.</p> <p>Given that strategic scale development within Area B has the potential to result in the loss of a significant area of 'very good quality' (Grade 2) agricultural land as well as the sterilisation of important mineral deposits, a significant negative effect is expected for this SA objective.</p>
SA8. Maintain and improve the quality of groundwater, surface waters and coastal waters and the hydromorphological (physical) quality of rivers and coastal waters.	--	<p>Area A is not located within a Source Protection Zone (SPZ).</p> <p>Character Area 4, within which Area D falls, contains mainly major aquifers with intermediate vulnerability. Vulnerability has been recorded as being high within the more central locations of Character Area 4, which is likely to include areas surrounding Sellindge. Towards the mostly northern section of the Character Area 4 by the hamlet of Broad Street which is towards the north east of Area D, no groundwater vulnerability classification has been assigned. Character Area 4 is within a surface water safeguard zone and the western portion is within a surface water Nitrate Vulnerable Zone (NVZ) and this is likely to impact upon Area A towards Stone Hill.</p> <p>As per information from the District Council's Water Cycle Study (2011) the settlements of Folkestone and Hythe broadly have a good level of coverage from waste water treatment works (WWTWs). Most of them have a current or planned capacity sufficient to meet planned growth although there is potentially insufficient capacity in the strategic wastewater connection between the Westenhanger area and the Sellindge WWTW which lies to the south east of Area D.</p> <p>Given the potential for insufficient capacity in the strategic wastewater connection at Sellindge in particular a significant negative effect is expected on this SA objective.</p>
SA9. Reduce the risk of flooding, taking into account	0	<p>Only a very small pocket of land to the north of Area D is located within Flood Zone 2 or 3. River East Stour and its tributaries form areas of Flood Zone 2 and 3 to the south and north of the area. These areas of higher flood risk bound Area D away from its western boundary where Stone Hill is located. None of Area C is located within an area of 'significant' or 'extreme' flood risk as per the District</p>

SA Objectives	SA Score	Area D (East of Stone Hill)
the effects of climate change.		Council's Strategic Flood Risk Assessment (2015). Therefore, a negligible effect is expected on this SA objective.
SA10. Increase energy efficiency in the built environment and the proportion of energy use from renewable sources.	+	Providing strategic scale development within the District is likely to generate the economies of scale to incorporate high levels of energy efficient design, such as district heating and renewable energy schemes. A minor positive effect is therefore expected on this SA objective.
SA11. Use water resources efficiently	+	Providing strategic scale development within the District is likely to allow for opportunities to incorporate high levels of design which encourage water efficiency, such as low flush toilets or the enactment of Water Efficiency Improvement Action Plans at new development. A minor positive effect is therefore expected on this SA objective.
SA12. To reduce waste generation and disposal, and achieve the sustainable management of waste.	+	Providing strategic scale development within the District is expected to allow for opportunities for the provision of developments making use of sustainable and responsible construction practices and in the medium to long term through the incorporation of sustainable waste management facilities. A minor positive effect is therefore expected on this SA objective.
SA13. Reduce the need to travel, increase opportunities to choose sustainable transport modes and avoid development that will result in significant traffic congestion and poor air quality.	--	<p>Area D is served by only Southenay Lane which runs from south west to north east between the hamlets of Stone Hill (adjacent to the area to the south west) and Monk Hortons which is located approximately 1.1km to the north east. Stone Hill, which runs through Stone Hill hamlet, forms part of the south western edge of the area. The settlement of Sellindge is to the south east of Area D within approximately 600m, however, due to the limited nature of the local road infrastructure and lack of footpaths in this direction, walking to this location is not supported. The A20 runs to Sellindge and is located within 270m of Area D to the south. The M20 and railway line are not accessible from this area.</p> <p>The northern portion of Area D is less accessible than the south. Overall the transport infrastructure and provision for more sustainable modes of transport is considered to be poor throughout Area D and the main route across this area (Southenay Lane) would likely require significant improvements to support development.</p> <p>There are no cycle routes within the area. The 10/10A bus service operates along Plain Road and Stone Hill and provides services to Ashford, Sellindge, Hythe and Folkestone.</p> <p>Overall a significant negative is expected on this SA objective.</p>
SA14. Promote community vibrancy and social cohesion; provide opportunities to access services, facilities and environmental assets for all ages and abilities and	--	<p>Sellindge (identified as a Rural centre in the Core Strategy (2013)) which lies in relatively close proximity to the area provides access to a number of services and facilities, including a GP surgery, a primary school, a village shop with integrated Post Office, a village hall, a residents' association, a sports and social club, a farm shop and a public house. Many of the local services within Sellindge are however currently at capacity and walking access from Area D is currently not supported. Beyond this the area is rural with the hamlet of Stone Hill adjacent to the south west. This settlement does not provide easy access to any services or facilities.</p> <p>The area has a poor level of access to green infrastructure. Access to the closest area of identified open space is provided at St Mary the Virgin Churchyard at the edge of Sellindge approximately 300m to the south.</p> <p>Overall, a significant negative is therefore expected on this SA objective.</p>



SA Objectives	SA Score	Area D (East of Stone Hill)
avoid creating inequalities of opportunity for access.		
SA15. Reduce crime and the fear of crime.	+	Providing strategic scale development within the District is expected to allow for opportunities to incorporate the principle of 'designing out' crime at new developments for example through the suitable design of open spaces and the inclusion of appropriate lighting. A minor positive effect is therefore expected on this SA objective.

**Appendix 4**

Otterpool and Sellindge Spatial Options Appraisal  
Matrices

# Otterpool Spatial Options

## Otterpool A

SA Objectives	SA Score	Otterpool A
SA1. Improve the provision of homes, including affordable housing, having regard to the needs of all sections of society, including the elderly.	++	<p>Otterpool A has an estimated capacity to accommodate between 7,300 and 9,400 new homes in the District. The housing need for Folkestone &amp; Hythe has been set at 633 dwelling per annum<sup>140</sup> which equate to 12,030 homes over the plan period, with the potential for a higher need of 676 homes under the government’s new national methodology, or 12,845 dwellings over the plan period. The Council has identified that taking into account identified completions, sites with planning permission, sites which are allocated for development, sites proposed in the Places and Policies Local Plan and ‘windfall’ developments, the remaining balance to meet the nationally assessed housing need during the plan period up to 2037 is around 6,410 new dwellings. Development of the area covered by Otterpool A would meet this requirement in its entirety.</p> <p>Policy CSD1 in the adopted Core Strategy requires that developments proposing 15 or more dwellings should provide 22% affordable dwellings and policy HB3 of the Places and Policies Local Plan requires that, subject to viability and design restrictions, development proposing 10 or more dwellings should include 20% of market dwellings meeting Building Regulations adaptable homes standards. The requirement for affordable housing in the District has been identified as 139 dwellings per annum<sup>141</sup> and it is expected that Otterpool A will provide a significant number of new affordable and Lifetime homes to contribute to achieving this target.</p> <p>A significant positive effect is therefore expected on this SA objective.</p>
SA2. Support the creation of high quality and diverse employment opportunities.	++	<p>The District’s Growth Options Study Phase Two Report (2017) highlights the area around Junction 11 of the M20 and Folkestone Motorway Services as a potential area for further employment provision due to its current employment and retail uses and proximity to Junction 11 and Westenhanger railway station.</p> <p>Like all spatial options, employment land is allocated to meet the needs of the additional housing growth. This will open up a significant number and range of employment opportunities for new residents to access work close to where they live. However, it is recognised that not all new residents of working age will have jobs within the development, and that some jobs will be accessed by people living elsewhere. Therefore, ease of access will also be important.</p> <p>New employment opportunities will have good access to the existing road and rail network, making it easy for people to commute into and out of the area. The existing settlements of Sellindge, Westenhanger/Stanford and Lympne are all close by.</p> <p>The land identified for strategic scale development in Otterpool A is in close proximity to these existing strategic transport links, making it easy for new residents to access employment opportunities further afield. Westenhanger railway station is adjacent to the north eastern edge of the development. This station provides mainline services to London and Dover and the HS1 service also follows this route. Further strategic road access is provided via the A20 which passes through the area identified as Otterpool A. Access to the M20 motorway is provided within 155m of the north eastern corner of Otterpool A at Junction 11. The B2067 provides access through the southern portion of Otterpool A away from Lympne. Higher density development is proposed along the northern edge of the area close to the M20 and Westenhanger Station.</p> <p>Economic deprivation within the boundaries of Otterpool A is not significant.</p> <p>Overall a significant positive effect is expected on this SA objective.</p>

<sup>140</sup> Peter Brett Associates (March 2017) Strategic Housing Market Assessment Part 1 – Objectively Assessed Need

<sup>141</sup> Peter Brett Associates (December 2016) Strategic Housing Market Assessment Part 2 - Objectively Assessed Need for Affordable Housing

SA Objectives	SA Score	Otterpool A
SA3. Conserve, and where relevant enhance, the quality, character and local distinctiveness of the landscape and townscape.	-	<p>Otterpool A is enclosed by the defensible boundaries of the M20 and HS1 railway line to the north, the A20 to the east and the B2067/Aldington Road to the south. It is adjacent to and partially encloses the settlements of Barrowhill to the north west, Westenhanger/Stanford to the north east and Lymgne to the south east. Much of the development at Barrowhill and Westenhanger and at the north of Stone Street is currently linear meaning there is less sensitivity to further development. The Lymgne Industrial Estate is also adjacent to this option to the south. Beyond these settlements development is smaller scale with scattered farmsteads many of which are located along the A20 and the Greensand Ridge which follows the B2067/Aldington Road. The Kent Downs AONB is adjacent to Otterpool A to the south and east. The area to the west is also undeveloped in character and widely rural.</p> <p>It has been highlighted in the District’s High Level Landscape Appraisal (2017) that Otterpool A is located within LCA 11 (Lymgne). LCA 11 is identified as being within the setting of the AONB however it is described as having medium landscape sensitivity. The High Level Landscape Appraisal identifies that development within this LCA has the potential to be provided in such a way as to limit the loss of landscape elements or characteristics which add value to the area and impacts on the AONB. This will depend on the specific siting of the development.</p> <p>The District’s Growth Options Study Phase Two Report (2017) highlights land within Otterpool A to the west of Barrowhill, between Barrowhill and Westenhanger on the site of the former racecourse, and within a triangle of flatter land south of the A20 as it passes the racecourse site as being suitable for strategic scale development without need for extensive mitigation. Otterpool A would focus much of the higher densities of development at these locations. Development within Otterpool A would also present opportunities for softening in landscape terms to minimise visual impact on the AONB. Otterpool A includes reduced densities of development to the north east by Junction 11 as well including substantial areas of lower levels of development interspersed with areas to be maintained as strategic open space to the south and east where Otterpool A borders the AONB. The western edge of the land within Otterpool A is to be maintained as strategic open space where the landform rises towards Harringe Lane. Limiting development to the west-facing slope of the narrow valley to the east of Harringe Lane is one of two distinguishing features between Otterpool Options A and B<sup>142</sup>.</p> <p>The District’s supplementary high-level landscape sensitivity survey assesses the potential landscape effects associated with developing the land to the south of Harringe Brooks Wood – the second distinguishing feature between Otterpool Options A and B. Although the development of this countryside would adversely affect the openness of the immediate area, the area has no notable landscape features of any significant value. Therefore, the sensitivity of this location is considered to be no more or less significant than the rest of the open countryside earmarked for development within Otterpool A.</p> <p>Overall, it is considered that the close proximity of the AONB may result in adverse impacts on the setting of this designated landscape. However, the land within this option has not been identified as having a high sensitivity to development. Furthermore the proposed pattern of development, low to medium density and maintained strategic open spaces at the potentially more landscape sensitive locations and higher levels of development in areas which are more visually contained, would help to mitigate significant adverse effects on the rural character of the area. A minor negative effect is therefore recorded on this SA objective.</p>
SA4. Conserve and enhance the fabric and setting of historic assets.	--	<p>It has been assumed that all listed buildings in the site will be retained as they are located within strategic open land that helps also to preserve their setting. Nonetheless, there is the potential for setting change to the following assets:</p> <p>Designated assets within the site susceptible to setting change:</p> <ul style="list-style-type: none"> <li>• Westenhanger Castle Scheduled Monument including Westenhanger Manor (Grade I) and Barns (Grade I) – minor negative</li> <li>• Otterpool Manor (Grade II) – negligible-minor negative</li> <li>• Upper Otterpool (Grade II) – negligible-minor negative</li> </ul>

<sup>142</sup> Otterpool considers two westward extensions up the slope towards Harringe Lane. The landscape effects of both of these westward extensions are appraised under SA objective 3 in the appraisal matrix for Otterpool B.

SA Objectives	SA Score	Otterpool A
		<p>Designated assets within the study area susceptible to setting change:</p> <ul style="list-style-type: none"> <li>• Sandling Park RPG (Grade II) – minor negative</li> <li>• The Royal Oak Public House (Grade II) – negligible-minor negative</li> <li>• Little Berwick (Grade II) – negligible-minor negative</li> <li>• Berwick House (Grade II) – negligible-minor negative</li> <li>• Lymgne Conservation Area – negligible-minor negative</li> <li>• Belle Vue House and Flats (Grade II) – minor negative</li> <li>• Port Lymgne RPG (Grade II*) including Port Lymgne House, Stable Block, Forecourt Walls To East, And Loggia, Patio, Terrace And Shell Fountain To South (Grade II*) and Port Lymgne North Lodge, Wall And Gate Pier (Grade II) and Port Lymgne South Lodge, Wall And Gate Pier (Grade II) – minor negative</li> <li>• Somerfield Court (Grade II) and Barn Complex about 66 Metres West of Somerfield Court (Grade II) – negligible</li> </ul> <p>Non-designated assets within the study area susceptible to setting change:</p> <ul style="list-style-type: none"> <li>• Farmstead south west of New Inn Green – minor negative</li> <li>• Round Barrow – minor negative</li> </ul> <p>Non-designated historic buildings/ structures within the site have not been subject to the same assumption given their location in areas earmarked for development. These assets are generally historic farmsteads of low (local) significance, although there are WWI-WWII military remains focused around Lymgne that are of greater value (e.g. local to regional). All are at are at risk of physical change, or setting change if retained. The effect of physical change would be greatest and is considered to be of minor negative-significant negative effect depending on whether the value of the asset is low or greater.</p> <p>In terms of archaeological assets, the site includes the scheduled monument of Westenhanger and a high number number of non-designated heritage assets, most of which are of low (local) value although some are greater. These include prehistoric round barrows (high value) and ring ditches (medium value) a Roman villa (medium –high value), and the defensive military remains focused around the former Lymgne airfield (low-medium value). It is important to note that non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments e.g. (high value), should be considered subject to the policies for designated heritage assets.</p> <p>Although located primarily within an area of strategic open space, a small part of the scheduled monument at Westenhanger falls within an area of proposed development. In addition, it cannot be assumed that strategic open land will preclude physical change to archaeological remains as there may be a requirement for enabling works, landscaping, etc. As such, both the scheduled monument as well as other non-designated archaeological assets of low to high value located within development areas and areas of strategic open land, are susceptible to physical change as a result of development. The potential effect to archaeological remains therefore ranges from minor negative to significant negative depending on the value of the asset.</p> <p>In terms of the historic landscape, the site largely comprises piecemeal enclosure of late medieval to 18<sup>th</sup> century date, which appears to have undergone some modification; it is therefore considered to be of low value. Nonetheless, this landscape is believed to include a number of historic hedgerows and also contributes to the setting of number of heritage assets. It will be subject to physical change as a result of development, the effect of which is judged to be minor negative. The areas of proposed open strategic land help to avoid the potential conflation of the Westenhanger and Lymgne, but there is arguably some conflation with Sellindge, which is increased if developed in tandem with Sellindge Option C.</p> <p>For more detail on the potential historic environment effects please refer to the Folkestone and Hythe Historic Environment Assessment (LUC 2018).</p>
SA5. Conserve and enhance biodiversity,	+/-	Otterpool Quarry Geological SSSI sits in the centre of Otterpool A. This area is earmarked as a strategic open space surrounded by development. Furthermore, this area falls within the Impact Risk Zones (IRZs) for Gibbins Brook and Lymgne Escarpment SSSIs to the

SA Objectives	SA Score	Otterpool A
<p>taking into account the effects of climate change.</p>		<p>north and south respectively. These IRZs have been set to reflect the particular sensitivities of the features for which each site is notified.</p> <p>Lympne Escarpment SSSI is located within 290m of the land at Otterpool A. Natural England has advised that land in the vicinity of the Lympne Escarpment should carefully consider options to mitigate extra car journeys on surrounding roads at the site allocation and planning application stages, given its particular importance to this designation. Gibbin's Brook SSSI is located 590m to the north. Natural England has advised that development in close proximity of Gibbin's Brook SSSI should have regard to the potential impacts of a higher level of visitors. Given that the land at Otterpool A is separated from this designation by the railway line and the M20 it is less likely that strategic scale development would have an adverse impact in terms of increased recreational pressures.</p> <p>Otterpool Quarry SSSI IRZ is limited to covering only 50 metres around the edge of the quarry site. Natural England has advised that the Otterpool Quarry SSSI IRZ should not be considered a significant constraint to development given its designation for geological reasons and its inaccessibility to the public. Otterpool Quarry is to be maintained as strategic open space with strategic open space and lower densities of development to be provided on all sides of the designation. Beyond the A20 higher densities of development are to be delivered. Given that the A20 currently acts as a barrier to and fragments the potential for wildlife movements to the north, higher densities of development to the north are likely have reduced adverse impacts on biodiversity.</p> <p>Harringe Brooks Ancient Woodland and Local Wildlife Site is close to the western edge of the proposed developed area in Otterpool A; however, areas of open space are to be maintained to the north and south. Some areas of BAP priority habitats are present within the land at Otterpool A. However these areas are small in scale with many linear and relatively confined in nature. These include linear boundary hedgerows to the north and north west of Lympne as well as wet woodland and willow carr to the west of Barrowhill.</p> <p>The development pattern and density of development proposed in Otterpool A has been identified in consultation with Natural England and is designed to minimise the potential for significant adverse impacts occurring on the wildlife assets within and in close proximity to the proposed development.</p> <p>Furthermore, the development at Otterpool is to be designed and delivered in line with garden town principles, which includes the requirement to enhance the natural environment, providing a comprehensive green infrastructure network and net biodiversity gains.</p> <p>Therefore, overall, a mixed minor positive and minor negative effect is expected on this SA objective.</p>
<p>SA6. Protect and enhance green infrastructure and ensure that it meets strategic needs.</p>	<p>++/--</p>	<p>The development of Otterpool A will result in the loss of a significant area of greenfield land which performs the function of green infrastructure to varying degrees, some of which is accessible to the public via public rights of way. The loss of existing green infrastructure on this scale is likely to result in significant negative effects on this objective. However, Otterpool A includes significant areas of strategic open space along its western edge, around Otterpool Quarry, by Westenhanger Castle and in between Lympne and Lympne Industrial Estate. These areas of strategic green infrastructure will protect existing wildlife habitats and corridors and offer new residents the opportunity to access the countryside, including existing residents in the villages of Westenhanger and Lympne. Residents in Sellidge may also benefit, but this is dependent on better access across the M20 and HS1 railway line.</p> <p>Providing a comprehensive and accessible green infrastructure network is wholly consistent with the garden town principles. Overall, a mixed significant positive/significant negative effect is expected on this SA objective.</p>
<p>SA7. Use land efficiently and safeguard soils, geology and economic mineral reserves.</p>	<p>--</p>	<p>Most of the land within Otterpool A comprises Grade 2 agricultural land. A small portion of Grade 3 agricultural land is present in the west and to the east of the option. There is a small portion of non-agricultural land at the south-eastern edge of the option in and around Lympne and the Lympne Industrial Estate.</p> <p>The adopted Kent Minerals and Waste Local Plan 2013 – 2030 (MWLP) identifies Mineral Safeguarding Areas (MSA) in Folkestone &amp; Hythe to ensure that minerals of economic interest are not needlessly sterilised by non-mineral development. The majority of the land within the boundaries of Otterpool A has been safeguarded for sandstone limestone mineral extraction.</p> <p>Otterpool A includes some significant pockets of strategic open space that would help to protect some Grade 2 agricultural land and</p>

SA Objectives	SA Score	Otterpool A
		safeguarded minerals. However, the strategic scale of development proposed throughout Otterpool A will result in the loss of areas of 'very good quality' (Grade 2) agricultural land as well as the sterilisation of important mineral deposits. Therefore a significant negative effect is expected for this SA objective.
SA8. Maintain and improve the quality of groundwater, surface waters and coastal waters and the hydromorphological (physical) quality of rivers and coastal waters.	--	<p>Otterpool A does not contain any land within a Source Protection Zone (SPZ).</p> <p>However, the area does contain major aquifers with intermediate vulnerability, with the area surrounding Barrowhill having been identified as likely to have higher vulnerability. Furthermore, the area identified within Otterpool A is marked out as an area of Serious water stress, surface water safeguard zone and surface water Nitrate Vulnerable Zone (NVZ), although NVZs relate to areas that are at risk from agricultural nitrate pollution rather than from development.</p> <p>The District's Water Cycle Study (2011), which is currently under review, highlights insufficient capacity in the strategic wastewater treatment network in the Westenhanger and Sellindge areas.</p> <p>Given the existence of aquifers with likely intermediate and higher vulnerability, and until such time as strategic provision of new waste water treatment is planned to serve the new development, a significant negative effect is expected on this SA objective.</p>
SA9. Reduce the risk of flooding, taking into account the effects of climate change.	--	<p>Otterpool A contains a small area of Flood Zone 2 and 3 along the East Stour River and its tributaries towards the hamlet of Barrowhill. This area passes through land within Otterpool A which has been identified for strategic scale development to the north of Barrowhill as well as between Barrowhill and Westenhanger. It is likely however that, within the areas identified for strategic scale development schemes, development could be designed in such a way as to avoid these areas and to allow for SuDS thereby reducing the vulnerability of new schemes in terms of flood risk. The District Council's Strategic Flood Risk Assessment (2015) has identified that none of the land within Otterpool A is located within an area of 'significant' or 'extreme' flood risk.</p> <p>However, the Environment Agency has expressed concern about the significant scale of development proposed being likely to significantly shorten the lag time of surface water drainage into the River Stour and the potential for this to increase the risk of flooding downstream in the Borough of Ashford, particularly around the Aldington Reservoir.</p> <p>Therefore, until these concerns can be appropriately mitigated a significant adverse effect is recorded against this SA objective.</p>
SA10. Increase energy efficiency in the built environment and the proportion of energy use from renewable sources.	++	The development at Otterpool is to be designed and delivered in line with garden town principles, including development that uses low-carbon and energy-positive technology. Furthermore, the economies of scale likely to be generated by the significant scale of the development proposed at Otterpool is likely to ensure high levels of energy efficient design and the incorporation of low carbon and renewable technologies. Therefore, a significant positive effect is expected on this SA objective.
SA11. Use water resources efficiently	++	The development at Otterpool is to be designed and delivered in line with garden town principles, including development that ensures climate change resilience. This is particularly important in the District of Folkestone & Hythe where water scarcity is a growing concern as a result of climate change. The economies of scale likely to be generated by the significant scale of the development proposed at Otterpool is likely to ensure high levels of water efficient design, such as low flush toilets or the enactment of Water Efficiency Improvement Action Plans as part of new developments. Therefore a significant positive effect is expected on this SA objective.
SA12. To reduce waste generation and disposal, and achieve the sustainable	+	All options identify areas to accommodate strategic scale development within the District and are therefore likely to generate the economies of scale necessary to move waste up the waste hierarchy through the incorporation of sustainable waste management facilities. A minor positive effect is therefore expected on this SA objective.

SA Objectives	SA Score	Otterpool A
management of waste.		
SA13. Reduce the need to travel, increase opportunities to choose sustainable transport modes and avoid development that will result in significant traffic congestion and poor air quality.	++	<p>Otterpool A lies in close proximity to the settlements of Sellindge to the north west of the M20, Westenhanger/Stanford to the north east and Lymgne to the south east. Sellindge has been identified as a Rural Centre in the Core Strategy (2013). Otterpool A benefits from strong access to strategic transport infrastructure most notably in the north and north east. The M20 motorway and railway line run along the northern edge of this area, and are both currently accessible to the north east at Junction 11 and Westenhanger railway station respectively. This railway station provides direct services to London and Dover and HS1 is operational on this route. Junction 11 is located within 155m of the boundary of Otterpool A. The A20 passes through the land in Otterpool A providing direct access to Sellindge with the B2067 completing the southerly route towards Lymgne Industrial Estate.</p> <p>Bus route 10/10A currently services the area along Aldington Road, Otterpool Lane, A20 Ashford Road and Stone Street. Bus services allow for access to Ashford, Sellindge, Hythe and Folkestone. At present a local cycle route runs from Lymgne along Stone Street to Newingreen before continuing on the A20 towards Sandling.</p> <p>Otterpool A would allow for higher density strategic scale development towards the north and north east along the A20. This is the area which currently benefits from strong access to existing strategic transport infrastructure. This approach is less likely to result in increased levels of congestion in the District than if strategic scale development was provided at a location where current transport infrastructure provisions were more limited. It should be noted however that the Council has identified that strategic scale development at Otterpool A could result in traffic problems and the potential need for improvements at junctions including Junction 11 at the M20, A20/A260, A20/A261 the section of the A20 that goes under the railway in Sellindge, A259/A261 and the central Hythe gyratory. This level of development may also require modernisation at Westenhanger railway station. The Council is currently discussing potential for incorporating high speed services at this station.</p> <p>Although the route of the M20 and railway line would limit the potential for walking and cycling to the existing services and facilities at Sellindge to the north, new residents would still be required to travel reduced distances to access them. Furthermore strategic development may allow for the provision of improved cycle and walking routes in this direction.</p> <p>Regarding existing transport infrastructure facilities and service provision, it is noted that this option would also help to provide for relative self-containment at the new Otterpool development. Residents would be required to travel less given that one job is to be delivered for every new home provided. The requirement to travel long distances would be further reduced considering that roughly six 2FE primary schools and 20,000 m<sup>2</sup> of retail space as well as new medical facilities would be provided in close proximity to the new dwellings delivered through Otterpool A. Furthermore the provision of strategic scale development is likely to present opportunities for the incorporation of improved sustainable transport links.</p> <p>The above proposals are wholly consistent with the garden town principles the new settlement will be designed to deliver. Therefore, a significant positive effect is expected on this SA objective.</p>
SA14. Promote community vibrancy and social cohesion; provide opportunities to access services, facilities and environmental assets for all ages and abilities and avoid creating inequalities of opportunity for	++	<p>Otterpool A would provide for the majority of strategic scale development to the north and east along the A20. This development would be provided in close proximity to Sellindge (identified as a Rural Centre in the Core Strategy (2013)) which provides access to a number of services and facilities. Otterpool A is also bordered by Lymgne to the south east. This settlement has been identified as a Primary Village and contains a limited number of services at present. The existing residents of Lymgne, Barrowhill, Newingreen and Westenhanger are likely to feel that their settlements will lose their character, which could affect social cohesiveness until the new development becomes established.</p> <p>Of potentially greater significance in the longer term and once fully operational, the strategic scale development proposed in Otterpool A will provide new services, facilities and supporting infrastructure to the benefit of new and existing residents in the area, including:</p> <ul style="list-style-type: none"> <li>education facilities – roughly six 2FE primary schools, one or two secondary schools including 6<sup>th</sup> form facilities, 11 to 12 nurseries, as well as specialist provision;</li> </ul>



SA Objectives	SA Score	Otterpool A
access.		<ul style="list-style-type: none"> <li>• medical facilities in a primary care hub housing around 10 GPs providing minor injury, diagnostic and holistic care services; and,</li> <li>• roughly 20,000 m<sup>2</sup> of retail space.</li> </ul> <p>Those areas which are to accommodate strategic scale development are concentrated to the north and east of the area.</p> <p>Some significant areas of strategic open space are to be included within the development area, provide new and existing residents with good access to the open countryside.</p> <p>The above proposals are wholly consistent with the garden town principles the new settlement will be designed to deliver. Therefore, a significant positive effect is expected on this SA objective.</p>
SA15. Reduce crime and the fear of crime.	+	<p>All options provide the opportunity to incorporate strategic scale development that designs out crime. This may include for example the suitable design of open spaces and the inclusion of appropriate lighting. Therefore, a minor positive effect is expected on this SA objective.</p>

## Otterpool B

SA Objectives	SA Score	Otterpool B
SA1. Improve the provision of homes, including affordable housing, having regard to the needs of all sections of society, including the elderly.	++	<p>Otterpool B is expected to deliver the same number of homes as Otterpool A: between 7,300 and 9,400 new homes in the District. The housing need for Folkestone &amp; Hythe has been set at 633 dwelling per annum<sup>143</sup> which equate to 12,030 homes over the plan period, with the potential for a higher need of 676 homes under the government's new national methodology, or 12,845 dwellings over the plan period. The Council has identified that taking into account identified completions, sites with planning permission, sites which are allocated for development, sites proposed in the Places and Policies Local Plan and 'windfall' developments, the remaining balance to meet the nationally assessed housing need during the plan period up to 2037 is around 6,410 new dwellings. While additional areas have been identified through Otterpool B to accommodate lower levels of development to the west of Barrowhill, areas which Otterpool A identified for development of the same density have been removed to the west of Lymgne Industrial Estate, resulting in no net gain or loss of homes overall.</p> <p>Policy CSD1 in the adopted Core Strategy requires that developments proposing 15 or more dwellings should provide 22% affordable dwellings and policyHB3 of the Places and Policies Local Plan requires that, subject to viability and design considerations, development proposing 10 or more dwellings should include 20% of dwellings meeting Building Regulations adaptable homes standards. The requirement for affordable housing in the District has been identified as 139 dwellings per annum<sup>144</sup> and it is expected that Otterpool B will provide a significant number of new affordable and Lifetime homes to contribute to achieving this target.</p> <p>Like Otterpool A, Otterpool B is likely to generate a significant positive effect on this SA objective.</p>
SA2. Support the creation of high quality and diverse employment opportunities.	++	<p>Otterpool B would allow for strategic scale development in broadly the same areas as Otterpool A with the inclusion of additional land for lower density development to the west of Barrowhill. However land which would accommodate development of a similar density to the west of Lymgne Industrial Estate in Otterpool A would not be developed through Otterpool B, resulting in no net gain or loss of homes overall.</p> <p>The area to the west of Barrowhill has been identified as being more overtly economically deprived (recorded as being within the 40%-60% percentile on the Indices of Multiple Deprivation). Development here may help to more directly address economic deprivation in the District, although due to the scale of development proposed this is unlikely to be significant.</p> <p>Like all spatial options, employment land is allocated to meet the needs of the additional housing growth. Given that no further homes would be delivered on top of those proposed through Otterpool A, similar significant positive effects are recorded against this objective.</p> <p>New employment opportunities at Otterpool B will broadly have good access to the existing road and rail network, making it easy for people to commute into and out of the area. However, Otterpool B provides for increased development to the west where transport infrastructure is relatively weak given the minor nature of Harringe Lane and current constraints on the potential to upgrade Harringe Bridge over the M20 and railway line to the north. Although this is not considered to significantly impact on economic growth in this location.</p>

<sup>143</sup> Peter Brett Associates (March 2017) Strategic Housing Market Assessment Part 1 – Objectively Assessed Need

<sup>144</sup> Peter Brett Associates (December 2016) Strategic Housing Market Assessment Part 2 - Objectively Assessed Need for Affordable Housing

SA Objectives	SA Score	Otterpool B
SA3. Conserve, and where relevant enhance, the quality, character and local distinctiveness of the landscape and townscape.	--	<p>All the land which has been included and excluded as part of this option falls within the same Landscape Character Area as the land within Otterpool A (LCA 11: Lympne) and is of medium landscape sensitivity. However, the land proposed for development in Otterpool Option A to the south of Harringe Brooks Wood has been removed as part of this option and Otterpool B would result in further development being provided to the west of Barrowhill towards Harringe Lane where the land slopes down into a narrow valley and then rises steeply towards Harringe Lane. Two westward extensions to the development proposed in Otterpool Option A are considered under Otterpool Option B and assessed in the District's supplementary high-level landscape sensitivity survey:</p> <ol style="list-style-type: none"> <li>i. The first westward extension is limited to a footpath that runs a short distance to the east of Harringe Lane, joining the road at its southern extremity, before running parallel with the road and then eastwards towards the higher density development at the north western corner of the Otterpool proposed development area.</li> <li>ii. The second westward extension excludes the area to the east of the footpath described above but includes the land immediately to the south of the M20 motorway and east of Harringe lane.</li> </ol> <p>The District's supplementary high-level landscape sensitivity survey assesses the potential landscape effects associated with developing both of these sub-areas. Option i is considered to have greater scenic quality and perceptual aspects than option ii because of its more intimate setting, containing unspoilt pasture with small wooded areas and hedgerows. However, option ii is noted to contain rarer landscape features, including a stream and notable wooded field boundaries. For this reason option ii is considered to be marginally more sensitive in landscape terms than option i. However, both options would result in the development of land which is highly visible from the east compromising the openness of the countryside in the narrow valley to the east of Harringe Lane. Therefore, the sensitivity of this location is considered to be greater than the rest of the open countryside earmarked for development within Otterpool A.</p>
SA4. Conserve and enhance the fabric and setting of historic assets.	--	<p>The overall score for the site is significant negative, largely for the same reasons as outlined in relation to Otterpool Option A. However, there is greater overall physical impact to known heritage assets as the archaeological assets include not only a few more low value features, but also a protected military aircraft crash site considered to potentially be of high value. These will all be susceptible to physical change the effect of which will range from minor negative to significant negative.</p> <p>In terms of setting change, Option B has a lower impact than Option A as a result of it encroaching less on the rural setting and legibility of Port Lympne Grade II Registered Park and Garden.</p> <p>In historic landscape terms the change will also be greater, as it will result in greater loss and introduce development up to the M20 and railway on the opposite side of Sellindge and if developed in tandem with Sellindge Option A/ B/ D will arguably create some conflation between the two settlements.</p> <p>For more detail on the potential historic environment effects please refer to the Folkestone and Hythe Historic Environment Assessment (LUC 2018).</p>
SA5. Conserve and enhance biodiversity, taking into account the effects of climate change.	+/-	<p>Otterpool B affects the same designated ecological assets described within and in close proximity to Otterpool A. However, Otterpool B would result in the development of additional land to the west of Barrowhill towards Harringe Lane. This option would also result in an adjustment to the development boundary to the west of Lympne Industrial Estate.</p> <p>The land which is to be included for development to the west of Barrowhill is greenfield land, however this area does not contain or is not located in very close proximity to any sites of significant ecological sensitivity or interest. Only a small portion of this land to the north towards the M20 lies within the Gibbin's Brook IRZ. Natural England have identified that strategic scale development within the IRZ may have an adverse impact on this designation in terms of increased recreational pressures given that it is common access land. As only a small part of the additional land proposed for development through this option is located within the IRZ, and considering that this land is separated from the SSSI by the M20 and railway line, the potential for further significant increases in recreational pressures is likely to be reduced.</p> <p>The land to the west of Lympne Industrial Estate falls within the IRZ set for Lympne Escarpment. Natural England has advised that</p>

SA Objectives	SA Score	Otterpool B
		<p>land in the vicinity of the Lympe Escarpment SSSI should carefully consider options to mitigate extra car journeys on surrounding roads at the site allocation and planning application stages given this issue's particular importance to the SSSI. Although this option would adjust the boundary to the west of Lympe Industrial Estate, this land was either to be maintained as strategic open space or lower density development. As such this minor adjustment is unlikely to significantly mitigate any adverse effects generated by the development proposed in this location in Otterpool A.</p> <p>The development pattern and density of development proposed in Otterpool B has been identified in consultation with Natural England and is designed to minimise the potential for significant adverse impacts occurring on the wildlife assets within and in close proximity to the proposed development.</p> <p>Furthermore, the development at Otterpool is to be designed and delivered in line with garden town principles, which includes the requirement to enhance the natural environment, providing a comprehensive green infrastructure network and net biodiversity gains.</p> <p>Therefore, overall, a mixed minor positive and minor negative effect is expected on this SA objective.</p>
SA6. Protect and enhance green infrastructure and ensure that it meets strategic needs.	+ +/--	<p>The development of Otterpool B will result in the loss of a significant area of greenfield land which performs the function of green infrastructure to varying degrees, some of which is accessible to the public via public rights of way. The loss of existing green infrastructure on this scale is likely to result in significant negative effects on this objective. However, like Otterpool A, Otterpool B includes significant areas of strategic open space along its western edge, around Otterpool Quarry, by Westenhanger Castle and in between Lympe and Lympe Industrial Estate. These areas of strategic green infrastructure will protect existing wildlife habitats and corridors and offer new residents the opportunity to access the countryside, including existing residents in the villages of Westenhanger and Lympe. Residents in Sellindge may also benefit, but this is dependent on better access across the M20 and HS1 railway line.</p> <p>Providing a comprehensive and accessible green infrastructure network is wholly consistent with the garden town principles. However, Otterpool B would result in the development of additional land to the west of Barrowhill towards Harringe Lane as well as an alteration to the development boundary by Lympe Industrial Estate to the south. These variations limit the area of proposed accessible open space to the west of the garden settlement proposed in Otterpool A.</p> <p>Overall, a mixed significant positive/significant negative effect is recorded for this objective.</p>
SA7. Use land efficiently and safeguard soils, geology and economic mineral reserves.	--	<p>Compared to Otterpool A, Otterpool B would result in the development of additional land to the west of Barrowhill towards Harringe Lane and less development to the west of Lympe Industrial Estate. The land to the west of Barrowhill is made up of Grade 2 and Grade 3 agricultural land, while the land towards Lympe Industrial Estate is Grade 2 agricultural land. Furthermore, much of the land at both of these locations has been safeguarded for limestone extraction.</p> <p>Therefore, compared to Otterpool A, Otterpool B is likely to result in a similar loss of agricultural and mineral safeguarded land.</p> <p>Overall, a significant negative effect is expected for this SA objective.</p>
SA8. Maintain and improve the quality of groundwater, surface waters and coastal waters and the hydromorphological (physical) quality of rivers and coastal waters.	--	<p>Compared to Otterpool A, the inclusion of additional development to the west of Barrowhill and removal of land to be developed to the west of Lympe Industrial Estate through Otterpool B would not result in the development of land within a Source Protection Zone (SPZ). However, the land around Barrowhill has been identified as likely to have a higher risk of effecting underlying aquifers than the land to the east. Furthermore, this land is also identified as lying within an area of Serious water stress, surface water safeguard and Nitrate Vulnerable Zone (NVZ).</p> <p>The District's Water Cycle Study (2011), which is currently under review, highlights insufficient capacity in the strategic wastewater treatment network in the Westenhanger and Sellindge areas.</p> <p>Given the existence of aquifers with likely intermediate and higher vulnerability, and until such time as strategic provision of new waste water treatment is planned to serve the new development, a significant negative effect is expected on this SA objective.</p>

SA Objectives	SA Score	Otterpool B
SA9. Reduce the risk of flooding, taking into account the effects of climate change.	--	<p>The development of additional land to the west of Barrowhill towards Harringe Lane through Otterpool B would result in the development of land which is within Flood Zone 2 and 3 by the River East Stour and its tributaries. These areas are linear in nature and form a very small part of the additional area to be developed over and above Otterpool A. As such it is expected that development could be located to avoid the areas of higher flood risk. Furthermore the District Council's Strategic Flood Risk Assessment (2015) has identified that none of land within this additional area is within an area of 'significant' or 'extreme' flood risk.</p> <p>However, the Environment Agency has expressed concern about the significant scale of development proposed being likely to significantly shorten the lag time of surface water drainage into the River Stour and the potential for this to increase the risk of flooding downstream in the Borough of Ashford, particularly around the Aldington Reservoir.</p> <p>Therefore, until these concerns can be appropriately mitigated a significant adverse effect is recorded against this SA objective.</p>
SA10. Increase energy efficiency in the built environment and the proportion of energy use from renewable sources.	++	<p>The development at Otterpool is to be designed and delivered in line with garden town principles, including development that uses low-carbon and energy-positive technology. Furthermore, the economies of scale likely to be generated by the significant scale of the development proposed at Otterpool is likely ensure high levels of energy efficient design and the incorporation of low carbon and renewable technologies. Therefore, a significant positive effect is expected on this SA objective.</p>
SA11. Use water resources efficiently	++	<p>The development at Otterpool is to be designed and delivered in line with garden town principles, including development that ensures climate change resilience. This is particularly important in the District of Folkestone &amp; Hythe where water scarcity is a growing concern as a result of climate change. The economies of scale likely to be generated by the significant scale of the development proposed at Otterpool are likely to ensure high levels of water efficient design, such as low flush toilets or the enactment of Water Efficiency Improvement Action Plans as part of new developments. Therefore a significant positive effect is expected on this SA objective.</p>
SA12. To reduce waste generation and disposal, and achieve the sustainable management of waste.	+	<p>All options identify areas to accommodate strategic scale development within the District and are therefore likely to generate the economies of scale necessary to move waste up the waste hierarchy through the incorporation of sustainable waste management facilities. A minor positive effect is therefore expected on this SA objective.</p>
SA13. Reduce the need to travel, increase opportunities to choose sustainable transport modes and avoid development that will result in significant traffic congestion and poor air quality.	++/-	<p>Being broadly similar to Otterpool A, Otterpool B is likely to generate the same significant positive effects against this objective. However, Otterpool B would result in the development of additional land to the west of Barrowhill towards Harringe Lane. The transport infrastructure to the west is particularly under developed with Harringe Lane the only route in and out. The capacity of Harringe Lane to accommodate significant increases in traffic is poor and constraints have been identified in relation to its potential to be upgraded to the north at the bridge over the M20 and railway.</p> <p>There are currently no bus services which run through the additional land to the west and Harringe Lane currently provides limited capacity to allow for such services to be provided. In addition no cycle paths run through this land.</p> <p>Given that Otterpool B will generate no more homes than Otterpool A, Otterpool B is unlikely to provide any additional services and facilities over and above those provided through Otterpool A.</p> <p>Therefore, a mixed significant positive, minor negative effect is recorded for this objective to draw out the difference between the two Otterpool spatial options.</p>

SA Objectives	SA Score	Otterpool B
SA14. Promote community vibrancy and social cohesion; provide opportunities to access services, facilities and environmental assets for all ages and abilities and avoid creating inequalities of opportunity for access.	++/-	<p>Otterpool B is the same as Otterpool A, in its densities of development, in the services and facilities it is likely to provide and in its proximity to existing services and facilities in the neighbouring settlements of Sellindge and Lympne. Some significant areas of strategic open space are to be included within the development area, provide new and existing residents with good access to the open countryside.</p> <p>The above proposals are wholly consistent with the garden town principles the new settlement will be designed to deliver. Therefore, a significant positive effect is expected on this SA objective.</p> <p>However, Otterpool B would result in the development of additional land to the west of Barrowhill towards Harringe Lane. The capacity of Harringe Lane to accommodate significant increases in traffic is poor and constraints have been identified in relation to its potential to be upgraded to the north at the bridge over the M20 and railway, making it harder for residents in this part of the new settlement to access existing services and facilities over Harringe Bridge towards Sellindge. Furthermore Lympne is located approximately 2.4km at its closest point. There are currently no public transport services which run through this area. New services and facilities provided as part of the development will require significant improvements to local infrastructure to be accessible from the land included to the west of Barrowhill.</p> <p>Therefore, a mixed significant positive, minor negative effect is recorded for this objective to draw out the difference between the two Otterpool spatial options.</p>
SA15. Reduce crime and the fear of crime.	+	<p>All options provide the opportunity to incorporate strategic scale development that designs out crime. This may include for example the suitable design of open spaces and the inclusion of appropriate lighting. Therefore, a minor positive effect is expected on this SA objective.</p>

# Sellindge Spatial Options

## Sellindge A

SA Objectives	SA Score	Sellindge A
SA1. Improve the provision of homes, including affordable housing, having regard to the needs of all sections of society, including the elderly.	++	<p>Sellindge A would provide an additional 400-600 homes on land to the south of Sellindge. The delivery of an additional 400-600 homes at Sellindge is likely to have a significant positive effect on this objective.</p> <p>Policy CSD1 in the adopted Core Strategy requires that developments proposing 15 or more dwellings should provide 22% affordable dwellings and policy HB3 of the Places and Policies Local Plan requires that, subject to viability and design restrictions, development proposing 10 or more dwellings should include 20% of dwellings meeting Building Regulations adaptable homes standards. The requirement for affordable housing in the District has been identified as 139 dwellings per annum<sup>145</sup> and it is expected that Sellindge A will provide a significant number of new affordable homes.</p> <p>As such this option would contribute to meeting affordable housing requirements in Folkestone &amp; Hythe.</p>
SA2. Support the creation of high quality and diverse employment opportunities.	++/-	<p>Sellindge A would allow for strategic scale development to the south of Sellindge.</p> <p>Like all spatial options, employment land is allocated to meet the needs of the additional housing growth. New employment opportunities will have good access to the existing road and rail network to the south, making it easy for people to commute into and out of the area.</p> <p>It is noted however that large-scale employment uses may not be suitable for the entirety of the area as lorries associated with large-scale employment would have to pass through the village centre of Sellindge given the current location of access to the M20. As such the significant positive effect is expected to be combined with a minor negative effect as part of an overall mixed effect.</p> <p>Employment growth to the north of the M20 would help to address economic deprivation in the area around Sellindge (recorded as being within the 40%-60% percentile on the Indices of Multiple Deprivation).</p>
SA3. Conserve, and where relevant enhance, the quality, character and local distinctiveness of the landscape and townscape.	-	<p>Sellindge A would result in the development of land to the south of Sellindge. This area of land is bordered by the defensible boundaries of the A20 to the north and the M20 to the south, with limited views of the Kent Downs AONB. The land parcel is made-up a number of small fields the size of which, in combination with their irregular boundaries and intermittent pockets of woodland, provide quite an intimate feel with scenic quality. There are glimpses through to Sellindge in pockets where the land parcel borders the A20. Noise from the M20 has been noted to affect the tranquillity in the southern portion of the area.</p> <p>The High Level Landscape Character Appraisal (2017) identified that this area would be capable of accommodating development without loss of landscape elements or characteristics which add value to the area and Kent Downs AONB dependent upon its specific siting.</p> <p>The District's supplementary high-level landscape sensitivity survey assesses the potential landscape effects associated with developing the area. This assessment concludes that while development would be largely unseen from the wider landscape, development would devalue the scenic and intimate quality of the landscape in the immediate vicinity. A minor negative effect is therefore recorded on this SA objective for this option.</p>
SA4. Conserve and enhance the fabric and setting of	--	<p>In terms of designated assets the site contains a protected military crash site that will be susceptible to physical change as a result of development. This will result in a significant negative effect. There are no non-designated heritage or archaeological assets recorded within the site that are susceptible to physical change. The known archaeological resource in the study area points to there being a</p>

<sup>145</sup> Peter Brett Associates (December 2016) Strategic Housing Market Assessment Part 2 - Objectively Assessed Need for Affordable Housing

SA Objectives	SA Score	Sellindge A
historic assets.		<p>good potential for post-medieval agricultural features of low value, and the geological conditions (colluvium) have a potential for buried land surfaces and residual artefactual evidence.</p> <p>The historic landscape character is considered to be of low value as it is primarily comprised of parliamentary enclosure, with no historic hedgerows identified, but it does contribute to the setting of the nearby built heritage assets, both designated and non-designated.</p> <p>Assets susceptible to setting change within the study area are listed below, along with the predicted effect. It should be noted that the effect to Somerfield court and barn is based on the fact that development is currently on-going around it.</p> <p>Designated asset within the site susceptible to setting change:</p> <ul style="list-style-type: none"> <li>• Crash site of a Supermarine Spitfire – significant negative</li> </ul> <p>Designated assets within the study area susceptible to setting change:</p> <ul style="list-style-type: none"> <li>• Church of St Mary (Grade I) – negligible</li> <li>• Elm Tree Farm House (Grade II) and Barn About 5 Metres North of Elm Tree Farm House (Grade II) – negligible</li> <li>• Somerfield Court (Grade II) and Barn Complex about 66 Metres West of Somerfield Court (Grade II) – negligible</li> <li>• Guinea Hall (Grade II) – negligible-minor negative</li> </ul> <p>Non-designated assets within the study area susceptible to setting change:</p> <ul style="list-style-type: none"> <li>• Old School Cottage – negligible-minor negative</li> <li>• Heritage Farm/Manor House – minor negative</li> <li>• Potten Farm – minor negative</li> <li>• Grove House – negligible-minor negative</li> <li>• Farmstead south east of Grove House – minor negative</li> </ul> <p>For more detail on the potential historic environment effects please refer to the Folkestone and Hythe Historic Environment Assessment (LUC 2018).</p>
SA5. Conserve and enhance biodiversity, taking into account the effects of climate change.	-	<p>Sellindge A would result in the development of land to the south of Sellindge. Besides being greenfield land, this area does not contain or lie in close proximity to any sites of significant ecological sensitivity or interest. However, the area does contain a small Orchard designated as priority habitat and is located within Gibbin’s Brook SSSI IRZ.</p> <p>Gibbin’s Brook SSSI is common access land and is therefore vulnerable to recreational pressures. Significant strategic scale development to the north of the M20 could significantly increase the numbers of visitors to the SSSI. As such the development of land to the south of Sellindge within Sellindge A has the potential to generate adverse effects on this SA objective, although it is unlikely that the scale of development would result in significant negative effects in isolation.</p>
SA6. Protect and enhance green infrastructure and ensure that it meets strategic needs.	--	<p>Sellindge A would result in the development of land to the south of Sellindge some of which is accessible by public rights of way and a significant proportion of which is greenfield (planning permission has recently been granted for 250 homes within the area). While there are some existing pockets of accessible green infrastructure in Sellindge, at Sellindge Primary School, Sellindge Sports and Social Club and amenity greenspace at Whitehall Way Residents Recreational Area, there are no current plans for this area of development to include any new open spaces, resulting in the potential for a net loss of accessible green infrastructure around Sellindge. This is likely to result in a significant negative effect on this objective.</p>
SA7. Use land efficiently and safeguard soils,	--	<p>Sellindge A would result in the development of greenfield land to the south of Sellindge. This area consists of entirely Grade 2 agricultural land. In addition, the land within the area to the south of Sellindge has been safeguarded for sandstone mineral</p>



SA Objectives	SA Score	Sellindge A
geology and economic mineral reserves.		extraction. Developed to the south of the M20 would result in the loss of 'very good quality' (Grade 2) agricultural land as well as the sterilisation of more mineral deposits. Therefore, a significant negative effect is expected for this SA objective.
SA8. Maintain and improve the quality of groundwater, surface waters and coastal waters and the hydromorphological (physical) quality of rivers and coastal waters.	--	The inclusion of additional development to the south of Sellindge through Sellindge A would not result in the development of land within a Source Protection Zone (SPZ). However, the area does contain major aquifers with intermediate vulnerability, with the area surrounding Barrowhill immediately to the south west having been identified as likely to have higher vulnerability. Furthermore, the area identified within Sellindge A is identified as lying within an area of Serious water stress and a surface water safeguard zone. The western edge of the area is likely to be affected by the surface water Nitrate Vulnerable Zone (NVZ). The District's Water Cycle Study (2011), which is currently under review, highlights insufficient capacity in the strategic wastewater treatment network in the Westenhanger and Sellindge areas. Given the existence of aquifers with likely intermediate vulnerability and the nitrate vulnerable zone, and until such time as strategic provision of new waste water treatment is planned to serve the new development, a significant negative effect is expected on this SA objective.
SA9. Reduce the risk of flooding, taking into account the effects of climate change.	0	The development of 400-600 homes to the south of Sellindge through Sellindge A would not result in the development of land which is within Flood Zone 2 or 3. Furthermore the District Council's Strategic Flood Risk Assessment (2015) has identified that none of land within this additional area is within an area of 'significant' or 'extreme' flood risk. Therefore, in isolation, this development is likely to have a negligible effect on this SA objective.
SA10. Increase energy efficiency in the built environment and the proportion of energy use from renewable sources.	+	The development of 400-600 homes to the south of Sellindge through Sellindge A would generate the economies of scale necessary to incorporate high levels of energy efficient design. However, it is unclear whether the development could include significant investment in low-carbon/renewable energy schemes. Therefore, a minor positive effect is recorded against this objective.
SA11. Use water resources efficiently	+	The development of 400-600 homes to the south of Sellindge through Sellindge A would generate the economies of scale necessary to incorporate high levels of water efficient design, such as low flush toilets or the enactment of Water Efficiency Improvement Action Plans as part of new developments. Therefore, a minor positive effect is recorded against this objective.
SA12. To reduce waste generation and disposal, and achieve the sustainable management of waste.	+	The development of 400-600 homes to the south of Sellindge through Sellindge A would generate the economies of scale necessary to move waste up the waste hierarchy through the incorporation of sustainable waste management facilities. Therefore, a minor positive effect is recorded against this objective.
SA13. Reduce the need to travel, increase opportunities to	-	The relatively linear village of Sellindge contains a number of small local services and facilities, including a church, garden centre, primary school, GP, village hall, sports hall, pub, post office and shop. The centre of the village sits within the vicinity of the junction of Ashford Road and Swan Lane, which sits in between and in close proximity to the GP, post office and shop and primary school.

SA Objectives	SA Score	Sellindge A
<p>choose sustainable transport modes and avoid development that will result in significant traffic congestion and poor air quality.</p>		<p>However the ribbon residential development along Ashford Road to the west and Swan Lane to the north are much more isolated.</p> <p>Sellindge A would result in the development of land to the south of Sellindge, directly to the west of the existing village centre. While new residents in the eastern half of the village extension would be in close proximity to a good range of existing services and facilities, residents in the western half would be much more isolated, only being in close proximity to the local pub and church.</p> <p>Ashford Road provides access towards Westenhanger and Lympe to the south west. Harringe Lane, at the western boundary of the area, provides access across the M20 and railway line to the south; however, this route is narrow and vulnerable to capacity issues. Although the M20 motorway and mainline rail service runs along the southern boundary of Sellindge A the closest points of access to these routes are provided 3.4km and 2.7km to the east at Junction 11 and Westenhanger railway station respectively.</p> <p>Bus route 10/10A currently services the area along the A20 Ashford Road. Bus services allow for access to Ashford, Sellindge, Hythe and Folkestone. There are currently no cycle routes in the area.</p> <p>The Council has identified that there are likely to be traffic congestion problems associated with the strategic scale development in the area, specifically at the A20 under the railway and M20 at the eastern end of Sellindge and to the west at Harringe Bridge.</p> <p>The additional growth proposed in Sellindge A is likely to exacerbate the potential for congestion on the existing road network, both due to the scale of the development and its location in relation to the existing services and facilities in the village. Therefore a minor negative effect is recorded against this objective.</p>
<p>SA14. Promote community vibrancy and social cohesion; provide opportunities to access services, facilities and environmental assets for all ages and abilities and avoid creating inequalities of opportunity for access.</p>	-	<p>The relatively linear village of Sellindge contains a number of small local services and facilities, including a church, garden centre, primary school, GP, village hall, sports hall, pub, post office and shop. The centre of the village sits within the vicinity of the junction of Ashford Road and Swan Lane, which sits in between and in close proximity to the GP, post office and shop and primary school. However the ribbon residential developments along Ashford Road to the west and Swan Lane to the north are much more isolated.</p> <p>Sellindge A would result in the development of land to the south of Sellindge, directly to the west of the existing village centre. While new residents in the eastern half of the village extension would be in close proximity to a good range of existing services and facilities, residents in the western half would be much more isolated, only being in close proximity to the local pub and church. Furthermore, the scale of development is likely to adversely impact the linear character of the existing village of Sellindge, and put existing services and facilities under pressure. Until plans are set out to improve access, particularly on foot and by bicycle, between the development proposed at Sellindge A and the centre of the village, it is likely that some of the new residents within this extension to the village would be isolated.</p> <p>Therefore overall a minor negative effect is recorded against this objective.</p>
<p>SA15. Reduce crime and the fear of crime.</p>	+	<p>All options provide the opportunity to incorporate strategic scale development that designs out crime. This may include for example the suitable design of open spaces and the inclusion of appropriate lighting. Therefore, a minor positive effect is expected on this SA objective.</p>

## Sellindge B

SA Objectives	SA Score	Sellindge B
SA1. Improve the provision of homes, including affordable housing, having regard to the needs of all sections of society, including the elderly.	++	<p>Sellindge B would provide an additional 800-1,000 homes on land to the south and west of Sellindge. The delivery of an additional 800-1,000 homes at Sellindge is likely to have a significant positive effect on this objective.</p> <p>Policy CSD1 in the adopted Core Strategy requires that developments proposing 15 or more dwellings should provide 22% affordable dwellings and policy HB3 of the Places and Policies Local Plan requires that, subject to viability and design restrictions, development proposing 10 or more dwellings should include 20% of dwellings meeting Building Regulations adaptable homes standards. The requirement for affordable housing in the District has been identified as 139 dwellings per annum<sup>146</sup> and it is expected that Sellindge B will provide a significant number of new affordable homes.</p> <p>As such this option would contribute to meeting affordable housing requirements in Folkestone &amp; Hythe.</p>
SA2. Support the creation of high quality and diverse employment opportunities.	++/--	<p>Sellindge B would allow for strategic scale development to the south and west of Sellindge.</p> <p>Like all spatial options, employment land is allocated to meet the needs of the additional housing growth. New employment opportunities will have good access to the existing road and rail network to the south, making it easy for people to commute into and out of the area.</p> <p>It is noted however that large-scale employment uses may not be suitable for the entirety of the area identified in Sellindge B as lorries associated with large-scale employment would have to pass through the village centre of Sellindge, given the current location of access to the M20. Furthermore access south along Harringe Lane is limited with limited potential to upgrade the bridge over the M20 and railway line. As such the significant positive effect is expected to be combined with a significant negative effect as part of an overall mixed effect.</p> <p>Employment growth to the north of the M20 would help to address economic deprivation in the area around Sellindge (recorded as being within the 40%-60% percentile on the Indices of Multiple Deprivation).</p>
SA3. Conserve, and where relevant enhance, the quality, character and local distinctiveness of the landscape and townscape.	-	<p>Sellindge B would result in the development of additional land to the south and west of Sellindge. Although the land to the north of the M20 falls within a different Landscape Character Area (LCA 09: Sellindge) to the land to the south, both have medium landscape sensitivity. The High Level Landscape Character Appraisal (2017) identified that this area would be capable of accommodating development without loss of landscape elements or characteristics which add value to the area dependent upon its specific siting.</p> <p>The area is bordered by the defensible boundaries of the A20 to the north and the M20 to the south, with limited views of the Kent Downs AONB. This is due to the undulating surrounding landform, intervening development at Sellindge, and woodland or tree belts giving it a relatively contained zone of visual influence. The M20 has been noted to affect the tranquillity in the southern portion of the area.</p> <p>The eastern half of the area (Sellindge A) is made-up a number of small fields the size of which, in combination with their irregular boundaries and intermittent pockets of woodland, provide quite an intimate feel with scenic quality. There are glimpses through to Sellindge in pockets where the land parcel borders the A20.</p> <p>The western half of the land parcel is comprised of two relatively small fields laid to pasture. It is enclosed by trees on three sides.</p> <p>The District's supplementary high-level landscape sensitivity survey assesses the potential landscape effects associated with developing the area to the east (Sellindge A) and the area to the west separately. This assessment concludes that while development would be largely unseen from the wider landscape, development would devalue the scenic and intimate quality of the landscape in the</p>

<sup>146</sup> Peter Brett Associates (December 2016) Strategic Housing Market Assessment Part 2 - Objectively Assessed Need for Affordable Housing

SA Objectives	SA Score	Sellindge B
		eastern area. A minor negative effect is therefore recorded on this SA objective for this option.
SA4. Conserve and enhance the fabric and setting of historic assets.	--	<p>In terms of designated assets, the site contains a protected military crash site that will be susceptible to physical change as a result of development. This will result in a significant negative effect. There are no non-designated heritage or archaeological assets recorded within the site that are susceptible to physical change. The known archaeological resource in the study area points to there being a good potential for post-medieval agricultural features of low value, and the geological conditions (colluvium) have a potential for buried land surfaces and residual artefactual evidence.</p> <p>The historic landscape character is primarily comprised of parliamentary enclosure. No potential historic hedgerows have been identified but the landscape does contribute to the setting of the nearby built heritage assets, both designated and non-designated. It would be subject to physical change resulting in a minor negative effect.</p> <p>Assets susceptible to setting change are listed below, along with the predicted effect. It should be noted that the effect to Somerfield court and barn is based on the fact that development is currently on-going around it.</p> <p>Designated assets within the study area susceptible to setting change:</p> <ul style="list-style-type: none"> <li>• Elm Tree Farm House (Grade II) and Barn About 5 Metres North of Elm Tree Farm (Grade II) – negligible</li> <li>• Somerfield Court (Grade II) and Barn Complex About 66 Metres West of Somerfield Court (Grade II) – negligible</li> <li>• Guinea Hall (Grade II) – negligible-minor negative</li> <li>• Church of St Mary (Grade I) – minor negative</li> </ul> <p>Non-designated assets within the study area susceptible to setting change:</p> <ul style="list-style-type: none"> <li>• Old School Cottage – negligible-minor negative</li> <li>• Heritage Farm/Manor House – minor negative</li> <li>• Potten Farm – minor negative</li> <li>• Grove House – negligible-minor negative</li> <li>• Farmstead SE of Grove House – minor negative</li> <li>• Court Lodge – minor negative</li> </ul> <p>Detailed appraisals of these assets can be found in the Folkestone and Hythe Historic Environment Assessment (LUC 2018).</p>
SA5. Conserve and enhance biodiversity, taking into account the effects of climate change.	-	<p>Sellindge B would result in the development of land to the south and west of Sellindge. Besides being greenfield land, this area does not contain or lie in close proximity to any sites of significant ecological sensitivity or interest. However, the area does contain a small orchard and some deciduous woodland designated as priority habitat. Furthermore, the area sits within the IRZ of the Gibbin's Brook SSSI. Gibbin's Brook SSSI is common access land and is therefore vulnerable to recreational pressures. Significant strategic scale development to the north of the M20 could significantly increase the numbers of visitors to the SSSI.</p> <p>As such the development of land to the south and west of Sellindge within Sellindge B has the potential to generate adverse effects on this SA objective, although it is unlikely that the scale of development would result in significant negative effects in isolation.</p>
SA6. Protect and enhance green infrastructure and ensure that it meets strategic needs.	--	<p>Sellindge B would result in the development of greenfield land to the south and west of Sellindge some of which is accessible by public rights of way. While there are some existing pockets of accessible green infrastructure in Sellindge, at Sellindge Primary School, Sellindge Sports and Social Club and amenity greenspace at Whitehall Way Residents Recreational Area, there are no current plans for this area of development to include any new open spaces, resulting in the potential for a net loss of accessible green infrastructure around Sellindge. This is likely to result in a significant negative effect on this objective.</p>
SA7. Use land efficiently and safeguard soils,	--	<p>Sellindge B would result in the development of greenfield land to the south and west of Sellindge. This area consists of almost entirely Grade 2 agricultural land, while a small pocket of Grade 3 agricultural land is present at the area's north western boundary. In addition, the land within the area to the south and west of Sellindge has been safeguarded for sandstone or limestone mineral</p>

SA Objectives	SA Score	Sellindge B
geology and economic mineral reserves.		<p>extraction.</p> <p>It is therefore expected that the development of the greenfield land to the south and west of Sellindge would result in the loss of a significant area of 'very good quality' (Grade 2) agricultural land as well as the sterilisation of more mineral deposits. Therefore, a significant negative effect is expected for this SA objective.</p>
SA8. Maintain and improve the quality of groundwater, surface waters and coastal waters and the hydromorphological (physical) quality of rivers and coastal waters.	--	<p>The inclusion of additional development to the south of Sellindge through Sellindge B would not result in the development of land within a Source Protection Zone (SPZ).</p> <p>However, the area does contain major aquifers with intermediate vulnerability, with the area surrounding Barrowhill immediately to the south east having been identified as likely to have higher vulnerability. Furthermore, the land within Sellindge B is identified as lying within an area of Serious water stress, a surface water safeguard zone while its western portion is within a surface water Nitrate Vulnerable Zone (NVZ).</p> <p>The District's Water Cycle Study (2011), which is currently under review, highlights insufficient capacity in the strategic wastewater treatment network in the Westenhanger and Sellindge areas.</p> <p>Until such time as strategic provision of new waste water treatment is planned to serve the new development, significant negative effects are expected on this SA objective.</p>
SA9. Reduce the risk of flooding, taking into account the effects of climate change.	0	<p>The development of 800-1,000 homes to the south and west of Sellindge through Sellindge B would result in the development boundary extending towards areas of Flood Zone 2 and 3 at River East Stour and its tributaries to the west. A small portion of the land within Sellindge B falls within these areas of higher flood risk. It is however expected, given the relatively small proportion of the area affected, that this area could be easily avoided during the masterplanning of the development. Furthermore the District Council's Strategic Flood Risk Assessment (2015) has identified that none of land within the area is within an area of 'significant' or 'extreme' flood risk.</p> <p>Therefore, in isolation, this development is likely to have a negligible effect on this SA objective.</p>
SA10. Increase energy efficiency in the built environment and the proportion of energy use from renewable sources.	+	<p>The development of 800-1,000 homes to the south of Sellindge through Sellindge B would generate the economies of scale necessary to incorporate high levels of energy efficient design. However, it is unclear whether the development could include significant investment in low-carbon/renewable energy schemes. Therefore, a minor positive effect is recorded against this objective.</p>
SA11. Use water resources efficiently.	+	<p>The development of 800-1,000 homes to the south of Sellindge through Sellindge B would generate the economies of scale necessary to incorporate high levels of water efficient design, such as low flush toilets or the enactment of Water Efficiency Improvement Action Plans as part of new developments. Therefore, a minor positive effect is recorded against this objective.</p>
SA12. To reduce waste generation and disposal, and achieve the sustainable management of waste.	+	<p>The development of 800-1,000 homes to the south of Sellindge through Sellindge B would generate the economies of scale necessary to move waste up the waste hierarchy through the incorporation of sustainable waste management facilities. Therefore, a minor positive effect is recorded against this objective.</p>
SA13. Reduce the	--	<p>The relatively linear village of Sellindge contains a number of small local services and facilities, including a church, garden centre,</p>

SA Objectives	SA Score	Sellindge B
<p>need to travel, increase opportunities to choose sustainable transport modes and avoid development that will result in significant traffic congestion and poor air quality.</p>		<p>primary school, GP, village hall, sports hall, pub, post office and shop. The centre of the village sits within the vicinity of the junction of Ashford Road and Swan Lane, which sits in between and in close proximity to the GP, post office and shop and primary school. However the ribbon residential development along Ashford Road to the west and Swan Lane to the north are much more isolated.</p> <p>Sellindge B would result in the development of 800-1,000 new homes to the south and west of Sellindge, directly to the west of the existing village centre. While new residents in the eastern end of this significant village extension would be in close proximity to a good range of existing services and facilities, residents in the vast majority of the extension would be much more isolated, only being in close proximity to the local pub and church. It is recognised that an additional 800-1,000 new homes could potentially support the provision of new services and facilities as part of a new local centre. However, the provision of such services and facilities are unknown at this time.</p> <p>Ashford Road provides access towards Westenhangar and Lympe to the south west. Harringe Lane is at the western boundary of the area providing access across the M20 and railway line to the south; however, this route is narrow and vulnerable to capacity issues. Although the M20 motorway and mainline rail service runs along the southern boundary of Sellindge B the closest points of access to these routes are provided 3.4km and 2.7km to the east at Junction 11 and Westenhangar railway station respectively.</p> <p>Bus route 10/10A currently services the area along A20 Ashford Road. Bus services allow for access to Ashford, Sellindge, Hythe and Folkestone. There are currently no cycle routes in the area.</p> <p>The Council has identified that there are likely to be traffic congestion problems associated with the strategic scale development in the area, specifically at the A20 under the railway and M20 at the eastern end of Sellindge and to the west at Harringe Bridge.</p> <p>The additional growth proposed in Sellindge B has the potential to significantly exacerbate the potential for congestion on the existing road network, both due to the scale of the development and its location in relation to the existing services and facilities in the village. Therefore a significant negative effect is recorded against this objective.</p>
<p>SA14. Promote community vibrancy and social cohesion; provide opportunities to access services, facilities and environmental assets for all ages and abilities and avoid creating inequalities of opportunity for access.</p>	--	<p>The relatively linear village of Sellindge contains a number of small local services and facilities, including a church, garden centre, primary school, GP, village hall, sports hall, pub, post office and shop. The centre of the village sits within the vicinity of the junction of Ashford Road and Swan Lane, which sits in between and in close proximity to the GP, post office and shop and primary school. However the ribbon residential developments along Ashford Road to the west and Swan Lane to the north are much more isolated.</p> <p>Sellindge B would result in the development of 800-1,000 new homes to the south and west of Sellindge, directly to the west of the existing village centre. While it is recognised that an additional 800-1,000 new homes could potentially support the provision of new services and facilities as part of a new local centre, the provision of such services and facilities are unknown at this time.</p> <p>New residents in the eastern end of this significant village extension would be in close proximity to a good range of existing services and facilities; however residents in the vast majority of the extension would be much more isolated, only being in close proximity to the local pub and church. Furthermore, the scale of development is likely to adversely impact the linear character of the existing village of Sellindge, and put existing services and facilities under pressure. Until plans are set out to improve access, particularly on foot and by bicycle, between the development proposed at Sellindge B and existing or future centres within the village, it is likely that some of the new residents within this extension to the village would be isolated.</p> <p>Therefore overall a significant negative effect is recorded against this objective.</p>
<p>SA15. Reduce crime and the fear of crime.</p>	+	<p>All options provide the opportunity to incorporate strategic scale development that designs out crime. This may include for example the suitable design of open spaces and the inclusion of appropriate lighting. Therefore, a minor positive effect is expected on this SA objective.</p>

## Sellindge C

SA Objectives	SA Score	Sellindge C
SA1. Improve the provision of homes, including affordable housing, having regard to the needs of all sections of society, including the elderly.	++	<p>Sellindge C would provide an additional 400-600 homes on land to the east of Sellindge. The delivery of an additional 400-600 homes at Sellindge is likely to have a significant positive effect on this objective.</p> <p>Policy CSD1 in the adopted Core Strategy requires that developments proposing 15 or more dwellings should provide 22% affordable dwellings and policy HB3 of the Places and Policies Local Plan requires that, subject to viability and design restrictions, development proposing 10 or more dwellings should include 20% of dwellings meeting Building Regulations adaptable homes standards. The requirement for affordable housing in the District has been identified as 139 dwellings per annum<sup>147</sup> and it is expected that Sellindge C will provide a significant number of new affordable homes.</p> <p>As such this option would contribute to meeting affordable housing requirements in Folkestone &amp; Hythe.</p>
SA2. Support the creation of high quality and diverse employment opportunities.	++/-?	<p>Sellindge C would allow for strategic scale development to the east of Sellindge.</p> <p>Like all spatial options, employment land is allocated to meet the needs of the additional housing growth. New employment opportunities will have good access to the existing road and rail network to the south, making it easy for people to commute into and out of the area.</p> <p>It is noted however that large-scale employment uses may not be suitable for the entirety of the area given that lorries entering and exiting from the north and western edge of the area would most likely have to pass through the village centre of Sellindge or make use of the more rural routes along Swan Lane, Blindhouse Lane and the B2068 for motorway access. However, access from the southern end of the area could avoid a significant proportion of the potential disruption predicted avoiding the need for traffic associated with employment activities from travelling through the village to access the motorway.</p> <p>As such the significant positive effect is expected to be combined with a minor negative effect as part of an overall mixed effect. Until such time as the location of potential employment development is known within this option, uncertainty has been attached to the adverse effects associated with this objective.</p> <p>Employment growth to the north of the M20 would help to address economic deprivation in the area around Sellindge (recorded as being within the 40%-60% percentile on the Indices of Multiple Deprivation).</p>
SA3. Conserve, and where relevant enhance, the quality, character and local distinctiveness of the landscape and townscape.	-	<p>Sellindge C would result in the development of an additional 400-600 homes to the east of Sellindge. The area largely comprises of a large field that is subdivided by remnant hedgerow. To the north there is an additional area of arable land to the rear of Swan Lane. To the south the site is bordered by the M20, its other boundaries are marked with trees and vegetation. There is a line of electricity pylons that crosses the site to the south. The land rises from the south, east and north to a peak, which is roughly in the middle of the western boundary. From the higher parts of the parcel there are extensive views of the Kent Downs Area of Outstanding Natural Beauty. Despite the adverse impacts of the electricity pylons and the M20, the openness makes the area feel part of the wider landscape. The M20 has been noted to affect the tranquillity within the southern portion of the area.</p> <p>Although the land to the north of the M20 falls within a different Landscape Character Area (LCA 09: Sellindge) to the land to the south, both have medium landscape sensitivity. The High Level Landscape Character Appraisal (2017) identified that this area would be capable of accommodating development without loss of landscape elements or characteristics which add value to the area dependent upon its specific siting.</p> <p>The District's supplementary high-level landscape sensitivity survey assesses the potential landscape effects associated with developing the area to the east. This assessment concludes that development would result in the loss of openness within the immediate vicinity and, with open views to the wider countryside, development would likely form an incongruous element within the</p>

<sup>147</sup> Peter Brett Associates (December 2016) Strategic Housing Market Assessment Part 2 - Objectively Assessed Need for Affordable Housing

SA Objectives	SA Score	Sellindge C
		wider landscape. A minor negative effect is therefore recorded on this SA objective for this option.
SA4. Conserve and enhance the fabric and setting of historic assets.	-	<p>The site contains no designated or non-designated heritage assets. However, it is likely that medieval to post-medieval agriculture features of low value are present. Additionally, the geological conditions of the site (which include colluvium, alluvium and peat) indicate a potential for buried land surfaces and unstratified/reworked artefacts, as well as buried archaeological and palaeoenvironmental remains.</p> <p>The historic landscape mainly comprises piecemeal enclosure of late medieval to 18<sup>th</sup> century date, and is relatively unmodified. It is considered likely to include a number of historic hedgerows, and in addition is important in terms of the contribution it makes to the setting of the listed buildings adjacent to the site. It would be subject to physical change resulting in a minor negative effect.</p> <p>Within the study area a total of six assets (four designated and two non-designated) have been identified as having the potential to experience setting change. The assessment for these is as follows:</p> <p>Designated assets within the study area susceptible to setting change:</p> <ul style="list-style-type: none"> <li>• Little Rhodes (Grade II) – negligible-minor negative</li> <li>• Rhodes House (Grade II) – minor negative</li> <li>• Somerfield Court (Grade II) and Barn Complex About 66 Metres West of Somerfield Court (Grade II) – negligible</li> </ul> <p>Non-designated assets within the study area susceptible to setting change:</p> <ul style="list-style-type: none"> <li>• Brook Farm – negligible-minor negative</li> <li>• Farmstead North East of Little Rhodes – none</li> </ul> <p>Detailed appraisals of these assets can be found in the Folkestone and Hythe Historic Environment Assessment (LUC 2018).</p>
SA5. Conserve and enhance biodiversity, taking into account the effects of climate change.	--	<p>Sellindge C would result in the development of additional land to the east of Sellindge. Besides being greenfield land, this area does not contain any sites of significant ecological sensitivity or interest. There are areas of BAP priority habitat within the land at Sellindge C, however. These are towards the southern portion of Sellindge C where linear alluvial forests and hedgerow arable field margins stretch towards the north east as well as from east to west respectively. Furthermore, the area is located within 40m of Gibbin's Brook SSSI, well within its IRZ. Gibbin's Brook SSSI is common access land and is therefore vulnerable to recreational pressures. Significant strategic scale development located within close proximity has potential to generate significant adverse recreational pressures as a result of increased visitor numbers.</p> <p>While it is noted that strategic open space is to be maintained at the north and eastern edges of Sellindge C which are the closest areas to Gibbin's Brook SSSI a precautionary approach has been taken when recording the overall likely effect of strategic scale development at this location at this stage.</p>
SA6. Protect and enhance green infrastructure and ensure that it meets strategic needs.	--	<p>Sellindge C would result in the development of greenfield land to the east of Sellindge some of which is accessible by public rights of way. While there are some existing pockets of accessible green infrastructure in Sellindge, at Sellindge Primary School, Sellindge Sports and Social Club and amenity greenspace at Whitehall Way Residents Recreational Area, there are no current plans for this area of development to include any new open spaces, resulting in the potential for a net loss of accessible green infrastructure around Sellindge. This is likely to result in a significant negative effect on this objective.</p>
SA7. Use land efficiently and safeguard soils, geology and economic mineral	--	<p>Sellindge C would result in the development of greenfield land to the east of Sellindge. This area consists of Grade 2 agricultural land. In addition, much of the land within the area to the east of Sellindge has been safeguarded for sandstone mineral extraction. While the north and east edges of the land at Sellindge C would be maintained as strategic open space significant levels of development would be accommodated at the land closest to Sellindge.</p> <p>It is therefore expected that the development of the additional land to the east of Sellindge would result in the loss of a significant</p>



SA Objectives	SA Score	Sellindge C
reserves.		area of 'very good quality' (Grade 2) agricultural land as well as the sterilisation of more mineral deposits. Therefore, a significant negative effect is expected for this SA objective.
SA8. Maintain and improve the quality of groundwater, surface waters and coastal waters and the hydromorphological (physical) quality of rivers and coastal waters.	--	<p>The inclusion of additional development to the east of Sellindge through Sellindge C would not result in the development of land within a Source Protection Zone (SPZ).</p> <p>However, the area does contain major aquifers with high vulnerability particularly in those portions of the area which are towards Sellindge. Furthermore the area surrounding Barrowhill immediately to the south has been identified as likely to have aquifers with higher vulnerability.</p> <p>The District's Water Cycle Study (2011), which is currently under review, highlights insufficient capacity in the strategic wastewater treatment network in the Westenhanger and Sellindge areas.</p> <p>Until such time as strategic provision of new waste water treatment is planned to serve the new development, significant negative effects are expected on this SA objective.</p>
SA9. Reduce the risk of flooding, taking into account the effects of climate change.	0	<p>The development of 400-600 homes to the east of Sellindge through Sellindge C would not result in the development of land which is within Flood Zone 2 or 3. Furthermore the District Council's Strategic Flood Risk Assessment (2015) has identified that none of the land within this additional area is within an area of 'significant' or 'extreme' flood risk.</p> <p>A negligible effect is therefore expected on this SA objective.</p>
SA10. Increase energy efficiency in the built environment and the proportion of energy use from renewable sources.	+	The development of 400-600 homes to the south of Sellindge through Sellindge A would generate the economies of scale necessary to incorporate high levels of energy efficient design. However, it is unclear whether the development could include significant investment in low-carbon/renewable energy schemes. Therefore, a minor positive effect is recorded against this objective.
SA11. Use water resources efficiently.	+	The development of 400-600 homes to the south of Sellindge through Sellindge A would generate the economies of scale necessary to incorporate high levels of water efficient design, such as low flush toilets or the enactment of Water Efficiency Improvement Action Plans as part of new developments. Therefore, a minor positive effect is recorded against this objective.
SA12. To reduce waste generation and disposal, and achieve the sustainable management of waste.	+	The development of 400-600 homes to the south of Sellindge through Sellindge A would generate the economies of scale necessary to move waste up the waste hierarchy through the incorporation of sustainable waste management facilities. Therefore, a minor positive effect is recorded against this objective.
SA13. Reduce the need to travel, increase opportunities to choose sustainable transport modes and avoid development that will result in	-	<p>The relatively linear village of Sellindge contains a number of small local services and facilities, including a church, garden centre, primary school, GP, village hall, sports hall, pub, post office and shop. The centre of the village sits within the vicinity of the junction of Ashford Road and Swan Lane, which sits in between and in close proximity to the GP, post office and shop and primary school. However the ribbon residential development along Ashford Road to the west and Swan Lane to the north are much more isolated.</p> <p>Sellindge C proposes the development of 400-600 dwellings to the east of Sellindge of Swann Lane to the east and north of the existing village centre. The majority of the proposed eastern extension is in close proximity to the existing centre of the village</p>

SA Objectives	SA Score	Sellindge C
significant traffic congestion and poor air quality.		<p>however, residents in the eastern half of the area are likely to be more isolated.</p> <p>The land within Sellindge C is accessible from the A20 to the south west, however access from the west would be from Swan Lane through the village centre of Sellindge. Swan Lane has a lower capacity than the A20. The M20 motorway and mainline rail service runs along the southern boundary of the land within Sellindge C with the closest points of access to these routes provided within 1.6km and 2.2km to the east at Westenhanger railway station and Junction 11 respectively. Residents accessing the M20 would have to travel northerly on the narrower routes of Swan Lane, Blindhouse Lane and the B2068.</p> <p>Bus route 10/10A currently services the area along A20 Ashford Road. Bus services allow for access to Ashford, Sellindge, Hythe and Folkestone. There are currently no cycle routes in the area.</p> <p>The Council has identified that there are likely to be traffic congestion problems associated with the strategic scale development in the area, specifically at the A20 under the railway and M20 at the eastern end of Sellindge and to the west at Harringe Bridge.</p> <p>As the additional growth proposed in Sellindge C is likely to exacerbate the potential for congestion on the existing road network due to the scale of the development a minor negative effect is recorded against this objective.</p>
SA14. Promote community vibrancy and social cohesion; provide opportunities to access services, facilities and environmental assets for all ages and abilities and avoid creating inequalities of opportunity for access.	-	<p>The relatively linear village of Sellindge contains a number of small local services and facilities, including a church, garden centre, primary school, GP, village hall, sports hall, pub, post office and shop. The centre of the village sits within the vicinity of the junction of Ashford Road and Swan Lane, which sits in between and in close proximity to the GP, post office and shop and primary school. However the ribbon residential development along Ashford Road to the west and Swan Lane to the north are much more isolated.</p> <p>Sellindge C proposes the development of 400-600 dwellings to the east of Sellindge of Swann Lane to the east and north of the existing village centre. The majority of the proposed eastern extension is in close proximity to the existing centre of the village, however, residents in the eastern half of the area are likely to be more isolated. However, the scale of development is likely to adversely impact the linear character of the existing village and put existing services and facilities under pressure. Until plans are set out to improve access, particularly on foot and by bicycle, between the development proposed at Sellindge C and existing or future centres within the village, it is likely that some of the new residents within this extension to the village would be isolated.</p> <p>Therefore a minor negative effect is recorded against this objective.</p>
SA15. Reduce crime and the fear of crime.	+	<p>All options provide the opportunity to incorporate strategic scale development that designs out crime. This may include for example the suitable design of open spaces and the inclusion of appropriate lighting. Therefore, a minor positive effect is expected on this SA objective.</p>

## Sellindge D

SA Objectives	SA Score	Sellindge D
SA1. Improve the provision of homes, including affordable housing, having regard to the needs of all sections of society, including the elderly.	++	<p>Sellindge D would provide an additional 1,300-1,600 homes on land to the south, west and east of Sellindge.</p> <p>Policy CSD1 in the adopted Core Strategy requires that developments proposing 15 or more dwellings should provide 22% affordable dwellings and policy HB3 of the Places and Policies Local Plan requires that, subject to viability and design restrictions, development proposing 10 or more dwellings should include 20% of dwellings meeting Building Regulations adaptable homes standards. The requirement for affordable housing in the District has been identified as 139 dwellings per annum<sup>148</sup> and it is expected that Sellindge D will provide a significant number of new affordable homes.</p> <p>As such this option would further help to contribute to meeting affordable housing requirements in Folkestone &amp; Hythe.</p>
SA2. Support the creation of high quality and diverse employment opportunities.	++/--?	<p>Sellindge D would allow for strategic scale development to the south, east and west of Sellindge.</p> <p>Like all spatial options, employment land is allocated to meet the needs of the additional housing growth. New employment opportunities will have good access to the existing road and rail network to the south, making it easy for people to commute into and out of the area.</p> <p>It is noted however that large-scale employment uses may not be suitable for the entirety of the area, or in the southern and western areas, as lorries associated with their use would have to pass through the village centre of Sellindge, given the current location of access to the M20. Furthermore access south along Harringe Lane is limited with limited potential to upgrade the bridge over the M20 and railway line. As such the significant positive effect is expected to be combined with a significant negative effect as part of an overall mixed effect.</p> <p>However, it is acknowledged that employment development only focussed in the southern portion of the eastern extension to Sellindge could avoid a significant proportion of the potential disruption predicted under the alternative scenarios of avoiding employment development to the north east, south and west. Until such time as the location of potential employment development is known within this option, uncertainty has been attached to the adverse effects associated with this objective.</p> <p>Employment growth to the north of the M20 would help to address economic deprivation in the area around Sellindge (recorded as being within the 40%-60% percentile on the Indices of Multiple Deprivation).</p>
SA3. Conserve, and where relevant enhance, the quality, character and local distinctiveness of the landscape and townscape.	-	<p>Sellindge D would result in the development of additional 1,300-1,600 homes to the south, west and east of Sellindge. The settlement pattern at this location is noted to currently be relatively dispersed and as such the delivery of this high number of new dwellings has the potential to impact upon the existing landscape character.</p> <p>Although the land to the north of the M20 falls within a different Landscape Character Area (LCA 09: Sellindge) to the land to the south, both have medium landscape sensitivity. The High Level Landscape Character Appraisal (2017) identified that this area would be capable of accommodating development without loss of landscape elements or characteristics which add value to the area dependent upon its specific siting.</p> <p>The southern portion of Sellindge D (Sellindge A and B) area is bordered by the defensible boundaries of the A20 to the north and the M20 to the south, with limited views of the Kent Downs AONB. This is due to the undulating surrounding landform, intervening development at Sellindge, and woodland or tree belts giving it a relatively contained zone of visual influence. The M20 has been noted to affect the tranquillity in the southern portion of the area.</p> <p>Sellindge A is made-up a number of small fields the size of which in combination with their irregular boundaries and intermittent pockets of woodland provide quite an intimate feel with scenic quality. There are glimpses through to Sellindge in pockets where the</p>

<sup>148</sup> Peter Brett Associates (December 2016) Strategic Housing Market Assessment Part 2 - Objectively Assessed Need for Affordable Housing

SA Objectives	SA Score	Sellindge D
		<p>land parcel borders the A20.</p> <p>The western area (the western half of Sellindge B) is comprised of two relatively small fields laid to pasture. It is enclosed by trees on three sides.</p> <p>The eastern area (Sellindge C) largely comprises of a large field that is subdivided by remnant hedgerow. To the north there is an additional area of arable land to the rear of Swan Lane. To the south the site is bordered by the M20, its other boundaries are marked with trees and vegetation. There is a line of electricity pylons that crosses the site to the south. The land rises from the south, east and north to a peak, which is roughly in the middle of the western boundary. From the higher parts of the parcel there are extensive views of the Kent Downs Area of Outstanding Natural Beauty. Despite the adverse impacts of the electricity pylons and the M20, the openness makes the area feel part of the wider landscape. The M20 has been noted to affect the tranquillity within the southern portion of the area.</p> <p>The District's supplementary high-level landscape sensitivity survey assesses the potential landscape effects associated with developing Sellindge Options A, B and C in isolation. The assessment concludes that development to the south and west would be largely unseen from the wider landscape, but that development would devalue the scenic and intimate quality of the landscape in the eastern area. Development to the east is considered to result in the loss of openness within the immediate vicinity and, with open views to the wider countryside, development would likely form an incongruous element within the wider landscape. The in-combination effects to the east, south and south west of Sellindge are however not considered to result in significant adverse landscape effects but minor adverse effects, albeit of a greater scale to the effects recorded for Sellindge options A, B and C.</p>
SA4. Conserve and enhance the fabric and setting of historic assets.	--	<p>In terms of designated assets the site contains a protected military crash site that will be susceptible to physical change as a result of development. This will result in a significant negative effect. There are no non-designated heritage or archaeological assets recorded within the site that are susceptible to physical change. However, it is likely that medieval to post-medieval agriculture features of low value are present. Additionally, the geological conditions of the site (which include colluvium, alluvium and peat) indicate a potential for buried land surfaces and unstratified/reworked artefacts, as well as buried archaeological and palaeoenvironmental remains.</p> <p>The historic landscape character of the site comprises a mix of parliamentary and late medieval to 18<sup>th</sup> century enclosure. The latter is likely to contain a number of historic hedgerows and both types are important in terms of the contribution they make to the setting of heritage assets in the study area.</p> <p>In the study area the following assets have been identified as being susceptible to setting change:</p> <p>Designated assets within the study area:</p> <ul style="list-style-type: none"> <li>• Church of St Mary (Grade I) – minor negative</li> <li>• Somerfield Court (Grade I) and Barn Complex About 66 Metres West of Somerfield Court (Grade II) – minor negative</li> <li>• Guinea Hall (Grade II) – negligible-minor negative</li> <li>• Rhodes House (Grade II) – minor negative</li> <li>• Elm Tree Farm House (Grade II) and Barn About 5 Metres North of Elm Tree Farm House (Grade II) – negligible</li> <li>• Little Rhodes (Grade II) – negligible-minor negative</li> </ul> <p>Non-designated assets within the study area:</p> <ul style="list-style-type: none"> <li>• Old School Cottage – negligible</li> <li>• Heritage Farm/Manor House – minor negative</li> <li>• Potten Farm – minor negative</li> <li>• Grove House – negligible-minor negative</li> <li>• Farmstead SE of Grove House – minor negative</li> <li>• Court Lodge – minor negative</li> </ul>

SA Objectives	SA Score	Sellindge D
		<ul style="list-style-type: none"> <li>• Brook Farm – negligible-minor negative</li> <li>• Farmstead north east of Little Rhodes - none</li> </ul> <p>Detailed appraisals of these assets can be found in the Folkestone and Hythe Historic Environment Assessment (LUC 2018).</p>
SA5. Conserve and enhance biodiversity, taking into account the effects of climate change.	--	<p>Sellindge D would result in the development of additional land to the south, west and east of Sellindge. Besides being greenfield land, this area does not contain any sites of significant ecological sensitivity or interest. The area to the west of the A20 is not located within close proximity of any biodiversity designations; however, the area to the east of the A20 is located within 40m of Gibbin’s Brook SSSI, well within its IRZ. The southern portion of the area to the east of the A20 also contains linear stretches of BAP priority habitats (alluvial forests and hedgerow arable field margins). Gibbin’s Brook SSSI is common access land and is therefore vulnerable to recreational pressures. Significant strategic scale development located within close proximity of a SSSI for which potential recreational pressures have been identified has the potential to generate significant negative effects against this objective.</p> <p>While it is noted that strategic open space is to be maintained at the north and eastern edges of Sellindge D which are the closest areas to Gibbin’s Brook SSSI a precautionary approach has been taken when recording the overall likely effect of strategic scale development at this location.</p>
SA6. Protect and enhance green infrastructure and ensure that it meets strategic needs.	--	<p>Sellindge D would result in the development of greenfield land to the south, west and east of Sellindge some of which is accessible by public rights of way. While there are some existing pockets of accessible green infrastructure in Sellindge, at Sellindge Primary School, Sellindge Sports and Social Club and amenity greenspace at Whitehall Way Residents Recreational Area, there are no current plans for this area of development to include any new open spaces, resulting in the potential for a net loss of accessible green infrastructure around Sellindge. This is likely to result in a significant negative effect on this objective.</p>
SA7. Use land efficiently and safeguard soils, geology and economic mineral reserves.	--	<p>Sellindge D would result in the development of greenfield land to the south, west and east of Sellindge. Much of this area consists of Grade 2 agricultural land with a small pocket of Grade 3 agricultural land toward the north western corner of the area. In addition, much of the land within the area to the south, west and east of Sellindge has been safeguarded for sandstone or for limestone mineral extraction. While the north and east edges of the land to the east of the A20 within Sellindge C would be maintained as strategic open space, significant levels of development would be accommodated at the land closest to Sellindge. Further strategic scale development would take place to the south and west of the settlement without the maintenance of any significant areas of strategic open space.</p> <p>It is therefore expected that the development of the additional land to the south, west and east of Sellindge would result in the loss of a significant area of ‘very good quality’ (Grade 2) agricultural land as well as the sterilisation of more mineral deposits. Therefore, a significant negative effect is expected for this SA objective.</p>
SA8. Maintain and improve the quality of groundwater, surface waters and coastal waters and the hydromorphological (physical) quality of rivers and coastal waters.	--	<p>The inclusion of additional development to the south, west and east of Sellindge through Sellindge D would not result in the development of land within a Source Protection Zone (SPZ).</p> <p>However, the area does contain major aquifers with intermediate vulnerability as well as those with high vulnerability in those areas which are in close proximity of Sellindge but the east of the A20. Furthermore those aquifers in the area surrounding Barrowhill immediately to the south have been identified as likely to have higher vulnerability. The land within Sellindge D to the west of the A20 is identified as lying within an area of Serious water stress and a surface water safeguard zone. The most westerly portion of the land in Sellindge D is within a surface water Nitrate Vulnerable Zone (NVZ).</p> <p>The District’s Water Cycle Study (2011), which is currently under review, also highlights insufficient capacity in the strategic wastewater treatment network in the Westenhanger and Sellindge areas.</p> <p>Until such time as strategic provision of new waste water treatment is planned to serve the new development, significant negative effects are expected on this SA objective.</p>

SA Objectives	SA Score	Sellindge D
SA9. Reduce the risk of flooding, taking into account the effects of climate change.	0	<p>The development of 1,300-1,600 homes to the south, west and east of Sellindge through Sellindge D would result in the development of land which is mostly located outside of Flood Zone 2 or 3. A small portion of the area to the west is located within Flood Zone 2 and 3. However, this is a small portion of the land earmarked for development. Furthermore, its location of the western end of the western extension to the village suggests that it can be easily avoided through appropriate masterplanning.</p> <p>Finally, the District Council's Strategic Flood Risk Assessment (2015) has identified that none of land within this additional area is within an area of 'significant' or 'extreme' flood risk.</p> <p>Therefore, a negligible effect is expected on this SA objective.</p>
SA10. Increase energy efficiency in the built environment and the proportion of energy use from renewable sources.	+	<p>The development of 1,300-1,600 homes to the south, west and east of Sellindge through Sellindge D would generate the economies of scale necessary to incorporate high levels of energy efficient design. However, it is unclear whether the development could include significant investment in low-carbon/renewable energy schemes. Therefore, a minor positive effect is recorded against this objective.</p>
SA11. Use water resources efficiently	+	<p>The development of 1,300-1,600 homes to the south, west and east of Sellindge through Sellindge D would generate the economies of scale necessary to incorporate high levels of water efficient design, such as low flush toilets or the enactment of Water Efficiency Improvement Action Plans as part of new developments. Therefore, a minor positive effect is recorded against this objective.</p>
SA12. To reduce waste generation and disposal, and achieve the sustainable management of waste.	+	<p>The development of 1,300-1,600 homes to the south of Sellindge through Sellindge D would generate the economies of scale necessary to move waste up the waste hierarchy through the incorporation of sustainable waste management facilities. Therefore, a minor positive effect is recorded against this objective.</p>
SA13. Reduce the need to travel, increase opportunities to choose sustainable transport modes and avoid development that will result in significant traffic congestion and poor air quality.	--	<p>Sellindge D proposes development of the land to the south, west and east of Sellindge proposed in options Sellindge A, B and C combined. Together, these three extensions would result in the expansion of the village of Sellindge by some 1,300-1,600 homes.</p> <p>The relatively linear village of Sellindge contains a number of small local services and facilities, including a church, garden centre, primary school, GP, village hall, sports hall, pub, post office and shop. The centre of the village sits within the vicinity of the junction of Ashford Road and Swan Lane, which sits in between and in close proximity to the GP, post office and shop and primary school. However the ribbon residential development along Ashford Road to the west and Swan Lane to the north are much more isolated.</p> <p>Despite the presence of an existing bus route and rail links from Westenhanger to the south east, the Council has identified that there are likely to be traffic congestion problems associated with the strategic scale development in the area, specifically at the A20 under the railway and M20 at the eastern end of Sellindge and to the west at Harringe Bridge. The significant scale of the development proposed in option Sellindge D is likely to significantly compound these congestion problems, resulting in significant negative effects against this objective.</p>
SA14. Promote community vibrancy and social cohesion; provide opportunities to access services, facilities and	--	<p>Sellindge D proposes development of the land to the south, west and east of Sellindge proposed in options Sellindge A, B and C combined. Together, these three extensions would result in the expansion of the village of Sellindge by some 1,300-1,600 homes.</p> <p>The relatively linear village of Sellindge contains a number of small local services and facilities, including a church, garden centre, primary school, GP, village hall, sports hall, pub, post office and shop. The centre of the village sits within the vicinity of the junction of Ashford Road and Swan Lane, which sits in between and in close proximity to the GP, post office and shop and primary school.</p>

SA Objectives	SA Score	Sellindge D
environmental assets for all ages and abilities and avoid creating inequalities of opportunity for access.		<p>However the ribbon residential development along Ashford Road to the west and Swan Lane to the north are much more isolated.</p> <p>Given the scale of the extensions and the linear nature of the village, it is likely that a significant proportion of the new residents would be relatively isolated, with limited access to existing services and facilities in the village. Furthermore, the scale of development is likely to adversely impact the linear character of the existing village of Sellindge, and put existing services and facilities under pressure.</p> <p>It is recognised that the scale of the development proposed in option Sellindge D could support the provision of new services and facilities as part of a new local centre, plus the equivalent of a 2FE primary school, which would help to complement the current provision at Sellindge. However, until plans are set out to improve access, particularly on foot and by bicycle, between the development proposed at Sellindge D and existing or future centres within the village, it is likely that some of the new residents within this extension to the village would be isolated.</p> <p>Therefore a significant negative effect is recorded against this objective.</p>
SA15. Reduce crime and the fear of crime.	+	<p>All options provide the opportunity to incorporate strategic scale development that designs out crime. This may include for example the suitable design of open spaces and the inclusion of appropriate lighting. Therefore, a minor positive effect is expected on this SA objective.</p>

# Appendix 5

## Proposed Submission Core Strategy Review New Policy Appraisal Matrices



## Policies SS6, SS7, SS8 and SS9: Guiding Development within a New Garden Settlement

SA Objectives	SA Score	Policies SS6, SS7, SS8 and SS9
SA1. Improve the provision of homes, including affordable housing, having regard to the needs of all sections of society, including the elderly.	++	<p>The national methodology for calculating housing need sets out a requirement for 676 new homes a year over the plan period. Policy SS6 of the Core Strategy Review sets out that the new garden settlement will provide for a minimum of 6,375 new homes in a phased manner within the plan period (to 2036/37) with potential for future growth to provide a total of 8000-10,000 homes beyond the plan period. Policy SS6 reiterates the policy requirement for 22% of all the homes to be provided to be affordable, subject to viability. In addition, a proportion of proposed dwellings shall be provided as self-built or custom-build plots. As such the policies contribute significantly to the District's housing requirements.</p> <p>A significant positive effect is therefore expected on this SA objective.</p>
SA2. Support the creation of high quality and diverse employment opportunities.	++	<p>Policy SS6 seeks to provide approximately 36,760sqm net of employment floorspace (B use classes) by 2037 with a broad mix of office, manufacturing and distribution uses. The settlement's location near the Channel Tunnel is to be used to promote employment opportunities in the new garden settlement. The indicative spatial plan for the new garden settlement set out in Policy SS6 locates the settlement's centre as well as an innovation/business hub in close proximity to the existing Westenhanger Railway Station and Junction 11 of the M20, which will help facilitate and maintain employment growth in the garden settlement.</p> <p>Policy SS7 seeks to deliver the new garden settlement in line with a number of place shaping principles which places the town centre as the focal point of the settlement. This will include a comprehensive and diverse range of facilities, services and business which will help to improve the vibrancy and ultimately vitality and viability of the town centre, creating job opportunities for local residents and facilitating sustainable economic growth.</p> <p>Policy SS9 requires that the garden settlement is enabled for ultra-fast fibre-optic broadband. In addition, new homes will be designed to provide space for home working and the settlement's cafes and public realm will include space to work on the go.</p> <p>A significant positive effect is therefore expected on this SA objective.</p>
SA3. Conserve, and where relevant enhance, the quality, character and local distinctiveness of the landscape and townscape.	+/-	<p>The development of the new settlement would occur on mostly undeveloped greenfield land and as such would have an adverse impact on the openness and rural character of the countryside. It has been highlighted in the District's High Level Landscape Appraisal (2017) that the new settlement would be located within LCA 11 (Lympne). LCA 11 is identified as being within the setting of the AONB however it is described as being of medium landscape sensitivity.</p> <p>However, Policy SS6 sets out that the new settlement is to be delivered in line with garden town principles which is to include an emphasis upon landscape-led development that responds to its setting within the Kent Downs AONB landscape <u>and the adjacent Lympne Escarpment</u>, notably views from the AONB, with an emphasis on a network of green and blue spaces including woodland and other planting and the maintenance of green open spaces within the settlement boundaries. The requirement for a landscape-led approach is strengthened through Policy SS7 and Policy SS8. Policy SS7 requires that proposals within the new settlement should respect its topography and key views, with particular consideration of key views from the AONB.</p> <p>The indicative spatial plan for the new garden settlement set out in Policy SS6 follows the defensible boundaries of the M20 and HS1 railway line to the north, the A20 to the east and the B2067/Aldington Road to the south. The new settlement would be adjacent to and partially enclose the settlements of Barrowhill to the north west, Westenhanger/Stanford to the north east and the Lympne Industrial Estate would also be adjacent to the south. A strategic green gap is retained between the new garden settlement and the existing village of Lympne to the south east to maintain the settlements' separate identities and prevent coalescence. The indicative spatial plan also identifies that strategic open space is to be maintained towards the western boundaries by Harringe Lane. Previous SA work has found that this elevated area of land has the potential to have significantly adverse impacts on the openness of the countryside surrounding this area and as such the approach set out in Policy SS6 would help to prevent these impacts.</p> <p>The town centre of the new settlement is to be provided around the existing development at Westenhanger with the business hub</p>

SA Objectives	SA Score	Policies SS6, SS7, SS8 and SS9
		<p>delivered to the east between this development and the existing hard edges of the A20 and M20. Denser development in this location will be set back from the heritage assets in this location – the Grade I listed Scheduled Ancient Monument of Westenhanger Castle and its associated barns – maintaining their special character and setting. Despite the hard edge provided by the southern arm of the M20 Junction 20, the innovation/business hub will directly abut the Registered Park and Garden of Sandling Park to the east.</p> <p>Finally, a significant amount of new development is located in close proximity to the busy transport corridor of the M20 and the highspeed railway line, both of which generate a significant amount of noise. The volume and constant nature of the noise is likely to generate adverse effects on the quality and character of the neighbourhoods, with potential adverse implications for the health and wellbeing of new residents. However, Policy SS8 states that noise and air pollution mitigation measures such as distance buffers and appropriate landscaping will be required. Furthermore, references are made to the policy requirements of the Council's Places and Policies Local Plan throughout the Core Strategy Review, specifically its detailed design requirements which safeguard the health and wellbeing of people living in the planned communities.</p> <p>Overall, it is considered that the close proximity of the garden settlement to the AONB and the area's historic landscapes may result in adverse impacts on their settings, although it is recognised that this land has not been identified as having high landscape sensitivity. The significant focus of policies SS6-SS9 to ensure the landscape setting and special qualities of the countryside are safeguarded and enhanced is considered to mitigate the significant adverse effects generated by the loss of such a significant area of open countryside. Furthermore, the potential for green and blue infrastructure enhancement, in combination with the definition of lost historic views and the creation of a new town with its own distinctive character and setting, opens up the possibility of generating positive effects on the current landscape as well as generating a new high quality townscape for the District's growing population to enjoy.</p> <p>A mixed effect (minor positive/minor negative) effect is therefore expected on this SA objective.</p>
SA4. Conserve and enhance the fabric and setting of historic assets.	-	<p>The development has the potential to result in physical change to a number of heritage assets including archaeological assets of high importance; it is largely as a result of this that an overall significant negative score was derived at. Potential effects to setting are generally considered to be minor negative or negligible, as a result of the protection offered by the open strategic land. Effects to the historic landscape are judged to have a minor negative effect.</p> <p>The policy requires the enhancement of the setting of assets where possible. There is an unavoidable change in the setting of Westenhanger Castle, Manor and Barns that will result in a minor negative effect, despite the provision of strategic open land around it. Nonetheless, the policy should ensure that the setting of Westenhanger Castle, Manor and Barns will be conserved – maintaining the elements most important to its significance – as well as enhanced, if possible. Depending on the action taken this could result in a minor positive effect. However, in this respect it is to be reiterated that improved visual or experiential qualities of the asset's context would not result in a beneficial effect on the heritage significance of an asset but would be townscape/ visual benefits.</p> <p>The policy recognises that there may be some archaeological assets that may require preservation in-situ, which should help to reduce the potentially significant negative physical effects to heritage assets such as the scheduled remains at Westenhanger or the non-designated Bronze Age Barrows and Roman Villa (or unexpected remains of national importance). However, there is still the potential for setting change to these assets, which would result in a minor negative effect.</p> <p>The requirement to 'conserve' other non-designated heritage and archaeological assets should also ensure that extant above-ground non-designated heritage assets are retained and, if possible, their setting enhanced. It should also ensure that, where appropriate, archaeological remains are recorded via the necessary means of field investigation and that historic structures are recorded via historic building recording. This would reduce the significant - minor negative effects predicted as a result of potential physical change to minor negative-negligible. Again, some setting change of minor negative – negligible effect, may still occur.</p> <p>In light of the policy, the effect of the development of heritage may be reduced to minor negative. Some limited minor beneficial effects may be possible but these would not reduce or offset the negative effect.</p>

SA Objectives	SA Score	Policies SS6, SS7, SS8 and SS9
SA5. Conserve and enhance biodiversity, taking into account the effects of climate change.	+/-	<p>The development of the new settlement would occur on mostly undeveloped greenfield land and as such would have an adverse impact on the ecological habitats and species currently living within the area as a result of habitat loss and fragmentation. The development pattern and density of development proposed in Policy SS6 has however been identified in consultation with Natural England and is designed to minimise the potential for significant adverse impacts occurring on biodiversity and green and blue infrastructure of the area, and help enhance local biodiversity and mitigate impact on views from the scarp of the Kent Downs.</p> <p>Of particular relevance is Otterpool Quarry SSSI which is located in the centre of the proposed settlement area. The area immediately surrounding the SSSI is to be maintained as strategic open space. The Ancient Woodland and Local Wildlife Site at Harringe Woods Brook is also located within the settlement boundary; however, this area and the area to the immediate north, south and west of this location are also to be maintained as strategic areas of open space.</p> <p>The new settlement is to be designed and delivered in line with garden town principles, to include an emphasis on the provision of woodland and green, open space. Policy SS7 sets out the place shaping principles for the new settlement and these are to include the adoption of a landscape-led approach to development. This approach is to allow for clear net biodiversity gains over and above residual losses to be achieved through the planting of native species and the creation of green ecological corridors. Enhancement of the nearby ancient woodlands, Local Wildlife Sites, the Otterpool Quarry SSSI and other sensitive ecological features, including the existing pond at the former Folkestone Racecourse is also to be achieved as part of the development of the new settlement. Policy SS7 also requires the preparation of a long term Green Infrastructure management plan which ensures long term community involvement and custodianship and an Access Strategy that protects and enhances existing PRoW, and creates new PRoW, whilst balancing demands for public access with ecological and landscape protection.</p> <p>Therefore, overall, a mixed effect (minor positive/minor negative) is expected on this SA objective.</p>
SA6. Protect and enhance green infrastructure and ensure that it meets strategic needs.	++/-	<p>The development of the new settlement would occur on mostly undeveloped greenfield land and as such will significantly reduce the area of open green space in the area. Policy SS7 sets out that the landscape-led approach to the design and development of the new garden settlement. The new settlement is to be designed and delivered in line with garden town principles, to include an emphasis on the provision of advanced woodland planting and green, community open space. Green and blue infrastructure corridors will be incorporated into the masterplan for the settlement. These areas of strategic green infrastructure will protect existing wildlife habitats and corridors and offer residents the opportunity to access the countryside, including existing residents in the villages of Westenhanger and Lympe. A new country park close to the centre of the new settlement and other areas of strategic open space will provide access to residents and workers of all ages and abilities, improving opportunities for leisure and recreation, as well as general access to the countryside in the area. Policy SS7 also requires the preparation of a long term Green Infrastructure management plan which ensures long term community involvement and custodianship and an Access Strategy that protects and enhances existing PRoW, and creates new PRoW, whilst balancing demands for public access with ecological and landscape protection.</p> <p>Overall, a mixed effect (significant positive/minor negative) is expected on this SA objective.</p>
SA7. Use land efficiently and safeguard soils, geology and economic mineral reserves.	--	<p>The new settlement is largely located on undeveloped greenfield land, most of which is designated as Grade 2 agricultural land, with a smaller proportion designated as Grade 3 agricultural land. Furthermore, much of the land at this location has been identified in the Kent Minerals and Waste Local Plan (2013 – 2030) to be safeguarded for sandstone and limestone mineral extraction.</p> <p>Policy SS8 requires that construction at the new settlement is soil neutral to avoid any importing or exporting of earth and that proposals for new development should set out measures for the remediation of contaminated land. Furthermore, the settlement is to contain large areas and corridors of open green space, providing opportunities to protect the higher quality soil and mineral resources.</p> <p>Despite the proposed measures to help mitigate loss of agricultural land and mineral resources, the significant scale of the development proposed will generate significant adverse effects on this SA objective.</p>
SA8. Maintain and improve the quality	+/-	<p>The new settlement is largely located on undeveloped greenfield land, increasing the risk of surface water flooding and run-off into the District's nearby rivers and ponds. While there are no Source Protection Zones (SPZ) within the development boundary, major aquifers</p>

SA Objectives	SA Score	Policies SS6, SS7, SS8 and SS9
of groundwater, surface waters and coastal waters and the hydromorphological (physical) quality of rivers and coastal waters.		<p>recognised for their intermediate and higher vulnerability are located below the settlement. Coupled with the District's identification as an area of serious water stress, a surface water safeguard zone and surface water Nitrate Vulnerable Zone (NVZ), the introduction of a significant new settlement in the area has the potential to have a significant and lasting adverse effect on the quantity and quality of the District's ground, surface and coastal waters.</p> <p>The District's Water Cycle Study (2011), highlights that there is insufficient capacity at the strategic wastewater treatment network in the Westenhanger and Sellindge areas. However, Southern Water has undertaken a preliminary assessment of the impact of the proposed development on the existing public sewer network. This investigation indicates that network reinforcement will be required at the "practical point of connection" (as defined in the New Connections Services implemented from 1st April 2018). Any upgrades in treatment capacity at Southern Water's Wastewater Treatment Works (WTTWs) that may be required to service the new garden settlement would be funded and delivered through the water industry's five yearly price review process, and would align with the provisions of Policy SS5 of the Core Strategy Review. The requisite network reinforcement will be provided through the New Infrastructure charge but Southern Water will need to work with site promoters to understand the development program and to review if the delivery of infrastructure upgrades aligns with the occupation of the development.</p> <p>Policy SS6 requires that the design and development of the new town is landscape-led, including enhancements to the area's green infrastructure networks (woodland, green spaces, ponds, rivers and streams). Policy SS7 recognises that the settlement falls within an area of 'serious water stress' and that the supply of water and water usage must be effectively managed. Sustainable drainage systems (SuDS) are to be integrated throughout the development, to minimise surface water flooding and downstream flooding along the East Stour River. Policy SS8 requires that water quality is to be protected and improved in compliance with the Water Framework Directive. Policy SS9 requires that the settlement should be self-sufficient with regards to the provision of infrastructure. Provision is to be secured or funded through Section 106 and Section 278 legal agreements to ensure it is delivered at the appropriate phase of the development. Therefore, it is expected that the current capacity issues in the local waste water treatment infrastructure will be resolved as part of the delivery of the new town.</p> <p>A mixed effect (minor positive/minor negative) is therefore expected for this SA objective.</p>
SA9. Reduce the risk of flooding, taking into account the effects of climate change.	+/-	<p>The new settlement is largely located on undeveloped greenfield land, increasing the risk of surface water flooding and run-off into the District's nearby rivers and ponds. The area contains a small area of Flood Zone 2 and 3 along the East Stour River and its tributaries towards the hamlet of Barrowhill. Some of this area has been identified for a higher level of mixed-use neighbourhood development and the provision of the new town centre.</p> <p>The Environment Agency has expressed concern about the significant scale of development proposed which is likely to significantly shorten the lag time of surface water drainage into the River Stour and the potential for this to increase the risk of flooding downstream in the Borough of Ashford, particularly around the Aldington Reservoir.</p> <p>Policy SS6 requires that the design and development of the new town is landscape-led, including enhancements to the area's green infrastructure networks (woodland, green spaces, ponds, rivers and streams). Sustainable drainage systems are to be integrated throughout the development, to minimise surface water flooding and downstream flooding along the East Stour River. To ensure there is no off-site impact on the East Stour in terms of downstream flood risk a site based Water Cycle Strategy has been prepared which identifies and reports that there will be no increase in peak flood volume as a result of development at the garden settlement, indeed the proposals decrease greenfield flow rate from 3.04 l/s / ha to 2 l/s / ha. The off-site impact on Aldington reservoir is expected to be minimal.</p> <p>A mixed effect (minor positive/minor negative) is expected on this SA objective.</p>
SA10. Increase energy efficiency in the built	++	<p>The new garden settlement as guided by Policy SS6 is to be delivered in such a way as to follow garden town principles. This is expected to include a comprehensive and flexible efficient, low-carbon and renewable energy strategy. Policy SS8 states that the new garden settlement should include micro and macro technologies, including decentralised heat and power networks. There is an</p>

SA Objectives	SA Score	Policies SS6, SS7, SS8 and SS9
environment and the proportion of energy use from renewable sources.		<p>aspiration to achieve carbon neutrality across the settlement, through a fabric-first approach that minimises embedded carbon and maximises the energy efficient properties of the components and materials that make up the new development's built fabric. In addition, the policy requires that the settlement includes the infrastructure to incorporate slow, fast and rapid electric vehicle charging points throughout. Importantly the supporting text of Policy SS9 explains that the uplift in land value which will be created through the granting of planning permission is to be captured to deliver high standards of energy efficiency.</p> <p>A significant positive effect is therefore expected on this SA objective.</p>
SA11. Use water resources efficiently	++	<p>The District is recognised as an area of serious water stress. Significant growth in the area will put greater stress on its water resources. The new garden settlement as guided by Policy SS6 is to be delivered in such a way as to follow garden town principles. This is expected to include development that ensures the highest levels of water efficiency and climate change resilience.</p> <p>Policy SS7 recognises that the settlement falls within an area of 'serious water stress' and that the supply of water and water usage must be effectively managed. Policy SS8 aspires to achieve the highest possible levels of water efficiency in both residential and commercial buildings in the new settlement and requires that water quality is to be protected and improved in compliance with the Water Framework Directive. An aim of achieving water neutrality is to be set across the settlement with demand management measures to be implemented so as to minimise water use and maximise the recycling and reuse of water resources across the settlement, utilising integrated water management solutions.</p> <p>A significant positive effect is therefore expected on this SA objective.</p>
SA12. To reduce waste generation and disposal, and achieve the sustainable management of waste.	++	<p>The new garden settlement as guided by Policy SS6 is to be delivered in such a way as to follow garden town principles. The policy contains specific reference to the need for the design of the settlement to support low waste production and sustainable waste management. The policy supports the exploration of masterplanning and policy approaches to achieve waste neutrality across the garden settlement. Policy SS8 identifies that applications for development at the new settlement should be accompanied by a site-wide waste strategy that demonstrate how a significant reduction in household waste and an increase in recycling rates will be delivered. Furthermore Policy SS8 requires that internal and external storage is provided for recycling and waste at all homes and businesses. Waste generation at all new homes, businesses and community buildings will be monitored as set out in Policy SS9.</p> <p>A significant positive effect is therefore expected on this SA objective.</p>
SA13. Reduce the need to travel, increase opportunities to choose sustainable transport modes and avoid development that will result in significant traffic congestion and poor air quality.	++	<p>The indicative spatial plan for the new garden settlement set out in Policy SS6 sets out a comprehensive and aspirational plan for the delivery of a self-sufficient new settlement built on garden town principles. New homes, businesses, education, health, community, transport and other infrastructure facilities and services will be provided to meet the needs of the new community. Walking, cycling and access to sustainable public transport are to be prioritised. Policy SS7 requires that all homes in the new settlement are within 800m (walking distance) of a local centre, including a primary school. New road infrastructure in the settlement is going to be designed for low speed, with priority to be given to pedestrians and cyclists. Policy SS7 identifies that the focal point of the settlement will be the town centre and business hub, which is to be located close to the existing Westenhanger railway station and Junction 11 of the M20 motorway, so providing excellent transport links to the wider region and London.</p> <p>Bus route 10/10A currently services the area along Aldington Road, Otterpool Lane, A20 Ashford Road and Stone Street allowing for access to Ashford, Sellindge, Hythe and Folkestone. Policy SS7 sets out that the capacity of Junction 11 on the M20 should be upgraded and that Westenhanger Station will be subject to improvements. Improvements are also to be made to the existing bus services. It is also notable that Policy SS6 would limit development to west, with strategic open space to be maintained towards Harringe Lane which is rural and narrow in character and is limited in terms of its future potential for improving capacity of the road network. The proposed measures will significantly reduce the adverse effects generated by the need to accommodate a significant amount of growth in the District, as well as improve the capacity and sustainability of the existing public transport network.</p> <p>A significant positive effect is therefore expected on this SA objective.</p>

SA Objectives	SA Score	Policies SS6, SS7, SS8 and SS9
SA14. Promote community vibrancy and social cohesion; provide opportunities to access services, facilities and environmental assets for all ages and abilities and avoid creating inequalities of opportunity for access.	++	<p>The indicative spatial plan for the new garden settlement set out in Policy SS6 sets out a comprehensive and aspirational plan for the delivery of a self-sufficient new settlement built on garden town principles. New homes, businesses, education, health, community, transport and other infrastructure facilities and services will be provided to meet the needs of the new community. However, the significant growth at the new garden settlement will affect the existing communities in the surrounding villages of Lympne, Barrowhill, Newingreen and Westenhanger in the short to medium term until the new settlement is constructed and its services and facilities are established.</p> <p>Policy SS6 states that new services, facilities and infrastructure should be provided in line with new homes to minimise strain on the District's existing services, facilities and infrastructure. Policy SS6 states that a health centre, and primary, secondary, special and nursery facilities shall be provided. Policy SS7 sets out the place-shaping principles of these new centres, which will be designed to maximise convenience to new residents and workers. All homes are to be within 800m (walking distance) of a local centre. The new settlement will include a vibrant town centre and several neighbourhood centres containing a full range of retail and community facilities. This policy also requires that nearby local village centres and other town centres including Folkestone, Hythe, Dover and Ashford are not to be negatively impacted upon in terms of their vitality and viability. Policy SS8 focusses on the sustainability and wellbeing of the new community and requires that the new community have access to a well-designed public realm and open space network that encourages community cohesion and physical activity. Community spaces for gathering, leisure and recreation will be provided, including community allotments and orchards. Policy SS9 requires that the new infrastructure provides access to the existing neighbouring communities at Lympne, Barrow Hill, Sellindge, Westenhanger, Saltwood, Stanford and Postling. It is expected that these policies would thereby help not only to ensure that the new settlement will have an appropriate degree of self-sufficiency but is still appropriately integrated with the surrounding communities.</p> <p>A significant positive effect is therefore expected on this SA objective.</p>
SA15. Reduce crime and the fear of crime.	+	<p>The new garden settlement is to be designed to a high standard in line with garden town principles. High quality public realm and green infrastructure have been prioritised in Policy SS7. It is expected that this approach should allow for the inclusion of appropriate safety and security features to support the 'designing out' of crime. The approach of Policy SS8 is to allow for homes orientated to encourage informal overlooking which would further help to limit the potential for crime across the new settlement.</p> <p>A minor positive effect is therefore expected on this SA objective.</p>

## Policy CSD9: Sellindge Strategy

SA Objectives	SA Score	Policy CSD9
SA1. Improve the provision of homes, including affordable housing, having regard to the needs of all sections of society, including the elderly.	++	<p>Policy CSD9 has been comprehensively rewritten to deliver significantly more growth at the village of Sellindge than was previously planned in the adopted Core Strategy (2013). The Proposed Submission Core Review Policy CSD9 includes a two-phase indicative spatial plan for the delivery of 600 dwellings over the plan period (30% affordable homes in phase one and 22% affordable homes in subsequent phases and 10% designed to meet the needs of the ageing population in Phase 2).</p> <p>As such, Policy CSD9 as revised would contribute more positively to the housing requirements of the District. Therefore, a significant positive effect is expected on this SA objective.</p>
SA2. Support the creation of high quality and diverse employment opportunities.	++	<p>Policy CSD9 has been comprehensively rewritten to deliver significantly more growth at the village of Sellindge than was previously planned in the adopted Core Strategy (2013). The Proposed Submission Core Strategy Review Policy CSD9 includes the provision of up to 1,000sqm of business (B1 Class - research and development of products and processes, light industry appropriate in a residential area) floorspace at the new south eastern end of the village. The policy supports the provision of new links between this employment land and the Westenhanger Station further to the south west. This location is likely to help make best use of the village's position in close proximity to strategic transport links at Junction 11 of the M20 and the railway station. In addition, the growth of the village is to include the expansion of its current facilities and services, including the primary school, doctor's surgery, parish council offices and village hall. These new and improved facilities will create new jobs in the village.</p> <p>A significant positive effect is therefore expected on this SA objective.</p>
SA3. Conserve, and where relevant enhance, the quality, character and local distinctiveness of the landscape and townscape.	+/-	<p>Policy CSD9 has been comprehensively rewritten to deliver significantly more growth at the village of Sellindge than was previously planned in the adopted Core Strategy (2013). The current settlement pattern at this location is noted to be relatively dispersed and as such the delivery of this high number of new dwellings and other forms of development has the potential to impact upon the existing landscape character.</p> <p>Sellindge lies within the setting of the AONB and development of the scale supported could give rise to adverse landscape impacts on its setting. The views of the AONB are however limited due to the undulating topography in the surrounding area, the presence of the development within Sellindge and surrounding woodland and tree belts. The M20 and A20 currently act as strong defensible boundary to development at this location. Although the village is recognised for its medium landscape sensitivity, the District's High Level Landscape Character Appraisal (2017) identified that this area would be capable of accommodating development without loss of landscape elements or characteristics which add value to the area, dependent upon its specific siting.</p> <p>Finally, a significant amount of new development is located in close proximity to the busy transport corridor of the M20 and the highspeed railway line, both of which generate a significant amount of noise. The volume and constant nature of the noise is likely to generate adverse effects on the quality and character of the neighbourhoods, with potential adverse implications for the health and wellbeing of new residents. However, Policy SS8 states that noise and air pollution mitigation measures such as distance buffers and appropriate landscaping will be required. Furthermore, reference is made to the policy requirements of the Council's Places and Policies Local Plan throughout the Core Strategy Review, specifically its detailed design requirements which safeguard the health and wellbeing of people living in the planned communities.</p> <p>The Proposed Submission Core Strategy Review Policy CSD9 includes significant improvements to the design of the village centre, including a new village green/common (1.5 or 2 hectares in size), significant tree planting at the southern and eastern edges of the new development as well as other public realm improvements, particularly to the village's existing pedestrian and cycle network.</p> <p>Policy CSD9 requires that boundary landscaping and woodland planting be provided at the rural edges of the development, particularly to the western boundary of Site A and on the eastern boundary of Site B due to the possible visual impact on the setting</p>

SA Objectives	SA Score	Policy CSD9
		<p>of the AONB.</p> <p>An overall mixed effect (minor positive/minor negative) is therefore expected on this SA objective.</p>
SA4. Conserve and enhance the fabric and setting of historic assets.	-	<p>Policy CSD9 has been comprehensively rewritten to deliver significantly more growth at the village of Sellindge than was previously planned in the adopted Core Strategy (2013). Sellindge is a medieval settlement, the historic core of which is focused around the parish church and Stone Hill with linear ribbon development characterised by farmsteads and cottages extending along what is now the A20.</p> <p>The proposed extensions to the village to the south west and east will maintain the settlements historic linear pattern but will alter its rural character and in the process change the setting of two designated assets – Rhodes House and Little Rhodes – as well as three non-designated assets – Potten Farm, Grove House and the Farmstead SE of Grove House. Policy CSD9 will ensure that the setting of these assets is considered during masterplanning and where (important to their heritage significance) conserved. It also states that appropriate landscaping, including woodland planting shall be provided on the rural edge of the development, particularly around the western boundary of Site A, to retain the rural character and on the eastern boundary of Site B, due to the possible visual impact on the setting of the AONB. Around Site A this will also offer some protection to the setting of Potten Farm to the west.</p> <p>Archaeological deposits associated with the protected crash site will be damaged/ removed and there is the potential for further damage/ loss of unknown archaeological deposits. The potential impact to these assets will be offset by appropriately staged programme of archaeological evaluation that informs the requirement for, and design of, ensuing mitigation.</p> <p>Development will also potentially result in the loss of a number of historically important hedgerows (as per the 1997 Hedgerow regulations), but review of their potential retention during masterplanning may help lower the impact to the historic landscape.</p> <p>In light of this, the effect of the development is considered to be minor negative.</p>
SA5. Conserve and enhance biodiversity, taking into account the effects of climate change.	+/-	<p>Policy CSD9 has been comprehensively rewritten to deliver significantly more growth at the village of Sellindge than was previously planned in the adopted Core Strategy (2013). The extensions to the village will accommodate 600 homes and up to 1,000sqm of employment land over the plan period. This development will be located on greenfield land, resulting in the potential for habitat loss and fragmentation. Furthermore, development to the east of the village is located within 450m of Gibbins Brook SSSI, generating the potential for increased recreational pressures on the SSSI.</p> <p>The supporting text of the policy requires that impacts on the SSSI should be minimised and funding provided for its enhancement and protection. Furthermore, the policy requires that the growth be incorporated within and bordered by appropriate landscape, including a new village green/common, substantial woodland planting at the rural edges of the village, all of which have the potential to deliver new habitats for priority nature conservation species.</p> <p>Overall, a mixed effect (minor positive/minor negative) is therefore expected on this SA objective.</p>
SA6. Protect and enhance green infrastructure and ensure that it meets strategic needs.	++/-	<p>Policy CSD9 has been comprehensively rewritten to deliver significantly more growth at the village of Sellindge than was previously planned in the adopted Core Strategy (2013). The extensions to the village will accommodate 600 homes and up to 1,000sqm of employment land over the plan period. This development will be located on greenfield land, resulting in the potential for green infrastructure fragmentation and loss. However, the policy requires that the growth be incorporated within and bordered by appropriate landscape, including a new village green/common and substantial woodland planting at the rural edges of the village.</p> <p>The areas identified for development are currently accessible via Public Rights of Way, which provide access out into the open countryside. The policy supports the provision of a new link between the housing development which is to be delivered to the east of the A20 and the existing recreation ground. Furthermore, pedestrian and cycle access within and out into the countryside is to be improved, including new links to the wider Public Right of Way network. Additionally, the policy states that development should provide wherever possible internal links within the site itself and external links to neighbouring sites to ensure there is ease of access</p>



SA Objectives	SA Score	Policy CSD9
		<p>for a range of transport modes to new and existing development/facilities within the village.</p> <p>An overall mixed effect (significant positive/minor negative) is therefore expected on this SA objective.</p>
SA7. Use land efficiently and safeguard soils, geology and economic mineral reserves.	--	<p>Policy CSD9 has been comprehensively rewritten to deliver significantly more growth at the village of Sellindge than was previously planned in the adopted Core Strategy (2013). The extensions to the village will accommodate 600 homes and up to 1,000sqm of employment land over the plan period. This development will be located on greenfield land, which is largely recorded as Grade 2 agricultural land and safeguarded in the Kent Minerals and Waste Local Plan (2013 – 2030) for sandstone or for limestone mineral extraction.</p> <p>While the edges of the new development proposed would include landscaping areas free from development and an open area of greenfield land would be retained in the centre of the village as a village green, there would still be a significant loss of greenfield land recognised for its high agricultural and mineral value. Therefore, a significant negative effect is expected for this SA objective.</p>
SA8. Maintain and improve the quality of groundwater, surface waters and coastal waters and the hydromorphological (physical) quality of rivers and coastal waters.	+/-	<p>The development supported through Policy CSD9 is largely located on undeveloped greenfield land, increasing the risk of surface water flooding and run-off into the District's nearby rivers and ponds. Major aquifers of intermediate and higher vulnerability lie below the village and the most westerly portion of the land identified for development sits within a surface water Nitrate Vulnerable Zone (NVZ).</p> <p>The District's Water Cycle Study (2011) highlights insufficient capacity in the strategic wastewater treatment network in the Westenhanger and Sellindge areas. Consequently, the introduction of a significant new settlement in the area has the potential to have a significant and lasting adverse effect on the quantity and quality of the District's ground, surface and coastal waters. However, Southern Water has undertaken a preliminary assessment of the impact of the proposed development on the existing public sewer network. This investigation indicates that network reinforcement will be required at the "practical point of connection" (as defined in the New Connections Services implemented from 1st April 2018). Any upgrades in treatment capacity at Southern Water's Wastewater Treatment Works (WTWs) that may be required to service the new garden settlement would be funded and delivered through the water industry's five yearly price review process, and would align with the provisions of Policy SS5 of the Core Strategy Review. The requisite network reinforcement will be provided through the New Infrastructure charge but Southern Water will need to work with site promoters to understand the development program and to review if the delivery of infrastructure upgrades aligns with the occupation of the development.</p> <p>Policy CSD9 requires that new development is designed to minimise water usage and requires that improvements in the local wastewater infrastructure and other utilities as required to meet the needs of the development. Furthermore, sustainable drainage systems (SuDS) will be integrated throughout the development, to minimise surface water flooding and the resultant increased risk of ground and water pollution.</p> <p>An overall mixed effect (minor positive/minor negative) is therefore expected on this SA objective.</p>
SA9. Reduce the risk of flooding, taking into account the effects of climate change.	0	<p>The development supported through Policy CSD9 is largely located on undeveloped greenfield land, increasing the risk of surface water flooding and run-off into the District's nearby rivers and ponds. However, the development that Policy CSD9 supports at Sellindge is not located in any flood risk zones and the District Council's Strategic Flood Risk Assessment (2015) identified no 'significant' or 'extreme' flood risk in the area.</p> <p>Therefore, a negligible effect is expected on this SA objective.</p>
SA10. Increase energy efficiency in the built environment and the proportion of energy	++	<p>The supporting text to Policy CSD9 states that there is potential for the new growth at Sellindge to be designed in such a way as to embrace low carbon and energy efficient technologies and the opportunities will be explored. This is reiterated in the policy which requires that new homes are delivered to the highest energy efficiency standards.</p> <p>A significant positive effect is therefore expected on this SA objective.</p>

SA Objectives	SA Score	Policy CSD9
use from renewable sources.		
SA11. Use water resources efficiently	++	<p>The supporting text to Policy CSD9 states there is potential for the new growth at Sellindge to be designed in such a way as to embrace water efficient and management technologies. This is reiterated in the policy which requires that the new homes delivered within the village are designed to minimise water usage to 90 litres per person per day of potable water.</p> <p>A significant positive effect is therefore expected on this SA objective</p>
SA12. To reduce waste generation and disposal, and achieve the sustainable management of waste.	+	<p>The supporting text to Policy CSD9 states there is potential for the new growth at Sellindge to be designed in such a way as to embrace waste reduction and sustainable waste management. The policy text however does not contain specific requirements which might assist with the meeting of this aim.</p> <p>A minor positive effect is therefore expected on this SA objective.</p>
SA13. Reduce the need to travel, increase opportunities to choose sustainable transport modes and avoid development that will result in significant traffic congestion and poor air quality.	++/-	<p>Policy CSD9 has been comprehensively rewritten to deliver significantly more growth at the village of Sellindge than was previously planned in the adopted Core Strategy (2013). The Proposed Submission Core Strategy Review Policy CSD9 includes a two-phase indicative spatial plan for the delivery of 600 dwellings, up to 1,000sqm of business (B1 Class) floorspace and the expansion of the village's existing services and facilities. The significant scale of this growth has the potential to generate significant road congestion issues for the relatively linear village, particularly around the junction of Ashford Road and Swan Lane, which sits in between and in close proximity to the GP, post office and shop and primary school.</p> <p>The indicative spatial plan for the allocated growth locates development in order to minimise road traffic generated by the employment land (located at the southern end of the village close to the M20) through the village along the A20. Growth is also located away from Harringe Lane, a small rural road with limited capacity and potential for upgrading. The supporting text of the policy highlights that impacts of development on the B2068 and A20 should be considered as part of development proposals. Furthermore the policy includes support for the provision of new and improved services and facilities to maintain the self-sufficiency of the settlement and minimise the need to travel by private vehicle. Important improvements in local services and facilities include a primary school extension, expansion of the doctor's surgery and accommodation for the parish council, all to be delivered in the first phase of development. The policy also supports the delivery of new pedestrian and cycle improvements within the settlement, most notably towards Westenhanger Station, to ensure there is ease of access for a range of transport modes to the wider region and London.</p> <p>A mixed effect (significant positive and minor negative) is therefore expected on this SA objective.</p>
SA14. Promote community vibrancy and social cohesion; provide opportunities to access services, facilities and environmental assets for all ages and abilities and avoid creating inequalities of opportunity for	++	<p>Policy CSD9 has been comprehensively rewritten to deliver significantly more growth at the village of Sellindge than was previously planned in the adopted Core Strategy (2013). The Proposed Submission Core Strategy Review Policy CSD9 includes a two-phase indicative spatial plan for the delivery of 600 dwellings, up to 1,000sqm of business (B1 Class) floorspace and the expansion of the village's existing services and facilities.</p> <p>The linear village of Sellindge contains a number of small local services and facilities, including a church, garden centre, primary school, GP, village hall, sports hall, pub, post office and shop. The new development proposed is contained within a relatively compact area to the south west and east of the village centre, thereby limiting the potential for new residents to become isolated by the current linear form of development within the settlement. The cycle and pedestrian improvements supported through this policy, particularly towards Westenhanger Station, are likely to be of particular benefit in terms of maintaining accessibility to Folkestone and London. The policy also requires the delivery of new services and facilities, including new open spaces, Public Rights of Way, a primary school extension, expansion of the doctor's surgery and accommodation for the Parish Council.</p>

SA Objectives	SA Score	Policy CSD9
access.		<p>Policy CSD9 requires that the public realm and open space network of the new settlement be well designed with much of the development being centred around a new village green. The new green space will encourage community cohesion and physical activity. It is expected that the policy would thereby help not only to ensure that the growing village will have an appropriate degree of self-sufficiency but is still appropriately integrated with surrounding communities.</p> <p>Overall a mixed effect (significant positive/minor negative) is expected on this SA objective.</p>
SA15. Reduce crime and the fear of crime.	+	<p>The development proposed within Policy CSD9 is to be comprehensively masterplanned using high quality materials to improve and create new public areas, including a new village green which will include robust and durable lighting and furniture. This work will be designed through extensive community engagement. It is expected that this approach will ensure that the villagers' safety and security are safeguarded and improved through the design of the village's growth.</p> <p>A minor positive effect is therefore expected on this SA objective.</p>