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Folkestone & Hythe District Council's Core Strategy Review

Proposed Submission Sustainability Appraisal Report

Non-Technical Summary

Prepared by LUC
December 2018

Planning and EIA
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Project Title: Folkestone & Hythe Core Strategy Review – Sustainability Appraisal Report – Non-Technical Summary

Client: Folkestone & Hythe District Council

Version	Date	Version Details	Prepared by	Checked by	Approved by
1.0	09/11/2018	Draft Reg. 19 SA Report NTS	Josh Allen Lauren Ielden Sarah Temple	Josh Allen	Jeremy Owen
2.0	17/12/2018	Final Reg. 19 SA Report NTS	Josh Allen Sarah Temple	Jeremy Owen	Jeremy Owen

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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 Plans and strategies such as the Core Strategy are subject to SA at each stage of their development to assess their likely effects on social, economic and environmental issues. There have been two iterations of the Review of the Core Strategy published for consultation in line with requirements of the SEA Directive and Regulations:
 - A Draft version published in March 2018.
 - A Proposed Submission version published in December 2018.
- 1.3 Each iteration of the plan has been accompanied by an SA Report. This Non-Technical Summary represents a summary of the contents of the full SA Report accompanying the Proposed Submission version of the Review of the Core Strategy.

Sustainability Appraisal and Strategic Environmental Assessment

- 1.4 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 Regulations¹. Therefore, it is a legal requirement for the Review of the Core Strategy to be subject to SA and SEA throughout its preparation.
- 1.5 The requirements to carry out SA and SEA are distinct, although it is possible to satisfy both using a single appraisal 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'.

Habitats Regulations Assessments

- 1.6 Under Article 6 (3) and (4) of the Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (Habitats Directive) land-use plans, including Local Plans, are also subject to Habitats Regulations Assessment (HRA). The purpose of HRA is to assess the impacts of a land-use plan against the conservation objectives of a European Site and to ascertain whether it would adversely affect the integrity of that site.
- 1.7 The following European sites fall within 10km of Folkestone & Hythe District:
 - Dungeness, Romney Marsh and Rye Bay Ramsar.
 - Dungeness, Romney Marsh and Rye Bay Special Protection Area.
 - Dungeness Special Area of Conservation.
 - Wye and Crundale Downs Special Area of Conservation.
 - Lydden and Temple Ewell Downs Special Area of Conservation.
 - Folkestone to Etchinghill Escarpment Special Area of Conservation.
 - Blean Complex Special Area of Conservation.
 - Dover to Kingsdown Cliffs Special Area of Conservation.
 - Parkgate Down Special Area of Conservation.

¹ The Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004 No. 1633)

- 1.8 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.

The Review of the Core Strategy

- 1.9 Folkestone & Hythe District Council formally adopted the Core Strategy in September 2013. The adopted Core Strategy sets out the strategic planning policy framework and strategic site allocations² 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.
- 1.10 The Core Strategy 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

- 1.11 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 enjoying a healthy, prosperous lifestyle and benefiting 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.
- 1.12 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.
- 1.13 While the Council prioritises development on brownfield land, a Strategic Housing Land Availability Assessment 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 limited 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.
- 1.14 Consequently, the Council commissioned two key updates to its Local Plan Evidence Base:
- An update to the District's Strategic Housing Market Assessment 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 Study³ 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.
- 1.15 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

² The two strategic site allocations and two strategic broad locations allocated within the adopted Core Strategy now have planning permission.

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

Housing, Communities and Local Government (MHCLG) prepared and consulted on a revised draft of the National Planning Policy Framework which was published in July 2018. The NPPF includes a new national methodology for calculating housing need.

- 1.16 Informed by the updated NPPF, Strategic Housing Market Assessment, the Growth Options Study, reviewed Corporate Plan and other updates to the District's Local Plan evidence base⁴, the Review of the Core Strategy plans for development and growth to at least 2037.

Baseline Information

- 1.17 Folkestone & Hythe is located in the south east of England on the southern coast of the County of Kent (see **Figure 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.
- 1.18 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.
- 1.19 Folkestone & Hythe is largely rural in character with the north eastern half of the District containing Kent Downs Area of Outstanding Natural Beauty (AONB) and south western half of the District consisting of the largely flat Romney Marsh.
- 1.20 The District shares boundaries with the administrative areas of Ashford, Canterbury and Dover in Kent and Rother in East Sussex.
- 1.21 **Chapter 4** of the full SA Report sets out a detailed environmental, social and economic baseline for Folkestone & Hythe District Council. **Figures 1 to 7** illustrate the location as well as the key socioeconomic and environmental assets and constraints of the District.

⁴ For example, alongside the Growth options Study, the Council has commissioned a high-level Landscape Appraisal used to inform the strategic review of the relative impacts of strategic level development in various locations.

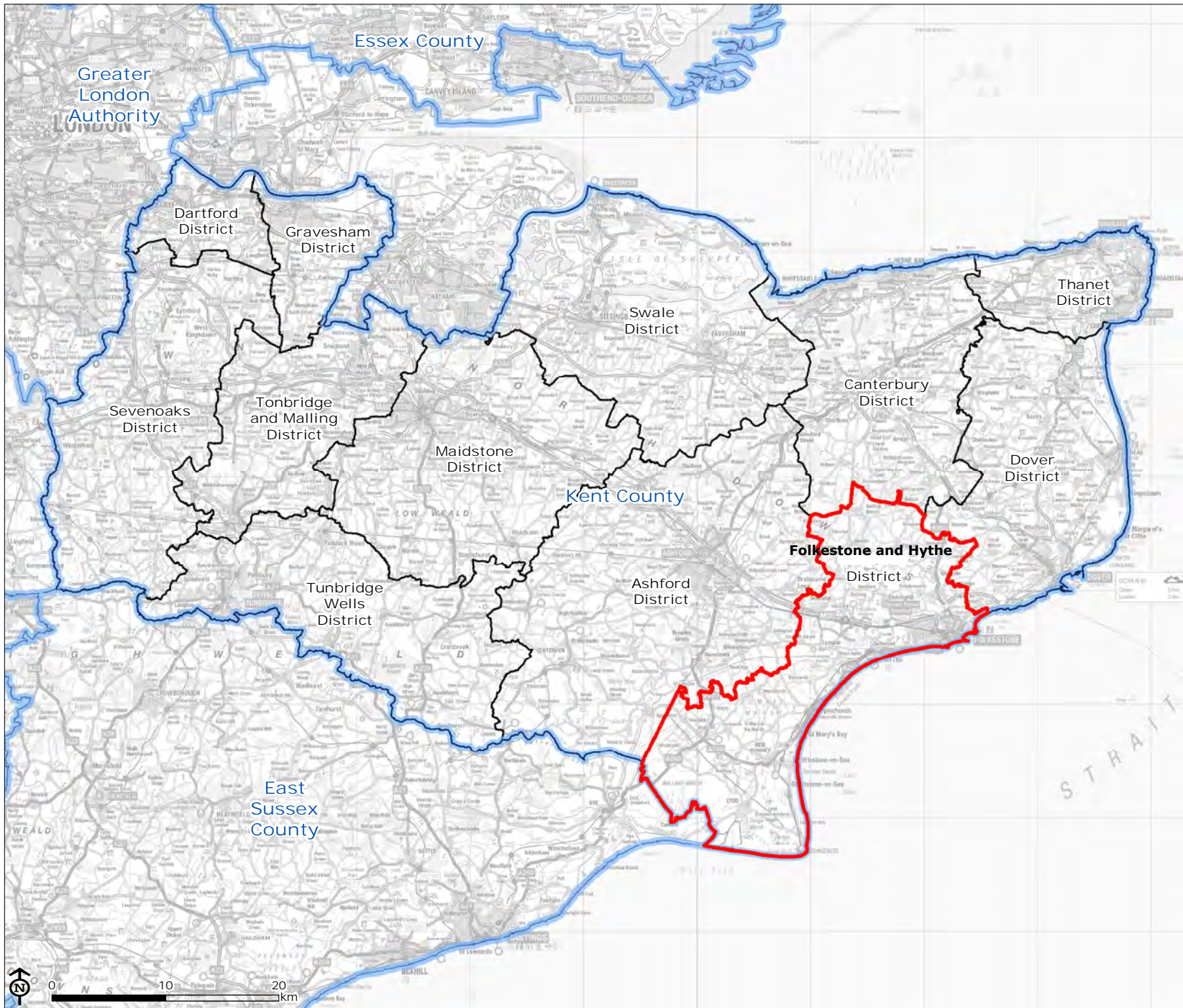


Figure 1: Location of District

- District boundary
- County boundary
- District boundary

Source: OS







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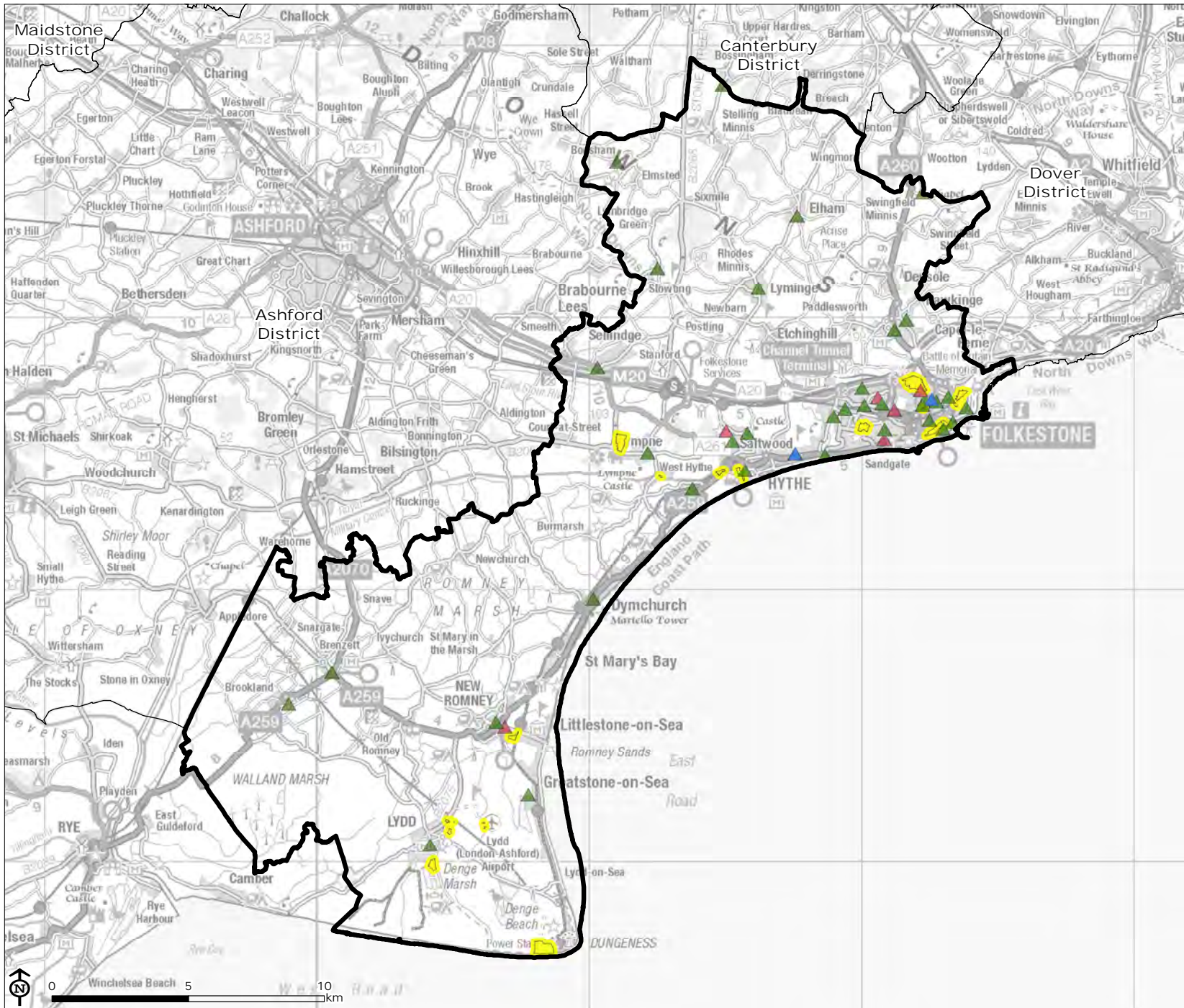
LUC

Folkestone
Hythe & Romney Marsh

Folkestone and Hythe Sustainability Appraisal Core Strategy Review

Figure 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

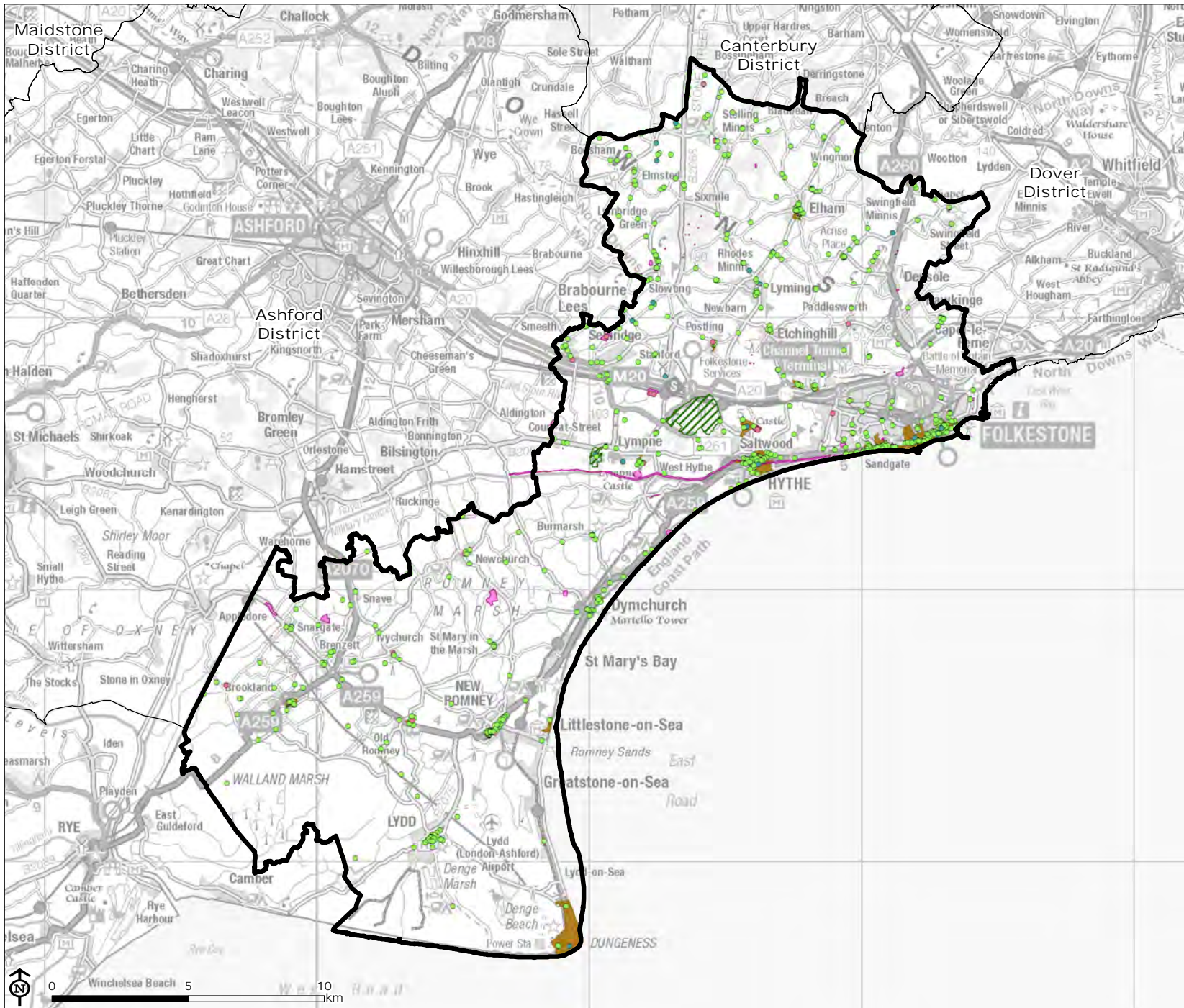
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Folkestone and Hythe Sustainability Appraisal Core Strategy Review

Figure 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



Folkestone and Hythe Sustainability Appraisal Core Strategy Review

Figure 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

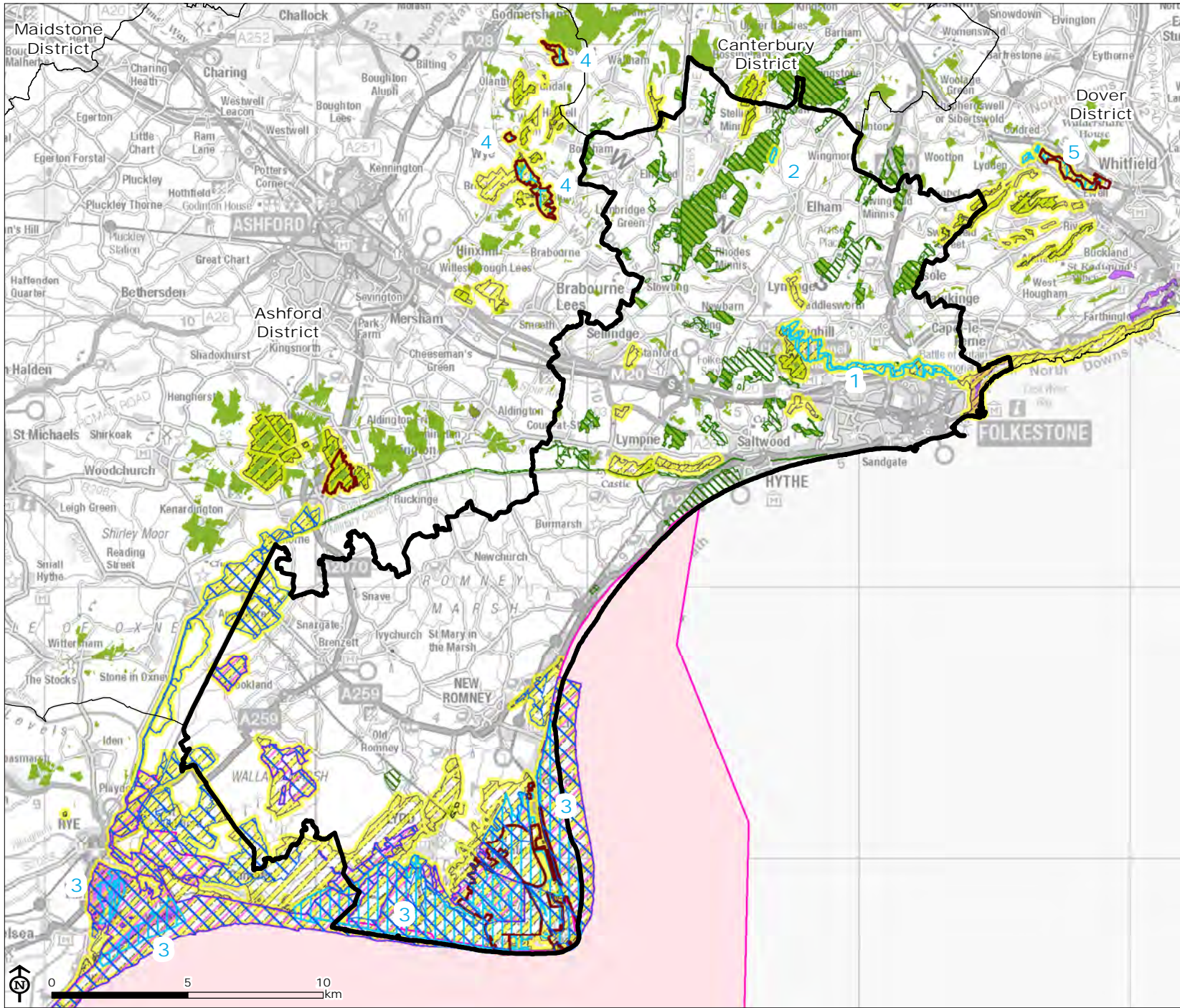




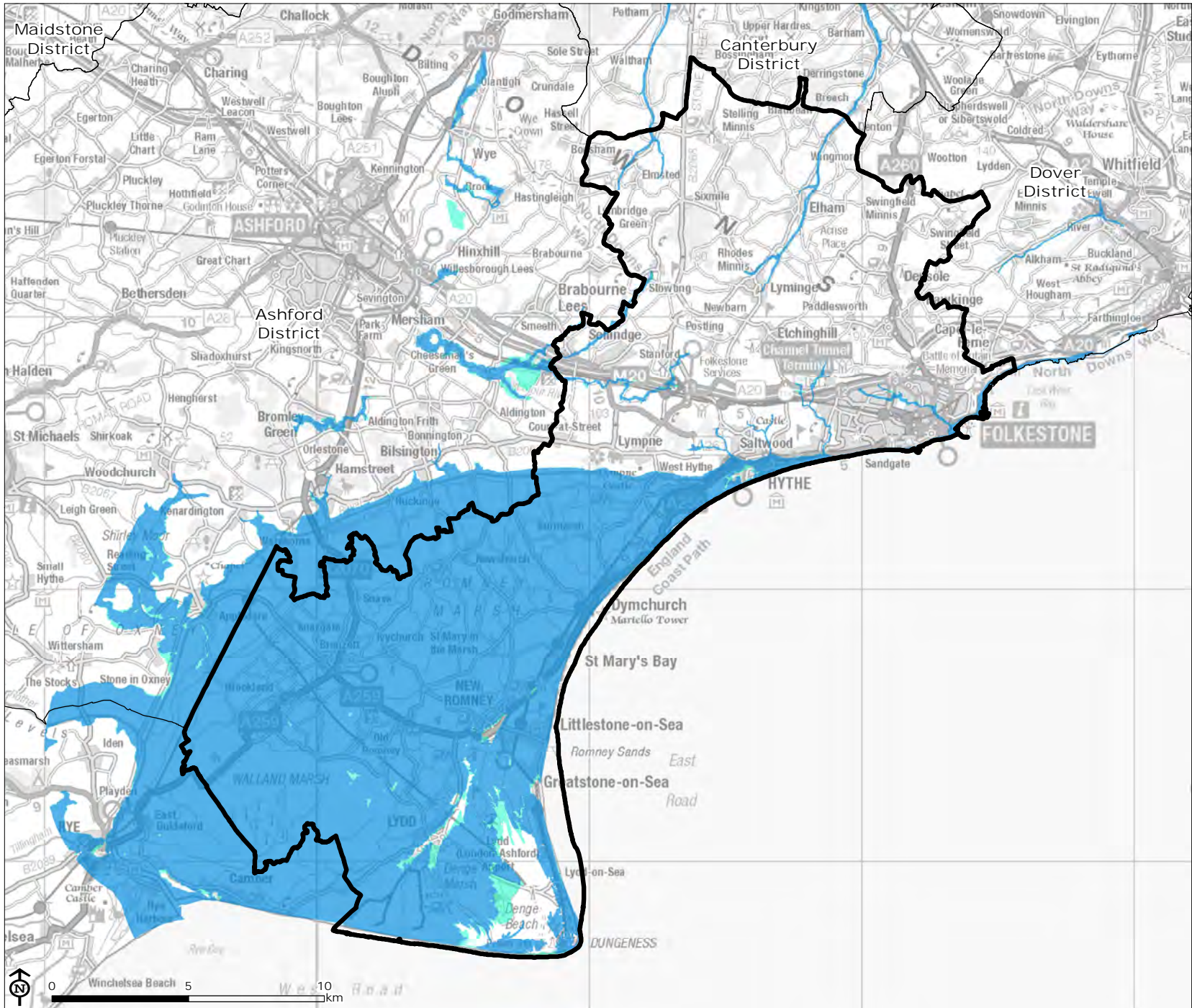


Figure 5: Flood Risk

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














Source: OS, Folkestone and Hythe District Council

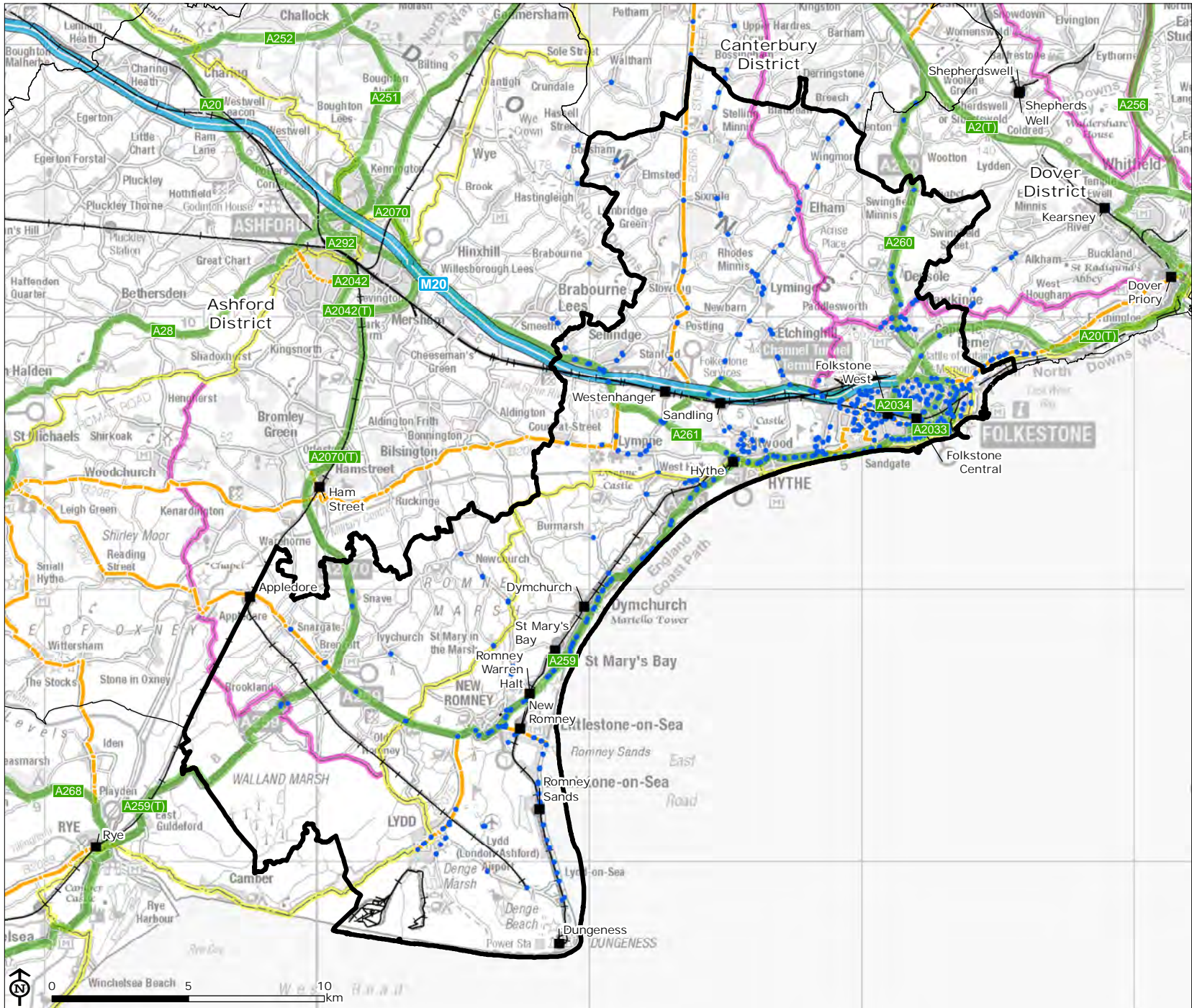
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Figure 6: Transport Network

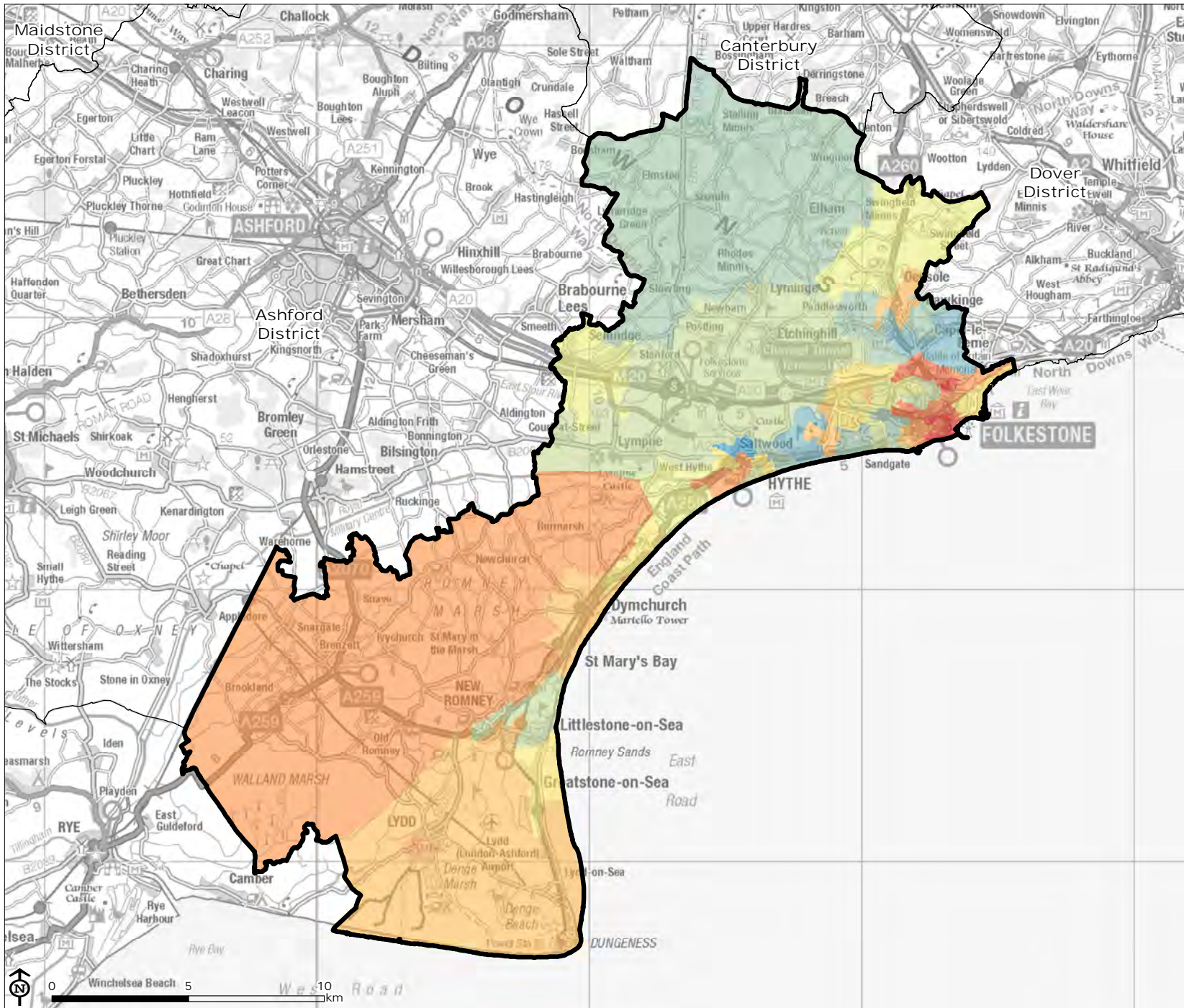
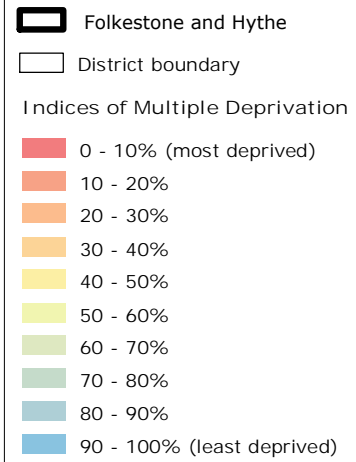
-  Folkestone and Hythe
-  District boundary
-  Train station
-  Bus stop
-  Railway track
-  Motorway
-  A road
-  B road
- Cycle routes**
-  National route
-  Regional route
-  NCN link

Source: OS, Folkestone and Hythe District Council, Sustrans
 Map Scale @ A4: 1:200,000



Folkestone and Hythe Sustainability Appraisal Core Strategy Review

Figure 7: Indices of Multiple Deprivation



Source: OS, DCLG
 Map Scale @ A4: 1:200,000



Social Context

- 1.22 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.
- 1.23 The housing stock in the District is relatively old, with the worst housing conditions are focused in the older housing stock. There are currently around 450 long-term empty homes in the District. Despite this, homelessness in Folkestone & Hythe is a growing issue.
- 1.24 Access to the local housing market in the District is an issue as the average house price is more than six times the average household income. There is a high demand for affordable homes in Folkestone & Hythe.
- 1.25 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).
- 1.26 Folkestone & Hythe is ranked 113th in the Index of Multiple Deprivation out of 326 local authorities nationally, and is the third most deprived authority in Kent. 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. The District has four areas that are in the top 10% most deprived nationally which are to be found in or around the urban area of Folkestone.
- 1.27 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.

Economic Context

- 1.28 Folkestone has the largest concentration of shops and services in the District. However, due to accessibility factors, residents in the west of the District at New Romney may choose to visit Ashford, whilst those to the north around Elham and Stelling Minnis may look to Canterbury.
- 1.29 The recent economic performance of Folkestone & Hythe has been characterised by high unemployment and long-term contraction of established local industries. There has been relatively strong growth in certain areas, such as 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.
- 1.30 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.
- 1.31 Unemployment in Folkestone & Hythe has dropped significantly from 6.7% (Jul 13-Jun 14) to 4.4% (Apr 2017-March 2018). The most recent figure is higher than the regional and national average as well as the majority of the Districts in Kent (Thanet, Gravesham, Medway and Swale have a higher unemployment rate). Levels of youth unemployment are higher than Kent and National levels.
- 1.32 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.

Environmental Context

- 1.33 Over 33% of the District falls within the Kent Downs Area of Outstanding Natural Beauty (AONB). The District has a number of locally designated 'Local Landscape Areas' concentrated around Romney Marsh and also parts of the Sandgate Escarpment and Seabrook Valley, Eaton Lands, Coolinge Lane, Enbrook Valley and Mill Lease Valley.
- 1.34 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.

- 1.35 Folkestone & Hythe District contains a wide range of habitats including species-rich chalk grassland, ancient woodland, low lying marsh, shingle, and dune areas. Three areas (Parkgate Downs, Dungeness and the Folkestone to Etchinghill Escarpment) have been designated Special Areas of Conservation (SACs), Dungeness, Romney Marsh and Rye Bay have been designated as a Special Protection Area (SPA) and Ramsar site, which means these areas are regarded as being of international importance under the EU Habitats Directive. Dungeness is also a National Nature Reserve.
- 1.36 There are 13 Sites of Special Scientific Interest 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'.
- 1.37 There is a significant amount of Ancient Woodland in Folkestone & Hythe, concentrated to the west, northwest and north of Folkestone. 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 Sites of Special Scientific Interest, which are primarily coastal or wetland habitats.
- 1.38 The 2002 Agricultural Land Classification Survey defined approximately 60% of the District's land area as 'Excellent' or 'Very Good' for agricultural purposes. Romney Marsh ward is the most productive area, containing virtually all of the 'Grade I' agricultural land in the District and a significant proportion of the County's 'Grade I' agricultural land.
- 1.39 The Council monitors air quality across the District. According to the results for 2015/16, air quality pollution levels of NO₂ – Nitrogen Dioxide - have increased in 11 out of 12 monitoring points. However the results are still within the DEFRA air quality objectives levels of below 40µg/m³ annual mean.
- 1.40 There is a long history of flooding within Folkestone & Hythe including over 101 flooding events in the last decade. Over half of homes in the District are at risk of flooding from either coastal or fluvial sources. 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.
- 1.41 Virtually all of the Romney Marsh area is within flood zone 3 due to its topography (see **Figure 2**). However, the degree of risk varies significantly within the area, being dependent on factors such as topography, hydrological features and position in relation to flood defences.
- 1.42 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. A number of Source Protection Zones have been established, mainly in the north of the District, to protect groundwater quality in sensitive areas.
- 1.43 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 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 to reduce the amount of water discharged to combined sewers and WWTWs, where technically feasible.
- 1.44 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.

Key Sustainability Issues and their Likely Evolution without the Core Strategy

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

Table 1: Summary table of key sustainability issues

Key sustainability issues	Likely evolution of the issues without the Local Plan
Housing	
<p>There are key challenges to housing delivery including the development restrictions posed by the Kent Downs AONB and a lack of large sites, which limits the potential to deliver affordable housing.</p> <p>Lack of affordability of housing is a growing issue in the District.</p>	<p>The on-going lack of affordable housing is likely to lead to many people being priced out of the market.</p> <p>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.</p>
Economy and Labour Market	
<p>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.</p> <p>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.</p> <p>Unemployment in general and youth unemployment in particular are high in Folkestone & Hythe and many of the jobs available are relatively low paid.</p> <p>Folkestone & Hythe has relatively low levels of educational attainment and skills which could hinder economic growth in the District.</p> <p>Parts of Folkestone, notably several areas of the 'secondary frontage' suffer from high vacancy rates of retail premises.</p> <p>There is a need to plan for the consequences of the de-commissioning of Dungeness 'B' power station.</p>	<p>Folkestone & Hythe's economy is lagging behind that of others in the South East.</p> <p>Folkestone & Hythe's economy is likely to continue to lag behind others without coordinated action from the Local Plan to promote regeneration of its town, provision of appropriate employment space and access to education and training.</p>
Landscape and townscape	
<p>The District contains a number of distinct rural landscapes as well as those more influenced by human development which could be harmed by inappropriate development.</p>	<p>Pressures on local landscapes are likely to increase with the rising population of the District, new development and climate change.</p> <p>Without the Local Plan, there is increased potential for a rise in direct pressures on</p>

Key sustainability issues	Likely evolution of the issues without the Local Plan
	wildlife as well as less opportunity to adopt a co-ordinated, spatial approach to the development of open green spaces/green networks for recreation, walking and cycling networks, and wildlife.
Historic environment	
<p>There are many sites, features and areas of historical and cultural interest in the District, a number of which are at risk, and which could be adversely affected by poorly planned development.</p> <p>There are opportunities to improve access to and interpretation of the District's historic environment, particularly its assets from the Napoleonic period at Shorncliffe.</p>	<p>Continued development pressure means that the risk of harm to heritage assets would be likely to continue and may be exacerbated without a planned local approach to development.</p> <p>In the absence of a Local Plan, issues are likely to continue to be exacerbated without a planned local approach to development. National policy should help to protect and enhance heritage assets but whether or not this will help specific sites is uncertain.</p>
Biodiversity	
<p>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.</p> <p>Green networks for wildlife and natural green spaces need to be fully reflected in the GI Strategy to provide a framework for the consideration of development proposals, and for avoiding harm and gaining enhancements where appropriate.</p>	<p>With the population of the District increasing, pressure on recreation and wildlife areas is likely to be exacerbated.</p> <p>Without the Local Plan there is less opportunity to adopt a co-ordinated approach to the development of green networks for wildlife and natural green spaces designed to steer recreational pressure away from sensitive wildlife sites.</p> <p>The severity and likelihood of adverse impacts on local ecosystems is also likely to increase with predicted climate change. Without an up to date Local Plan, there is less opportunity to adopt a co-ordinated, spatial approach to managing the effects of this change through careful site allocations and targeted wildlife conservation and enhancement initiatives.</p>
Soil and minerals	
<p>Folkestone & Hythe contains some of the most productive agricultural land in the South East but this could be lost to development.</p> <p>Folkestone & Hythe contains areas of historically contaminated land which could pose a risk to human health or which could be remediated and brought into appropriate use.</p> <p>Folkestone & Hythe contains valuable sand and gravel reserves which could be sterilised by development.</p>	<p>The NPPF requires local planning authorities to take into account the benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be used in preference to those of a higher quality.</p> <p>The NPPF also requires local planning authorities to encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is</p>

Key sustainability issues	Likely evolution of the issues without the Local Plan
	<p>not of high environmental value.</p> <p>In relation to minerals, the NPPF requires local planning authorities to avoid needlessly sterilising known locations of minerals resources of local and national importance by non-mineral development. The incorporation of new strategic allocations with the Core Strategy Review local Plan may result in the need for the County Council to review the capacity of local minerals reserves to accommodate this increase local growth.</p>
Water quality and water resources	
<p>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.</p> <p>Drinking water is a scarce resource in the District and population and household growth will place further pressure on this resource.</p> <p>There is potentially insufficient capacity in the strategic link wastewater connection between the Westenhanger and Lympe area and the Sellindge WwTW.</p>	<p>Population growth, together with the hotter, drier summers expected under climate change, are likely to put ever greater pressure on the District's water resources.</p> <p>National plans and strategies encourage new development to meet water efficiency standards and water companies must plan to reduce leaks from the water supply network as well as improve water efficiency. Without the Local Plan, however, it will be more difficult to adopt a co-ordinated approach to water resource planning with water companies and more difficult to implement water efficient design in new development.</p>
Climatic change mitigation, adaptation and flood risk	
<p>The need to meet national carbon reduction targets. The Local Plan 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.</p> <p>The sensitivity of the natural environment in Folkestone & Hythe may limit the number of acceptable locations for further large scale renewable energy developments.</p> <p>Hotter, drier summers expected under climate change have the potential for adverse effects on human health.</p> <p>Climate change is likely to impact upon habitats and thereby biodiversity.</p> <p>Risk of flooding is a major concern in Folkestone & Hythe with 55% of the District at or below sea level.</p> <p>The expected magnitude and probability of significant fluvial, tidal, ground and surface</p>	<p>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 Local Plan can contribute to climate change mitigation through policies which require higher energy efficiency standards (e.g. for larger allocations) and provide a positive policy approach to the consideration of renewable energy applications. The Local Plan also has a role to play in implementing climate change adaptation, for example through appropriate building design and the identification of less vulnerable locations for development. It can also help to ensure that less environmentally sensitive locations are chosen, thereby reducing development pressure on wildlife which may already be under pressure from climate change.</p>

Key sustainability issues	Likely evolution of the issues without the Local Plan
<p>water flooding is increasing in the District due to climate change.</p> <p>Coastal erosion and the associated flood risks are a considerable spatial constraint on new development in the District.</p>	<p>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 to avoid inappropriate development in areas at risk of flooding.</p>
Waste	
<p>Folkestone & Hythe performs relatively well in terms of recycling and composting of household waste in comparison to other local authorities in the UK. Poorly planned new development could reduce recycling rates and increase waste generation from construction and demolition, achievement of waste and recycling objectives.</p>	<p>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 Review of the Core Strategy has the potential to positively influence waste management at a strategic-scale across the District.</p>
Air pollution	
<p>Air quality is not currently judged to be a significant issue in the District. However, locations targeted for large scale development could experience significant increases in road traffic from residents and/or employees, resulting in localised adverse effects, in urban areas such as Folkestone and along major roads such as the A20 and M20.</p>	<p>The need to travel by unsustainable modes and associated emissions of air pollutants are likely to increase without action from the Local Plan to direct development to sustainable locations and increase provision of sustainable transport infrastructure. Nevertheless, the ability of the Local Plan to influence air pollution in the District is limited by the fact that much of the traffic passing through it is on the strategic road network and driven by regional and national factors.</p> <p>Kent's Local Transport Plan has a lead role to play in managing transport related issues and its objective include reducing emissions, encouraging a shift to sustainable transport and tackling congestion, all of which should help to manage transport-related air quality issues, even in the absence of the Local Plan.</p>
Transport	
<p>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</p>	<p>The adopted Core Strategy already includes policies encouraging the use of sustainable modes of transport. While such policies would continue to apply, the Core Strategy Review offers an opportunity to tailor policies that would address private vehicle use within the</p>

Key sustainability issues	Likely evolution of the issues without the Local Plan
<p>development could exacerbate this.</p> <p>There is a heavy dependency on the private car to access employment. If this pattern continues, planned housing and employment growth could lead to problems of traffic congestion and increasing emissions of greenhouse gases and air pollutants.</p>	<p>District, and encourage the use of more sustainable modes of transport in specific areas. This would also help to address health and obesity issues.</p>
Population and human health	
<p>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.</p> <p>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.</p> <p>Population growth, household growth and demographic change will place additional and changing demands on key services such as housing, health, education and social care.</p> <p>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.</p>	<p>The issues 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.</p> <p>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.</p>
Open space	
<p>There is demand for more conveniently located parks and greenspace in a number of existing communities, including in the rural areas. Recent development has resulted in some open spaces in the District being lost with no net gains. Future development could lead to further losses and greater demand.</p>	<p>With the rising population of the District, pressures on the quality and availability of open space are likely to continue without a planned approach to development.</p> <p>Without a Local Plan there is less opportunity to adopt a co-ordinated, spatial approach to the development of open green spaces/green networks for recreation, walking and cycling networks, and wildlife.</p> <p>The adopted Core Strategy includes strategic allocation policies which make provision for new open spaces. While such policies would continue to apply, the Core Strategy 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.</p>

Sustainability Appraisal Framework

- 1.46 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.
- 1.47 The SA framework for the Core Strategy Review is presented in Table 2. 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.

Table 2: Folkestone & Hythe Framework for SA of Review of the Core Strategy

SA Objective Reference	SA Objective
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.

Determining Significance

- 1.48 It is the role of SA to identify those effects of the Plan which are significant. The dividing line between sustainability scores is often quite small. Where we distinguish significant effects from more minor effects this is because, in our judgement, the effect of the allocation or policy on the SA objective will be of such magnitude that it will have a noticeable and measurable effect compared with other factors that may influence the achievement of that objective.
- 1.49 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.
- 1.50 The use of colour coding in the matrices allows for likely significant effects (both positive and negative) to be easily identified, as shown in the key below. Mixed effects are recorded for an SA objective where there is potential for both positive and negative effects.

Key to symbols of effects used in the SA of the Core Strategy Review

++	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

Data limitations and difficulties encountered

- 1.51 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.
- 1.52 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.
- 1.53 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** of the Main SA Report). However, we have drawn out the key messages relevant to the preparation of the Local Plan and the SA.
- 1.54 Similarly, every effort has been made to ensure that the final version of this SA Report reflects the latest evidence base.























SA findings for the High Level Growth Options

- 1.55 **Chapter 6** of the main SA Report 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 website⁵.
- 1.56 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.
 - Area 2: Folkestone and Surrounding Area.
 - Area 3: Hythe and Surrounding Area.
 - Area 4: Sellindge and Surrounding Area.
 - Area 5: Romney Marsh and Walland Marsh.
 - Area 6: Lydd, New Romney and Dungeness.
- 1.57 The location of each Character Area is shown in **Figure 8**.
- 1.58 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. Consequently, smaller sub-areas defined as free from strategic constraints were defined within Character Area 4 for further assessment:
- Area A: North and East Sellindge.
 - Area B: South of M20.
 - Area C: South and West Sellindge.
 - Area D: East of Stone Hill.
- 1.59 The location of each sub-area and the strategic constraints within their immediate vicinity are shown in **Figure 9**.
- 1.60 The SA tested and built upon this high level growth options work by appraising the six Character Areas and 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 the District.
- 1.61 **Table 3** presents the SA findings for each of the six Character Areas against the SA objectives set out in the SA Framework. **Table 4** 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. Detailed SA matrices setting out detailed justification for every effect identified for each Character and Sub-area are listed in order in **Appendix 3** of the main SA Report.
- 1.62 These 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** of the main SA Report.

⁵ Folkestone and Hythe Core Strategy Review SA Scoping Report, March 2017 Available at: <https://www.folkestone-hythe.gov.uk/planning/planning-policy/local-plan/core-strategy-review-2016>

Figure 8: 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

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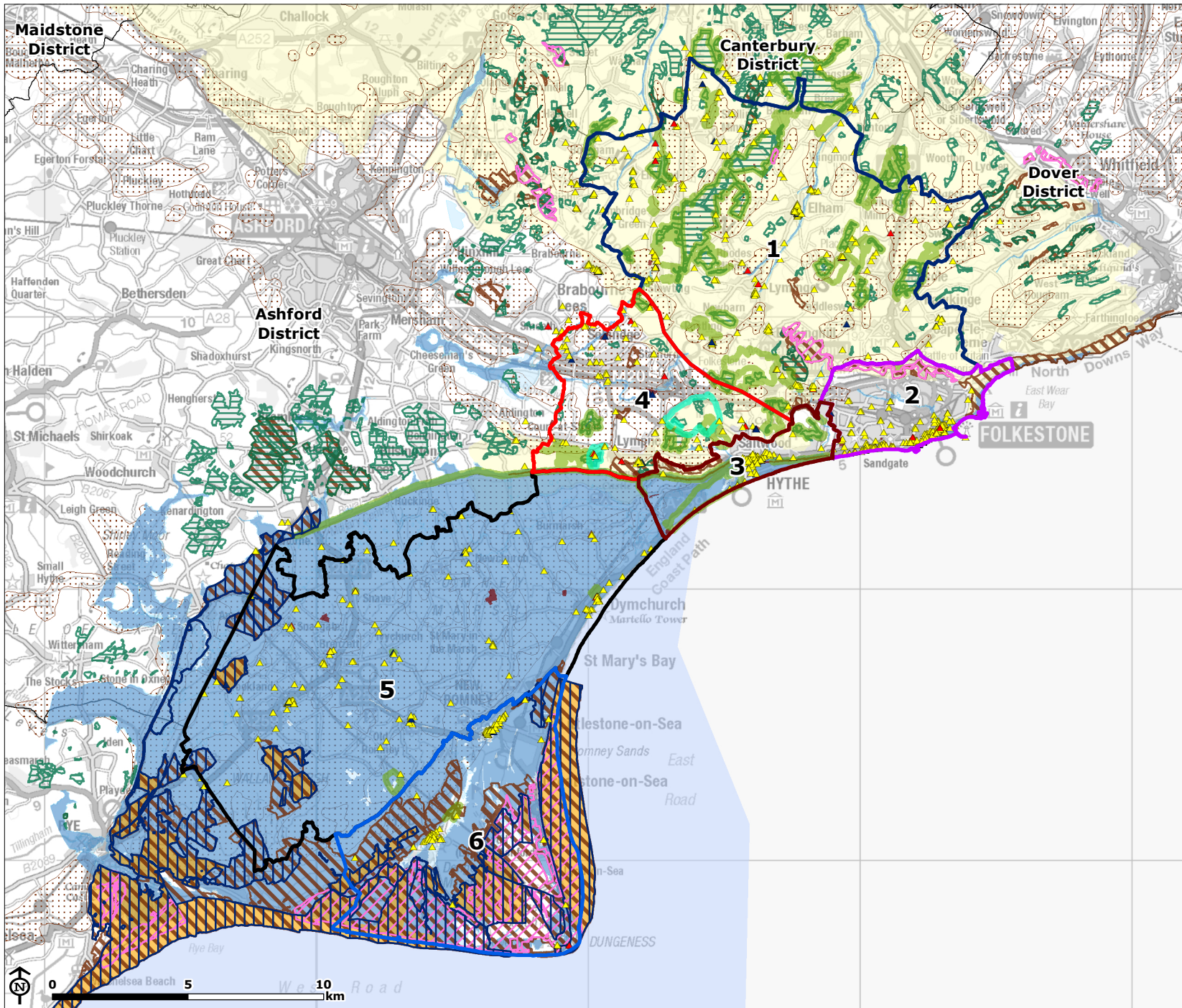
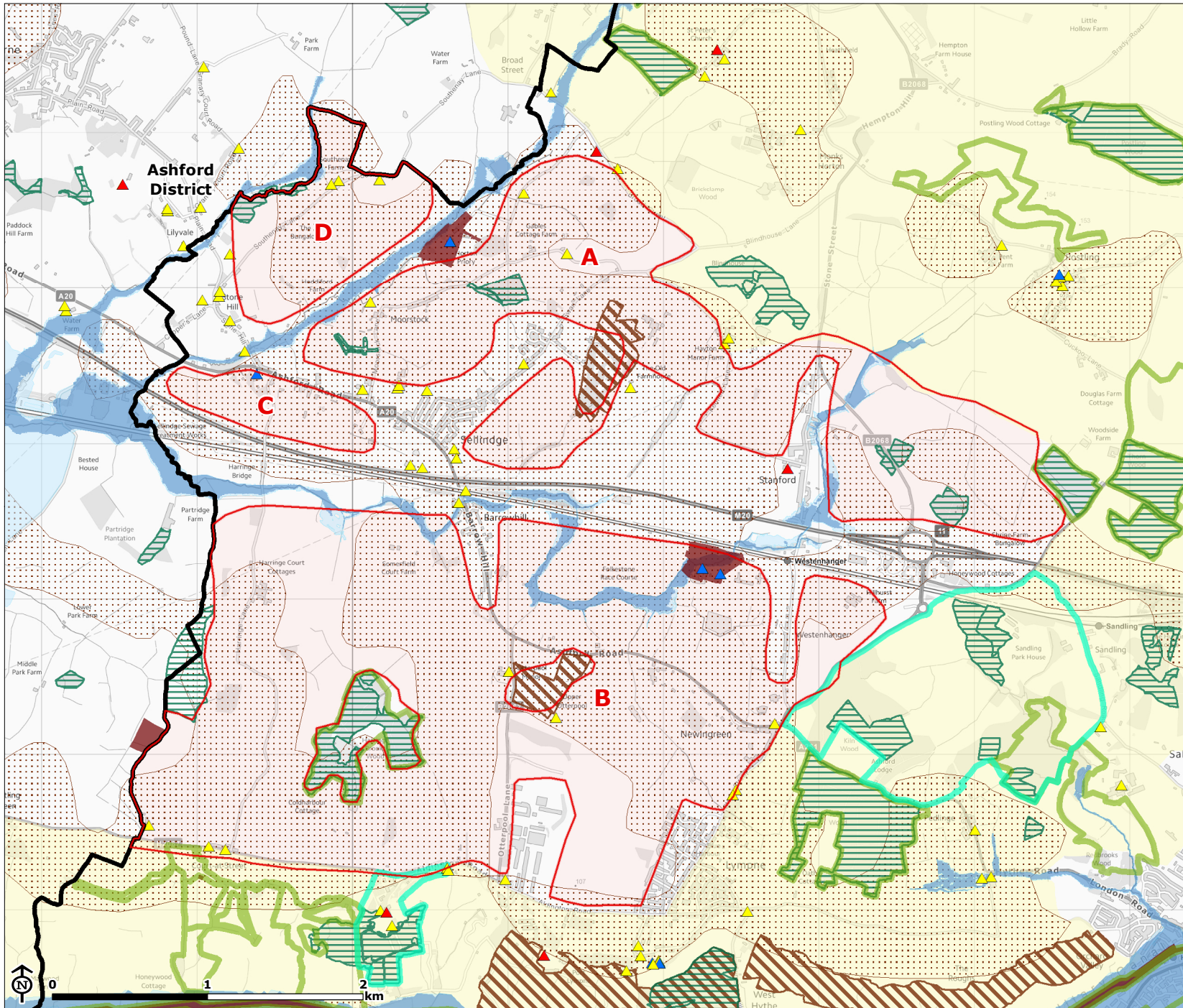


Figure 9: Sub-Areas Showing Constraints



- 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

Overview of Character Area SA findings

- 1.63 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 are recorded for the most northerly (Character Area 1) and southerly Character Areas (Character Areas 5 and 6).
- 1.64 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.
- 1.65 Character Area 3, which includes the urban area of Hythe, and Character Area 4, containing Sellindge and the surrounding area, are 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 portions of the Area, Character Area 4 has good transport links, which provide access to local services and facilities in the District and beyond.
- 1.66 Despite some significant heritage and flood risk constraints in certain portions 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 ground water 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.

Overview of Sub-area SA findings

- 1.67 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.
- 1.68 Sub-area B is considered to be the most accessible location for strategic scale development in the District 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.
- 1.69 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.
- 1.70 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.
- 1.71 Recommendations for the definition of spatial options within each of the Character Area 4 Sub-Areas are set out at the top of each of the detailed appraisal matrices in **Appendix 3** of the main SA Report.

Table 3: 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)	+/-	+/--	--	--	--	+/-	-	--	--	+	+	+	--	--	+

Table 4: 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	+	+	+	--	--	+

SA findings for the Spatial Options at Otterpool and Sellindge






- 1.72 Following on from the SA of the growth options tested and identified through the District's Growth Options Study, Folkestone & Hythe District Council identified six spatial options for appraisal in between the villages of Lymyne, Sellindge and Westenhanger. This broad area is shown on Figure 1 of the Phase Two Report⁶ and is reproduced in this report in **Figure 9**.
- 1.73 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 9**).
 - 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)⁷.
 - The need to find strategic development areas sufficient to meet the outstanding need for development identified in the Council's Strategic Housing Market Assessment.
 - The need to test potential development areas with clear, defensible boundaries.
- 1.74 These factors led to the identification of six spatial options for appraisal as reasonable alternatives for strategic growth south and north of the M20/HS1 Corridor:
- **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 (see **Figure 10**).
 - **Otterpool Spatial Option B** has been 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 (see **Figure 11**).
 - **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 (see **Figure 12**).
 - **Sellindge Spatial Option B** includes the same southern extension as Sellindge A and further development to the west of Harringe Lane (see **Figure 13**).
 - **Sellindge Spatial Option C** includes an eastern extension to Sellindge on agricultural land to the east of Ashford Road (A20) and Swan Lane (see **Figure 14**).
 - **Sellindge Spatial Option D** includes the same areas of development proposed in Sellindge A, B and C combined (see **Figure 15**).

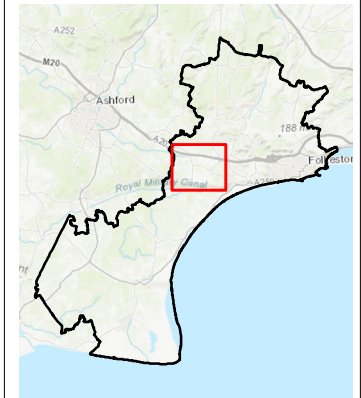
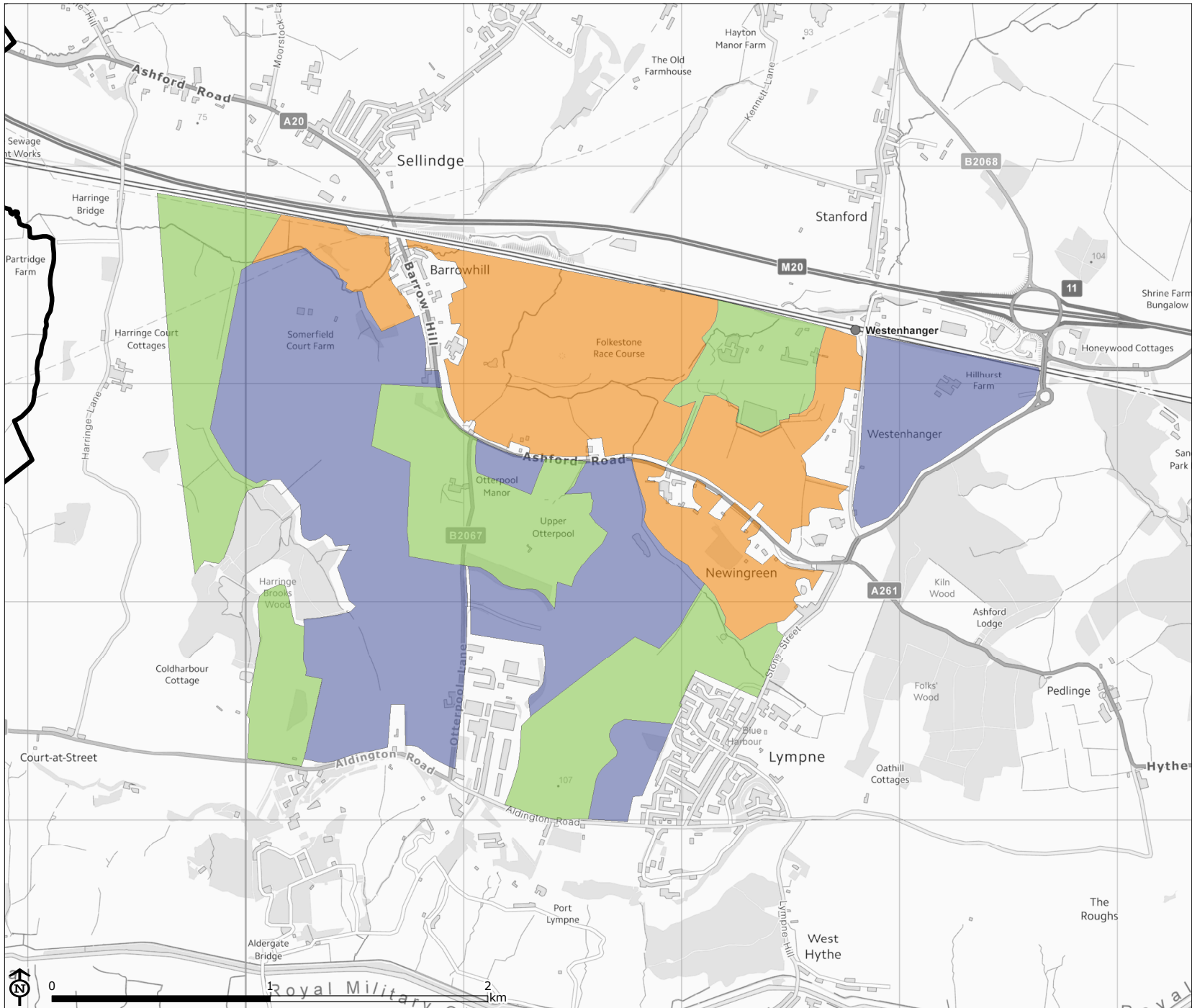
⁶ Folkestone and Hythe Growth Options Study Phase Two Report, AECOM, April 2017, Figure 1, p. 1-7.

⁷ Folkestone and Hythe Growth Options Study Phase Two Report, AECOM, April 2017, Figure 28, p.2-60.

- 1.75 **Table 5** presents the SA findings for the two Otterpool spatial options against the SA objectives set out in the SA Framework. **Table 6** 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.
- 1.76 Detailed SA matrices setting out detailed justification for every effect identified for each spatial option are listed in order in **Appendix 4** of the main SA Report.
- 1.77 These SA findings were used alongside the high-level Growth Options Study to define the site allocation policies in Core Strategy Review described and appraised in **Chapter 9** of the main Report.

Figure 10: Development Proposed in Otterpool A

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








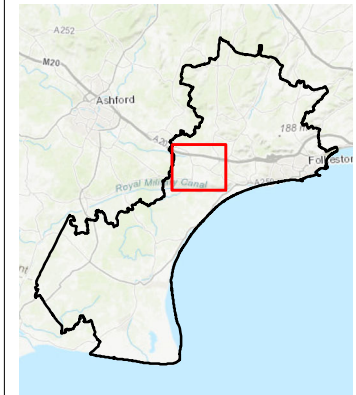
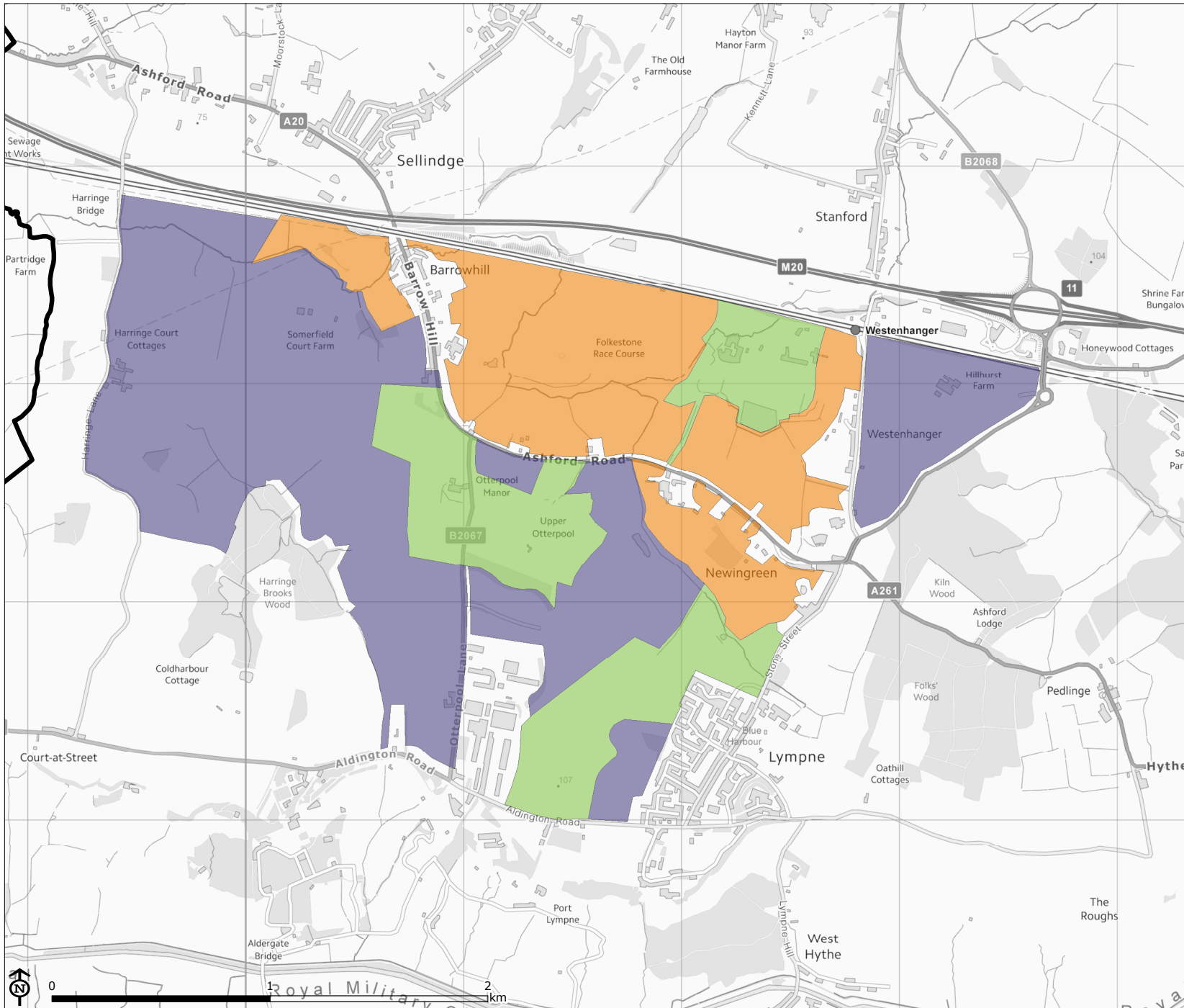
Source: OS, Folkestone and Hythe

District Council

Map Scale @ A4: 1:25,000

Figure 11: Development Proposed in Otterpool B

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






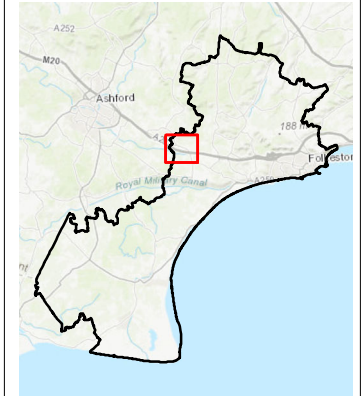
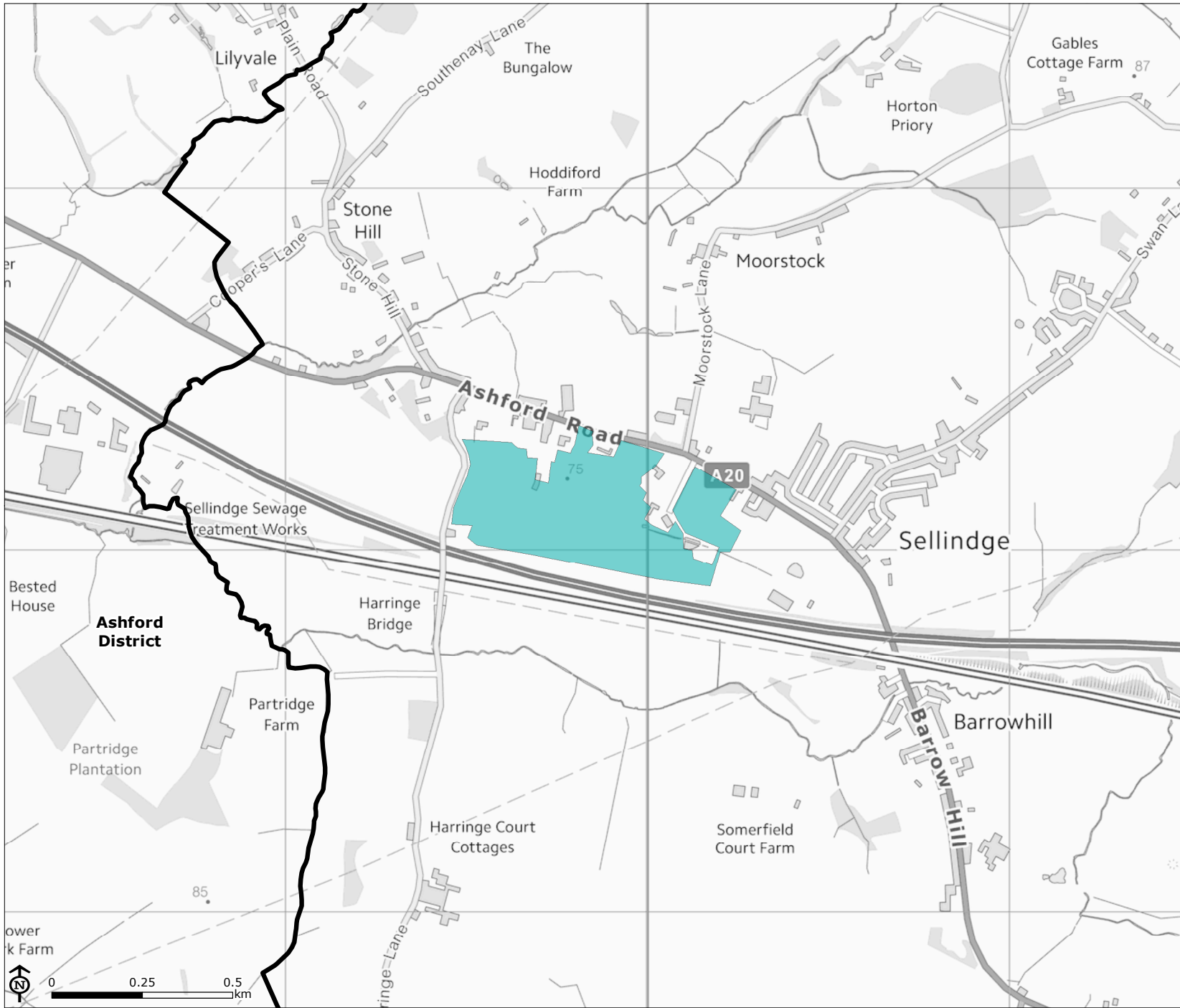
Source: OS, Folkestone and Hythe

District Council

Map Scale @ A4: 1:25,000

Figure 12: Development Proposed in Sellindge A

-  Folkestone and Hythe
-  District boundary
-  Development






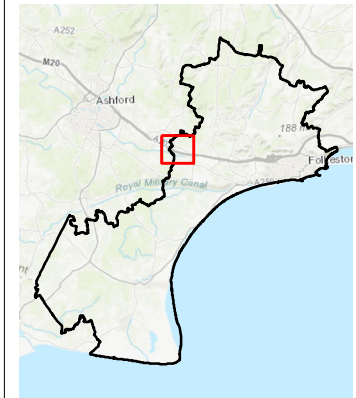
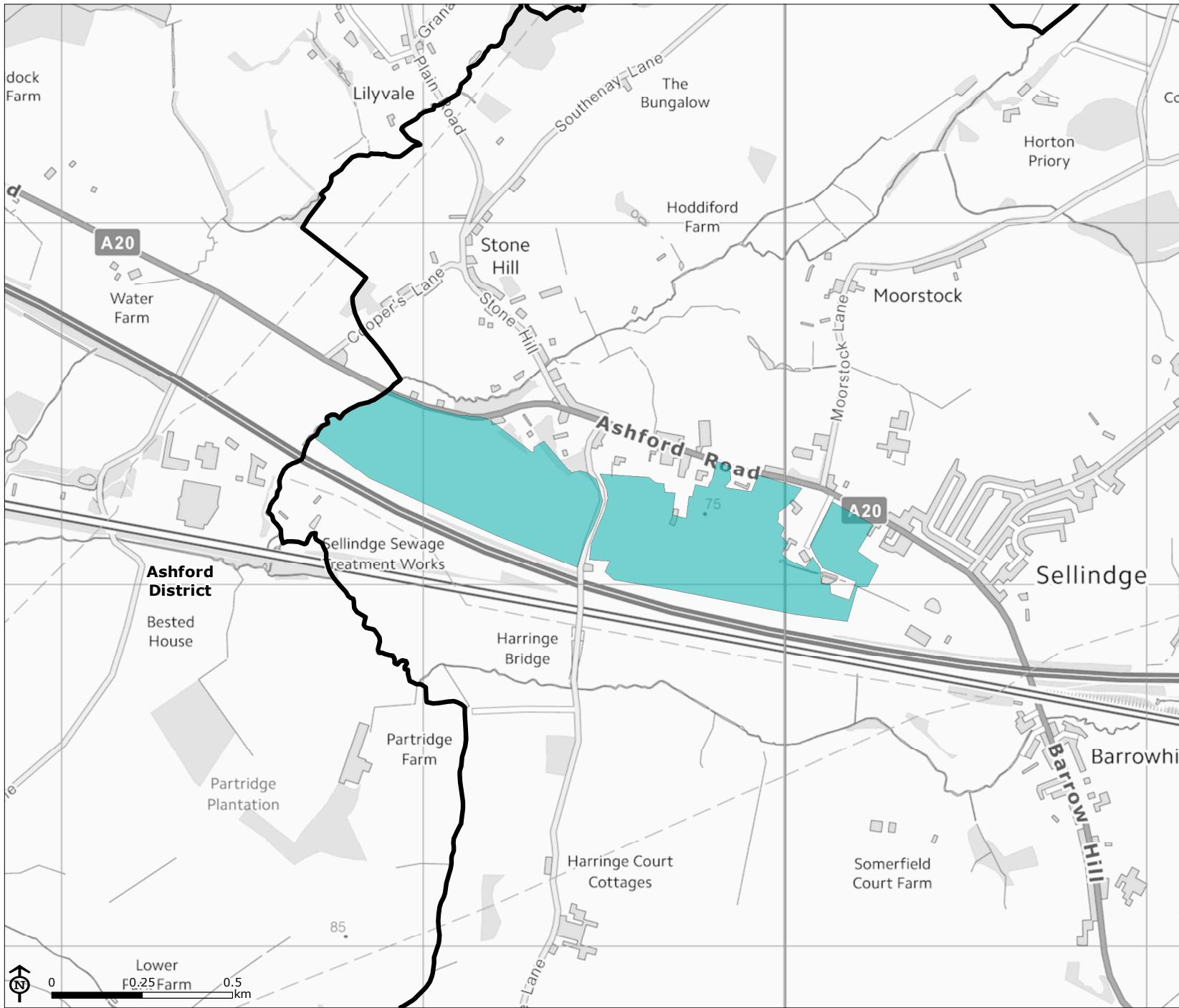
Source: OS, Folkestone and Hythe

District Council

Map Scale @ A4: 1:15,000

Figure 13: Development Proposed in Sellindge B





-  Folkestone and Hythe
-  District boundary
-  Development

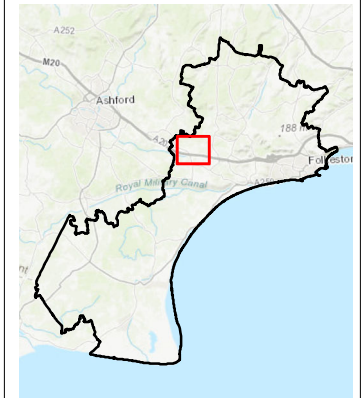
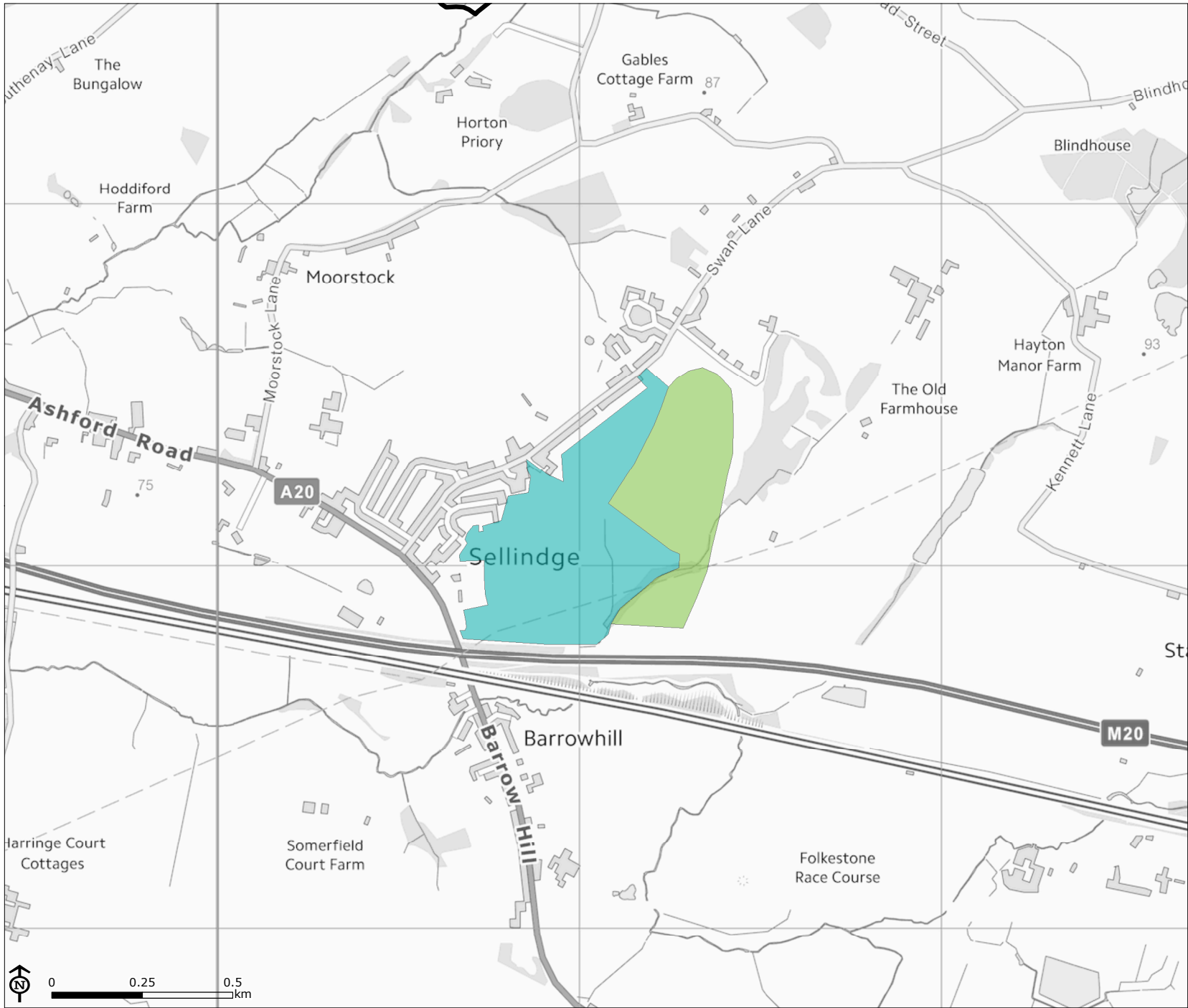


Source: OS, Shepway District Council
Map Scale @ A4: 1:15,000

Lower
 0 0.25 0.5
 Farm km

Figure 14: Development Proposed in Sellindge C

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







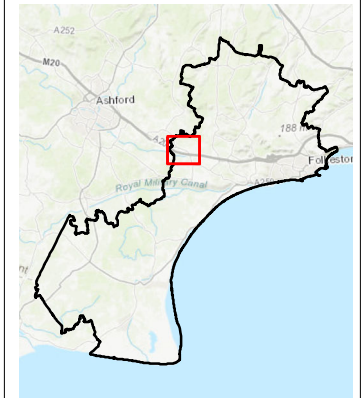
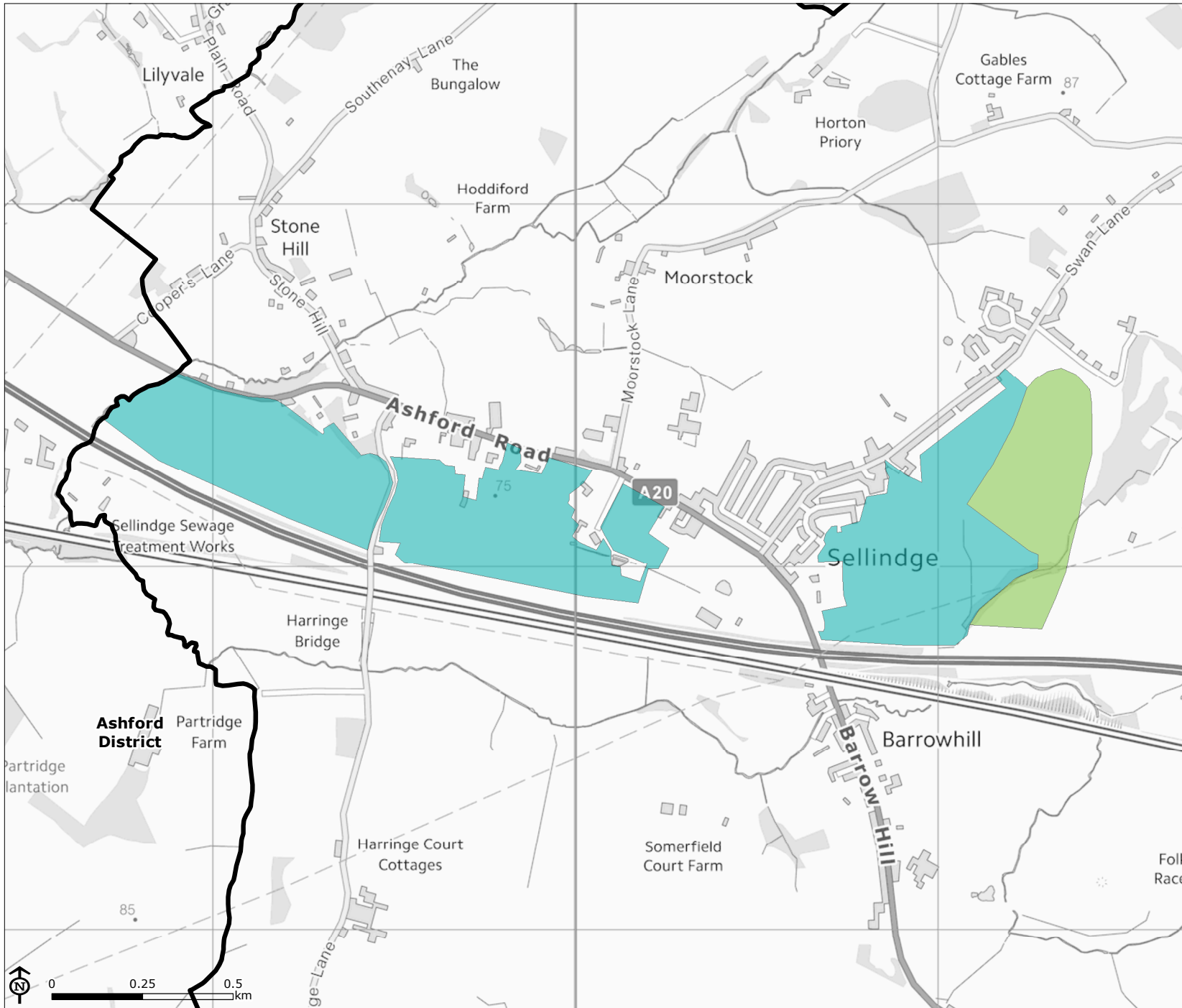
Source: OS, Folkestone and Hythe

District Council

Map Scale @ A4: 1:15,000

Figure 15: 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



Table 5: 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

- 1.78 Significant positive effects re 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. 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 Lymgne, Barrowhill, Newingreen and Westenhangar are likely to feel that their settlements will lose their character, which could affect social cohesiveness until the new development becomes established.
- 1.79 It should be noted however that Otterpool B also scores minor adverse effects against **SA objectives 13 (Sustainable Transport Infrastructure) and 14 (Services and Facilities)**. These minor adverse effects are 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. 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

- 1.80 Significant positive effects have been 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 city principles.
- 1.81 The potential for significant adverse effects have been 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 have also been identified for **SA objective 6 (Green Infrastructure)** as both options are to be masterplanned in line with garden city principles. This is likely to result in at least 40% of the total development to be retained/enhanced as greenspace, including around Otterpool Quarry, by Westenhangar Castle and in between Lymgne and Lymgne Industrial Estate.
- 1.82 Potential significant adverse effects have been 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 Westenhangar and the potential for downstream flooding of the River Stour as a result of greater surface water flood risk in the new town.
- 1.83 Both Otterpool development options propose a pattern of development with lower densities and strategic open spaces at the potentially more landscape sensitive locations and higher levels of development in areas that are more visually contained. These measures are considered to mitigate significant adverse effects on the rural character of the area identified for Otterpool A. 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 is considered to be greater than the rest of the open countryside identified for development within Otterpool A. Therefore, a significant negative effect is recorded against **SA objective 3 (Landscape)** for Otterpool B.
- 1.84 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.
- 1.85 Both options contain a significant amount of development 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 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

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

Table 6: 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

- 1.87 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.
- 1.88 All four Sellindge options are 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 score significant positive effects against **SA objective 2 (Employment)**. The significant positive effects expected in relation to SA objective 2 for Options B and D are likely to be combined with significant negative effects, however, 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 is 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.
- 1.89 Minor negative effects have been 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.
- 1.90 All options providing strategic scale development are 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 are 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.
- 1.91 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

- 1.92 All four options are 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 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 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) are 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.

- 1.93 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.
- 1.94 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 Site of Special Scientific Interest 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 is recorded for these options given that close proximity of new development has the potential to further exacerbate identified potential recreational pressures at the Site of Special Scientific Interest.

Overview of Sellindge Spatial Option SA Findings

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

SA findings of the Proposed Submission Core Strategy Review

- 1.96 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, which was subject to SA and consulted upon in March 2018. A refined Proposed Submission Core Strategy Review has now 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. 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.
- 1.97 Many of the policies within the adopted Core Strategy (2013) remain materially unchanged in the Proposed Submission Core Strategy Review (see **Table 7**), and are expected to have the same effects as were reported in the final SA Report which accompanied the adopted Core Strategy in 2013⁸.

⁸ 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>

Table 7: 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)
Spatial Strategy Policies		
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 was removed.
Policy SS5 'District Infrastructure Planning'	Text revised to recognise the adoption of the District's Community Infrastructure Levy (CIL) Charging Schedule and Infrastructure Delivery Plan.	Minor wording changes. References to 'Folkestone & Hythe' and final sentence 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.
Core Strategy Delivery Policies		
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 Needs 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.

1.98 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 generation of additional trips would need to be addressed. The expansion has now been approved and will increase the amount of traffic on the roads connecting the airport to local and regional population centres, including London. In combination, the expansion of the airport and the growth and New Romney have 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. Policy SS1 states that should proposals come forward for the further expansion of London Ashford Airport at Lydd, the Council will prepare an Action Area Plan for the site.

- 1.99 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. The remaining seven policies in the Core Strategy 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** summarises the effects recorded for the seven revised Core Strategy policies SS1-SS4, CSD1, 2 and 5. **Table 9** summarises the combined 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 10** summarises the 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.

Consideration of Reasonable Alternatives

- 1.100 The definition of the preferred Spatial Strategy as defined 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 above and in **Chapters 6** and **7** of the main SA Report.
- 1.101 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.
- 1.102 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 outlined above and in **Chapters 6** and **7** of the main SA report.
- 1.103 The revisions to policies CSD1, CSD2 and CSD5 largely reflect changes in national planning policy and guidance and the findings of the District's updated 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 to reflect Government policy⁹ and updated Planning Practice Guidance¹⁰.
 - **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 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.
- 1.104 Given that these changes reflect legislation, national policy or updated local evidence there are considered to be no reasonable alternatives.

⁹ Written Ministerial Statement by The Minister of State, Department for Communities and Local Government, 28 November 2014

¹⁰ Planning Practice Guidance, Paragraph 031, Reference ID: 23b-031-20161116

Table 8: 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

- 1.105 Policy SS1 sets out the spatial strategy for growth in Folkestone & Hythe over the plan period.
- 1.106 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)**.
- 1.107 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 Westenhangar 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

- 1.108 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.
- 1.109 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)**. 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).

Policy SS3 – Place-Shaping and Sustainable Settlements Strategy Revisions

- 1.110 Policy SS3 seeks to direct development within the plan period to the existing settlements of Folkestone & 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.
- 1.111 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 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).

Policy SS4 – Priority Centres of Activity Strategy Revisions

- 1.112 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.
- 1.113 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).

Policy CSD1 Balanced Neighbourhoods for Folkestone & Hythe

- 1.114 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.
- 1.115 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 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

- 1.116 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.
- 1.117 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

- 1.118 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.
- 1.119 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**).

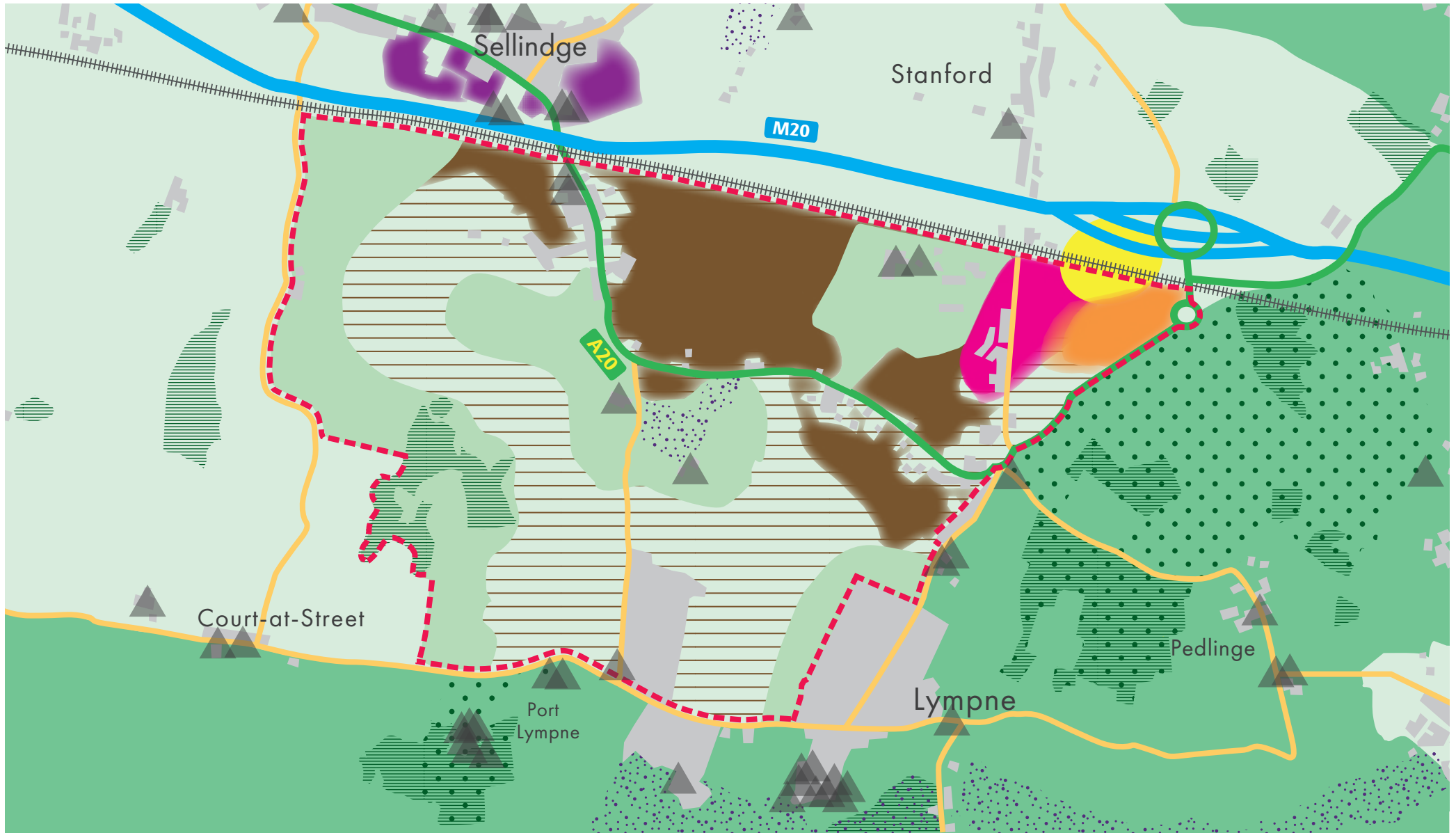
New Garden Settlement Policies SS6, SS7, SS8 and SS9

- 1.120 **Figure 16** illustrates the indicative spatial plan for the new garden settlement in the North Downs as included in the Core Strategy Review.
- 1.121 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.

- 1.122 Policies SS6, SS7, SS8 and SS9 have been appraised collectively in one SA matrix included in **Appendix 5** on the main SA Report. 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.
- 1.123 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.
- 1.124 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.
- 1.125 A minor negative effect was recorded in relation to **historic environment (SA objective 2)**. This score results from 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.
- 1.126 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)**.
- 1.127 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)**.
- 1.128 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)**.
- 1.129 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)**.
- 1.130 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 16: Policy SS6 Indicative Spatial Plan



Policy SS6 - Garden Settlement North Downs - Indicative Strategy

- | | | | | |
|----------------------|----------------------|--|------------------|--------------------------|
| A Roads | Policy SS6 Boundary | Town Centre | Business Hub | Historic Park/
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 | |

1.132 A summary of the effects recorded for the Core Strategy Review policies SS6, SS7, SS8 and SS9 is set out in **Table 9** below.

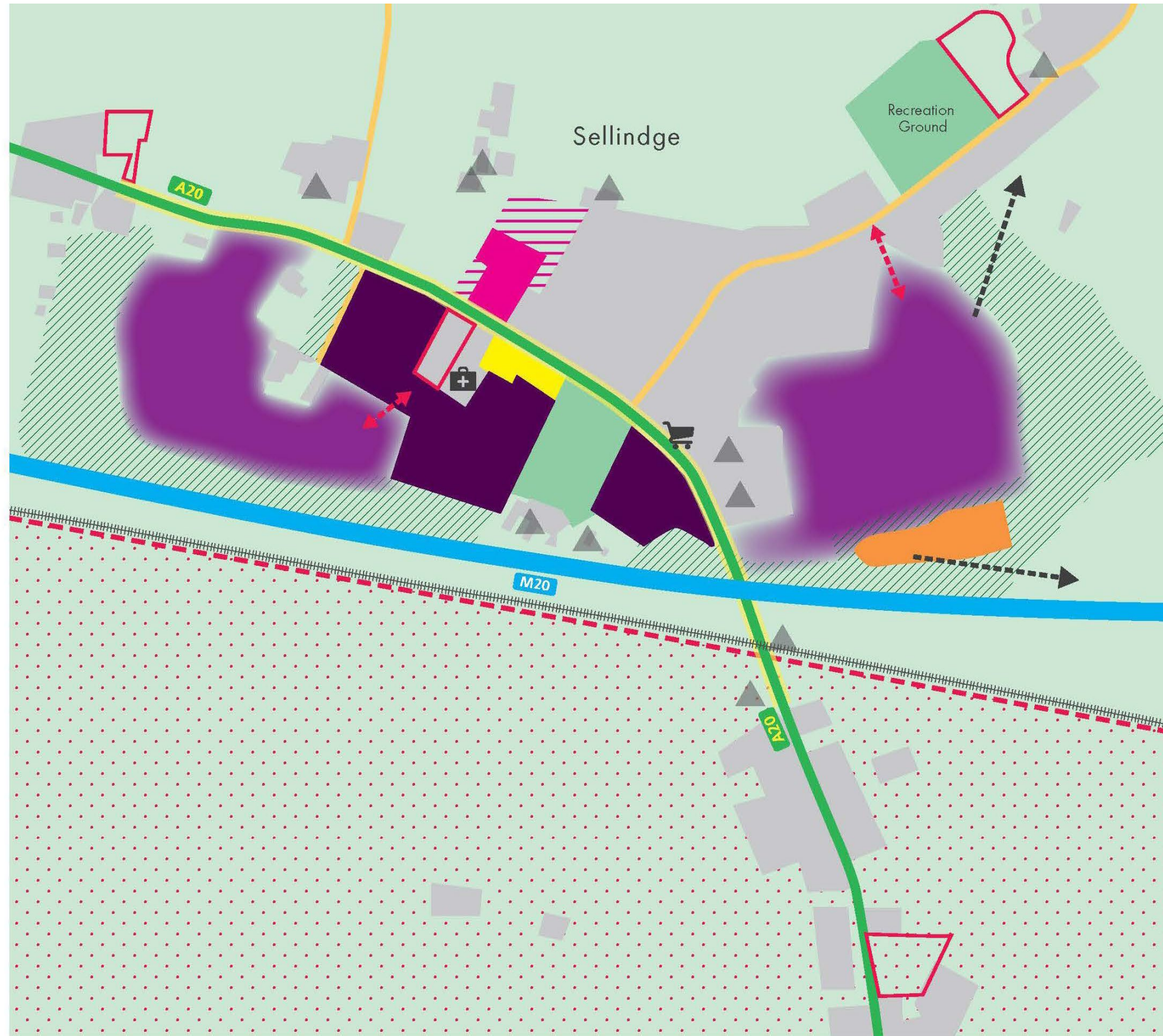
Table 9: Summary of effects following appraisal of Core Strategy Review Policies SS6, SS7, SS8 and SS9

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

- 1.133 **Figure 17** illustrates the indicative spatial plan for development in Sellindge as included in the Core Strategy Review.
- 1.134 A detailed appraisal matrix for Policy CSD9 is presented in **Appendix 5** of the main SA Report. In summary, the new Policy CSD9 will generally have positive effects in relation to the SA objectives.
- 1.135 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.
- 1.136 A minor negative effect is recorded for the **historic environment (SA objective 4)** 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.
- 1.137 A mixed effect (significant positive/minor negative) is recorded in relation to the provision and accessibility of **green infrastructure (SA objective 6)**, dependent upon 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 relate to the loss of greenfield land affecting the openness and rural nature of the village and the wider countryside and the potential for habitat fragmentation.
- 1.138 The positive effects for 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 Site of Special Scientific Interest, and the quality of the local watercourses and water bodies.
- 1.139 The delivery of 600 new dwellings in total in the village in combination with up to 1,000sqm 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.
- 1.140 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. A minor negative effect has been retained in relation to the potential 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. The new services and facilities as set out in the policy would further help to reduce the need to travel away from the village.
- 1.141 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 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)**.
- 1.142 A summary of the effects recorded for the Proposed Submission Core Strategy Review Policy CSD9 is set out in **Table 10** below.

Figure 17: 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

Table 10: 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

1.143 This section considers the effects of the changed and new policies within Core Strategy Review 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, including the District Council's Proposed Submission Places and Policies Local Plan (PPLP):

- **Significant positive effects** are recorded for **SA objectives 1 (Housing), 2 (Employment), 13 (Sustainable Transport) and 14 (Community Cohesion, Services and Facilities)**.
- **A mixed significant positive / significant negative effect** is recorded for **SA objective 7 (Efficient Use of land)** 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.
- **Mixed minor positive / minor negative effects** are recorded against **SA objectives 3 (Landscape), 5 (Biodiversity), 8 (Water Quality) and 9 (Flood Risk)** in acknowledgement of the significant area of greenfield land being developed, which is likely to increase the likelihood of negative effects on the District's landscape, historic environment, biodiversity and water assets and in acknowledgement of 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.
- **Mixed significant positive / minor negative effects** are recorded against **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.
- **Minor negative effects** are recorded against **SA objective 4 (Historic Environment)** in acknowledgement 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
- **Significant positive effects** are recorded in relation to **SA objectives 10 (Energy Efficiency and Renewables) and 11 (Water Efficiency)** in acknowledgement of the Core Strategy Review's new policies to deliver a new garden settlement in the District.

Cross-boundary Cumulative Effects

1.144 In addition, 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 has been considered. 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).

1.145 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)**.

1.146 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 of the viability of Folkestone & Hythe District's employment sites and town centres, with the potential for **significant negative effects** in relation to **SA objectives 14 (Community Cohesion, Services and Facilities) and 2 (Employment)**.

- 1.147 There is also the potential for synergistic **significant positive 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.
- 1.148 The Core Strategy Review and Proposed Submission PPLP are likely to generate **significant positive 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.
- 1.149 Folkestone & Hythe District Council is working with its neighbouring authorities to mitigate the potential for such cumulative adverse effects and maximise the opportunities for cumulative benefits for the region.

Mitigation

- 1.150 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.
- 1.151 **Table 11** 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.
- 1.152 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, for development (**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. Policies in the Minerals and Waste Local Plan mitigate the loss of mineral reserves by promoting mineral extraction in advance of surface development.

Table 11: Mitigation of potential negative effects identified

SA objectives	Other Local Plan policies providing possible mitigation	
	Draft 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>SS1: District Spatial Strategy 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>SS7: New Garden Settlement - Place Shaping Principles 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 development is to be informed by a Landscape and</p>	<p>HB1: Quality Places Through Design encourages development which makes a positive contribution to its location and surroundings.</p> <p>HB2: Cohesive Design promotes Building for Life 12 standards, including creating a place with a distinctive character.</p> <p>NE3: Protecting the District's Landscapes and Countryside 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	
	Draft Proposed Submission Core Strategy Review	Places and Policies Local Plan
	<p>Visual Impact Assessment.</p> <p>CSD3: Rural and Tourism Development of Shepway states that buildings can only be converted if they will contribute to the character of their location.</p> <p>CSD9: Sellindge Strategy states that appropriate landscaping should be provided at the rural edge of the extensions of the existing settlement.</p>	<p>NE1: Enhancing and Managing Access to the Natural Environment, NE2: Biodiversity and CC2: Sustainable Design and Construction 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>CC2: Sustainable Design and Construction 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>SS3: Place-Shaping and Sustainable Settlements Strategy, clause e, seeks to respect and enhance key historic features of conservation interest in the District.</p> <p>SS7: New Garden Settlement - Place Shaping Principles 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>CSD9: Sellindge Strategy includes specific safeguards with respect to the assets identified in the Historic Environment Assessment (LUC 2018).</p>	<p>HB2: Cohesive Design promotes Building for Life 12 standards, including creating a place with a distinctive character.</p> <p>HE1: Heritage Assets, HE2: Archaeology, HE3: Local List of Heritage Assets and HE4: Folkestone's Historic Gardens 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>
SA5. Conserve and enhance biodiversity, taking into account the effects of climate change.	<p>SS7: New Garden Settlement - Place Shaping Principles 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>CDS4: Green Infrastructure of Natural Networks, Open Spaces and Recreation seeks to achieve</p>	<p>HB1: Quality Places Through Design encourages development which creates, enhances and integrates areas of public open space, green infrastructure and biodiversity.</p> <p>HB2: Cohesive Design 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</p>

SA objectives	Other Local Plan policies providing possible mitigation	
	Draft Proposed Submission Core Strategy Review	Places and Policies Local Plan
	<p>net gains in biodiversity, at the same time as safeguarding designated biodiversity sites from harm.</p> <p>CSD9: Sellindge Strategy 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>landscape and wildlife habitats.</p> <p>NE1: Enhancing and Managing Access to the Natural Environment and NE2: Biodiversity seek to conserve and enhance biodiversity in the District.</p> <p>NE2: Biodiversity 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>SS1: District Spatial Strategy seeks to secure new accessible public green space.</p> <p>SS7: New Garden Settlement - Place Shaping Principles 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>CSD4: Green Infrastructure of Natural Networks, Open Spaces and Recreation 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>CSD9: Sellindge Strategy requires that a new village green space is provided over 1.5-2.0 ha at Sellindge.</p>	<p>HB1: Quality Places Through Design encourages development which creates, enhances and integrates areas of public open space, green infrastructure and biodiversity.</p> <p>HB2: Cohesive Design 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>NE1: Enhancing and Managing access to the Natural Environment, NE2: Biodiversity and CC2: Sustainable Design and Construction 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>C2: Safeguarding Community Facilities, C3: Provision of Open Space and C4: Children's Playspace promote the safeguarding and new provision of open spaces in the District.</p> <p>HW4: Promoting Active Travel 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>SS1: District Spatial Strategy 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>SS3: Place-Shaping and Sustainable Settlements Strategy highlights that the principle of</p>	<p>NE4: Equestrian Development, CC6: Solar Farms and HW3: Development that Supports Healthy, Fulfilling and Active Lifestyles require proposals to avoid the loss of high quality agricultural land where possible.</p>

SA objectives	Other Local Plan policies providing possible mitigation	
	Draft Proposed Submission Core Strategy Review	Places and Policies Local Plan
	<p>development is likely to be acceptable on previously developed land, within defined settlements, provided that it is not of high environmental value.</p> <p>SS8: New Garden Settlement - Sustainability and Healthy New Town Principles 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>Minerals and Waste Local Plan 2013-2030</p> <p>CSM5: Land-won Mineral Safeguarding 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>DM7: Safeguarding Mineral Resources 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>DM9: Prior Extraction of Minerals in Advance of Surface Development 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 flooding, taking into account the effects of climate change.	<p>SS3: Place-Shaping and Sustainable Settlements Strategy, clause C, seeks to prevent development in areas at risk of flooding.</p> <p>SS7: New Garden Settlement - Place Shaping Principles 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>CC3: Sustainable Drainage Systems (SuDS) 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>NE1: Enhancing and Managing Access to the Natural Environment, NE2: Biodiversity and CC2: Sustainable Design and Construction 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)

- 1.153 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); and
- 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).

1.154 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)

1.155 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.

1.156 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 (Potten Farm and the Farmstead SE of Grove House) in the masterplanning stage of development.
- The requirement for archaeological evaluation and mitigation (in accordance with PPLP Policy HE4).
- Policy SS7 paragraph 5 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.

1.157 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.**

Monitoring

- 1.158 **Table 9.1** in the main SA Report sets out a number of suggested indicators for monitoring the potential significant effects of implementing the Local Plan.

Conclusions

- 1.159 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 (see **Chapter 3** and **Appendix 2** in the main SA Report), Plan baseline (see **Chapter 4** in the main SA Report) and consultation comments received in relation to the Scoping Report (see **Appendix 1** in the main SA Report) were used to define the SA Framework (see **Chapter 5** in the main SA Report). The SA Framework has been used to appraise high level growth options (see **Chapter 6** and **Appendix 3** in the main SA Report) and spatial options (see **Chapter 7** and **Appendix 4** in the main SA Report) 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** of the main SA Report. 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** of the main SA Report. Further details on the SA process to date can be found in **Chapters 1** and **2** of the main SA Report which set out the structure of the SA Report and the SA Methodology applied.
- 1.160 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.
- 1.161 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 growth in the District and prioritised the allocation and development of brownfield land before greenfield land.
- 1.162 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 & 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)**.

- 1.163 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

- 1.164 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