

Places and Policies Local Plan Sustainability Appraisal Post-Adoption Statement



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#### Sustainability Appraisal Post-Adoption Statement

#### 1. Introduction

- 1.1 In July 2020 the Folkestone and Hythe District Council Places and Policies Local Plan was found legally compliant and sound (subject to modifications) by the Planning Inspector appointed to examine it.
- 1.2 This report explains how the Sustainability Appraisal (SA) process influenced the development of the Places and Policies Local Plan.

Sustainability Appraisal and Strategic Environmental Assessment

1.3 SA identifies the social, environmental and economic impacts of a strategy and suggests ways to avoid or minimise negative impacts and maximise positive impacts. The Planning and Compulsory Purchase Act 2004 requires that SA is undertaken during the preparation of local plan documents, and that an SA Report is published. The Folkestone and Hythe SA also incorporates Strategic Environmental Assessment (SEA), as required by the European Directive on Environmental Assessment of Plans and Programmes 2001/42/EC (transposed into UK legislation through the Environmental Assessment of Plans and Programmes Regulations 2004). This is consistent with advice in the National Planning Policy Framework (2019), which states:

"Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains)."

- 1.4 The main focus of this report is on how the SA and SEA have informed the final Place and Policies Local Plan (PPLP). Regulation 16 of the Environmental Assessment of Plans and Programmes Regulations 2004 requires that, as soon as reasonably practicable after the adoption of a plan for which SEA has been carried out, the planning authority must publish a statement, which explains:
  - (a) how environmental considerations have been integrated into the plan;
  - (b) how the environmental report has been taken into account;
  - (c) how consultation opinions on the environmental report have been taken into account:
  - (d) the reasons for choosing the plan as adopted, in the light of the other reasonable alternatives dealt with; and
  - (e) the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.

1.5 As the SA and SEA process have been integrated throughout the plan preparation process, this statement addresses not only environmental aspects but also the wider sustainability (social and economic) aspects.

#### Habitats Regulations Assessment

1.6 Habitats Regulations Assessment (HRA) – assessment of the impacts of plans and projects on the Natura 2000 network of internationally important nature conservation sites – is also required as part of the plan preparation process, by the European 'Habitats Directive' (transposed into UK legislation through the Conservation of Habitats and Species Regulations 2010). The Habitats Directive applies the precautionary principle to designated sites: plans can only be permitted if it has been shown that they will not adversely affect the designated sites, or else can go ahead only under limited and stringent requirements regarding findings of no alternatives, imperative reasons of overriding public interest and provision of compensatory measures.

# 2. How environmental and wider sustainability considerations have been integrated into the Local Plan

#### Whether SEA/SA is required

2.1 The formal preparation of the Local Plan began after 20 July 2004, so under the EU Directive this plan falls within the timescale of those requiring an SEA. National legislation also requires that sustainability appraisal should be an integral part of the plan preparation process.

#### Methodology

- 2.2 A framework for the SA process was established by commissioning the consultancy company LUC to produce a methodology. This guided the SA process throughout the development of the Local Plan, which was undertaken by LUC.
- 2.3 The SA process has incorporated the requirements of SEA.

#### The process of SA/SEA

- 2.4 The various stages of SA/SEA that have been undertaken throughout the development of the Local Plan are summarised in Table 1.
- 2.5 **The scoping stage:** The first Scoping Report was produced in 2014. It included baseline data about environmental, economic and social characteristics of the areas likely to be affected by the Local Plan, identified other plans, programmes and policies and their objectives, and identified issues and opportunities associated with each sustainability objective. The baseline data would be updated where applicable at each stage of the SA. The Scoping Report set out the proposed methodology for the remainder of the SA process, including the framework of SA objectives, appraisal questions and associated assumptions that were used to appraise the PPLP.
- 2.6 At each stage in the scoping process, statutory agencies and other key bodies were consulted on draft documents and comments received were taken into account in the final published document.

Table 1: How Sustainability Appraisal has been integrated into plan-making

| Date          | Plan-making Stage   | SA/SEA Stage                    |
|---------------|---------------------|---------------------------------|
| April 2014    | -                   | Scoping Report                  |
| January 2015  | Issues and Options  | Issues and Options<br>Appraisal |
| October 2016  | Preferred Options   | Preferred Options SA<br>Report  |
| February 2018 | Submission Document | Submission SA Report            |

| Date           | Plan-making Stage                                | SA/SEA Stage  |
|----------------|--|---|
| September 2019 | Preferred Gypsy and<br>Traveller Site Allocation | Preferred Gypsy and<br>Traveller Site Allocation<br>SA Report |
| January 2020   | Main Modifications                               | Main Modifications SA<br>Report                               |

- 2.7 **Sustainability objectives:** Sustainability objectives to guide the appraisal process were formulated and to meet the requirements of the SEA Directive, the views of the three statutory consultees (Natural England, English Heritage and the Environment Agency) were sought in relation to the scope and level of detail to be covered by the SA of the Local Plan. These objectives cover a range of social, environmental and economic impacts, for example: to reduce poverty and social exclusion, to ensure air quality continues to improve, provide employment opportunities and to increase the production and use of renewable energy (see Annex 1).
- 2.8 **The appraisal stages:** At each stage of Local Plan preparation, proposals were assessed (in the light of baseline scoping information) against a series of sustainability objectives (see above). The findings of the appraisal process were taken into account as the Local Plan evolved, and at each stage of the process a Sustainability Appraisal Report was produced, and consulted on alongside the relevant Local Plan document. Further information about the appraisal stages is provided in subsequent sections of this statement.
- 2.9 The SA has contributed to plan development by providing an independent assessment of the sustainability of the Council's proposed options and policies as they were developed. By integrating the SA as part of the wider and ongoing Local Plan development (as demonstrated in Table 1), the recommendations from the appraisal process were able to feed into and inform the Local Plan from the initial to final stages of its production. The various SA Reports provide an audit trail of the appraisal process.

- 3. How the Sustainability Report (including Environmental Report) has been taken into account
- 3.1 As outlined above, the Folkestone and Hythe Places and Policies Local Plan has gone through a series of stages of preparation. The full suite of SA Reports can be accessed via the Folkestone and District Council website at
- 3.2 <a href="https://www.folkestone-hythe.gov.uk/planning-policy/local-plan-previous-studies">https://www.folkestone-hythe.gov.uk/planning-policy/local-plan-previous-studies</a>
- 3.3 At each stage the SA report contained a non-technical summary and the likely significant effects of the Local Plan were identified, described and evaluated. Possible mitigation measures to minimise negative impacts and opportunities to maximise beneficial impacts were identified, reasonable alternative options were considered (and, further into the process, the reasons for selecting or rejecting alternatives) and possible areas for further monitoring were identified. At each stage the assessment and report produced was reflective of the level of detail in the plan, its stage in the plan-making process.

#### Scoping

3.4 The scoping stage of the SA process helped to guide the generation of themes for the first draft of the Local Plan (the Issues and Options stage). The scoping process highlighted the sustainability issues affecting the District and ensured that the sustainability objectives were in the minds of the plan-makers when drafting the policy options. The scoping stage of the SA fed into the drafting of the Local Plan at its most initial stages and influenced policy options such as 'Maximising permeability and enhancing pedestrian and cycle access' in development and 'Develop additional policies to protect, manage and enhance important habitats and species that are not already subject to Core Strategy policy and national planning guidance'. It also provided the baseline information against which subsequent policy options were assessed.

#### Selecting and Refining Options

3.5 Appraisal was carried out on each of the policy options that were included in the Issues and Options Document. Options were scored as positively or negatively affecting the baseline data. The appraisal also drew on legal requirements and targets identified by the review of relevant plans, policies and programmes. The results of this appraisal advised the policy-makers which of the policy options were the most sustainable. It also identified mitigation measures that could further improve the sustainability of the Local Plan policies. The SA report, along with direction received from consultation responses, government guidance and higher level policy all contributed to the selection and refinement of the preferred Local Plan policy options.

#### Preferred Options

3.6 Once preferred policy approaches were selected, their likely significant effects were evaluated, and measures were suggested to mitigate against adverse

| effects and maximise | e beneficial | effects to | o further | improve | the sustai | nability of |
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each policy. As the policy approaches were developing, each was appraised to evaluate any specific impacts. The identification of these impacts and proposals for improvement were then fed into the plan-making process. Issues that resulted in a negative score under one sustainability objective may have also been addressed by a different objective, so the objectives were also assessed against each other and recommendations were drawn out.

#### Submission Document

3.7 After extensive public consultation on the policy approaches, the submission policies were produced in February 2018. At this stage, suggestions proposing amendments to the policy wording were minimal, as a result of the recommendations and changes made during previous stages of appraisal. At this stage of the appraisal it was found that in general, the policy approaches and site options that were taken forward in the Local Plan were those that performed more positively or at least as well against the SA objectives than the rejected options. However, there were recommendations made for future work such as monitoring the potential significant effects of implementing the Local Plan.

Sustainability Appraisal during the Examination in Public

3.8 A Sustainability Appraisal was also undertaken on changes proposed through the Examination process:

Gypsy and Traveller Site: A series of public hearing sessions took place between the 15 and 17 May 2019. During the hearings the Inspector expressed concern that the draft plan did not adequately address the housing needs of the gypsy and traveller community. In order for the plan to be found 'sound' the Inspector instructed the council to identify a site to meet the outstanding permanent gypsy and traveller pitch requirement of four pitches. The councils preferred site was published for public consultation for a six week period between 2 September 2019 and 14 October 2019. This was accompanied by a sustainability appraisal. Site option GT41 was selected and was allocated in Policy RM15. Policy RM15 was considered likely to generate a significant positive effect against SA objective 5 (Housing) and significant negative effects against SA objectives 1 (Flood Risk) and 11 (Efficient Use of Land). The significant negative effect recorded against SA objective 1 (Flood Risk) was recorded as uncertain until such time as the potential for mitigation measures was known. However GT41 was considered the only available and suitable site capable of delivering four Gypsy and Traveller pitches.

Proposed Amendments (Main Modifications) stage: Throughout the course of hearing sessions in May 2019, a number of modifications were proposed to the Local Plan. Prior to consulting on these, the modifications were appraised and a SA Addendum was published alongside the consultation document for comments. 3.8 In the main, no additional sustainability implications (including cumulative) were identified. The SA findings resulting from these revisions were made available to the Planning Inspector, the public and planning officers for review, so as to raise awareness of implications, and to ensure any significant effects arising from the policy revisions were flagged. The SA concluded that the

Proposed Modifications would lead to changes in the assessment scoring of the following:

- Policy UA15 Land at the Saltwood Care Centre, Hythe (minor positive effect SA8a);
- Policy CC2 Sustainable Design and Construction (uncertainty against some of the objectives);
- Policy HW1 Promoting Healthier Food Environments (minor positive effect SA3); and
- New Policy RM15 Land adjacent to 'The Retreat', Lydd Road, Old Romney (as above).

The Proposed Main Modifications would not change the overall cumulative effects of the PPLP as recorded in the 2018 SA Report. The HRA Addendum assessed the Proposed Main Modifications to the Proposed Submission Draft version of the PPLP and concluded that the HRA remains consistent and robust as previously reported in the HRA Report for the Folkestone and Hythe PPLP (August 2018). Therefore, the conclusions of the HRA for the Plan remained that the Plan (taking into account the proposed Main Modifications) is not likely to have adverse effects on the integrity of European sites, either alone or incombination with other plans or projects, providing that the mitigation set out in the Local Plan is implemented.

## 4. How opinions expressed through public consultation have been taken into account

4.1 As shown in Table 1, during the preparation of the Local Plan there have been a number of stages of public consultation relating to the SA, many of which have been linked to consultation on the Local Plan development stages.

Consultation on SA Scoping Report stages

4.2 In accordance with the SEA Regulations the relevant statutory bodies (Environment Agency, English Heritage (now Historic England) and the Countryside Agency and English Nature (later Natural England)) were consulted, along with other key stakeholders on emerging scoping reports and baseline data documents prior to these being finalised. Comments received in relation to these documents were incorporated prior to the documents being finalised.

Consultation on SA Reports throughout development of the Local Plan

- 4.3 Whenever the Council undertook formal consultation on the Local Plan, the relevant SA Report was published alongside it. Documents were made available to view and download on the Council's website, and were also available for inspection at local libraries during normal opening hours. Letters of notification, inviting comments, were sent to relevant consultees as detailed in the District Council's Consultation Statement.
- 4.4 A separate Consultation Statement was prepared detailing the various stages of consultation, the responses received and how these were taken into account. Statements about consultation responses and how these were addressed were published and made available to inform decision makers throughout the plan preparation process. During the formal examination stages of the plan preparation, all comments were made available to the Planning Inspector and where appropriate discussed at Examination hearing sessions.
- 4.5 Throughout the preparation of the Local Plan, comments received at the consultation stages generally related to the emerging Local Plan document rather than specifically the SA, however in some instances the points being made were related. Where relevant these were reflected in subsequent appraisals.

- 5. The reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with
- 5.1 The Places and Policies Local Plan was prepared in an iterative way, with the SA, other evidence and the results of public consultation informing plan production.
- 5.2 A wide range of alternative options have been considered as part of the Local Plan development. However it is important to appreciate that the primary role of the Local Plan is to help to deliver the vision and objectives of the Core Strategy. The Core Strategy, adopted in 2013, sets out the overarching spatial strategy and broad scale and distribution of development. The Local Plan adds detail in the form of development management policies and site allocations and, in accordance with planning legislation, must have regard to the Core Strategy as the higher order development plan document.
- 5.3 The range of reasonable alternatives for the Local Plan with regard to development management policies and site allocations, were therefore limited by the need for consistency with the adopted development plan (the Core Strategy). Nevertheless, the SA did investigate in detail all reasonable alternatives within the scope and remit of the Local Plan, and this has informed decision-making for the plan.
- 5.4 The findings of the sustainability appraisal of potential options for each policy approach identified a preferred approach, and / or rejection of a particular approach. The SA process also identified opportunities to avoid or to mitigate potential negative sustainability impacts. This enabled emerging policies to be amended to ensure the Local Plan's sustainability was enhanced.
- 5.5 The SA commented on how sustainable each of these options would be along with any considerations that would need to be taken into account when implementing them. This is because the plan was required to comply with existing and emerging national planning policy and guidance. These requirements set the framework for the plan, ensuring that local development was considered in conjunction with wider national objectives. As such, any reasonable alternatives needed to have regard to higher level policy. The results of public consultation were also taken into account in selecting plan options, along with the recommendations of the Planning Inspector appointed to examine the Local Plan in order to secure soundness.
- 5.6 The Places and Policies Local Plan Preferred Options includes commentary on how the sustainability appraisal contributed to selecting options and developing the policies.

(See: https://shepway-consult.objective.co.uk/portal/pplp/preferred\_options?pointId=s1440686658110 #section-s1440686658110)

5.7 The Local Plan Sustainability Appraisal that informed the Regulation 18 document included an appraisal of potential reasonable alternative policy approaches and sites for allocation.

(See: https://shepway-consult.objective.co.uk/portal/pplp/sa?pointId=1475770680139)

5.8 The policies and sites included in the adopted Local Plan were selected largely because they progress and support delivery of the vision, objectives and policies set out in the Core Strategy, whilst achieving the most benefits and least negative effects for sustainable development.

- 6. The measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme
- 6.1 The Environmental Assessment of Plans and Programmes Regulations 2004 require that local authorities "monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action."
- 6.2 A Monitoring Framework has been developed in support of the Local Plan which will help:
  - 1. To provide baseline data for the next SA and to provide a picture of how the environment / sustainability criteria of the area are evolving;
  - 2. To monitor the significant effects or uncertainties of the plan identified through the SA process; and
  - 3. To ensure that action can be taken to reduce / offset the significant effects of the plan.
- 6.3 Where possible, in implementing the monitoring identified as part of the SA, use will be made of existing monitoring processes to avoid duplication of effort.
- 6.4 The Local Plan delivers the overarching development vision, objectives and strategy of the Core Strategy. As such, there is overlap between the monitoring of implementation of the Local Plan and the existing monitoring framework which was developed for the Core Strategy. Baseline contextual indicators and policy specific performance data is reported annually through the Council's suite of topic focused monitoring reports, and then subsequently drawn together in the Authority Monitoring Report, all of which are available on the Council's website.
- 6.5 The Council's regular reporting includes:
  - Commercial development: covering the characteristics of employment, business and retail development and local property market data (including vacancy);
  - Environment and sustainability: covering the condition of, and impact of development upon, areas of nature conservation, landscape, flood risk and heritage; the environmental performance of new buildings and wider environmental issues such as air pollution (including within any Air Quality Management Areas, although none are currently designated);
  - Housing delivery: covering housing supply and delivery, including affordable housing;

- Industrial estates: covering the occupancy, vacancy and performance of designated employment areas within the district; and
- Town and local centres monitor: covering the occupancy, vacancy and performance of designated town and local centres within the district.
- 6.6 The monitoring measures proposed as part of the SA process relate to the significant adverse effects and uncertainties that have been predicted to result from policy option implementation. These include the uncertainties highlighted during the comparison of the Local Plan policies against the SA sub objectives and recommendations.
- 6.7 Table 2 below sets out the indicators that are proposed to monitor the significant effects and sets out a number of suggested indicators for monitoring the potential significant effects of implementing the Local Plan and the relevant SA Objective. Indicators are drawn from the Scoping Report and the Local Plan Monitoring Framework. Relevant indicators from the Core Strategy and Corporate Plan are included.

Table 2: Indicators to monitor significant and potential significant effects

| SA Indicator  | Proposed monitoring indicator   | Local Plan Monitoring<br>Indicator   | Target /data  |
|---|---|--|---|
| SA1: Reduce the risk<br>of flooding, taking into<br>account the effects of<br>climate change          | Number of properties<br>built in areas of flood<br>zones 2 and 3<br>Number of planning<br>permissions granted<br>contrary to EA advice<br>Number of new<br>developments<br>incorporating SUDS | Compliance of all development proposals with SuDS policy   | Monitoring of development management decisions and S106 legal agreements for maintenance and managment Data from Lead Local Flood Authority |
|   |   | Core Strategy indicator -<br>B7 Manage Folkestone<br>and Hythe's coast to<br>ensure resilience to<br>climate change<br>processes reducing the<br>risk to life and property<br>from flood hazards, and<br>actively managing<br>coastal environments for<br>green infrastructure and<br>sustainable recreational<br>purposes | Implementation of the Folkestone to Cliff End Flood and Erosion Management Strategy   |
| SA2: Increase energy efficiency in the built environment, the proportion of energy use from renewable | Number of new developments incorporating low carbon technologies  | New development which generates energy from renewable and low carbon sources   | Building Regulations<br>data  |

| SA Indicator   | Proposed monitoring indicator  | Local Plan Monitoring<br>Indicator   | Target /data  |
|--|--|--|---|
| sources and resilience to a changing climate and extreme weather   | Installed renewable energy capacity  Number of Air Quality Management Areas declared   | Percentage of major non-residential development achieving BREEAM 'Very good' standard  Percentage of new residential development meeting the requirements of water efficiency regulating – 110 litres per person per day  Core Strategy Indicator - B2. Minimise local carbon emissions, maintain air quality, control pollutants and promote sustainable waste  | Continuous relative improvements in Folkestone and Hythe's emissions performance Development of new low-carbon waste handling centres   |
| SA3: Promote community vibrancy, provide opportunities to access services, facilities and environmental assets for all and avoid creating inequalities of opportunity for access | New education and/or training facilities permitted (sqm)  Extent of new and loss of community facilities (sqm)  Amount of additional 'town centre use' floorspace provided in Folkestone and Hythe town centres  Amount of open space and sport and recreation facilities  Percentage of people living in fuel poverty  Number of people claiming Jobseekers' Allowance  Affordable home completions | Percentage of primary frontage in non-retail use Percentage of frontage in non-retail use Gains and losses of shops and services within district and local centres Amount of existing community facilities lost (without replacement) and gained as a result of new development (sqm) Amount of existing public play, open space and sports provision lost (without replacement) and gained as a result of new development | In accordance with requirements in Core Strategy Policy CSD1 As set out in allocations policies /HIA  Primary shopping frontages 100 per cent No loss of shops and services  Shopping survey HIA, CIA  Developer contributions and commuted payments received and spent  Standards set out in plan are met Developer contributions and commuted payments received and spent |

| SA Indicator  | Proposed monitoring indicator   | Local Plan Monitoring<br>Indicator  | Target /data  |
|---|---|---|---|
|   |   | Core Strategy indicators  – A3.Achieve real terms increases in gross incomes  A4. Grow the proportion of residents with higher-level qualifications  C1. Maintain cohesive neighbourhoods and encourage increased voluntary activity, retention of viable local community buildings and civic interest in community development  C5.Increase access to services that are appropriate to the needs of the local population and maintain essential rural services | Earnings by residence (real terms)  NVQ4+ qualifications  Adoption of community plans inc Neighbourhood Development Plans  Additional school and GP premises  |
| SA4: Reduce crime and the fear of crime   | Number of crimes committed  | Corporate Plan Shepway District Council Corporate Delivery Plan 2017 – 2020 Reduce the impact of anti-social behaviour  | Reduce crime, tackle anti-social behaviour and support vulnerable people by working with partners through the Shepway Community Safety Partnership. Support the most vulnerable people in our communities to tackle crime and fear of crime to enable people to feel safe and secure through measures such as tackling Anti-Social Behaviour and designing out crime. |
| SA5: Improve the provision of homes, including affordable housing, having regard to the needs of all sections of society, including the elderly | Affordable housing completions Average house prices Number of people in housing need (SHMA) Annual housing completions –total houses built, types, sizes and tenures Total vacant dwellings | Net annual housing completions by tenure  1. Total annual permanent pitch increase;   | In accordance with requirements in Core Strategy Policy CSD1 As set out in allocations policies /HIA Meet need identified in up-to-date Gypsy and Traveller Accommodation   |

| SA Indicator   | Proposed monitoring indicator   | Local Plan Monitoring<br>Indicator  | Target /data  |
|--|---|---|---|
|  | Number of permanent Gypsy and Traveller Pitches delivered Number of statutory homeless people Number or proportion of local authority homes meeting Lifetime Homes/Decent Homes Standards   | 2. Extensions to existing sites; 3. Annual temporary pitches granted permission; 4. Annual loss of pitches; and 5. Baseline number of district pitches  Core Strategy Indicator  C3. Assist in meeting the essential needs of vulnerable local social groups and provide more properties that allow people to remain living independently | Assessment (GTAA) for 5 year supply  No net loss if 5 year supply not achieved.  HIA/ GTAA  Appeal decisions allowed / dismissed on 5 year land supply grounds  -Lifetime Homes completions                               |
| SA6: Support the creation of high quality and diverse employment opportunities | Amount of new employment land delivered Extent of employment land lost to residential development Number of people claiming Jobseekers' Allowance Qualifications of the working age population Extent and speed of broadband coverage | Annual increase of employment floorspace (sqm) district-wide. Gross and net totals by use class:  | Delivery of Core Strategy Policy SS2 targets for employment land supply (informed by updated evidence in the Employment Land Review 2017)  All development within urban area All major developments within the rural area |
| SA7: Conserve and enhance the fabric and setting of historic assets            | Number of entries on<br>the Heritage at Risk<br>Register  | Change in the extent and quality of the built environment:  Number of scheduled ancient monuments, grade I, II*,II listed buildings,  | Minimise loss of or damage to heritage assets  Minimise additions to and increase removals from the risk register.  |

| SA Indicator   | Proposed monitoring indicator  | Local Plan Monitoring<br>Indicator  | Target /data   |
|--|--|---|--|
|  |  | battlefields, historic parks and gardens, conservation and other heritage assets;  • Loss of, or addition to heritage assets  • Addition or removals from the risk register Recorded damage to heritage assets  Number of listed buildings lost   |  |
| SA8: Conserve, and where relevant enhance, the quality, character and local distinctiveness of the landscape and townscape | Percentage of new development taking place on brownfield/previously developed land Number of new proposals in the AONB and other 'sensitive landscape areas'   | Percentage of net annual dwellings built on brownfield land  Percentage of applications refused on design grounds  Percentage of planning permissions given in Area of Outstanding Natural Beauty (AONB)  | Core Strategy Policy SS2  65 per cent of dwellings to be provided on previously developed ('brownfield') land by 2030/31  Monitoring of development management decisions  Monitoring of development management decisions Appeal decisions allowed / dismissed on impacts on the AONB |
| SA9: Conserve and enhance biodiversity, taking into account the effects of climate change                                  | Amount of greenfield land lost to development Change in condition of SSSIs Number of Local Wildlife Sites Amount of development that takes place on Local Green Spaces, open spaces and other outdoor sports facilities. | Percentage of planning permissions granted in SSSI and Natura 2000 sites. Loss of identified Green Infrastructure (GI) and new Provision Condition of Natura 2000 sites Condition of SSSIs Condition of Nature Reserves and Local Wildlife Sites Implementation of projects identified in GI Plan | Natural England – condition of SSSI report  Kent Biodiversity Action Plan - Biodiversity Opportunity Area reports  |
| SA10: Reduce the need to travel; increase opportunities to choose sustainable  | Proportion of people who travel to work by public transport Railway Station footfall   | Enhancements to pedestrian and cycle routes from new development  | Developer contributions and commuted payments received and spent   |

| SA Indicator  | Proposed monitoring indicator  | Local Plan Monitoring<br>Indicator   | Target /data   |
|---|--|--|--|
| transport modes and avoid development that will result in significant traffic congestion  | Bus patronage levels Number of Travel Plans implemented with new development Number of users of cycle paths Number of junctions at or exceeding capacity   | Core strategy – B9. Promote choice in means of transport through opportunities for walking and cycling and improved public transport networks and information                            | Expand bus routes  |
| SA11: Use land efficiently and safeguard soils, geology and economic mineral reserves   | Percentage of development taking place on brownfield/previously developed land Number of planning applications approved within a Minerals Consultation Area or Mineral Safeguarding Area Amount of development that takes place on best and most versatile agricultural land Proportion of household waste recycled Proportion of commercial waste recycled Proportion of waste sent to landfill | Percentage of net annual dwellings built on brownfield land  Core Strategy – B2. Minimise local carbon emissions, maintain air quality, control pollutants and promote sustainable waste | Core Strategy Policy SS2 65 per cent of dwellings to be provided on previously developed ('brownfield') land by 2030/31  Continuous relative improvements in Folkestone and Hythe's emissions performance Development of new low-carbon waste handling centres |
| SA12: Maintain and improve the quality of groundwater, surface waters and coastal waters and the hydromorphological (physical) quality of rivers and coastal waters | No likely significant effects identified through the SA.   | Core strategy Indicator  – B5. Increase the efficiency of water management to maintain local water resources and to improve the quality of watercourses and the sea                      | EnvironmentAgency<br>water quality data;<br>ground, surface and sea  |
| SA13: Use water resources efficiently   | No likely significant effects identified through the SA.   | Percentage of new residential development meeting the requirements of water efficiency regulating – 110 litres per person per day  | Building Regulations data  |
| SA14: Protect and enhance green infrastructure and  | Extent of new or loss of new Local Green Spaces •  | Implementation of projects identified in GI Plan   | Monitoring of development management decisions   |

| SA Indicator                     | Proposed monitoring indicator  | Local Plan Monitoring<br>Indicator   | Target /data  |
|----------------------------------|--|--|---|
| ensure that it meets local needs | Amount of development<br>that takes place on<br>Local Green Spaces<br>Extent of new and loss<br>of open space and sport<br>and recreation facilities | Loss of identified Green Infrastructure (GI) and new Provision Condition of Natura 2000 sites Amount of existing public play, open space and sports provision lost (without replacement) and gained as a result of new development | and S106 legal agreements  Standards set out in plan are met Developer contributions and commuted payments received and spent |

#### 7. Conclusions

- 7.1 The Places and Policies Local Plan includes the detailed development management policies and site allocations that will help to deliver the strategic part of the district's development plan, the Core Strategy 2013. Together, these two development plans provide the statutory framework for delivering and managing development to 2031.
- 7.2 This SA post-adoption statement demonstrates that a robust process of sustainability appraisal (incorporating the strategic environmental assessment requirements) has been applied throughout the process of preparing the Places and Policies Local Plan, and has informed its development.
- 7.3 To inform the preparation of the Plan, an Appropriate Assessment under the Habitats Regulation Assessment has also been undertaken to assess the impacts of the Plan on the Natura 2000 network of internationally important nature conservation sites.
- 7.4 In including policies designed so that development and use of land in the district contributes to the mitigation of, and adaptation to, climate change, the Council has complied with the relevant legal requirements concerning climate change.
- 7.5 The Inspector's Report on the Local Plan (paragraphs 65 to 67) confirms that the sustainability appraisal carried out by the Council is adequate, and the plan is compliant with legal requirements, including with regard to sustainability appraisal.
- 7.6 The Inspector's Report also confirms the Habitats Regulations Assessment Report January 2018 and addendum July 2018 sets out why an Appropriate Assessment (AA) is not necessary.

Annex 1: Sustainability Appraisal Objectives and appraisal questions

| SA Indicator  | Appraisal questions: will the Plan/option lead to?   |
|---|--|
| SA1: Reduce the risk of flooding, taking into account the effects of climate change         | Development which supports and corresponds with the Water Framework Directive, the NPPF, Technical Guidance to the NPPF and the flood risk management policies of the EA?  |
|   | Development which has regard to the Shepway Strategic Flood Risk Assessment?   |
|   | Development which incorporates SuDS (including their long-term maintenance) to reduce the rate of run-off and reduce the risk of surface water flooding and combined sewer overflows?  |
| SA2: Increase energy efficiency in the built environment, the proportion of energy use from | Developments that are energy efficient in their design and construction and which provide opportunities for combined heat and power?   |
| renewable sources and resilience to a changing climate and extreme weather                  | Greater consideration of climate change adaptation within planning and design?   |
|   | An increase in the number of large scale renewable energy schemes?   |
|   | An increase in the local/on-site renewable energy generating capacity?   |
|   | A decrease in oil consumption?   |
|   | Opportunities for modal shift away from private motor vehicles?  |
|   | Support for managing the natural environment in a way that recognises its potential to deliver climate change adaptation services?   |
|   | (N.B. Climate change is also likely to impact upon habitats and thereby biodiversity. This issued is dealt with under SA objective 9.)   |
| SA3: Promote community vibrancy, provide opportunities to access services, facilities and   | Well-designed, compact communities which are of a sufficient critical mass or density to support local services and public transport provision?  |
| environmental assets for all and avoid creating inequalities of opportunity for access      | Opportunities to improve educational attainment, qualification levels and participation in education and training through access to existing or the provision of new educational infrastructure in relation to new residential developments? |
|   | Provision of new or enhancement of existing leisure facilities for young people at the neighbourhood level, where thresholds/standards require these?  |
|   | Opportunities to lead healthier lifestyles, including development that enhances existing and /or makes provision for and maintenance towards sports and  |

| SA Indicator  | Appraisal questions: will the Plan/option lead to?   |
|---|--|
|   | recreational facilities e.g. publicly available pitches, allotments, swimming pools, courts, etc.?   |
|   | Adequate provision of health services to support new communities through the enhancement of existing facilities or through the creation of new?  |
|   | Developments, especially in deprived communities, which reduce car dependence by ensuring employment opportunities, health services, educational facilities, shops and recreational opportunities are accessible by foot, cycle or public transport? |
|   | Improvements to local public transport infrastructure, especially in deprived communities?   |
|   | Reintegration of physically divided or highly linear villages or neighbourhoods through, for example, provision of central social infrastructure?  |
| SA4: Reduce crime and the fear of crime   | Reduced levels of crime, anti-social behaviour and the fear of crime through design i.e. improvements to the environment, street layout, public space provision, passive surveillance, lighting etc.?  |
| SA5: Improve the provision of homes, including affordable housing, having regard to the needs of all sections of society, including the elderly | Sufficient amounts of housing to meet the needs of the community and local economy?  |
|   | Development which delivers an appropriate mix of housing, including affordable housing and dwellings for older people?   |
| SA6: Support the creation of high quality and diverse employment opportunities  | An adequate supply of land, skills and infrastructure (such as ICT) to meet the requirements of sectors targeted for economic growth and diversification, including those set out in the Shepway Economic Strategy?                                  |
|   | Improved access to jobs for local people from all sectors of the community?  |
|   | Enhanced vitality and vibrancy of town centres?  |
|   | Expansion or upgrading of key visitor attractions?   |
|   | Employment opportunities which address the economic consequences of the de-commissioning of Dungeness nuclear power station?   |
|   | Provision of high quality employment sites and associated infrastructure suitable for the likely continuation in a shift from manufacturing to higher skill, service industries?   |
| SA7: Conserve and enhance the fabric and setting of historic assets   | Development that avoids negative effects on listed buildings, conservation areas, scheduled ancient monuments, registered historic parks and gardens, and registered battlefields and their settings)?   |
|   | Development that is well related to the natural environment<br>and characteristic scale, form materials and detailing of the<br>settlement and contributes to a sense of place?  |

| SA Indicator   | Appraisal questions: will the Plan/option lead to?   |
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|  | Promotes the enhancement of the archaeological resource<br>and other aspects of heritage, such as, parks and open<br>spaces, and areas with a particular historical or cultural<br>association?  |
|  | Opportunities for the enhancement of historic assets, townscapes and landscapes?   |
| SA8: Conserve, and where relevant enhance, the quality, character and local distinctiveness of the landscape and townscape   | Areas of the highest landscape sensitivity being provided with the highest level of policy protection?   |
|  | Development which considers the existing character, form and pattern of the landscape, buildings and settlements?  |
|  | The protection and enhancement of local distinctiveness and contribution to a sense of place?  |
|  | The provision of and maintenance towards green infrastructure assets and networks (including green open space and river/canal corridors) and ensure that this is linked into new and existing developments, to improve the connectivity of green spaces and green networks?            |
| SA9: Conserve and enhance biodiversity, taking into account the effects of climate change  | Avoidance of net loss, damage to, or fragmentation of designated and non-designated wildlife sites and habitats? Opportunities to enhance habitats for protected species and priority species identified in the Kent BAP or the England Biodiversity Strategy 2020?                    |
|  | Opportunities for people to come into contact with robust wildlife places whilst encouraging respect for and raising awareness of the sensitivity of these sites?  |
|  | Development which includes the integration of ecological conditions and contributes to improvement in ecological connectivity in rural and urban areas?  |
|  | The maintenance and enhancement of the four large scale ecological networks in the District?   |
|  | (N.B. Climate change is likely to impact upon habitats and thereby biodiversity. Plan policies which achieve the goals listed above should all help to enhance the ability of wildlife to adapt to a changing climate.)  |
| SA10: Reduce the need to travel; increase opportunities to choose sustainable transport modes and avoid development that will result in significant traffic congestion | A complementary mix of land uses within compact communities that minimises the length of journeys to services and employment, increases the proportion of journeys made on foot or by cycle, and are of a sufficient density to support local services and public transport provision? |
|  | Development in locations well served by public transport, cycle paths and walking routes?  |
|  | Support for the objectives of the Shepway Cycling Plan?  |

| SA Indicator  | Appraisal questions: will the Plan/option lead to?   |
|---|--|
| SA11: Use land efficiently and safeguard soils, geology and economic mineral reserves   | Development that avoids high quality agricultural land?  |
|   | The remediation of contaminated sites?   |
|   | Development on brownfield sites?   |
|   | Development that protects soil processes and functions?  |
|   | Development that protects sites valued for their geological characteristics?   |
|   | Development that avoids sterilising economic mineral reserves?   |
| SA12: Maintain and improve the quality of groundwater, surface waters and coastal waters and the hydromorphological (physical) quality of rivers and coastal waters | Development that will not lead to the deterioration of: the quality of groundwater, surface waters or coastal waters; the physical quality of rivers and coastal waters; Water Framework Directive status?   |
|   | Development where adequate foul drainage, sewage treatment facilities and surface water drainage are available?  |
|   | Development which incorporates SuDS (including their long-term maintenance) to reduce and the risk of combined sewer overflows and to trap and break down pollutants?  |
| SA13: Use water resources efficiently   | Development where adequate water supply is available?  |
|   | Water efficient design and reduction in water consumption (e.g. rainwater recycling/grey water reuse and BREEAM/ EcoHomes Excellent Standard)?   |
| SA14: Protect and enhance green infrastructure and ensure that it meets local needs   | The provision and maintenance of green infrastructure assets and networks (including green open space and river/canal corridors) and ensure that this is linked into new and existing developments, to improve the connectivity of green spaces and green networks?  |
|   | (N.B. The East Kent Green Infrastructure (GI) Working<br>Group has identified an East Kent GI Typology which<br>encompasses the following GI types:  |
|   | <ul> <li>Biodiversity e.g. Natura 2000 sites, SSSIs, LNRs, Local Wildlife Sites</li> <li>Civic Amenity e.g. parks, allotments, cemeteries</li> <li>Linear features e.g. the Royal Military Canal, railway corridors. The full list of GI components of this typology is available from the Shepway GI Report, 2011.</li> </ul> |