



Town Planning

Submitted to
Shepway District Council

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High Level Options Report

Shepway District Growth Options Study

December 2016
Final Report

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1 Introduction

1.1 Project context

In October 2016, AECOM was commissioned by Shepway District Council (SDC) to develop a Strategic Growth Options Study for Shepway District.

The Strategic Growth Options Study is an evidence base document intended to inform the Local Plan process. The context for the Growth Options Study comprised a new calculation of Shepway's emerging Objectively Assessed Housing Need (OAHN) as part of a Strategic Housing Market Assessment (SHMA) carried out jointly with Dover District Council.

The emerging SHMA suggests that significantly more homes are needed across Shepway in coming years than planned for within the adopted Core Strategy¹. In order to constitute sustainable development, these homes will require appropriate supporting infrastructure, including new employment opportunities.

As such, a partial review of the Core Strategy is taking place. The partial review will help ensure that the uplift in housing numbers can be accommodated within Shepway and that the jobs and infrastructure that the new homes will need can also be successfully delivered.

The Strategic Growth Options Study is therefore a crucial element of the evidence base for the Core Strategy partial review. It is being carried out in parallel with the Sustainability Appraisal (SA) process for the Core Strategy partial review, and there will be various points at which these parallel processes inform one another.

The spatial context for the study is a District with significant strategic constraints to development, including the Kent Downs Area of Outstanding Natural Beauty (AONB)² across much of its northern half, and a very large area of functional floodplain across its low-lying southern area.

Reflecting the potential of the land within the District outside both of these strategically constrained areas, in 2016 the Council submitted an expression of interest to Government for the development of a new garden town at Otterpool Park, close to the M20 motorway and High Speed 1 (HS1) rail line.³ On 11th November 2016, the Department of Communities and Local Government confirmed via a press release that the development of a new locally-led Garden Town at Otterpool Park, comprising up to 12,000 new dwellings, now had Government backing. As such, the development of a garden town at Otterpool Park is now effectively national planning policy.

However, as noted by SDC in the project brief for the Strategic Growth Options Study, the expression of interest is *'without prejudice to any future decisions the Council might take in its capacity as local planning authority. The Council has taken considerable care with its governance arrangements to separate its responsibilities as local planning authority from its role as a joint promoter of a new settlement at Otterpool Park.'*

¹ Available online at (Deprecated)

² <http://www.kentdowns.org.uk/>

³ See <http://www.folkestone-hythe.gov.uk/otterpool-park> for details

As such, although the proposed location for the Otterpool Park development is among the areas to be tested for its development potential, it will be treated for the purposes of the study in exactly the same way as land elsewhere in the District, reflecting the need for a consistent, objective and transparent approach.

1.2 Project objectives and structure

In the words of SDC, the Strategic Growth Options Study will '*seek to review possible options for growth so as to establish a robust high-level spatial strategy that can be carried forward in the development of planning policies as the central element in the partial review of the Core Strategy*'.

In other words, the Strategic Growth Options Study will aim to determine the extent to which SDC can meet its housing need on suitable land within its own boundaries. Importantly, the study should seek a positive approach to planning, in line with the approach promoted by the National Planning Policy Framework (NPPF)⁴. This means assessing opportunities for growth as well as uncovering the constraints and limits to development. It also means that the study needs to assess the suitability of land for a range of appropriate uses, not just for housing, even in a context of housing-driven growth.

The study will aim to set out how any constraints uncovered may be mitigated and how opportunities for growth may be maximised. The study is a technical, impartial and objective exercise. This means that in determining the suitability or otherwise of land for development, the assessment has been based on the physical characteristics of the land and on relevant local and national planning policy considerations.

The study has not been influenced by opinions on where growth should go, politically motivated or otherwise; for this reason consultation has been limited to technical specialists at this stage. As with all evidence base documents underpinning the Core Strategy process, members of the public and elected politicians will have an opportunity to comment on study conclusions through the Core Strategy consultations.

In assessing the technical suitability of land for development, the assessment has deliberately been blind to political borders at all times; as such, ward, parliamentary constituency and other political boundaries in the study area were considered neither as opportunities nor as constraints for the purposes of the study.

As the study is an evidence base rather than a policy document, it does not necessarily follow or imply that development of some or all land identified as suitable for development will take place or that development at these locations is supported by SDC. Rather, this assessment provides SDC with a technical evidence base to consider future options for site allocations and to inform development management decisions.

It should also be noted that the cumulative area of land considered suitable for development in this report is likely to exceed the total required according to the evidence of housing need; however, avoiding any 'upper limit' to the assessment of land in terms of dwelling numbers will enable SDC to consider which are the most accessible and sustainable locations for growth, and will give all stakeholders the confidence that all locations were assessed for development suitability on an equal basis.

The report considers transport data from a range of relevant sources but detailed transport modelling of its conclusions has not been carried out. As such, modelling the transport impacts of developing some

⁴ Available online at https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

or all of the land recommended as suitable for development by this report is a necessary next step to help inform the SDC planning process.

Although the focus of this report is on land beyond the urban edge, urban sites nevertheless have an important role to play. This study does not affect the desirability of a sustainable 'brownfield first' approach as supported by the NPPF. Therefore, brownfield opportunities, including windfall opportunities, should be considered ahead of, or in parallel with, greenfield opportunities.

Having assessed existing evidence gaps before commissioning the study, SDC identified that a High Level Landscape Appraisal (HLLA) should form a part of it, developing and appraising landscape evidence to inform the study conclusions alongside existing evidence from other topic areas.

The HLLA has informed the two other elements of the Strategic Growth Options Study, namely the High Level Options Report and the Phase Two report.

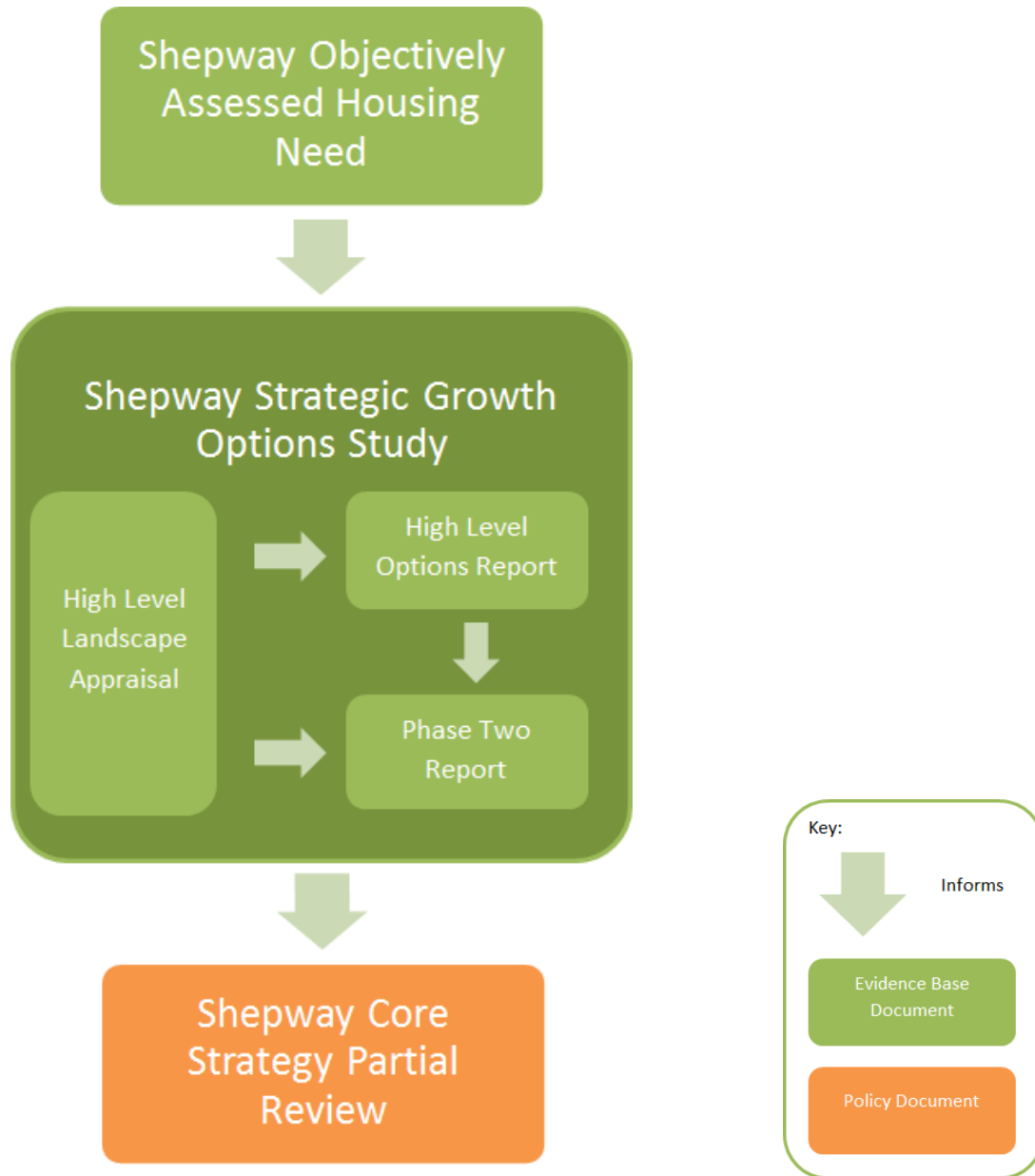
This High Level Options Report comprises the first half of the study. Its aim is to assess strategic considerations having an impact on suitability of land for development. The Phase Two Report then carries forward the conclusions of the High Level Options Report by going down to specific detail on the boundaries of individual sites.

AECOM has applied a similar two-stage structure in numerous growth studies elsewhere, and considers it the best approach to use as it allows for the fact that the constraints and opportunities for growth differ significantly depending on spatial scale. It is very likely that constraints and opportunities will emerge in the Phase Two Report that were not visible in the High Level Options Report. Equally, the High Level Options Report allows for a streamlined, efficient approach by saving time on detailed analysis of land already considered strategically unsuitable.

Finally, it should be noted that this is a strategic study which assesses large scale sites, which for the purposes of the study comprise sites with capacity for 250 dwellings or more. Land deemed by this study not suitable for development at this scale may nevertheless retain the potential to be suitable for smaller scale development.

The context for and structure of the Strategic Growth Options Report are illustrated in Figure 1 below.

Figure 1: Context and Structure of the Shepway Strategic Growth Options Report



2 Approach

2.1 Summary of methodology

The first phase of work, as explained above, comprises the High Level Options (HLO) report. This will set out the key spatial principles underpinning the study, drawing on a combination of NPPF requirements, SA considerations and AECOM knowledge and experience of similar studies. This will give the study a firm, objective and consistent basis from the start.

The HLO report will be informed by the input of statutory consultees and representatives of other relevant technical stakeholder organisations. This will ensure that the correct strategic constraints and opportunities are identified. Each consultee will be invited, via an e-mail survey, to provide information on the constraints and opportunities to development in specific locations across the District from their technical perspective.

Alongside information from statutory consultees and other relevant stakeholder organisations, all relevant existing planning evidence and policy will be collated and analysed to ensure high-level options are based firmly on information already available. This review of existing data will cover a wide range of topics but in respect of landscape will be informed by the HLLA, being progressed in parallel with the HLO report, as illustrated in Figure 1 above.

Should any evidence gaps be found to exist, or should the evidence base require clarification or be considered inaccurate in any way, this will be stated, along with reasons for the judgement and the proposed approach to mitigation.

Following assessment of existing and new evidence, a technical stakeholder workshop – summarised in chapter 4 below – was held with the following aims:

- Presentation to consultees of planning and landscape data collected so far, both from the consultees themselves and through the data and evidence review;
- Verification of that data;
- Creating a collective understanding of what the data means; and
- Developing that collective understanding into a series of two or more high level options.

This final HLO report therefore incorporates agreed spatial principles, data from statutory consultees from both e-mail survey and workshop, full review and interpretation of policy and evidence and high level options based on all data gathered.

The Phase Two report will then be ready to start. It will comprise a detailed assessment of individual areas considered to have potential in the HLO report and will draw from existing and newly-gathered data to set out site-specific opportunities and constraints. Again, the HLLA will be progressed alongside and will inform this phase of the work.

Once data has been assessed and applied, the Phase Two report will set out indicative conclusions on land uses and development scale by area. It will also enable key infrastructure opportunities and constraints to be identified at a site-specific level.

The same statutory consultees and technical stakeholders who informed the HLO report can continue to inform AECOM's Phase Two work at a site-specific level- as such, individual consultees will be contacted as appropriate on a flexible, ad-hoc basis depending on site-specific issues uncovered.

The final Phase Two report will provide site-specific conclusions, drawing on the HLO report conclusions, a full assessment of site-specific constraints and opportunities, land uses, development scale, infrastructure, and further information from statutory consultees and technical stakeholders as appropriate.

Finally, the whole of the HLO and the Phase Two reports will be presented together in a fully-illustrated final Strategic Growth Options Study document, adding relevant text on interpretation and a brief final assessment of deliverability and next steps for the Council, including public consultation, as it builds the findings of the study into the local plan process.

The draft final HLLA report will build on the interim version by incorporating relevant findings and data from the landscape element of the Phase 2 work (task 2.1). The final HLLA, comprising the landscape work informing both the HLO report and the Phase Two report, will form a technical appendix to the Strategic Growth Options Study.

At the time that the final Growth Options report is published, Council members will be briefed on key findings and conclusions via a Powerpoint presentation and a question and answer session to follow. The presentation will be made available on the SDC website.

2.2 Key spatial planning principles

For the Shepway Growth Options Study to form a consistent and comprehensible element of the Local Plan evidence base, it needs to be underpinned by a number of key spatial planning principles.

This will ensure that study conclusions help SDC's emerging Core Strategy partial review contribute to the achievement of sustainable development, in line with the key objectives of the National Planning Policy Framework (NPPF). The NPPF defines sustainable development as 'the golden thread running through both plan-making and decision-taking'.

As such, the NPPF should be used as the key sources of the spatial planning principles deployed. This will ensure the Growth Options Study is properly anchored in its planning context.

Once relevant spatial planning principles have been determined based on the NPPF, they can then inform **criteria** for testing the suitability of land for development. These criteria have been developed by AECOM over time in carrying out numerous similar strategic growth studies.

Paragraph 7 of the NPPF states that there are three dimensions to sustainable development: economic, social and environmental.

The three dimensions then inform the NPPF's twelve Core Planning Principles, which can in turn inform the spatial planning principles of the Growth Options Study. The process is illustrated in Table 1 below.

Table 1: Translation of NPPF into spatial planning principles

| Dimension of sustainable development | NPPF Core Planning Principles and Shepway Core Strategy policies informed by each dimension⁵ | Emerging spatial planning principle for Growth Options Study |
|---|--|--|
| NPPF economic dimension | NPPF Core Planning Principle 3: proactively drive and support sustainable economic development to deliver homes, business and industrial units, infrastructure and thriving local places | 1. The criteria for assessing suitability of land should facilitate the delivery of new homes, employment and related infrastructure |
| | NPPF Core Planning Principle 3: take account of market signals, such as land prices and housing affordability, taking account of the needs of the residential and business communities | 2. Shepway-specific market signals and the needs of District residents and businesses should inform criteria for assessing suitability of land for development |
| NPPF environmental dimension | NPPF Core Planning Principle 5: take account of the different roles and character of different areas, promoting the vitality of urban areas, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it | 3. Criteria for assessing suitability of land for development should recognise and respect the character of the countryside and the need to support rural communities |
| | NPPF Core Planning Principle 6: support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change | 4. Criteria for assessing suitability of land for development should build in opportunities for decarbonisation of development, and seek to avoid areas of flood risk and coastal change |

⁵ Only NPPF text relevant for the purposes of the Strategic Growth Options Study has been quoted

| Dimension of sustainable development | NPPF Core Planning Principles and Shepway Core Strategy policies informed by each dimension ⁵ | Emerging spatial planning principle for Growth Options Study |
|--------------------------------------|--|--|
| | <p>NPPF Core Planning Principle 7: contribute to conserving and enhancing the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser environmental value</p> | <p>5. Criteria for assessing suitability of land for development should seek to direct development to land of lesser environmental value, and identify opportunities for conserving and enhancing the natural environment, including reducing pollution.</p> |
| | <p>NPPF Core Planning Principle 8: encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value</p> | <p>6. Criteria for assessing suitability of land for development should seek to maximise brownfield/previously developed land opportunities, provided that land is not of high environmental value</p> |
| | <p>NPPF Core Planning Principle 9: promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas</p> | <p>7. Criteria for assessing suitability of land for development should seek to identify opportunities for mixed-use development and multiple uses of land</p> |
| | <p>NPPF Core Planning Principle 10: conserve heritage assets in a manner appropriate to their significance</p> | <p>8. Criteria for assessing suitability of land for development should seek to conserve and if possible enhance heritage assets</p> |

| Dimension of sustainable development | NPPF Core Planning Principles and Shepway Core Strategy policies informed by each dimension⁵ | Emerging spatial planning principle for Growth Options Study |
|---|--|---|
| | NPPF Core Planning Principle 11: Actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable | 9. Criteria for assessing suitability of land for development should seek to maximise opportunities for public transport, walking and cycling as transport modes, as part of a wider approach towards creating sustainable settlements |
| NPPF social dimension | NPPF Core Planning Principle 4: seek to secure a good standard of amenity for all existing and future occupants of land and buildings | 10. Criteria for assessing suitability of land for development should maximise amenity for existing and future residents |
| | NPPF Core Planning Principle 12: take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs | 11. Criteria for assessing suitability of land for development should take account of opportunities to improve health, culture and well-being, including through appropriate consideration of community facilities, recreation and open space |
| Overarching/all dimensions | NPPF Core Planning Principle 1: set out a positive vision for the future of an area; Core Planning Principle 2: planning should be a creative exercise in finding ways to enhance and improve places | 12. The study should focus on opportunities as well as constraints. It should seek to apply creative solutions to the planning process. |

| Dimension of sustainable development | NPPF Core Planning Principles and Shepway Core Strategy policies informed by each dimension ⁵ | Emerging spatial planning principle for Growth Options Study |
|--------------------------------------|---|--|
| | NPPF Core Planning Principle 1: joint working/co-operation to address larger than local issues; | 13. The study should seek to maximise involvement, co-operation and joint working with neighbouring and County authorities |
| | NPPF Core Planning Principle 1: provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency | 14. The study conclusions should be unambiguous and easy to interpret; there should be a focus on informing the planning process throughout. |

As a caveat to Table 1, it should be noted that many principles from the strategic planning context, in particular those from the NPPF, appear in some cases to relate more specifically to plans rather than to evidence base documents informing plans. Although the Growth Options Study is an evidence base document rather than a plan itself, it is considered nonetheless desirable for the principles of the study to be as closely aligned as possible to the principles of the planning process that it will inform.

The fourteen spatial principles outlined above will be taken forward and referenced as appropriate within subsequent analysis.

3 Evidence base review

3.1 Introduction

This High Level Options report has gathered together a wide range of evidence and data from numerous sources. The full list of documents reviewed appears in Appendix A, but key relevant points from our review have informed the subsections of this chapter below.

3.2 Character area-based approach

The first task in the assessment of strategic suitability of land for development is to divide Shepway District into a number of character areas, with each area comprising land with similar features, characteristics and landscape.

The six character areas that were defined are illustrated in Figure 2 below and are named as follows:

- 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

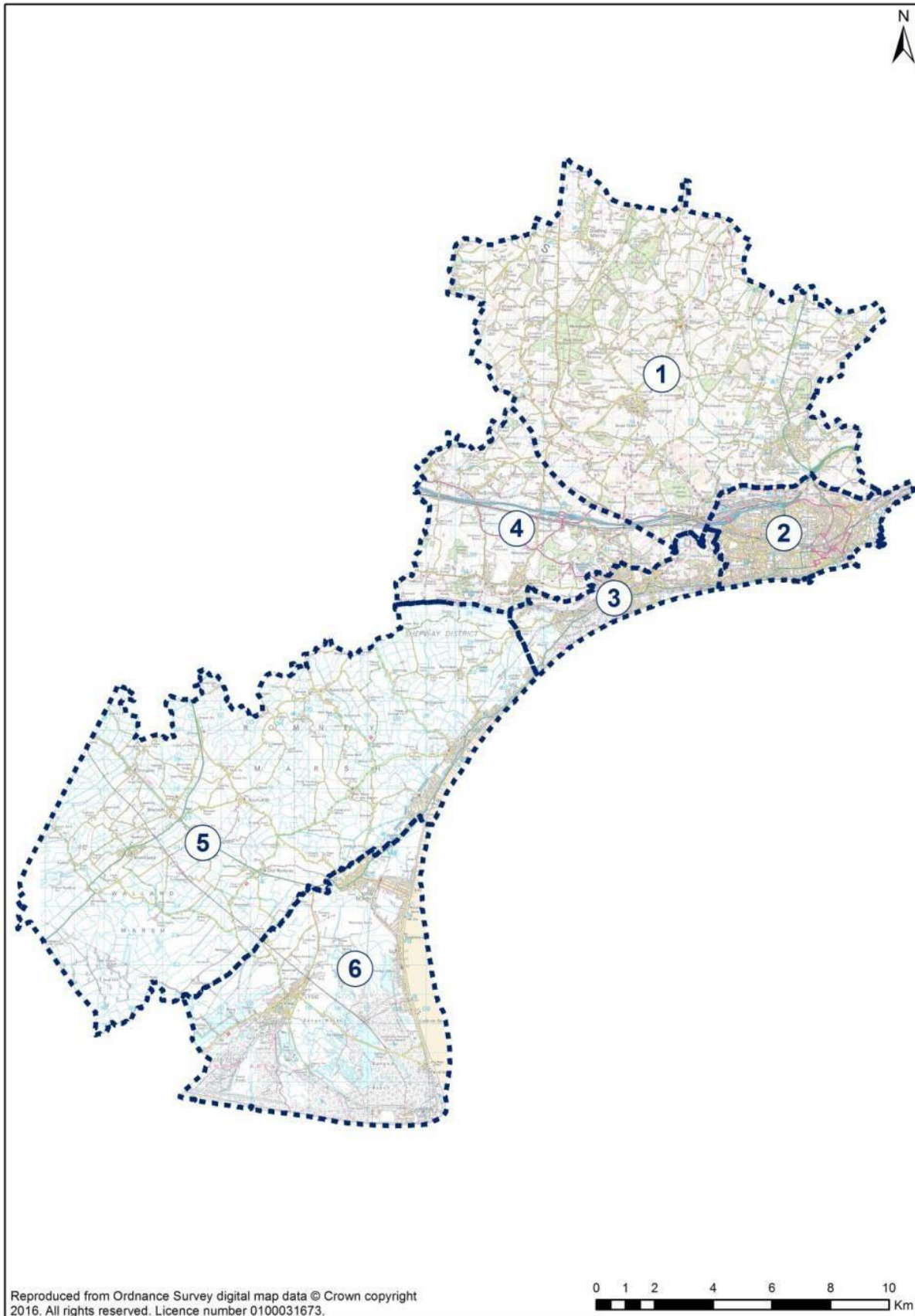
Table 2 below presents a detailed justification of how Shepway District was sub-divided into these six areas, including the approach of using existing boundaries to the greatest degree possible.

Table 2: Justification for sub-division of Shepway District into six character areas

| Character area | Justification for area and boundaries |
|---|--|
| 1: Kent Downs | This is an acknowledged sub-area within Shepway as it forms the majority of the AONB designation. The south-western boundary of the character area is the AONB boundary and the southern and south-eastern boundaries are those of the Folkestone/Hythe character area identified in the adopted Shepway Core Strategy. The western, northern and eastern boundaries are those of the District itself. |
| 2. Folkestone and Surrounding Area | The boundaries used are those of the Folkestone/Hythe character area identified in the adopted Shepway Core Strategy, except for the boundary dividing Folkestone from Hythe. This boundary is the western boundary of Cheriton and Sandgate & West Folkestone Wards. ⁶ The character area is urban in character and represents the whole of the settlement of Folkestone. |
| 3. Hythe and Surrounding Area | The boundaries used are those of the Folkestone/Hythe character area identified in the adopted Shepway Core Strategy, except for the eastern boundary dividing Hythe from Folkestone (described in 2 above). The character area is mainly urban in character and comprises the settlement of Hythe. |
| 4. Sellindge and Surrounding Area | The north-eastern boundary is that of the AONB as noted above, and the south-eastern boundary that of the Folkestone/Hythe character area in the Shepway Core Strategy as noted above. The western boundary is that of the District and the southern boundary that of the North Downs character area in the Core Strategy. The main strategic feature of the character area is the M20 and HS1 corridor. |
| 5. Romney Marsh and Walland Marsh | The northern and western boundaries of the character area are those of the District. The northern boundary is that of the Romney Marsh character area in the Core Strategy. The south-eastern boundary is a combination of the coastline and the boundary of Romney Marsh ward. The character of Area 5 is considered to be different from that of Area 6 in that it is more rural and that the Marshes have a different landscape character from Dungeness. |
| 6. Lydd, New Romney and Dungeness | The western boundary of the character area is that of the District. The north-western boundary is that of Lydd, New Romney Town, and New Romney Coast wards. The character of Area 6 is considered to be different from that of Area 5 in that Lydd and New Romney are larger urban areas than the small villages of Area 5 and that Dungeness has a different landscape character from Romney and Walland Marshes. |

⁶ Shepway ward map is available online at <https://www.folkestone-hythe.gov.uk/moderngov/documents/s16290/ward-map%202015%20attach%20to%20app%201.pdf>

Figure 2: The six character areas of Shepway District and their boundaries



3.3 Evidence base by sub-area

For each of the six character areas illustrated in Figure 2 ten criteria were selected, in consultation with SDC, against which each character area could be assessed for its strategic suitability for growth.

The criteria are considered equal in terms of importance and are as follows:

- Environmental constraints;
- Transport and accessibility;
- Geo-environmental considerations;
- Infrastructure capacity and potential;
- Landscape and topography;
- Heritage considerations;
- Housing demand;
- Regeneration potential;
- Economic development potential ; and
- Spatial constraints and opportunities.

Each of these criteria is discussed in more detail below.

3.4 Environmental constraints

The environmental constraints criterion covers immovable physical features and protective designations. This first criterion relies principally on GIS mapping and has the effect of 'sieving out' those areas where development would be less desirable in relative terms. The results of the environmental constraints exercise are illustrated in the map after each character area summary table.

Paragraph 113 of the National Planning Policy Framework (NPPF) is relevant here. It states that '*Local planning authorities should set criteria based policies against which proposals for any development on or affecting protected wildlife or geodiversity sites or landscape areas will be judged. Distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks.*'

Based on this advice, protective environmental designations have been split into two layers: 'statutory' (shown on the mapping as dark green) and 'non-statutory' (shown as light green).

The approach has been to seek to identify areas free from environmental constraints and protective designations to the greatest extent possible.

Flood risk

Paragraph 100 of the NPPF states that '*inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere.*' This advice is backed up by the

Government's Planning Practice Guidance (PPG)⁷ which states clearly that the aim should be to keep development out of medium and high risk flood areas (Flood Zones 2 and 3) and other areas affected by other sources of flooding where possible.

Figure 3 shows the extent of the flood risk areas in the study area. Zones 2 and 3 flood risk land is shown in light and dark blue respectively. Zone 1 land, in white, is designated by the Environment Agency as having a low probability of flooding, Zone 2 a medium probability, or between 1 in 100 and 1 in 1000 year annual risk of fluvial flooding, Zone 3a has a high probability of fluvial flooding and Zone 3b is designated as functional floodplain.⁸

In line with the sequential approach set out by the NPPF and PPG, land falling within flood zone 3 is considered as unsuitable for development and land falling within flood zone 2 was considered as suitable only where development could not feasibly be redirected to land in Flood Zone 1, which may include, under the Duty to Cooperate, Zone 1 land beyond Shepway's own boundaries but still within Shepway's housing market area.

Shepway's Strategic Flood Risk Assessment (SFRA)⁹ gives a more nuanced, detailed picture of flood risk locally compared with the Environment Agency flood mapping. As such, the SFRA will be used to inform the site-specific phase of the Growth Options Study in selected locations if necessary, but in line with national planning guidance, the Environment Agency mapping of Zones 2 and 3 land is considered most appropriate for strategic-level assessment.

This approach is also in line with local policy. Shepway's adopted Core Strategy supports non-strategic growth at selected locations within Flood Zones 2 and 3, in particular New Romney¹⁰, with the objective of supporting the sustainability of existing settlements and on condition growth is directed to the areas at lowest risk of flood impacts as determined by the SFRA (but still within Environment Agency Flood Zone 2).

As the aim of the Strategic Growth Options Study is to assess the potential for strategic-scale growth only, it has not assessed the potential for this kind of growth; nevertheless, the option remains open for Shepway for some of its housing need to be met through non-strategic extensions to existing settlements in Flood Zones 2 and 3 if these can be justified in sustainability terms.

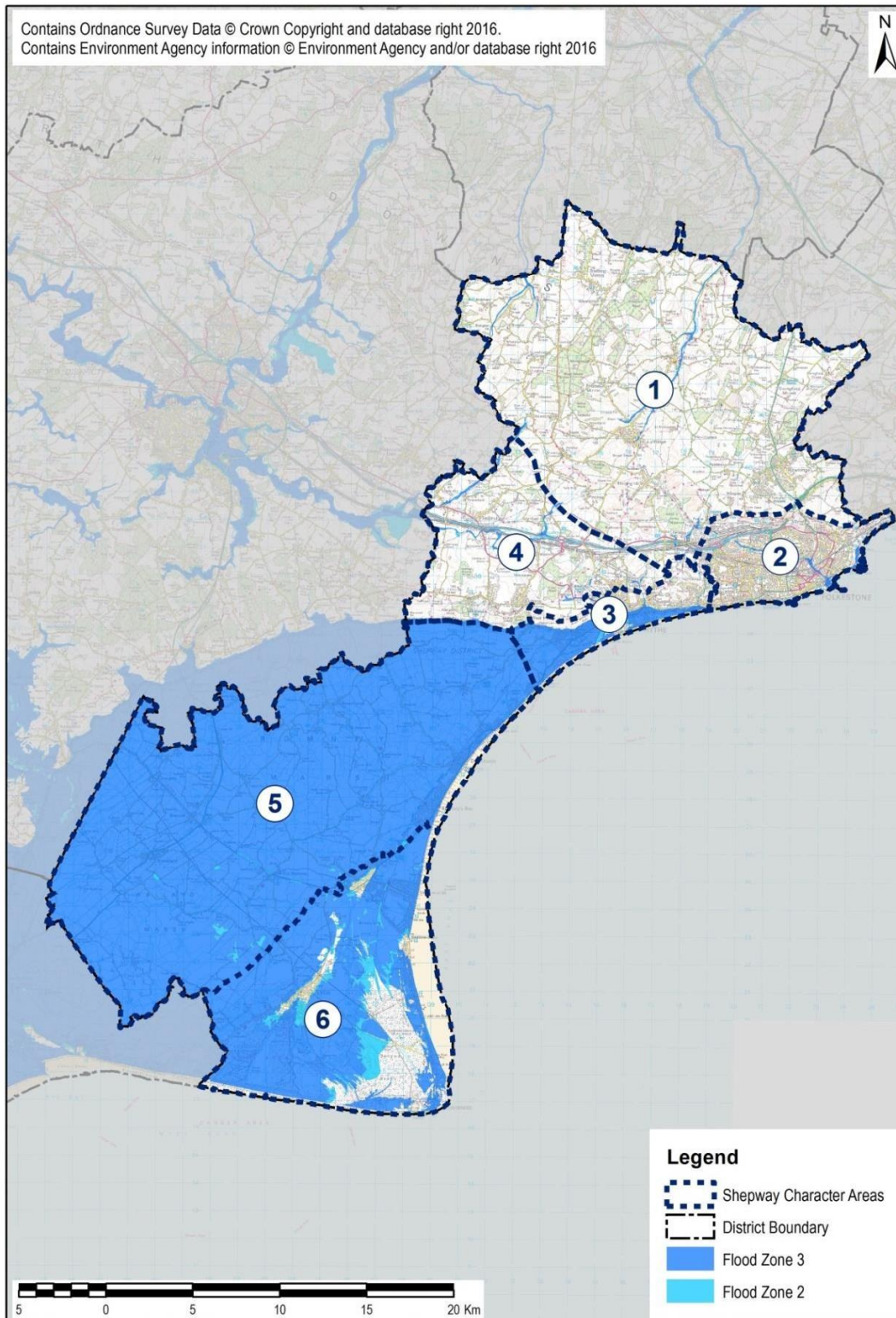
⁷ The page on sequential risk is the most relevant here: <http://planningguidance.communities.gov.uk/blog/guidance/flood-risk-and-coastal-change/the-sequential-risk-based-approach-to-the-location-of-development/>

⁸ See also <http://apps.environment-agency.gov.uk/wiyby/37837.aspx>

⁹ Available at: (Deprecated)

¹⁰ See Core Strategy Policy CSD8 and its supporting text

Figure 3: Flood risk across the study area

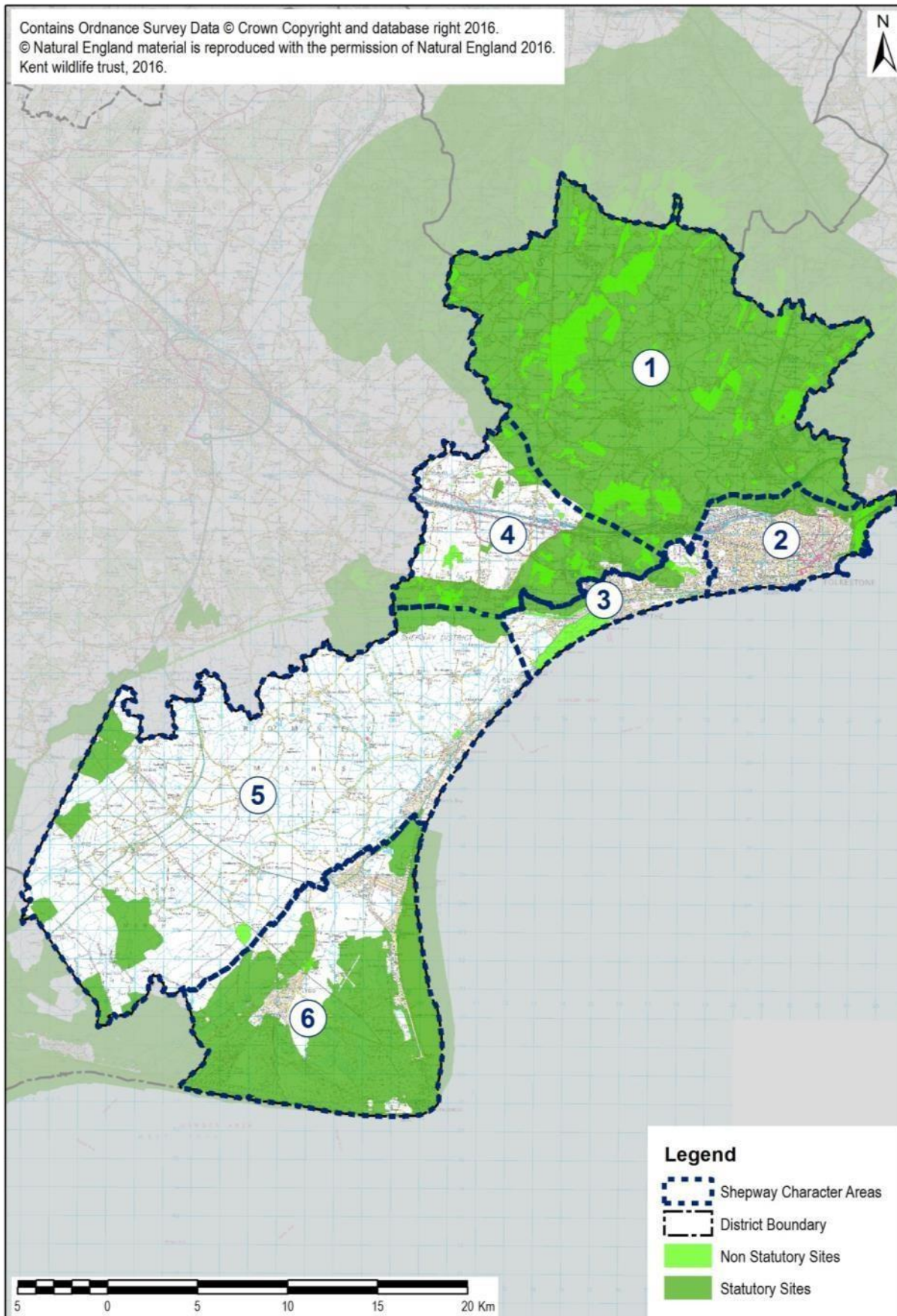


Environmental designations

Environmental designations may be divided into statutory and non-statutory designations, both shown on Figure 4, with the statutory designations in dark green and the non-statutory in light green. Statutory designations include Sites of Special Scientific Interest (SSSIs), National and Local Nature Reserves (NNRs and LNRs), Special Areas of Conservation (SACs), Special Protection Areas (SPAs), National Parks and Areas of Outstanding Natural Beauty (AONBs).

Non-statutory designations include national designations (for example, Ancient Woodland) and local designations specific to Shepway District.

Figure 4: Environmental designations across the study area



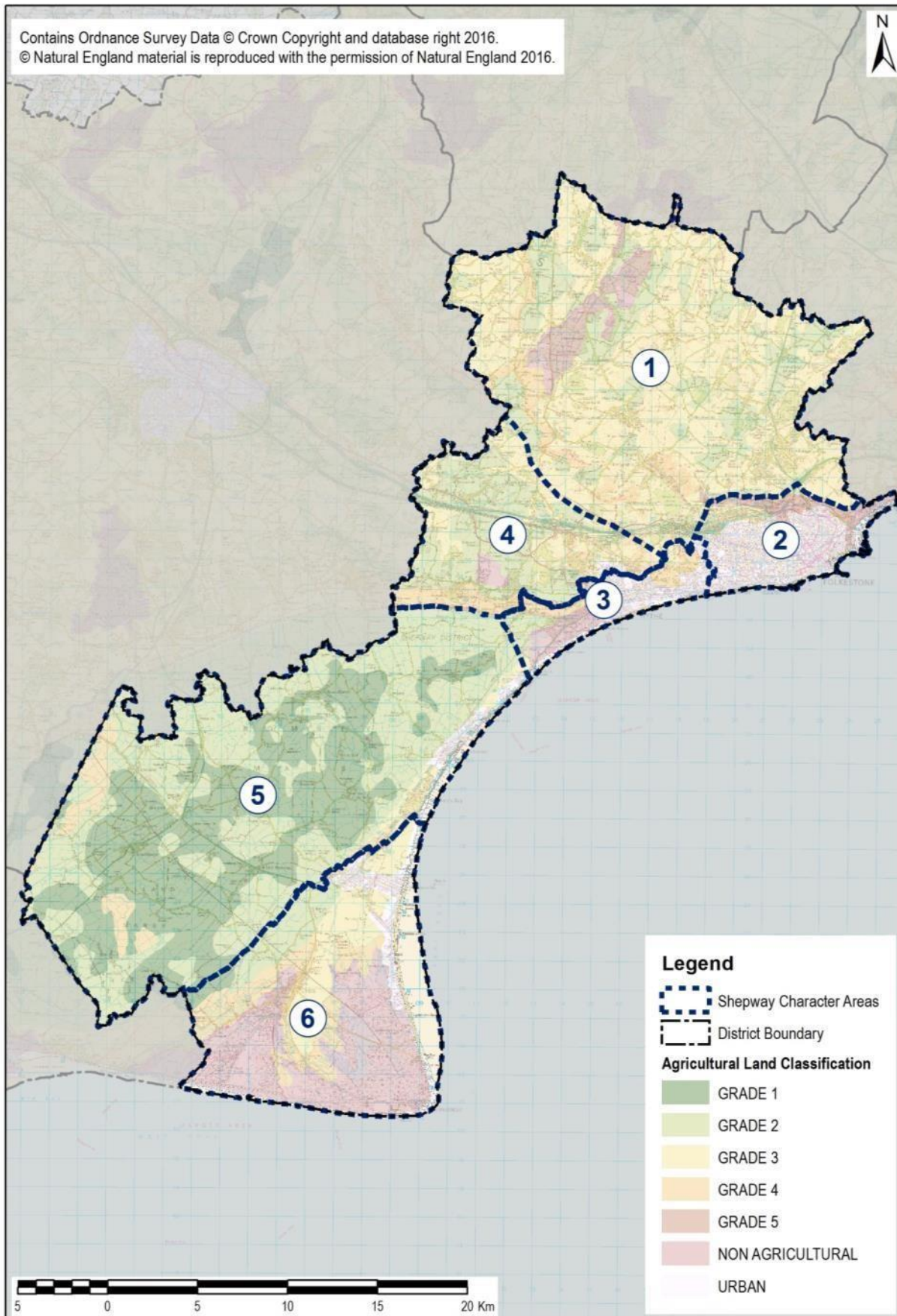
Agricultural land

The study area includes all five of Natural England's grades of agricultural land, namely Grade 1 (Excellent), Grade 2 (Very Good), Grade 3 (Good to Moderate), Grade 4 (Poor) and Grade 5 (Very Poor).¹¹ NPPF paragraph 112 states that '*local planning authorities should take into account the economic and other benefits of the best and most versatile¹² agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.*' This would indicate that development sites should aim to use Grades 3, 4 and 5 rather than Grades 1 and 2 to the extent that this is consistent with the achievement of sustainable development on other relevant criteria. Agricultural land classification in the study area is illustrated in Figure 5 below.

¹¹ See Natural England Agricultural Land Classification Map for London and the South East, available at <http://publications.naturalengland.org.uk/publication/141047?category=5954148537204736>

¹² Best and most Versatile (BMV) agricultural land means Grades 1, 2 and 3A. At any level other than the site-specific, whether Grade 3 land is 3A (and therefore BMV) or 3B (and therefore not BMV) is not specified.

Figure 5: Agricultural land classification across the study area



3.5 Transport and accessibility

The transport and accessibility criterion aims to identify the configuration, capacity and quality of existing transport networks and facilities. It also identifies corridors and nodes presenting opportunities for extension or enhancement based on assumed travel patterns associated with the planned growth.

The criterion covers accessibility (including on foot and by cycle), public transport routes and their potential capacity and constraints, and the location of potential growth sites in terms of their ability to be served by all modes of travel, but with an emphasis on minimising travel by car.

Assessment on this criterion ensures not only that new development is itself well-connected, but that it may have the potential to enhance the quality of life of residents in existing areas, for example in enabling better access to schools, leisure facilities and open space.

3.6 Geo-environmental considerations

This criterion covers a range of geological and environmental constraints to new development. In most cases geo-environmental constraints are not absolute, and regulatory systems are in place to cover those that emerge. For example, Building Regulations cover radon protection measures for new development. However, these constraints have potential to increase development cost and lead time.

For each character area, potential constraints were mapped, including:

Made Ground

Made ground is defined as ground formed by filling in natural or artificial pits, found in many areas where development has occurred historically. Preliminary appraisal of the potential for areas of heavily made ground has been made with reference to the maps produced by the British Geological Survey¹³. Where made ground is identified, risk is assigned respectively. Where no made ground is identified to be present risk is assessed as zero.

Radon

Radon is a naturally occurring radioactive gas which originates from minute amounts of uranium that occur naturally in rocks and soils. It is almost always possible to mitigate the impacts of radon at the levels found in England through protective measures such as appropriate ventilation or installation of an active radon sump, and reference has been made to the publication 'Radon - Guidance on protective measures for new buildings' to ascertain the likely requirement for radon protection measures to be installed on new buildings. Reference has also been made to the England and Wales radon maps available online¹⁴.

Potential Sources of Contamination

Where significant potentially contaminating processes and industry have been identified on-site, a higher risk of contamination has been assigned.

Landfilling Records

Historical landfill GIS data is available on the Environment Agency website¹⁵ and was assessed accordingly. Where historical landfilling is noted to have been present locally, risk has been assigned respectively.

¹³ See <http://www.bgs.ac.uk/data/maps/home.html>

¹⁴ See <http://www.ukradon.org/information/ukmaps/englandwales>.

¹⁵ See <http://apps.environment-agency.gov.uk/wiyby/37829.aspx>

Hydrogeological Sensitivity

Groundwater is contained within underground strata (aquifers) of various types across the country. Groundwater provides a proportion of the base flow for many rivers and watercourses and in England and Wales it constitutes approximately 35% of water used for public supply. It is usually of high quality and often requires little treatment prior to use.

However, it is vulnerable to contamination from pollutants, both from direct discharges into groundwater and indirect discharges into and onto land. Aquifer protection classifications are defined as follows:

- **Principal Aquifers**

These are layers of rock or drift deposits that have high intergranular and/or fracture permeability - meaning they usually provide a high level of water storage. They may support water supply and/or river base flow on a strategic scale. In most cases, principal aquifers are aquifers previously designated as major aquifer.

- **Secondary Aquifers**

These include a wide range of rock layers or drift deposits with an equally wide range of water permeability and storage. Secondary aquifers are subdivided into two types:

- **Secondary A** - permeable layers capable of supporting water supplies at a local rather than strategic scale, and in some cases forming an important source of base flow to rivers. These are generally aquifers formerly classified as minor aquifers;
- **Secondary B** - predominantly lower permeability layers which may store and yield limited amounts of groundwater due to localised features such as fissures, thin permeable horizons and weathering. These are generally the water-bearing parts of the former non-aquifers.
- **Secondary Undifferentiated** - has been assigned in cases where it has not been possible to attribute either category A or B to a rock type. In most cases, this means that the layer in question has previously been designated as both minor and non-aquifer in different locations due to the variable characteristics of the rock type.

Soil leaching classification data is based on soil physical and chemical properties which affect the downward passage of water and contaminants. This classification is not applied to soils above non-aquifers. Soils are divided into three types:

- **H: High leaching potential** – soils with little ability to dilute pollutants.
- **I: Intermediate Leaching Potential** – soils with a moderate ability to dilute pollutants.
- **L: Low Leaching Potential** – soils in which pollutants are unlikely to penetrate the soil layer because either water movement is largely horizontal, or they have the ability to dilute pollutants.

Groundwater Source Protection Zones

The Environment Agency has defined Source Protection Zones (SPZs) for 2000 groundwater sources such as wells, boreholes and springs used for public drinking water supply¹⁶. These zones show the risk of contamination from any activities that might cause pollution in the area. The closer the activity,

¹⁶ See <http://apps.environment-agency.gov.uk/wiyby/37833.aspx>

the greater the risk. The maps show three main zones (inner, outer and total catchment) and a fourth zone of special interest, which is occasionally applied, to a groundwater source.

The shape and size of a zone depends on the condition of the ground, how the groundwater is removed, and other environmental factors. Groundwater source catchments are divided into three zones as follows:

- Inner zone (Zone 1) - Defined as the 50 day travel time from any point below the water table to the source. This zone has a minimum radius of 50 metres;
- Outer zone (Zone 2) - Defined by a 400 day travel time from a point below the water table. This zone has a minimum radius of 250 or 500 metres around the source, depending on the size of the abstraction;
- Total catchment (Zone 3) - Defined as the area around a source within which all groundwater recharge is presumed to be discharged at the source.

The underlying hydrogeological sensitivity of each character area was reviewed using the Environment Agency website.

3.7 Infrastructure capacity and potential

Infrastructure covers a range of services and facilities provided by public and private bodies. In this report, the following types of infrastructure are included under the heading of infrastructure:

- Social and community infrastructure: health and education
- Utilities infrastructure: power generation and supply, water and sewerage
- Green infrastructure: green spaces and landscape corridors

Transport capacity and infrastructure is covered under a separate heading.

In the case of utilities infrastructure the capacity of the existing infrastructure has been taken into account, and whether infrastructure would be a constraint to development. For social, community and green infrastructure, it has been assumed that large scale development would necessitate new infrastructure such as schools, health services and open space. Information on existing health infrastructure, comprising the locations of GP and dentist surgeries, was sourced using the NHS Choices website.¹⁷

To ensure developments are sustainable, they need to be located to maximise use of existing infrastructure capacity where possible and to be of a critical mass to sustain the provision of new infrastructure where it is not already available.

Infrastructure capacity and potential considered as part of this assessment was based on the existing planning evidence base and through consultation with infrastructure providers. The aim was to understand the extent to which development in each character area could be met by existing capacity and/or existing committed investment.

For each character area, the infrastructure analysis helped to identify any key areas of concern that will require mitigation, the potential capacity of existing infrastructure to absorb new development, the extent to which new infrastructure would be required, and if so, what type.

¹⁷ GP services available at <http://www.nhs.uk/Service-Search/GP/LocationSearch/4>; dental services available at <http://www.nhs.uk/Service-Search/Dentists/LocationSearch/3>.

3.8 Landscape and topography

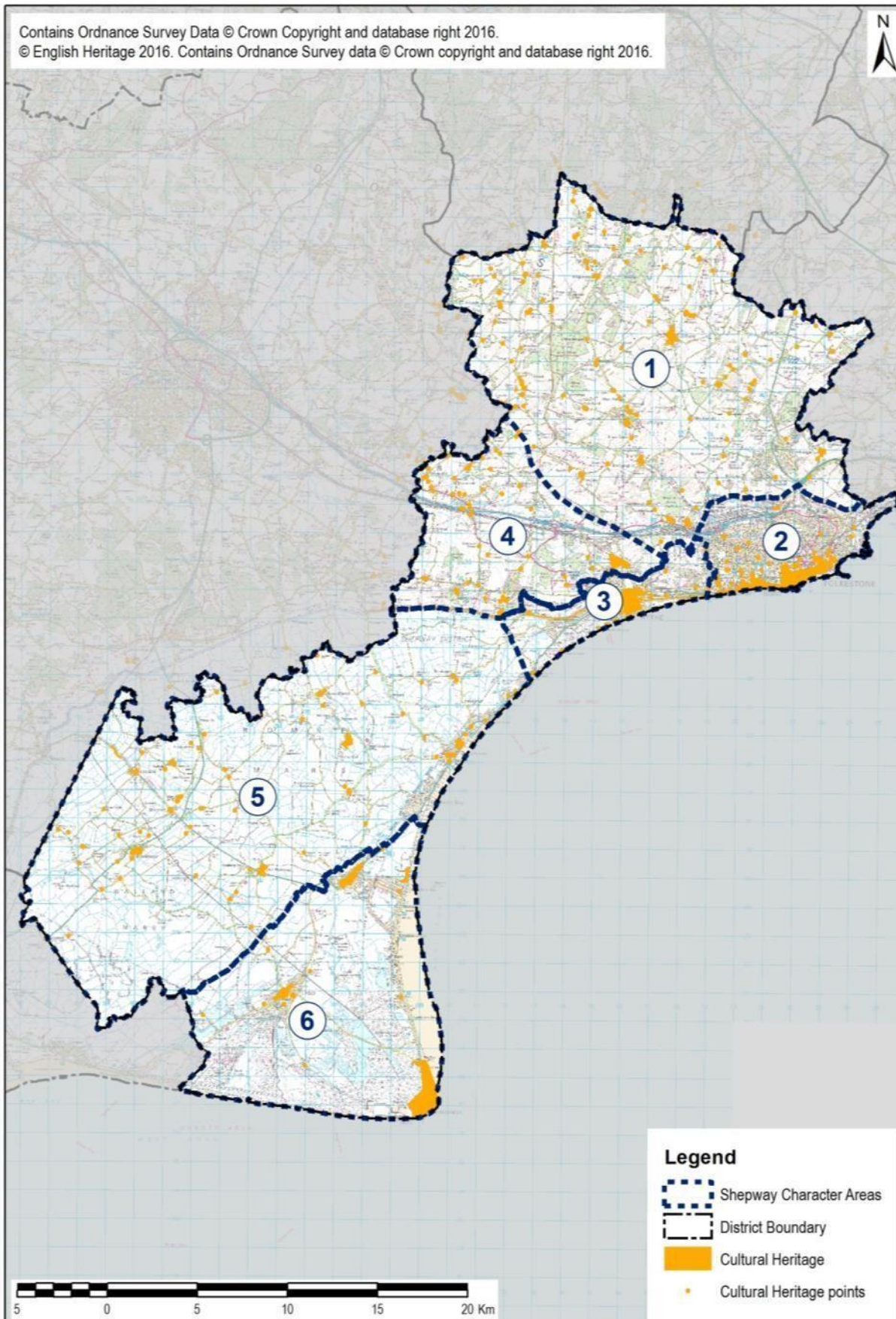
For each character area, the sensitivity of the local landscape to employment and residential development was assessed with reference to the relevant local landscape data. Given that development of a new High Level Landscape Appraisal for Shepway District is being carried out by AECOM alongside the development of the Growth Options Study, the emerging HLLA was used as a key data source and the specialists who contributed to this section are the same as those who authored the HLLA. This allowed for consistency across all work streams.

3.9 Heritage considerations

In a similar way to the approach for environmental designations, and in line with paragraph 126 of the NPPF, the approach seeks to avoid development in areas where it would adversely impact on a designated heritage asset. Designated heritage assets are defined by the NPPF as including scheduled monuments, listed buildings, registered parks and gardens, registered battlefields and conservation areas.

Heritage assets across the study area are illustrated in Figure 6 below.

Figure 6: Heritage assets across the study area



3.10 Housing demand

Character areas where demand for housing is highest (as determined through data on house prices, as well as Shepway's evidence base on housing viability and affordability¹⁸) were interpreted as being more suitable for housing development on this criterion, on the grounds that an increased supply of housing in the area would help correct existing mismatches between supply and demand.

In the same way, those character areas where affordability pressures are less severe were considered less suitable for housing development on this criterion, as demand for housing is lower in these locations.

Housing demand across the study area is mapped in Figure 7 below, sourced from Zoopla's heat map of UK property values¹⁹. Figure 7 is supplemented by Table 3, which summarises the conclusions from SDC's affordable housing viability report in order from most affordable to least affordable. The findings set out in Table 3 informed a four-way split in terms of recommended CIL charges across the District.

¹⁸ Available online at <https://www.folkestone-hythe.gov.uk/downloads/file/3336/pd004-2-3-examiner-s-revised-map-letter-to-the-council>

¹⁹ Available online at <http://www.zoopla.co.uk/heatmaps/>

Figure 7: Housing demand across the study area (as indicated by house prices)

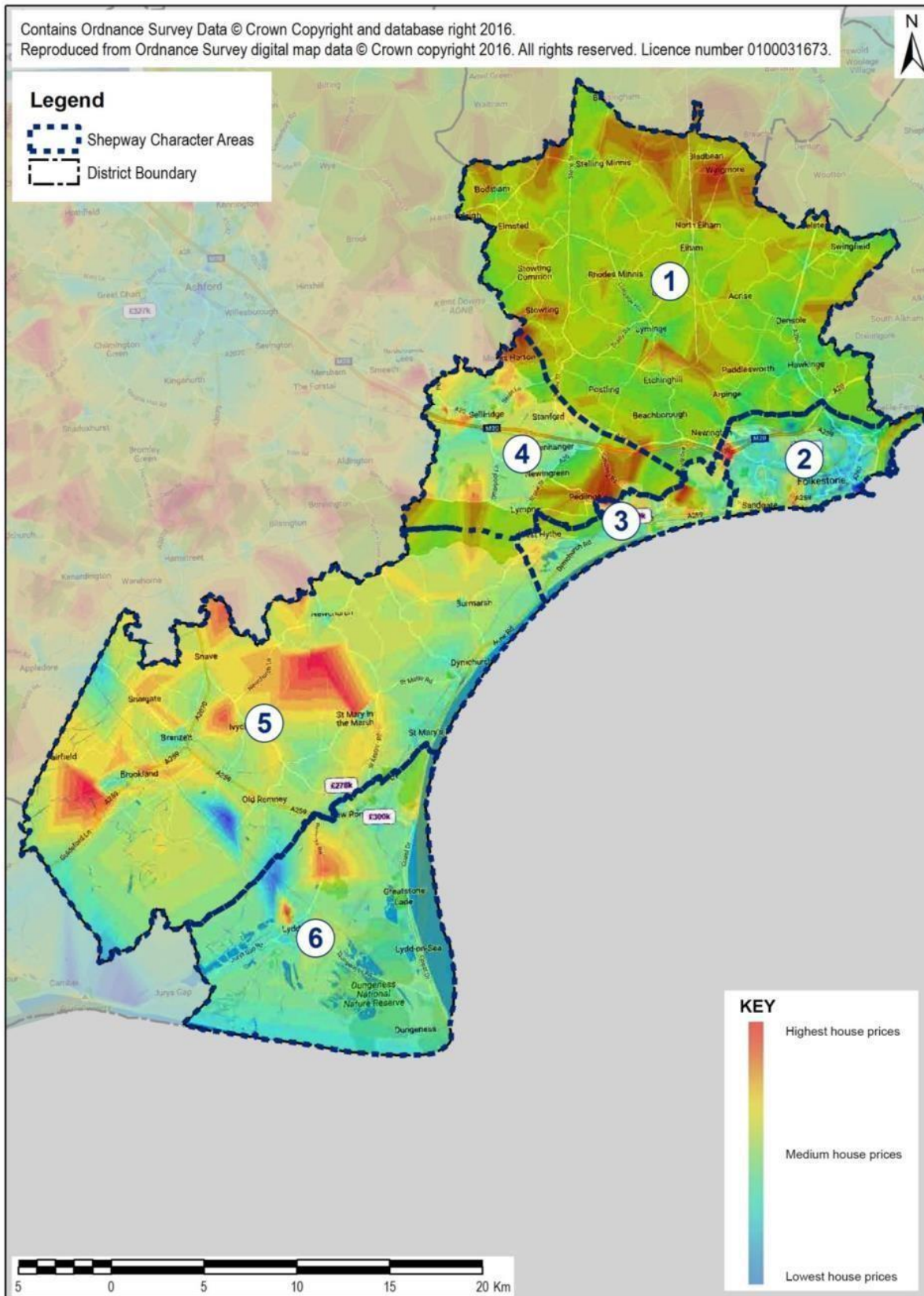


Table 3: Summary of housing land values across Shepway District

| Residential Value (£/m²) | Shepway Wards (2012 boundaries) | Character Area(s) |
|--|--|--------------------------|
| £2,000-£2,150 | Burmarsh, Dymchurch, Folkestone Cheriton, Folkestone East, Folkestone Foord, Folkestone Harbour, Folkestone Morehall, Folkestone Park, Hawkinge, Lydd | 1, 2, 5, 6 |
| £2,300-£2,450 | Burmarsh, Dymchurch, Etchinghill, Folkestone East, Folkestone Harvey Central, Folkestone Park, Greatstone-on-Sea, Hawkinge, Lyminge, Littlestone, New Romney, St Mary's Bay | 1, 2, 5, 6 |
| £2,600-£2,750 | Densole | 1 |
| £2,900-£3,050 | Brenzett, Hythe Central, Hythe East, Hythe West, Lympne | 5, 3, 4 |
| £3,350-£3,650 | Brookland, Elham, Folkestone Harvey West, Folkestone Sandgate, Ivychurch, Newchurch, Saltwood, Sellindge, Stanford and Westenhanger, Stelling Minnis | 1, 2, 3, 4, 5 |
| £3,950-£4,250 | Elham, Ivychurch, Sellindge, Stanford and Westenhanger | |

Source: Adapted from Shepway CIL and Whole Plan Economic Viability Assessment, Dixon Searle, 2014

3.11 Regeneration potential

The Indices of Multiple Deprivation 2015²⁰ show how Lower Super Output Areas (LSOAs- a statistical division with a mean population of 1,500 people) perform against various indices of deprivation, namely:

- Income deprivation;
- Employment deprivation;
- Health deprivation and disability;
- Education, skills and training deprivation;
- Barriers to housing and services;
- Living environment deprivation; and
- Crime.

The scores against each individual index of deprivation are merged to produce an LSOA score on an index of multiple deprivation. The scores are then ranked, with the most deprived LSOA in England ranked 1st and the lowest ranked 32,844th.

The ranking of each LSOA in the study area was scored from 1 to 10 according to the decile of English multiple deprivation within which it fell. For example, if a particular LSOA was ranked in the top ten percent most deprived in England, it was given a score of 1, whereas if it fell into the 10-20% least deprived, it got a score of 9.

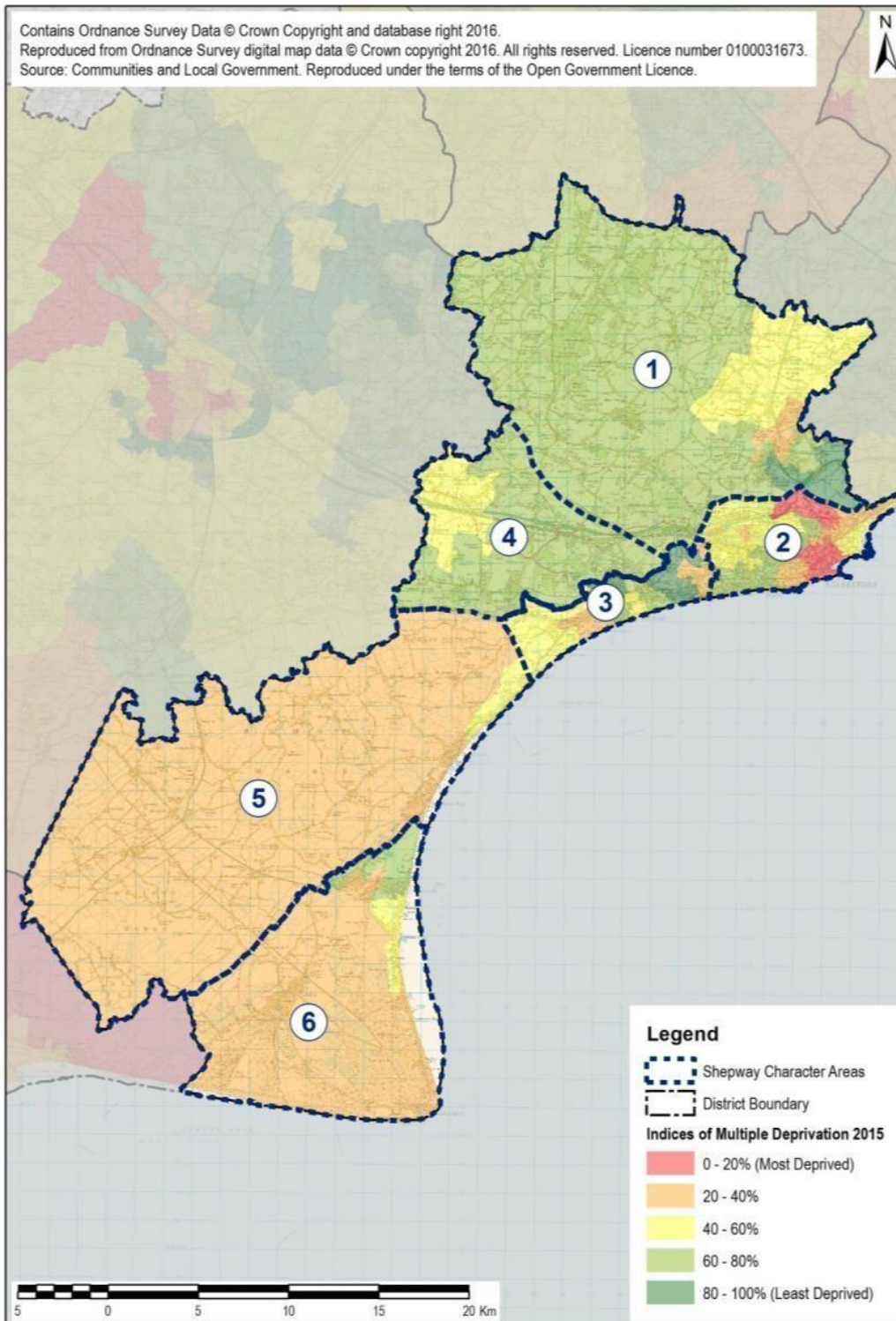
The scores were then mapped, providing an at-a-glance indication of deprivation in and adjacent to each character area. If the character area showed high levels of deprivation, the adjacency argument (whereby new development, if designed and implemented in a sustainable and careful way, can have beneficial effects on existing development) would indicate that new development has the potential to lift the area and generate positive effects in terms of employment, health, education and other indicators of well-being.

By contrast, where there are lower levels of deprivation, it is likely that new development would be unlikely to have a significant effect on local deprivation rankings.

Multiple deprivation, and hence potential for regeneration, across the study area is mapped in Figure 8 below.

²⁰ Available online at <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2015>

Figure 8: Indices of Multiple Deprivation across the study area



3.12 Economic development potential

This criterion relates to the location of employment and is based on the principle that homes should be built close to places of work in order to reduce commuting distances and thus reduce the need to travel. Each character area was assessed on its existing attractiveness to employers, using workplace data on employment from Census 2011²¹ that reflects existing major employment locations, as well as the current Council evidence base on economic development, including the Shepway District Employment Land Review (NLP, 2011) and the Retail Need Assessment Study (2010 Update).

It was assumed that potential for future economic development was higher in character areas with a track record of being attractive locations to major employers.

This criterion also takes into account existing and planned transport infrastructure in each character area and therefore interacts with the transport criterion to some extent. Employers tend to demand good access to road, rail and air transport. It may be, therefore, that some character areas with low levels of existing economic activity may be 'unlocked' for economic development if new transport infrastructure is delivered.

3.13 Spatial opportunities and constraints

This final criterion covers any spatial constraints and opportunities not covered under other criteria that are considered relevant in defining the physical extent and boundaries of new development.

This includes the need for new development to seek to avoid coalescence between existing free-standing villages. Likewise, where defensible boundaries to development exist at the strategic level, they can be regarded as a spatial opportunity for limiting development and, in many locations, protecting valued landscapes. Typical features considered under this criterion include, among others:

- Roads as boundaries to development
- Rail lines as boundaries to development
- Other landscape features as boundaries to development
- Existing development or site allocations as boundaries to development

The final topic covered under this criterion is existing or proposed developments, planning applications or allocations. In the case of the study area, this includes the proposed Otterpool Park Garden Town, which as of 2016 now enjoys Government support.

3.14 Traffic light assessment of criteria

Against each criterion, the most important and relevant considerations are provided as bullet points in the left-hand column of a table for each character area. The right-hand column consists of the traffic-light assessment referenced above, which provides an 'at a glance' balanced assessment of the potential for residential and/or employment growth in this area based on the bullet points.

In broad terms, the traffic light assessment process was carried out as follows:

- A **red** rating was given if it was considered that, on that specific criterion, constraints applied that were significant enough to preclude development entirely (also referred to as 'show-stoppers');

²¹ Available at <https://www.nomisweb.co.uk/census/2011/wp101ew>

- An **amber** rating was given if it was considered that, on that specific criterion, constraints applied but that there was some potential for them to be mitigated and/or that opportunities and constraints were broadly in balance; and
- A **green** rating was given if it was considered that, on that specific criterion, opportunities clearly outweighed constraints and/or that the constraints identified were minimal or easily mitigated.

Table 3 provides more detail on the specific factors that guide each criterion's traffic light score, followed by a description of each criterion before they are applied to each character area.

Table 3: Specific factors guiding the traffic light score for each criterion

| Criterion | Traffic light score | Factors taken into account |
|---------------------------------------|---------------------|---|
| Environmental constraints | R | Flood zone 3; and/or Statutory designations including SSSIs, NNRs, LNRs, SACs, SPAs, National Parks and AONBs that are significant in extent; and/or Non-statutory designations including Ancient Woodland and/or Sites of Wildlife interest that are significant in extent |
| | A | Agricultural Land Grade 1 and 2 and/or Flood zone 2, statutory designations, and/or non-statutory designations |
| | G | No insurmountable constraints found |
| Transport and accessibility | R | Low levels of current or planned accessibility by public transport and other means and/or significant congestion concerns |
| | A | Medium levels of current or planned accessibility by public transport and other means and/or some congestion concerns |
| | G | High levels of current or planned accessibility by public transport and other means and/or few congestion concerns |
| Geo-environmental considerations | R | Significant constraints such as made ground, radon, contamination, landfill, hydrogeological sensitivity, groundwater sensitivity |
| | A | Presence of some or all of above constraints but with some potential to be resolved / mitigated |
| | G | No significant geo-environmental constraints found |
| Infrastructure capacity and potential | R | Infrastructure needs arising from development could not be met by existing capacity or through new investment |
| | A | Infrastructure needs arising from development would require additional infrastructure investment |
| | G | Infrastructure needs arising from development could be met by existing capacity and/or existing committed investment |
| Landscape and topography | R | High sensitivity landscape considered to be least suitable for strategic level development in terms of likely impact on landscape character and visual amenity |
| | A | Medium sensitivity landscape where impact on landscape character and visual amenity will not necessarily be an obstacle to strategic level development, and where suitability is likely to be determined by other sustainability or strategic environmental considerations |
| | G | Low sensitivity landscape considered to be most suitable for strategic level development in terms of likely impact on landscape character and visual amenity |

| Criterion | Traffic light score | Factors taken into account |
|---------------------------------------|---------------------|--|
| Heritage considerations | R | Development would adversely impact on a designated heritage asset (scheduled monuments, listed buildings, registered parks and gardens, registered battlefields and conservation areas). |
| | A | Designated heritage assets present but impact has potential to be mitigated through location, design and/or layout of new development |
| | G | No significant impact on designated heritage assets |
| Housing demand | R | Area of very low housing demand; providing significant new housing in this location risks market failure/under-occupation |
| | A | Area of moderate housing demand; providing significant new housing in this location would help address this issue, but to a lesser extent than in high-demand areas |
| | G | Area of high housing demand; providing significant new housing in this location would help address this issue and help reduce affordability pressures |
| Regeneration potential | R | Area has little or no potential for regeneration according to the Indices of Multiple Deprivation |
| | A | Area has some potential for regeneration according to the Indices of Multiple Deprivation |
| | G | Area has significant potential for regeneration according to Indices of Multiple Deprivation |
| Economic development potential | R | Location is less suitable in terms of accessibility for existing and / or future employment opportunities |
| | A | Location is suitable to some extent in terms of accessibility for existing and / or future employment opportunities. |
| | G | Location is more suitable in terms of accessibility for existing and /or future employment opportunities |
| Spatial opportunities and constraints | R | High risk of impact on existing character of nearby settlement(s) and valued landscapes (i.e. significant coalescence risks and/or lack of defensible boundaries) |
| | A | Some risk of impact on existing character of nearby settlement(s) and valued landscapes (i.e. some coalescence risks and/or some defensible boundaries) |
| | G | Low risk of impact on existing character of nearby settlement(s) and valued landscapes (i.e. minimal coalescence risks and/or a greater number of defensible boundaries) |

3.15 Technical consultation

The strategic assessment of growth was informed by a number of technical specialists. As well as AECOM specialists in town planning, transport, geo-environment, infrastructure, heritage, housing demand and economic development potential, a number of sub-regional and national organisations,

including neighbouring and nearby planning authorities, were contacted to get their views on strategic constraints to and opportunities for growth.

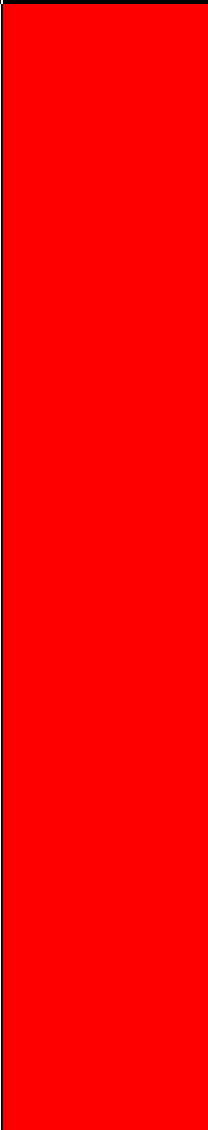
A letter, questionnaire and map was sent to the following organisations inviting views on new development within each character area from a technical perspective:

- Affinity Water;
- Ashford Borough Council;
- Canterbury City Council;
- Dover District Council;
- East Sussex County Council;
- Environment Agency;
- Historic England;
- Highways England;
- Homes and Communities Agency;
- Kent Downs Area of Outstanding Natural Beauty (AONB);
- Kent County Council (covering infrastructure, education, highways, minerals and waste and flood risk);
- Marine Management Organisation;
- Natural England;
- Network Rail;
- Romney Marsh Area Internal Drainage Board;
- Rother District Council;
- South East Local Economic Partnership;
- Southeastern Trains;
- Southern Water;
- Sport England;
- Thanet District Council; and
- UK Power Networks.

Each organisation was asked to comment on strategic constraints and opportunities within each character area, and their views and conclusions are reflected alongside those of AECOM's technical specialists and town planners and the local policy and evidence base in the tables below. Where any conclusions or advice conflicted, a professional judgement was made on the most accurate and/or up-to-date data to use.

3.16 Area 1 (Kent Downs)

| Criterion | Considerations | Overall Assessment |
|---------------------------|--|--------------------|
| Environmental constraints | <ul style="list-style-type: none"> • Fluvial flood risk is primarily low (Flood Zone 1; defined as areas considered to have less than a 1 in 1000 chance of flooding in any given year, aside from the Nail Bourne main river and short sections of the Seabrook Stream Main river in the south, where fluvial flood risk is high (Flood Zone 3). • The flood zones along these watercourses are not extensive • No areas are identified as being at residual risk from tidal flooding • Areas at high risk from surface water flooding (which includes ordinary watercourses), corresponding to areas at risk of flooding during an event with a 1 in 30 or greater chance of occurring in any given year are largely limited to drainage paths along topographic low points • Extensive and numerous ancient woodlands scattered across the area, of which the largest are Asholt or Ashley Wood (north of Folkestone), Elhampark Wood, Park Wood (both north-west of Elham), Reinden Wood (north of Hawkinge) and West Wood (west of Elham) • Sites of Special Scientific Interest at Alkham, Lydden and Swingfield Woods (north-east of Densole), Folkestone to Etchinghill Escarpment (north of Folkestone), Great Shuttlesfield Down (east of Lyminge), Lynsore Bottom (east of Stelling Minnis), Parkgate Down (north of Elham), and Yocketts Bank (west of Stelling Minnis) • Special Areas of Conservation at Folkestone to Etchinghill Escarpment and Parkgate Down • Kent Wildlife Trust nature reserves at Parkham Down (north of Elham), Spong Wood (near Elmsted) • Extensive and numerous Local Wildlife Sites, of which the largest are Acrise Wood and Park (east of Densole), Lyminge Forest (west of Elham), Reinden Wood, Tolsford and Summerhouse Hills (north-west of Folkestone) • Agricultural land quality: Generally Grade 3, but numerous large pockets of Grade 2 land, and smaller pockets of Grade 4 land. No Grades 1 or 5 land. • Kent County Council state that the area provides an important ecological buffer between the M20 and M2 corridor | |

| Criterion | Considerations | Overall Assessment |
|------------------------------------|--|--|
| <p>Transport and accessibility</p> | <ul style="list-style-type: none"> • A260 Folkestone to Canterbury designated as Primary External Connection in the Core Strategy • Regional Cycle Route 17 runs from Hawkinge to Paddleworth before heading north to Elham and Bossingham • Bus route 17 links Folkestone and Canterbury, via Etchinghill, Lyminge, Elham and North Elham • There are no rail stations located within this character area • Access to this rural area mainly consists of low order roads. The A20 is accessible to/from Hawkinge via Spitfire Way / A260 White Horse Hill to the southeast of the character area. • Travel in this area is mainly limited to private vehicles • Development options would need to consider the capacity of low order and rural roads to accommodate an increase in traffic, as well as the impact on local junctions, particularly around Hawkinge • AONB designation would complicate any necessary highways improvements • Kent CC note that the area includes a National Trail (North Downs Way) and other public bridleways, a scarce resource locally • Operation Stack should be considered in development options. The Dover Traffic Assessment Project (TAP), which imposes a 40mph speed restriction on vehicles approaching Dover from the west on the A20 and restricts HGVs to the left hand lane on the approach to the port from the Roundhill Tunnel, should also be considered. • Potential impacts on the following junctions will need to be considered, amongst others: <ul style="list-style-type: none"> -A260 Spitfire Way / A260 Canterbury Road / Canterbury Road -Alkham Valley Road / A20 -Alkham Valley Road / A260 Canterbury Road |  |

| Criterion | Considerations | Overall Assessment |
|----------------------------------|---|--------------------|
| Geo-environmental considerations | <ul style="list-style-type: none"> • Two former landfills present. Hawkinge (accepted inert, industrial, household waste) Operator was Kent County Council and Exted, which accepted inert and household waste. • Within Source Protection Zone (SPZ) area. There are six separate SPZ1 areas. These in turn surrounded by SPZ2 and all linked within SPZ3. SPZ1 areas include: around Skeet, Ottinge to Yew Tree Cross, north of Elham, east of Elham up to the west of Wootton, around Drellingore, and northeast of Swingfield Minnis. • Sporadic Secondary undifferentiated and Secondary A associated with superficial deposits (mixture of Clays with Flint Formation, Head and Alluvium). However, superficial deposits generally absent. The underlying bedrock is a Principal Aquifer with high and intermediate vulnerability (White and Grey Chalk). Lack of cover with regard to principal aquifer. • Located within a surface water drinking water safe guard zone (SGZ). However, the far east section east of the A260 is not in a surface water SGZ. Area not located within a Nitrate Vulnerable Zone (NVZ) • There are three noted abstractions wells. These are two large and one medium. They are for potable water supplies (North of Lyminge and west of Swingfield Minnis) and agriculture. • One Active Mineral Site – Newington Stone and Gravel Pit - using the bedrock material for construction (sand and gravel). Number of former workings in the southern section of the area. • Generally less developed area. Made Ground less likely in areas which have not seen much development, but potential in areas of former workings • Radon: Basic Protection measures would be required within new buildings • Depth of drift deposits in underlying geology would require consideration in drainage and ground stability | |

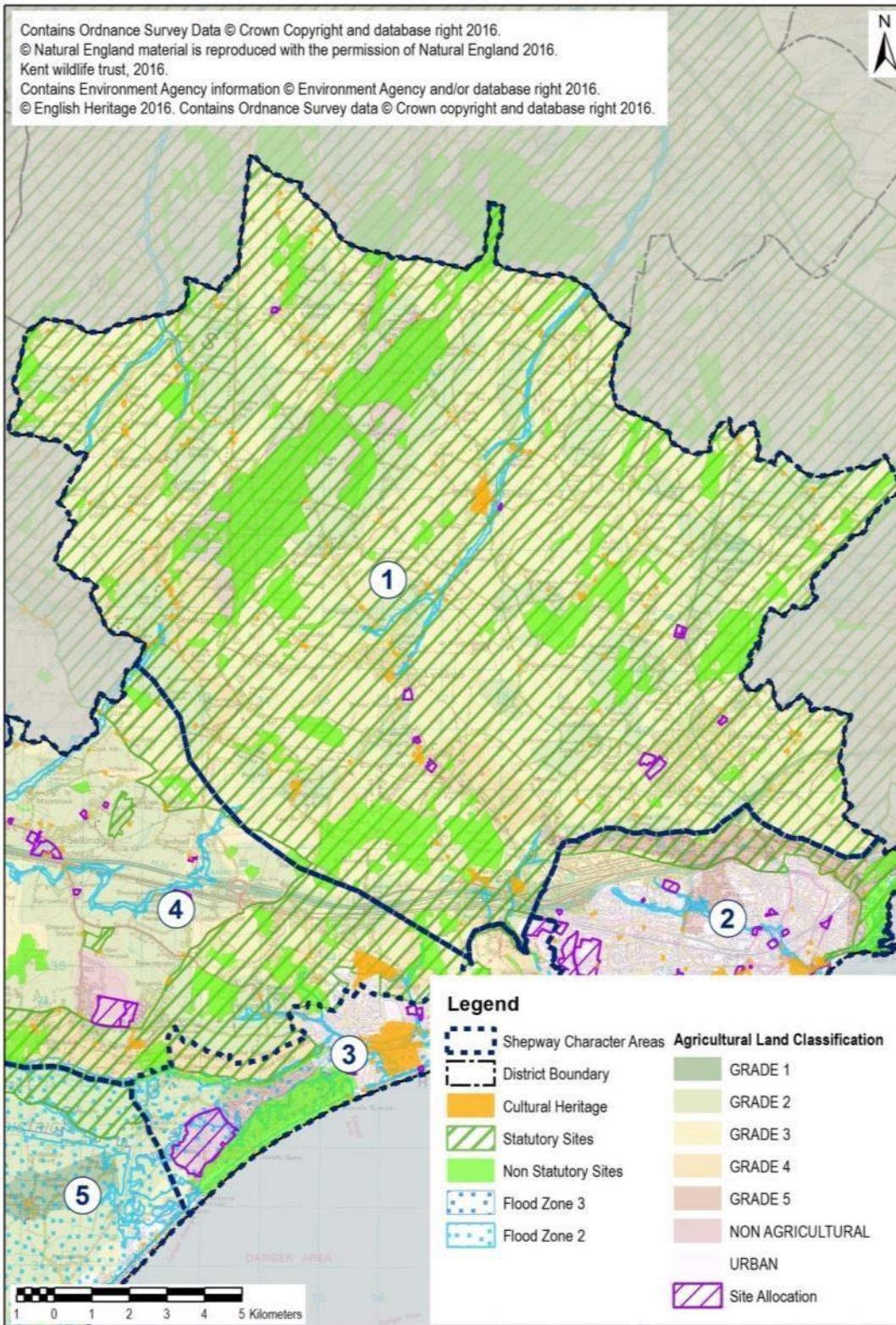
| Criterion | Considerations | Overall Assessment |
|--|---|---|
| <p>Infrastructure capacity and potential</p> | <ul style="list-style-type: none"> • Core Strategy designates Hawkinge as Service Centre • Core Strategy designates Elham and Lyminge as Rural Centres • Core Strategy designates Densole, Etchinghill and Stelling Minnis as Secondary Villages • Core Strategy identifies potential to reinforce Chalk Grassland Biodiversity Opportunity Area • Core Strategy identifies potential to reinforce Dover and Folkestone Cliffs Biodiversity Opportunity Area • Core Strategy identifies potential to reinforce East Kent Woodland and Downs Biodiversity Opportunity Area • Rural Services Study 2011 notes that even though Hawkinge is one of the more populated rural parishes, it lacks ‘traditional’ services such as a petrol station • Same study notes that Swingfield parish has a relatively large population but lacks a food shop and health services • Peene Quarry Country Park contributes to green infrastructure • Affinity Water state that in some parts of the area, though not all, there is limited capacity for new water connections. • Kent CC state that area is suitable for development in terms of flood risk infrastructure required • Kent CC note that Folkestone Household Waste Recycling Centre already close to capacity • Kent CC state that school sites in this area are generally restricted and buildings often old and constrained • UK Power Networks note that some areas are constrained for new electrical connection • A number of small primary schools, though no secondary school • Three GP surgeries and 1 NHS dentist • One library | <p style="background-color: yellow;"></p> |

| Criterion | Considerations | Overall Assessment |
|--------------------------|---|--------------------|
| Landscape and topography | <ul style="list-style-type: none"> • The area is wholly within the Kent Downs Area of Outstanding Natural Beauty (AONB). • Kent Downs AONB state that any development other than small-scale provision in villages would be contrary to legislation. • Largely within Natural England’s National Character Area (NCA) 119: North Downs. • Within the overarching North East Kent character area as defined in the Landscape Assessment of Kent 2004. • Within the North Downs District Character Area as defined in the Shepway Core Strategy 2013. • Within the North Downs Special Landscape Area (SLA) as designated under Saved Policy CO4 of the Shepway District Local Plan Review 2006. • No Local Landscape Area (LLA) designations under Saved Policy CO5 of the Shepway District Local Plan Review 2006. • The area comprises a broad landscape of rolling chalk downland intersected by long generally parallel narrow valleys such as at Elham. There is a prominent scarp to in the south of the area. Woodland cover is mixed between larger expanses of woodland in the west and smaller more intermittent blocks of woodland in the east. • Electricity transmission infrastructure comprising several high voltage power line routes traverses the area. • Natural England states that whole area sensitive in landscape terms. • Contains all of LCAs 01, 02, 03, 04 and 07, and parts of LCAs 05, 08, 10 and 16 from the HLLA. • LCA 01 is described as being of High sensitivity and with high susceptibility to development. • LCA 02 is described as being of High sensitivity, with high susceptibility to development. • LCA 03 is described as being of High sensitivity, with high susceptibility to development. • LCA 04 is described as being of Medium sensitivity with moderate susceptibility to development. • LCA 07 is described as being of High sensitivity, with high susceptibility to development. • LCA 05 is described as being of High sensitivity, with high susceptibility to development. • LCA 08 is described as being of High sensitivity, with high susceptibility to development. • LCA 10 forms a small part of the southern edge of the wider character area and is described as being of Low sensitivity and less susceptible to development. • LCA 16 forms a small part of the southern edge of the wider character area, severed from the rest of the character area by LCA 10. It is described as being of High sensitivity, with high susceptibility to development. | |

| Criterion | Considerations | Overall Assessment |
|-------------------------|---|--------------------|
| Heritage considerations | <ul style="list-style-type: none"> • Contains five village Conservation Areas (Elham, Newington, Frogholt, Etchinghill and Postling) • Grade I listed buildings as follows: Church of St Mary and St Radegund in Postling (north-west of Folkestone), Grade I Church of St Mary and St Ethelburga and remains of the older church to south in Lyminge, Grade I Church of St Oswald in Paddlesworth, Grade I Church of St Michael (east of Hawkinge), Grade I Church of St Martin (south-east of Elham), Grade I Church of St Peter I Swingfield (north-west of Folkestone), Grade I Church of St Mary the Virgin in Elham, Grade I Church of St James in Elmsted (north of Area 1), Grade I Davidson's Windmill in Stelling Minnis and Grade I Church of St Mary near Bossingham (north of Area 1), • Grade II* listed buildings as follows: three Grade II* Churches, Grade II* Dean Farm at Elmsted, Grade II* Old Leigh Place at Elmsted, Grade II* Sibton Park at Lyminge, Grade II* St John's Commandery at Swingfield, Grade II* Acrise Place and Acrise Court at Acrise, Grade II* Hoad Farm at Acrise, Grade II* Boyke Manor at Elham, Grade II* Parsonage Farmhouse at North Elham, Grade II* Lindon Hall at Lyminge, Grade II* Spong Farm House at Elmsted. • Kent County Council states that Stone Street, a Roman road connecting Durovernum (Roman Canterbury) and Stufall Castle, runs north-south through the area • Kent CC add that along the crest-line north of Folkestone there is an important military landscape related to WW2 • Historic England considers this a less suitable area for development. | |
| Housing demand | <ul style="list-style-type: none"> • This character area has the highest house prices in Shepway, indicating a mismatch between supply and demand • The higher house prices are situated in the villages of Wingmore, south of Lyminge, Stowting and north of Bodsham • The lower house prices are situated in the village of Lyminge, south of Bodsham, Elham, Densole and Hawkinge. • The CIL and Whole Plan Economic Viability Assessment showed low residential values (below £2,150 per square metre) in Hawkinge and Etchinghill • However, the Viability Assessment also showed medium (£2,300-£2,450 per sqm) values in Densole • The Viability Assessment showed high residential values (above £3,350 per sqm) in Elham and Stelling Minnis | |
| Regeneration potential | <ul style="list-style-type: none"> • Area average in terms of deprivation relative to others in Shepway • Mostly 60-80% least deprived • Area to the east in Swingfield Minnis 40-60% most deprived. • North of Hawkinge 20-40% most deprived. • South-east of Hawkinge in 80-100% least deprived. | |

| Criterion | Considerations | Overall Assessment |
|--|---|--------------------|
| Economic development potential | <ul style="list-style-type: none"> • Census 2011 shows relatively lower density of employment compared to more urban parts of Shepway • Core Strategy designates site at Hawkinge as Major Employment Site • Core Strategy designates Hawkinge as District Centre for economic development • Core Strategy designates Elham and Lyminge as Local Centres for economic development • Canterbury Road (A260) passes along the eastern edge of the character area. The M20 goes through a small portion in the south. The rest of the area only contains B roads, which could restrict economic development as the character area is fairly large. • There are no train stations within the character area. • Character area has access to strategic road network, offering some potential for economic development | |
| Spatial opportunities and constraints | <ul style="list-style-type: none"> • Existing settlements relatively small (with exception of Hawkinge), thus little risk of coalescence • Small size of settlements means either dispersed approach to development or single new settlement would be most appropriate in this location • Complex pattern of roads and lanes may provide some opportunities for defensible boundaries to development • Most suitable spatial locations for any new settlement would be either A260 corridor north of Densole or southern B2068 corridor with access to M20 | |
| <p>Conclusion- Key Strategic Constraints identified for Area 1</p> <p>Area 1’s key strategic, spatial constraint (illustrated in Figure 7) is considered to be the Kent Downs Area of Outstanding Beauty, a landscape designation that covers the entire area. National policy is unambiguous in stating that the AONB designation makes the area unsuitable for strategic-scale development. Other significant constraints include multiple environmental designations and a rolling landscape of scattered historic villages and farms, many with heritage constraints.</p> <p>Although flood risk is generally low, and the area benefits from access to the M20, there are no railway stations and the area is considered less suitable on the economic development potential criterion as a result. Although it is true that housing demand is likely high in the area, this consideration is not considered to outweigh the many other constraints on development, particularly the AONB designation.</p> <p>The overall conclusion is that Area 1 is not suitable for strategic growth and as such should be eliminated from further analysis. This assessment is made with particular reference to spatial planning principles 3, 5, 6, 8 and 14 (see Table 1).</p> | | |

Figure 7: Results of environmental constraints mapping for Area 1- Kent Downs

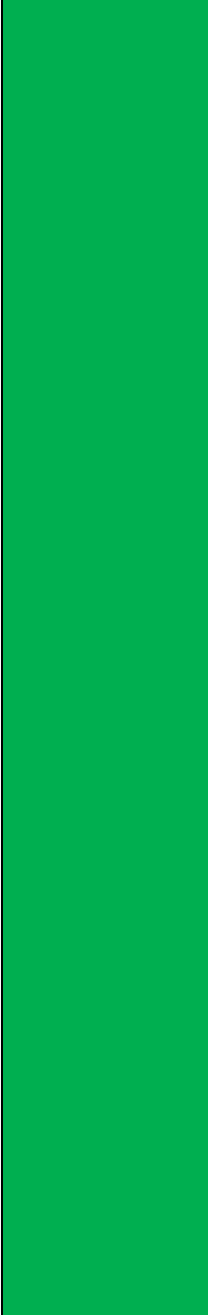


3.17 Area 2 (Folkestone and Surrounding Area)

| Criterion | Considerations | Overall Assessment |
|---------------------------|---|--------------------|
| Environmental constraints | <ul style="list-style-type: none"> • Fluvial and tidal flood risk is primarily low (Flood Zone 1). • Areas of high fluvial flood risk (Flood Zone 3) associated with main rivers (Pent Stream and Enbrook Stream) exist within central Folkestone and to the west. The SFRA notes previous fluvial flooding in these areas. • Areas at high tidal flood risk (Flood Zone 3) are predominantly restricted to cliff areas, with limited areas of Folkestone at risk of tidal flooding. • With the exception of areas in close proximity to Folkestone Harbour, the SFRA indicates that Area 2 is not at residual risk of tidal flooding. • The SFRA notes that overtopping has previously caused localised tidal flooding in Sandgate in the west of this Character Area. • Areas of Folkestone are at high risk of surface water flooding (which includes risk posed by ordinary watercourses) These areas are predominantly along the paths of main rivers and ordinary watercourses, and along the road network throughout Folkestone. • No ancient woodland locally • Locally designated Roadside Nature Reserves running alongside the Folkestone to Etchinghill Escarpment • Local Nature Reserve at Folkestone Warren (east of town) • Heritage Coast east of Folkestone • Local Wildlife Site at Hills Reservoir (north of town) • Site of Special Scientific Interest at Folkestone to Etchinghill Escarpment (north of town) • Special Area of Conservation at Folkestone to Etchinghill Escarpment • Agricultural land quality: Most land urban and therefore non-agricultural, but around edge of town Grades 5 and 3 to the north, Grade 2 to the north-east and Grade 4 to the west | |

| Criterion | Considerations | Overall Assessment |
|-----------------------------|---|--------------------|
| Transport and accessibility | <ul style="list-style-type: none"> • A260 Folkestone to Canterbury designated as Primary External Connection in the Core Strategy • B2011 Folkestone to Dover designated as Primary External Connection in the Core Strategy • M20/A20 Folkestone to Ashford designated as Primary External Connection in the Core Strategy • A259 Folkestone to Hythe designated as Main Internal Link in the Core Strategy • Core Strategy identifies Folkestone as location for two Main Railway Station Upgrades • Core Strategy identifies Folkestone as focus for Extended Bus Network • Core Strategy identifies Folkestone as location for three Key Highway Improvements • NCN 2, a long distance cycle route from Dover to Brighton, passes along Folkestone seafront towards Hythe. There are also a number of signed cycle routes within Folkestone. • Town is a hub for bus routes; route 10 provides services to Ashford, routes 16 and 17 to Canterbury, routes 91, 101 and 102 to Dover, with routes 101 and 102 also serving Hythe, New Romney, Lydd and Hastings; and routes 17, 558 and 630 serving Elham Valley. • Folkestone Central rail station provides connections to Dover to the east and Ashford to the northwest. Services also operate to and from London Charing Cross and St Pancras International, with High Speed 1 providing connections to St Pancras International in approximately fifty-five minutes. • Folkestone West is on the same line and provides the second of Shepway's two connections with High Speed 1. Folkestone West also has a good level of accessible on foot, by cycle, public transport and by private vehicle. • The Eurotunnel terminus is located to the north of Folkestone and the M20, with direct access from Junction 11a of the M20. • Folkestone also benefits from a harbour, although this has not operated as a cross channel passenger port since 2000. • Access to Folkestone is available from the west via the M20 and from the east via the A20. The A259 and A2034 provide access from the town centre to the A20/M20 Junction 13. The A259 also provides a link to the west through the town centre, towards Hythe and along the coast to the southwest. Folkestone is also highly accessible by other modes, such as rail, bus, walking and cycling. • The impact on car parking in the town centre should be considered • Development options would need to consider the impact of traffic routing through the town centre and to/from the M20. The capacity of other modes, such as rail and bus services, will also need to be considered. • Operation Stack, which involves queuing freight on either side of the coast bound carriageway between Junctions 8 and 9 of the M20 to manage disruption from the Eurotunnel or ferry services should be considered in development options. | |

| Criterion | Considerations | Overall Assessment |
|----------------------------------|--|--------------------|
| Geo-environmental considerations | <ul style="list-style-type: none"> • Two former landfills present: Dover Hill which accepted inert and commercial waste and Park Farm which accepted inert waste. • SPZ 1, 2 and 3 (and SPZ1 for subsurface activity only) in the west of the area (to the west of the A420 in area of Moorhall and Cheriton). Also, the far north of area may encroach in to SPZ1 north of Channel Tunnel Sidings. • Groundwater Vulnerability: Through the northern section of the area the groundwater is not classified vulnerable. Central and Southern area dominated by groundwater of high vulnerability (associated with chalk). The rest of this area is generally a mixture of high, intermediate and low vulnerability aquifers. • Rare sporadic distribution of Secondary (undifferentiated), with Secondary A aquifer along the coast line associated with the superficial deposits (Head Deposits and very rare alluvium and Storm Beach Deposits (gravel) and Beach Deposits and Tidal Flat Deposits along the coastal areas where present). • The bedrock (Gault Formation) is classified as unproductive strata cutting through east to west through the northern section of the character area (generally along line of motorway and railway and heading east). The remainder of the area is mainly Principal Aquifer (Chalk) with thin bands of Secondary A on the coast side (Lower Green Sands). Lack of cover with regard to principal aquifer • Groundwater Abstractions: Potable groundwater supply with a large abstraction just east of Channel Tunnel Terminal, but north of M20 • It is not in drinking water safeguard zone or an NVZ • No Active Mineral Sites, potentially a couple of old workings • Urban area including major road networks (motorways) and railways. Made Ground likely to be present. • Basic Protection measures would be required within new buildings (Radon). • There are slope stability issues in the area on steep land | |

| Criterion | Considerations | Overall Assessment |
|--|---|--|
| <p>Infrastructure capacity and potential</p> | <ul style="list-style-type: none"> • Core Strategy designates Folkestone as Shepway's only Sub-Regional Town • Core Strategy identifies new primary school needed in west Folkestone • Core Strategy identifies Folkestone as Priority for New Flood Defences • Core Strategy identifies Seabrook Valley as location for green infrastructure investment • Core Strategy identifies potential Climate Change Mitigation Measures for the coastline • East Cliff and Warren Country Park, Folkestone contributes to green infrastructure • Green Infrastructure Report 2011 lists Dover and Folkestone Cliffs and Downs as a key feature of Shepway's green infrastructure, and forming a Biodiversity Opportunity Area • Green Infrastructure Report 2011 references the Folkestone and Sandgate Green Chain including the Seabrook Valley (west of town), Folkestone Downs and the East Cliff and Warren • Retail Need Assessment Update 2010 notes (then) new supermarket capacity in Folkestone • Kent CC notes good access to green infrastructure • Affinity Water notes additional demand in this location will require costly capacity upgrades to water network • Kent CC notes drainage infrastructure constraints • Kent CC notes Folkestone Household Waste Recycling Centre operating near to capacity • Kent CC state that for major new development, new school sites would be required • UK Power Networks states that electrical network capacity is available • Choice of both primary and secondary schools, including one independent • A number of GP and dentist surgeries, though capacity not known • Several library services |  |

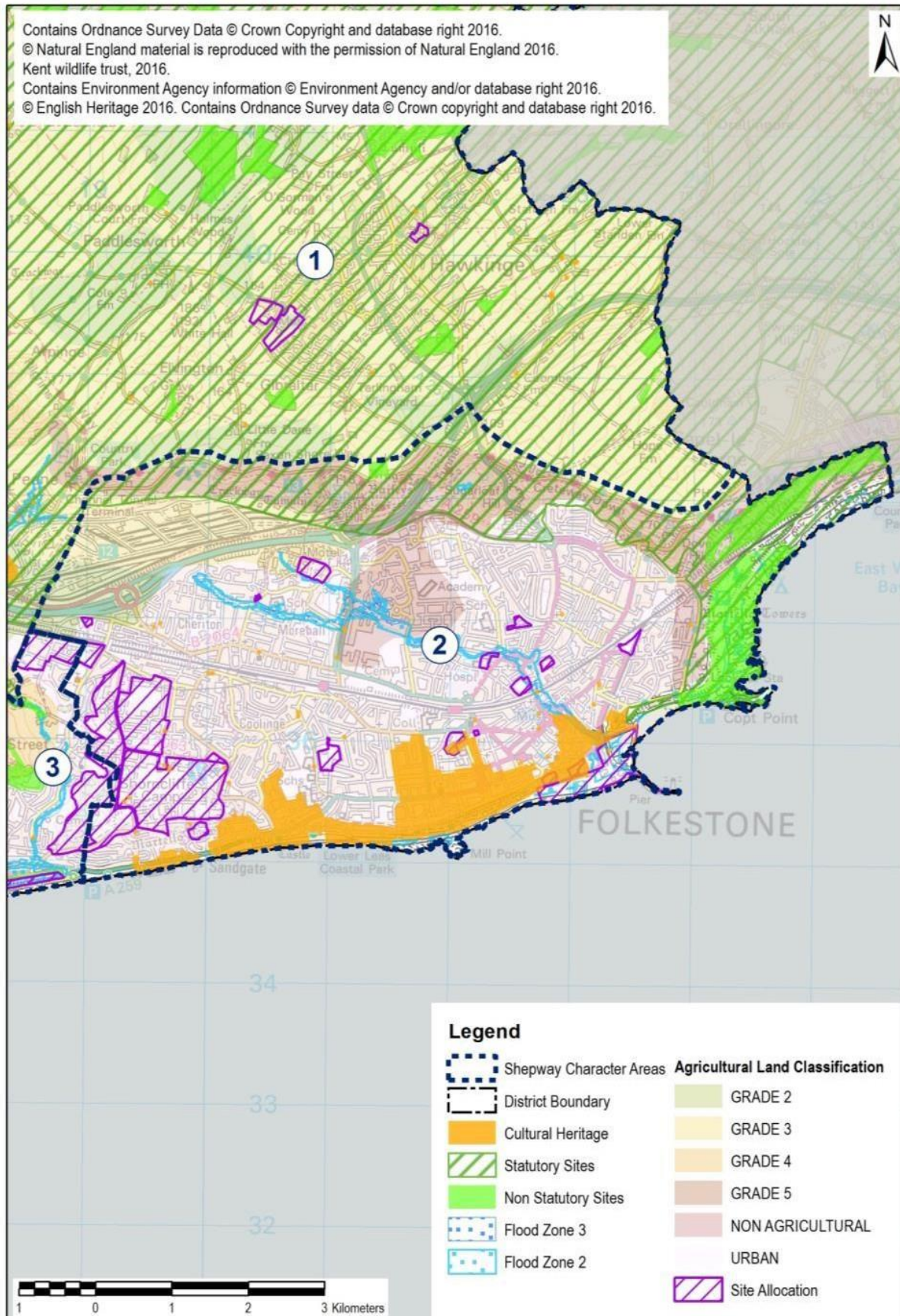
| Criterion | Considerations | Overall Assessment |
|--------------------------|--|--------------------|
| Landscape and topography | <ul style="list-style-type: none"> • Urban area tightly constrained by Kent Downs Area of Outstanding Natural Beauty, except to west of town. • The eastern half of the area is within Natural England's NCA 119: North Downs, and the western part is within NCA 120: Wealden Greensand. • Predominantly comprises the built-up urban area of Folkestone which is excluded from the Landscape Assessment of Kent 2004, with a narrow strip within the northern boundary of the area within the overarching North East Kent character area. • Within the Urban District Character Area as defined in the Shepway Core Strategy 2013. • A narrow strip of land along the northern and eastern boundaries of the area beyond the built-up urban edge of Folkestone is within the North Downs SLA as designated under Saved Policy CO4 of the Shepway District Local Plan Review 2006. • Includes the Coolinge Lane and Enbrook Valley LLA and part of the Sandgate Escarpment and Seabrook Valley LLA, as designated under Saved Policy CO5 of the Shepway District Local Plan Review 2006. • A narrow strip of land along the northern and eastern boundaries of the area beyond the built-up urban edge of Folkestone is within the Kent Downs AONB. • There is a prominent partially wooded scarp slope along the northern boundary of the area, which forms the northern edge of Folkestone. The land falls away to the English Channel in the south. • Settlement in the area comprises the principal built-up area of Folkestone. • Other notable built development or land use in the area includes the Channel Tunnel Terminal and the eastern end of the M20 motorway as it becomes the A20. • Contains all of LCAs 14 and 15, and parts of LCAs 08, and 10 from the HLLA. • LCA 14 comprises the cliffs in the east of the character area and is described as being of High sensitivity with positive scores in all criteria for landscape value and susceptibility. • LCA 15 comprises the urban area of Folkestone and makes up the majority of the character area, it is described as being of Low sensitivity as a result of its limited conservation interests, reduced perceptual aspects, and low susceptibility to development. • LCA 08 forms the ridge along the northern edge of the character area and is described as being of High sensitivity as a result of its positive landscape and scenic qualities, rarity, representativeness of the area, conservation interests, high recreational value and perceptual aspects, and its high susceptibility to development. • LCA 10 is described as being of Low sensitivity as a result of its reduced scenic quality, rarity, representativeness of the area, lack of conservation interests, poor recreational value and perceptual aspects, and no known cultural associations, it is considered to be less susceptible to development. | |

| Criterion | Considerations | Overall Assessment |
|-------------------------|--|--------------------|
| Heritage considerations | <ul style="list-style-type: none"> • Conservation areas located along the coast from the Pier Head Lighthouse down to the south of Sir John Moore Plain. • Listed buildings of interest include Grade I Sandgate castle in Folkestone (south-west Folkestone). • Kent CC states that the town's sea-front contains an extensive military landscape of Martello Towers, the Shorncliffe Redoubt and the Royal Military Canal • However, Historic England consider Folkestone more favourable for development in heritage terms | |
| Housing demand | <ul style="list-style-type: none"> • This character area has the fifth lowest house prices in Shepway • Majority of this area has low house prices, particularly in the east of Folkestone where house prices average £223,000. South Folkestone averages house prices of £238,000. South-west Folkestone has slightly higher house prices. • The CIL and Whole Plan Economic Viability Assessment showed low residential values (below £2,150 per square metre) in Cheriton, East, Foord, Harbour, Morehall and Park wards • However, the Viability Assessment also showed medium (£2,300-£2,450 per sqm) values in East, Harvey Central and Park wards • The Viability Assessment showed high residential values (above £3,350 per sqm) in Harvey West and Sandgate wards | |
| Regeneration potential | <ul style="list-style-type: none"> • Third most deprived character area • Core Strategy identifies Central Folkestone, Cheriton and Northern/Eastern Folkestone as priority communities for regeneration. • The area ranges from 0-80% deprived. • South and North Folkestone is in 0-20% most deprived. • East Folkestone in the 20-60% most deprived. • Large area in north-west Folkestone is 40-60% most deprived. • Central and south-west Folkestone is 60-80% least deprived. | |

| Criterion | Considerations | Overall Assessment |
|---------------------------------------|---|--------------------|
| Economic development potential | <ul style="list-style-type: none"> • Census 2011 shows relatively higher density of employment compared to more rural parts of Shepway • Core Strategy designates site at Folkestone as Major Employment Site • Core Strategy designates Folkestone as Town Centre for economic development • Core Strategy designates Sandgate as Local Centre for economic development • This character area has good strategic road access with the M20, A20, A259 and A2033. • Folkestone Central and Folkestone West train stations offer good access to and from the town • The Core Strategy Policy SS1 highlights that majority of Shepway’s commercial floorspace will take place within Folkestone, to enhance its role as a sub-regional centre • Is an existing main employment area | |
| Spatial opportunities and constraints | <ul style="list-style-type: none"> • Most urban of the six character areas, meaning any opportunities for new development very small scale • Any opportunities would form urban extensions to existing town of Folkestone, thus more sustainable development supported by national policy • Shorncliffe Garrison allocated within Places and Policies Local Plan Preferred Option Consultation document,, thus outside the scope of this study • Need to avoid risk of coalescence with Hythe- Core Strategy notes Seabrook Valley as a green wedge with this aim • Need to avoid risk of coalescence with Newington or Hawkinge (but relative risk of this much smaller) • No obvious opportunities for growth at strategic scale due to extent of urban area, surrounding constraints and existing site allocations | |

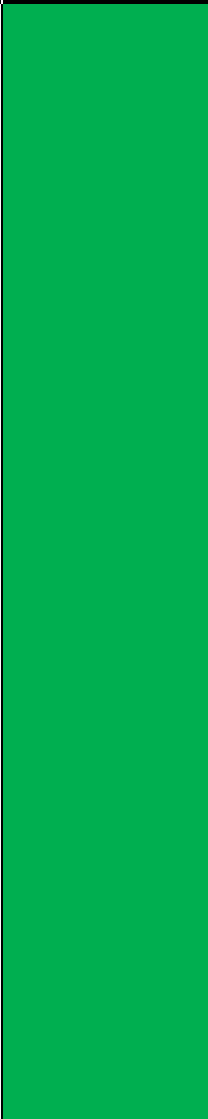
| Criterion | Considerations | Overall Assessment |
|---|----------------|--------------------|
| <p>Conclusion- Key Strategic Constraints identified for Area 2</p> <p>Area 2’s key strategic, spatial constraint (illustrated in Figure 8) is considered to be a simple lack of land that is not developed or designated for development, with the area failing on the spatial opportunities and constraints criterion for this reason. Of all character areas, Area 2 offers the widest range of criteria supportive of growth, including low flood risk and minimal environmental designations, excellent transport and other infrastructure, much land free from heritage designations and land mostly favourable in landscape terms.</p> <p>AECOM’s analysis has also identified opportunities for regeneration and potential for economic development. However, this very suitability for development when compared with surrounding areas has already been identified in recent rounds of planning. As such, a number of large-scale site allocations cover the remaining undeveloped land in the area, and the analysis suggests there is insufficient land remaining for further strategic-scale development for the purposes of this study (though this does not exclude the possibility of the Council identifying appropriate infilling opportunities as part of a separate exercise).</p> <p>The overall conclusion is that Area 2 is not suitable for strategic growth and as such should be eliminated from further analysis. This assessment is made with particular reference to spatial planning principles 1 and 14 (see Table 1).</p> | | |

Figure 8: Results of environmental constraints mapping for Area 2- Folkestone and Surrounding Area

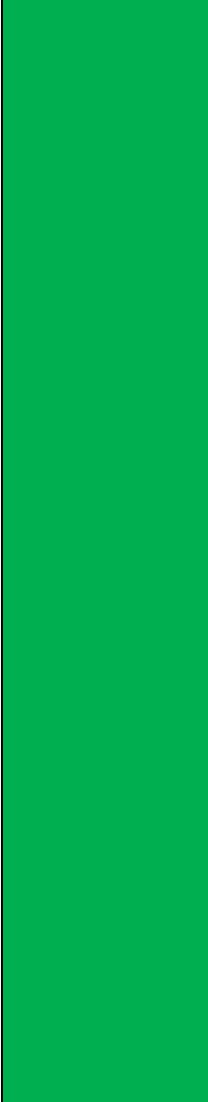


3.18 Area 3 (Hythe and Surrounding Area)

| Criterion | Considerations | Overall Assessment |
|---------------------------|---|--------------------|
| Environmental constraints | <ul style="list-style-type: none"> • Fluvial and/or tidal flood risk is predominantly high across town of Hythe (Flood Zone 3, >1% AEP fluvial event or >0.5% AEP tidal event) and towards the west of Area 3, which is entirely within Flood Zone 3. This is primarily from the sea, although the Royal Military Canal also poses a fluvial flood risk along its course within the area. • Western areas benefit from flood defences. However, areas to the east of Hythe Ranges, including areas of Hythe, are undefended Flood Zone 3 land. • Towards the northeast of Area 3, away from the coastline in the vicinity of Saltwood and Horn Street, fluvial and tidal flood risk is low (Flood Zone 1). • The residual risk (hazard) posed by tidal flooding to western areas of Hythe and beyond is significant to extreme under present day conditions and becoming more extensive up to the year 2115. The SFRA notes that overtopping has previously caused localised flooding in Hythe. • Areas in close proximity to the A259 are noted to be at low (between 1% and 0.1% AEP) to high (>3.3% AEP) risk from surface water flooding. • Urban area tightly constrained by Kent Downs Area of Outstanding Natural Beauty • Ancient Woodland at Paraker Wood and Scene Wood (both north-east of town) • Local Wildlife sites at Hythe Ranges (south-west of Hythe), Paraker Wood and Seabrook Stream, Shorncliffe (east of town), and Royal Military Canal (runs through town) • Fragmented remnant woodland also forming Local Wildlife Sites on slopes such as Chesterfield Wood, Brockhill, Saltwood Valley, Paraker Wood and Seabrook Stream. Kent Wildlife Trust note increasing recreational pressure on these (around Shorncliffe) • Sites of Special Scientific Interest at Lympne Escarpment (west of town) and Seabrook Stream (west of Folkestone) • Agricultural land quality: Most land urban and therefore non-agricultural, but around edge of town Grade 4 to the north-east, Grade 3 to the north and Grades 2 and 4 to the west | |

| Criterion | Considerations | Overall Assessment |
|------------------------------------|---|--|
| <p>Transport and accessibility</p> | <ul style="list-style-type: none"> • A259 Hythe to Folkestone designated as Main Internal Link in the Core Strategy • A261/A20 Hythe to M20 Junction 11 designated as Main Internal Link in the Core Strategy • A259 Hythe to New Romney designated as Main Internal Link in the Core Strategy • Core Strategy identifies Hythe (specifically, Sandling Road) as location for Key Highway Improvements • NCN 2 runs along Princes Parade towards the centre of Hythe before continuing alongside the Royal Military Canal towards Botolph’s Bridge. • From Hythe, bus routes 101/102 offer services between Folkestone, Hastings and Dover with route 10 providing services between Folkestone and Ashford. Route 16 provides a service to Canterbury. • Shepway has its own light rail service, the Romney, Hythe and Dymchurch Railway (RHDR). The route has seven stations with Hythe station located within this character area. The service generally caters to tourists but is also a well-used school route for children. • The A259 runs through Hythe from Folkestone to the east and from Dymchurch to the southwest. The A261 provides access to the A20 and the M20 to the north. The area is not accessible by mainline rail, however is accessible by bus, with connections to Folkestone and other areas within Kent. • Development options would need to consider the impact of traffic routing through Hythe, on routes to/from the M20 and on the A259 south towards New Romney. • Potential impacts on the A259 / A261 Scanlons Bridge junction will need to be considered, amongst others • Kent CC note good access to transport infrastructure |  |

| Criterion | Considerations | Overall Assessment |
|----------------------------------|--|--------------------|
| Geo-environmental considerations | <ul style="list-style-type: none"> • Three former Landfills: West Hythe Quarry which accepted Inert waste, Princes Parade (1) which accepted Inert and Commercial Waste and Princes Parade (2) which accepted Inert waste. • The area is not in an SPZ. • The south coast section is designated as a minor aquifer with high vulnerability (likely to be associated with the storm beach deposits and other superficial deposits). To the north of the North Military Canal, combination of high and intermediate vulnerability (Lower Green Sands bedrock). Running through the centre of this area (east to west) there is a section where there is no groundwater vulnerability rating assigned (associated with the Wealden Clay bedrock). • The superficial deposits are classified as Secondary A where it present which is mainly along the coastal section and absent to the north. • The bedrock is mainly classified as unproductive (Wealden Clay) except in the far north of the area where it is principal/Secondary A (Lower Green Sands). This is in the area towards Lympne and West Hythe. • The area is potentially within a drinking water safe guard zone. Along its northern edge at Lympne. (surface water only) where is bounds Character Area 4. • There is one groundwater abstraction. This is a small abstraction for golf course purposes. • The west side of the area is within surface water NVZ • There is one Active Mineral Site. The West Hythe Ballast Pit (sand and gravel from the Storm Beach Deposits) and a couple in inactive workings • There are areas of urban development and conurbations as well as former mineral workings. Made Ground likely to be present in these areas. • The area is not in an area affected by radon • There are slope stability issues in this area addressed through Shepway Local Plan saved policies. | |

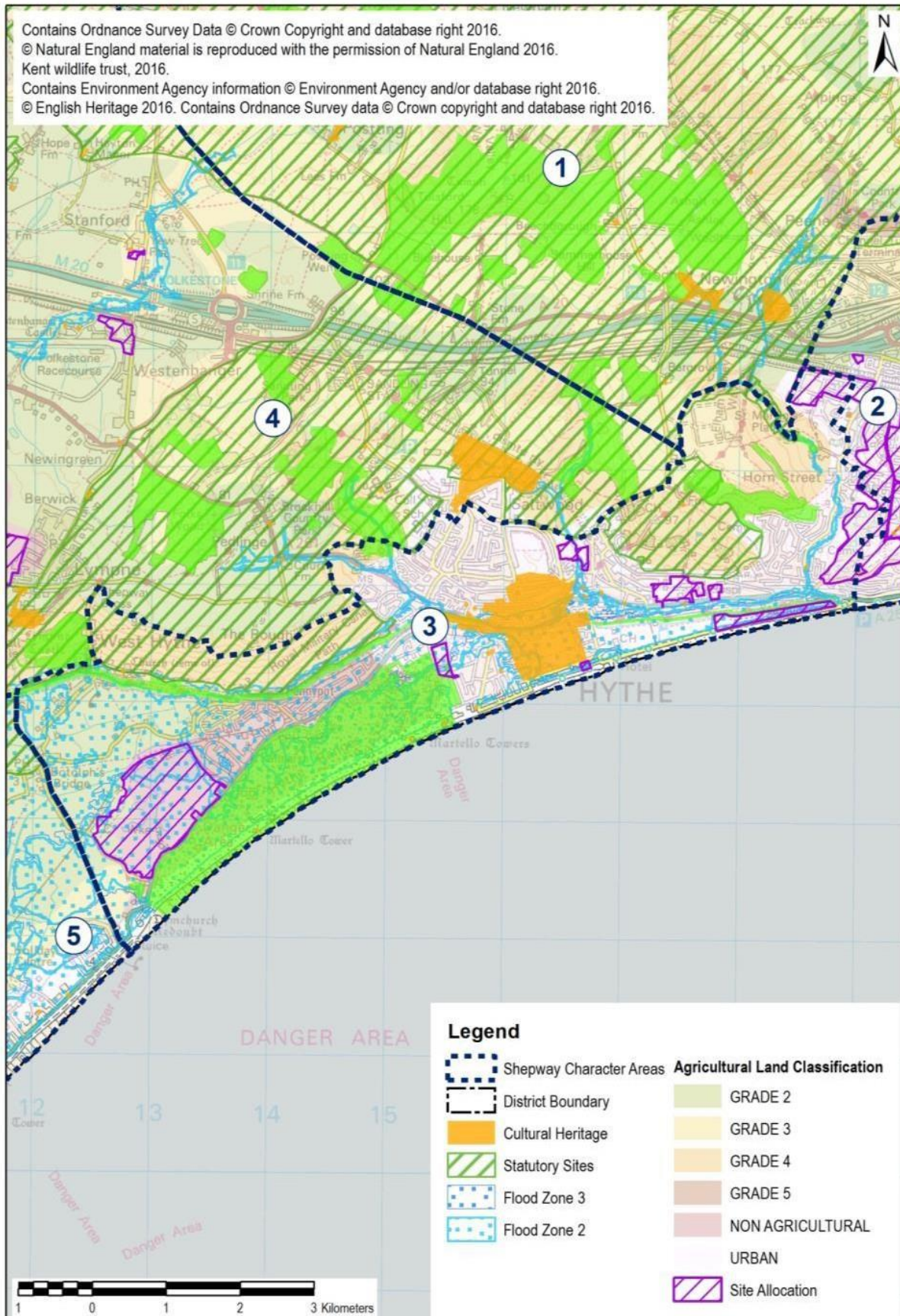
| Criterion | Considerations | Overall Assessment |
|--|--|--|
| <p>Infrastructure capacity and potential</p> | <ul style="list-style-type: none"> • Core Strategy designates Hythe as a Strategic Town for Shepway • Core Strategy identifies Hythe as Priority for New Flood Defences • Core Strategy identifies Nickolls Quarry as Major Area of Change with Potential Green Infrastructure Connections with Surrounding Landscape • Core Strategy identifies potential Climate Change Mitigation Measures for the coastline • Brockhill Country Park north of Hythe contributes to green infrastructure • Green Infrastructure Report 2011 references the Folkestone and Sandgate Green Chain including the Seabrook Valley (east of Hythe) • Retail Need Assessment Update 2010 notes new supermarket capacity in Hythe • Kent CC note good access to green infrastructure • Affinity Water note that additional development in this location will require costly upgrades to the water network • Kent CC states that there are drainage infrastructure constraints • Kent CC note that Folkestone Household Waste Recycling Centre is already operating close to capacity • Kent CC note that new school sites would be required for any increase in development in this location • UK Power Networks note electrical network capacity is available here • Three primary schools • No secondary school, but Brockhill Park Performing Arts College nearby in Area 4 • Two GP surgeries and a library |  |

| Criterion | Considerations | Overall Assessment |
|--------------------------|---|--------------------|
| Landscape and topography | <ul style="list-style-type: none"> • The area is largely within Natural England’s NCA 120: Wealden Greensand with a small part in its south-west within NCA 123: Romney Marshes. • Partially comprises the built-up area of Folkestone and Hythe which is excluded from the Landscape Assessment of Kent 2004, as well as comprising parts of the overarching Kent Downs and Romney Marshes character areas. • Within the Urban District Character Area as defined in the Shepway Core Strategy 2013. • Parts of the area along the northern boundary outside the built-up area of Hythe are within the North Downs SLA as designated under Saved Policy CO4 of the Shepway District Local Plan Review 2006. • Includes part of the Sandgate Escarpment and Seabrook Valley LLA in the east of the area, the Mill Lease Valley LLA and Eaton Lands LLA in the centre of the area, and part of Romney Marshes LLA in the west of the area, all designated under Saved Policy CO5 of the Shepway District Local Plan Review 2006. • Parts of the area along the northern boundary outside the built-up area of Hythe are within the Kent Downs AONB. • The area includes part of the prominent Hythe Escarpment in the west and higher ground in the north, forming the northern edge of Hythe. The land falls away to the English Channel in the south. Tree cover in the area is mixed with limited tree cover in the west between the coast and Hythe Escarpment, and greater tree cover with wooded hills and ridges in the east of the area. • A notable land use in the area is the Hythe Ranges, part of the Ministry of Defence’s (MOD) Defence Training Estate. • Contains all of LCAs 17, 18 and 19, and parts of LCAs 13, 16 and 21 from the HLLA. • LCA 17 is described as being of Medium sensitivity with good conservation interests and recreational value but reduced perceptual aspects; it has a moderate susceptibility to development. • LCA 18 is described as being of Medium sensitivity with good conservation interests, rarity and recreational value, and a low susceptibility to development. • LCA 19 comprises the Hythe Ranges and is described as being of Low sensitivity with reduced landscape and scenic quality. It is less susceptible to development. • LCA 13 comprises the eastern end of a scarp landscape and is described as being of High sensitivity as a result of its positive landscape and scenic qualities. • LCA 16 is described as being of High sensitivity as a result of its positive scenic quality, rarity, conservation interests, high recreational value and perceptual aspects, and its high susceptibility to development. • LCA 21 is described as being of High sensitivity as a result of its positive landscape quality, rarity, representativeness of its wider area, good recreational value and perceptual aspects, and is more susceptible to development. | |

| Criterion | Considerations | Overall Assessment |
|--------------------------------|---|--------------------|
| Heritage considerations | <ul style="list-style-type: none"> • Listed buildings of interest include Grade I The Parish Church of St Leonard in Hythe (centre of Hythe), and Grade I Church of St Martin (west of Folkestone). • Hythe Town Centre conservation area. • Kent County Council states that the area is dominated by the military landscape (Shorncliffe Camp, Royal Military Canal, Dymchurch Redoubt and the Martello Towers), and as a result, considers the area less suitable for development • Historic England state that there is very limited site availability that would not impact in some form on heritage assets and historic sites, including sites of high archaeological potential. | |
| Housing demand | <ul style="list-style-type: none"> • The character area has average house prices for Shepway • Prices are highest south-west of Blackhouse Hill and medium south of Pedlinge. The rest of the area has medium to low prices, with the centre of Hythe having an average of £361,000. • A new residential development is planned in Nickolls Quarry which will meet a proportion of local housing demand • The CIL and Whole Plan Economic Viability Assessment showed medium (£2,300-£2,450 per sqm) residential values in Hythe Central, East and West wards • The Viability Assessment showed high residential values (above £3,350 per sqm) in Saltwood | |
| Regeneration potential | <ul style="list-style-type: none"> • Character area least deprived of the six • However, Core Strategy identifies western Hythe as priority community for regeneration • Most deprived area is east and south-west of Hythe (20-40%). • South-east of Hythe and west of area is 40-60%. • Remaining area is 60-100% least deprived. | |
| Economic development potential | <ul style="list-style-type: none"> • Census 2011 shows moderate density of employment; less than Folkestone but more than rural parts of Shepway • Core Strategy designates site at Hythe as Major Employment Site • Core Strategy designates Hythe as Town Centre for economic development. • The character area has good access to the road network • There are no mainline train stations within the Character Area. | |

| Criterion | Considerations | Overall Assessment |
|--|---|--------------------|
| Spatial opportunities and constraints | <ul style="list-style-type: none"> • Urban character area, but with more undeveloped land than Area 2 • More land at the urban edge outside the AONB than at Folkestone, raising the possibility of limited urban extension to Hythe/Saltwood • Brockhill Country Park north of Hythe is a spatial constraint • Need to avoid risk of coalescence with Folkestone- Core Strategy notes Seabrook Valley as a green wedge with this aim • Development already under way at Nickolls Quarry (west of Hythe) thus major site outside the scope of this study • Need to avoid risk of coalescence with Dymchurch • To west of town, Royal Military Canal and A259 both may offer opportunities for defensible boundaries to development | |
| <p>Conclusion- Key Strategic Constraints identified for Area 3</p> <p>Area 3's key strategic, spatial constraints (illustrated in Figure 9) are considered to be environmental, landscape and spatial. Environmental constraints reflect the significant areas of Zone 2 and 3 floodplain, particularly in the western half of the area, but also the scale of ecological designations, in particular Hythe Ranges Local Wildlife Site. The Kent Downs AONB and its setting is also a significant landscape constraint, and the town centre conservation area is extensive.</p> <p>Transport infrastructure and economic opportunities are also more constrained than in Area 2, the other main urban character area.</p> <p>The overall conclusion is that Area 3 has no potential for strategic growth and as such will not be carried forward into Phase 2 analysis. This assessment is made with particular reference to spatial planning principles 1, 2, 4, 5, 6 (specifically with respect to the potential for use of previously-developed land as an urban extension of Folkestone), 9 and 12 (see Table 1).</p> | | |

Figure 9: Results of environmental constraints mapping for Area 3- Hythe and Surrounding Area

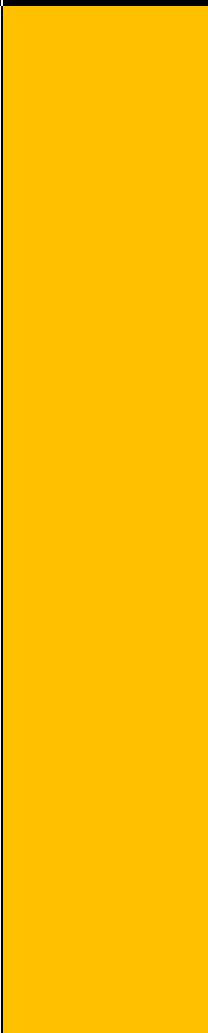


3.19 Area 4 (Sellindge and Surrounding Area)

| Criterion | Considerations | Overall Assessment |
|---------------------------|--|--------------------|
| Environmental constraints | <ul style="list-style-type: none"> • Fluvial and tidal flood risk is primarily low (Flood Zone 1) within Area 4 and it should be possible to locate development within areas of low flood risk • Exceptions include areas located in fluvial Flood Zone 3 along main river corridors including the East Stour River (and tributaries) • The Royal Military Canal is shown to form a barrier to flood waters occurring from breach/overlapping events to the south within Character Areas 3 and 5. Therefore, none of this Character Area is shown to be at residual risk of flooding based on the modelled breach/overlapping events within the SFRA • Areas at high risk from surface water flooding (>3.3% AEP) (which includes ordinary watercourses) are largely limited to drainage paths along topographic low points, including at Brockhill Country Park and Saltwood • Numerous small parcels of ancient woodland scattered across the area, of which the largest are Folks Wood (east of Lympne), and Harringe Brooks Wood (north of Court-at-Street) • No Kent Wildlife Trust Nature Reserves • Local Wildlife Sites at Brockhill Country Park, Saltwood (north-west of Hythe), Chesterfield Wood, Sandling Park (adjacent to previous), Folks Wood, Harringe Brooks Wood, Pasture and Woods Below Court-at-Street (south-west of Lympne), Postling Wents Woods (north of Sandling) • No Special Areas of Conservation • Sites of Special Scientific Interest at Gibbin's Brook (east of Sellindge), Lympne Escarpment (south of Lympne), and Otterpool Quarry (south of Folkestone Race Course) • Agricultural land quality: Most land across the area Grade 2, but smaller extent of Grade 3 and localized pockets of Grade 4 on the steeper slopes to the north and south | |

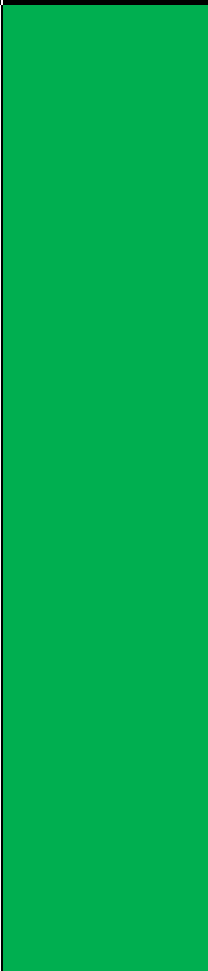
| Criterion | Considerations | Overall Assessment |
|-----------------------------|---|--------------------|
| Transport and accessibility | <ul style="list-style-type: none"> • A261/A20 Junction 11 M20 to Hythe designated as Main Internal Link in the Core Strategy • M20/A20 Ashford to Folkestone designated as Primary External Connection in the Core Strategy • Core Strategy identifies A20/A261 junction at Newingreen as location for Key Highway Improvements • A local cycle route runs from Lympne along Stone Street to Newingreen, continuing on the A20 to Ashford Road. • Bus route 10 provides a service from Sellindge and Lympne to Folkestone and Ashford. • Sandling rail station is located to the north of Hythe and to the west of Folkestone West. Due to its location, the station is relatively inaccessible to pedestrians, however there are facilities for cyclists and there are a limited number of bus services passing the station. Sandling provides connections to Dover to the east (via Folkestone) and Ashford to the northwest and onward connection to London. • Westenhanger station is located off Stone Street, to the northeast of Folkestone racecourse, to the north of Newingreen and Lympne and to the east of Sellindge. As in the case of Sandling station, Westenhanger is considered to be largely inaccessible on foot, due to a limited residential population in the immediate vicinity. Westenhanger provides connections to Dover to the east (via Folkestone) and Ashford to the northwest and onward connection to London. • The M20 runs through the centre of this character area, with access to the wider network (the B2068 to the north and A20 to the south) at Junction 11. The remainder of the network is rural in nature and consists of low order roads. The area is highly accessible by rail, however bus services to the rural areas, such as Lympne and Sellindge, are limited, and therefore private vehicle travel may contribute to a significant number of trips. • Development options would need to consider the impact on the M20 at Junction 11 and on key routes to the M20 i.e. the A20, A261 and B2068. The capacity of other modes, such as rail at Westenhanger and Sandling stations will also need to be considered. • Operation Stack, which involves queuing freight on either side of the coast bound carriageway between Junctions 8 and 9 of the M20 to manage disruption from the Eurotunnel or ferry services should be considered in development options. Operation stack may also extend to Junction 11 of the M20 (Westenhanger). • Potential impacts on the A20 / A261 Hythe Road / Stone Street / A20 Ashford Road junction will need to be considered, amongst others • Kent CC states that there is good access to transport infrastructure here | |

| Criterion | Considerations | Overall Assessment |
|----------------------------------|--|--------------------|
| Geo-environmental considerations | <ul style="list-style-type: none"> • Seven former Landfills and one current landfill. Former landfills include: Quarry Field (accepted inert and household waste), Lypne Industrial park (accepted inert waste), The Garden House (accepted inert waste), Sellindge (accepted inert and household waste), Swan Lane (accepted inert and household waste), Swan Lane (2) (no information available), Cock Ash Slip (no information available). The current active landfill is operated by Countrystyle Recycling (Folkestone) Limited. It is a A06 licence type which is a landfill taking other wastes not listed in categories A1, A2, A4 and A5. • The area is not in an SPZ • Groundwater vulnerability : Mainly major aquifer with intermediate vulnerability (Lower Green Sands) with high vulnerability within the more central areas of the area (Lower Green Sands). The northern tip (Broad Street), there is no groundwater vulnerability classified (associated with Gault Formation). • Minimal scatterings of Secondary undifferentiated to the north of the M20. Along with even less Secondary A in similar areas (associated with the superficial deposits of mainly Head Deposits and also thin beds of alluvium). • The bedrock aquifer is Principal and Secondary A where present (associated with Lower Green Sands). There is a section on the northern and far southwest where there is no aquifer designation (Gault Formation and Wealden Group). Lack of cover with regard to Principal aquifer • The area is within a surface water safeguard zone. The western Section is also within a surface water NVZ • There is one groundwater abstraction which is of medium quantity for spray irrigation for agriculture. • There are no Active Mineral Sites. However, there are a couple of former workings (Clay, sand and gravel, and limestone). • There are areas of urban development and conurbations. Made Ground likely to be present in these areas. • Basic Protection measures would be required within new buildings (Radon). This area is south of the M20. The rest of the area is not in a radon affected area. | |

| Criterion | Considerations | Overall Assessment |
|--|--|--|
| <p>Infrastructure capacity and potential</p> | <ul style="list-style-type: none"> • Core Strategy designates Sellindge as Rural Centre • Core Strategy designates Lymgne, Saltwood and Stanford/Westenhanger as Primary Villages • Core Strategy identifies Sellindge as Major Area of Change with Potential Green Infrastructure Connections with Surrounding Landscape • Core Strategy identifies potential to reinforce Mid Kent Greensand and Gault Biodiversity Opportunity Area • Green Infrastructure Report 2011 lists Mid-Kent Greensand and Gault, including Lymgne Escarpment, as a key feature of Shepway’s green infrastructure, and forming a Biodiversity Opportunity Area • Kent CC states that there is good access to green infrastructure here • Affinity Water notes that significant reinforcement of existing water network assets will be needed to enable growth in this area • Kent CC state that this area is favourable in terms of flood risk infrastructure requirements • Kent CC notes that Folkestone Household Waste Recycling Centre is already close to capacity • Kent CC state that new school sites would be required for any significant development • UK Power Networks state that electrical network capacity is available • Several primary schools and a secondary school (Brockhill Park Performing Arts College) • No GP surgeries, dentists or libraries |  |

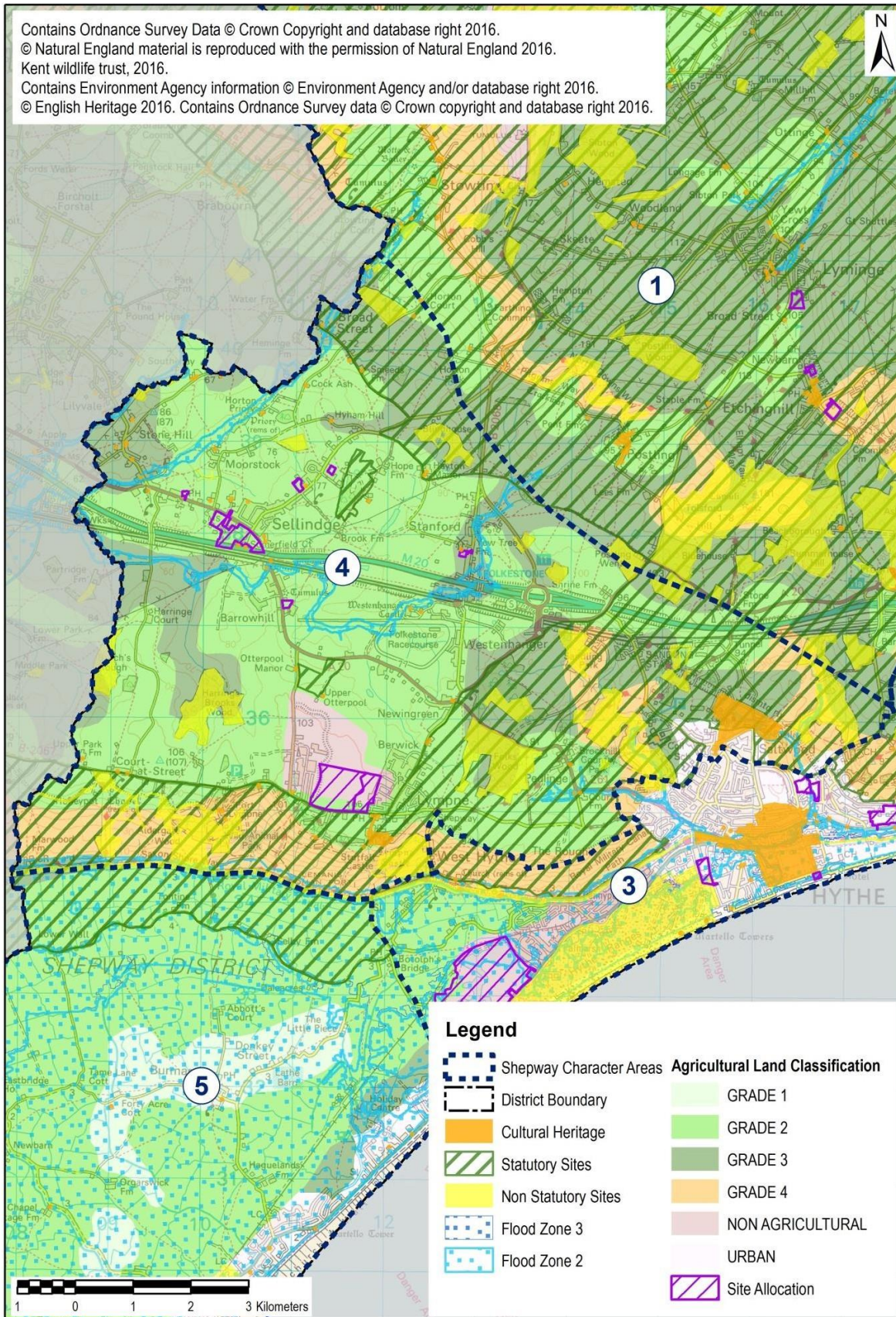
| Criterion | Considerations | Overall Assessment |
|--------------------------|--|--------------------|
| Landscape and topography | <ul style="list-style-type: none"> • Largely within Natural England’s NCA 120: Wealden Greensand • Small part of Kent Downs Area of Outstanding Natural Beauty south of Lympe and Court-at-Street. • Comprises parts of the overarching Kent Downs, Greensand Belt and Low Weald character areas as defined in the Landscape Assessment of Kent 2004. • Within the North Downs District Character Area as defined in the Shepway Core Strategy 2013. • Largely within the North Downs SLA as designated under Saved Policy CO4 of the Shepway District Local Plan Review 2006, with the exception of land around the north, east and west of Sellindge, and to the south of Sellindge beyond the M20 motorway. • No Local Landscape Area (LLA) designations under Saved Policy CO5 of the Shepway District Local Plan Review 2006. • The boundary of the North Downs SLA and Kent Downs AONB are not aligned. The boundary of the North Downs SLA extends beyond the AONB boundary including more of the area. • The area has a gently undulating landform in the north rising towards the steep Hythe Escarpment that falls away prominently to the south along the southern boundary of the area. It is a large-scale landscape of open fields and limited, small-scale woodland. • Notable development or land uses in the area with visual impacts include the M20 Motorway and High Speed 1 railway line which bisect the area, electricity transmission infrastructure comprising high voltage power lines, Folkestone Racecourse, and an industrial estate near Lympe. • The Kent Downs AONB states that the setting of the Kent Downs has great value and was one of the reasons why the Kent Downs AONB was designated. Legislation and guidance as well as appeal decisions confirm that it is appropriate to consider setting in respect of AONBs. • Natural England states that the majority of the non-AONB area is within the AONB setting, surrounded by AONB to the north, east and south. • Contains all of LCAs 06, 09, 11 and 12, and parts of LCAs 05, 10 and 13 from the HLLA. • LCA 06 is described as being of Medium sensitivity, with a moderate susceptibility to development. • LCA 09 is described as being of Medium sensitivity, with a moderate susceptibility to development. • LCA 11 is described as being of Medium sensitivity, with moderate susceptibility to development. • LCA 12 is described as being of High sensitivity, with high susceptibility to development. • LCA 05 is described as being of High sensitivity, with high susceptibility to development. • LCA 10 has a severing function within the character area. It is described as being of Low sensitivity and is considered to be less susceptible to development. • LCA 13 is described as being of High sensitivity and with high susceptibility to development. | |

| Criterion | Considerations | Overall Assessment |
|--------------------------------|---|--------------------|
| Heritage considerations | <ul style="list-style-type: none"> • Royal Military Canal along the southern boundary of the area is a Scheduled Ancient Monument • Listed buildings of interest include Grade 1 Saltwood Castle (north-east of Saltwood), Grade I Bastions and Curtain Wall about 10m south east of Saltwood Castle (north-east of Saltwood), Grade I Lympne Castle (south Lympne), Grade I Church of St Stephen (south Lympne), Grade I Westenhanger Manor (north-west of Westenhanger), Grade I Barns at Westenhanger Manor (north-west of Westenhanger), Grade I Church of St Mary (north-west of Sellindge), Grade I Monks Horton Priory (north of Sellindge), Grade II* Kite Manor in Monks Horton, Grade II* Port Lympne House at Lympne, Grade II*, and Grade II* Stanford Windmill at Stanford. • Kent County Council states that there is some potential for sympathetic larger scale development here; but any such development should look to secure positive benefits so that heritage assets are managed sustainably and their significance is taken account of and where possible enhanced • Conservation Areas located north of Saltwood and south of Lympne. | |
| Housing demand | <ul style="list-style-type: none"> • The character area has the second highest house prices in Shepway. • The highest prices are around Monks Horton, west of Sellindge, Pedlinge and along the southern boundary of the character area. There are lower house prices in Westenhanger, north of Lympne, and south of Sellindge. • The CIL and Whole Plan Economic Viability Assessment showed medium (£2,300-£2,450 per sqm) residential values in Lympne and Saltwood • The Viability Assessment showed high residential values (above £3,350 per sqm) in Sellindge, Stanford and Westenhanger | |
| Regeneration potential | <ul style="list-style-type: none"> • Scores average for deprivation • Nearly all of the area is 60-80% least deprived expect for north-west corner at Sellindge which is 40-60% least deprived | |
| Economic development potential | <ul style="list-style-type: none"> • Census 2011 shows relatively high density of employment for a more rural area thanks to Lympne Industrial Estate • Core Strategy designates site at Lympne as Major Employment Site • Core Strategy designates Sellindge as Local Centre for economic development • Excellent road access thanks to M20 • The A20 and A261 are also located within the Character Area. • Opportunities for economic development linked to Westenhanger and Sandling stations | |

| Criterion | Considerations | Overall Assessment |
|--|--|--|
| <p>Spatial opportunities and constraints</p> | <ul style="list-style-type: none"> • The most obvious spatial opportunity across this area is the M20 and the HS1 corridor. The corridor provides a logical anchor for development but also a strong northern or southern defensible boundary • Proposal for Otterpool Park Garden Town across large part of area (though boundaries not yet finalised) now benefits from Government support; it is a condition of policy support that it does not merge with existing villages • Settlement in the area comprises the villages of Sellindge and Lympe as well as a number of smaller villages and scattered farmsteads. • Land required for Operation Stack is a medium-scale spatial constraint, requiring further investigation at a site-specific level • A20 may also offer opportunities to ‘anchor’ development and/or serve as a defensible boundary • Numerous smaller roads with opportunities to be used as defensible boundaries • Core Strategy identifies land between A20 and M20 at Sellindge as Potential Core Development Area • Core Strategy identifies land both west and east of Sellindge village centre as Alternatives for Possible Supporting Residential Development • Folkestone Racecourse (closed 2012) major previously-developed site in the countryside, and part of the site being promoted for development as Otterpool Park Garden Village • Need to avoid risk of coalescence between Hythe and Lympe |  |

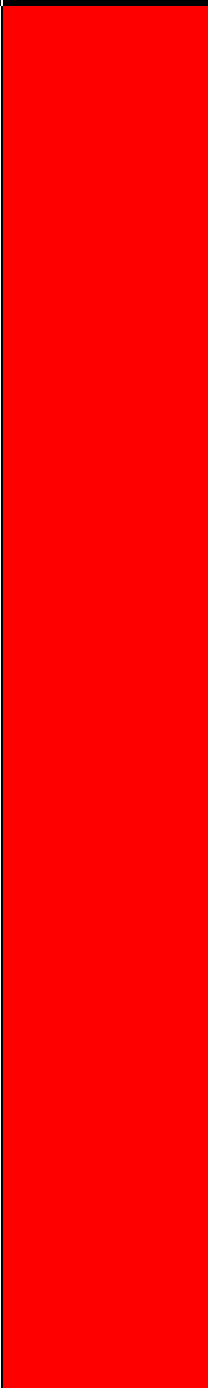
| Criterion | Considerations | Overall Assessment |
|-----------|--|--------------------|
| | <p>Conclusion- Key Strategic Constraints identified for Area 4</p> <p>Area 4's key strategic, spatial constraints (illustrated in Figure 10) are considered to be environmental and landscape. Though there is more extensive land free from direct constraint in Area 4 than any other, there are nevertheless ecological and heritage designations scattered throughout this area, as well as spatial constraints including existing villages, site allocations and transport infrastructure including land earmarked for Operation Stack.</p> <p>The area's most significant opportunity is Government support for the proposed Otterpool Park Garden Town, though the precise boundaries of the area suitable for development are not yet defined.</p> <p>The most significant constraint is considered to be the proximity of the Kent Downs AONB, with development in its setting needing to have appropriate regard to the AONB's special characteristics and reasons for designation. The area performs particularly well in terms of transport access and potential for economic development, and this helps explain why its performance on the infrastructure criterion is relatively strong for a largely rural area. National policy is clear that the proximity of the AONB, though certainly a constraint, does not rule out a more detailed investigation of the extensive land free from designations and direct constraints in this area. The former racecourse is a previously-developed site.</p> <p>As such, the overall conclusion is that Area 4 may have opportunities to accommodate strategic growth and therefore will be carried forward into Phase 2 analysis, with an appropriate focus on the setting of the Kent Downs AONB as a constraint and Government policy in respect of Otterpool Park as an opportunity. This assessment is made with particular reference to spatial planning principles 1, 2, 3, 4, 5, 6 (specifically with respect to the former racecourse site), 9, 10, and 12 (see Table 1).</p> <p>The resulting land considered suitable for further assessment in terms of strategic constraints is shown in Figure 14. Note that the absence of strategic constraints does not necessarily indicate that the land is free from specific constraints at a local level, which will be assessed in the second part of this report.</p> | |

Figure 10: Results of environmental constraints mapping for Area 4- Sellindge and Surrounding Area



3.20 Area 5 (Romney Marsh and Walland Marsh)

| Criterion | Considerations | Overall Assessment |
|---------------------------|---|--------------------|
| Environmental constraints | <ul style="list-style-type: none"> • Fluvial and/or tidal flood risk is predominantly high (Flood Zone 3, >1% AEP fluvial event, >0.5% AEP tidal event). This risk is primarily from tidal flooding, however main rivers are present and likely to pose a risk within Area 5. • The majority of Area 5 is in an 'Area Benefitting from Flood Defences' and therefore flood risk is considered to be residual, in the event of a breach or overtopping of the defences. • The far south and northeast of Area 5 is shown to be at low to moderate hazard in the event of a breach and/or overtopping during present day conditions (up to 2015). • Allowing for climate change (up to 2115) events large areas are at risk from breach/overtopping of defences. The northeast (including Romney Marsh) is at significant/extreme hazard and Dymchurch and areas to the west from low to significant hazard. • Very small areas around Brenzett, Brookland, Snargate, Ivychurch are not at residual risk from tidal flooding and any future development should be focused here where possible; however, too small for strategic-scale development • Area 5 is predominantly at very low risk (areas with less than a 1 in 1000 chance of flooding in any given year) from surface water flooding. However, surface water flooding has been recorded in marshland to the north and south of Brookland • Water Cycle Report 2011 states that the volume and quantity of water on Romney Marsh is vital for both agriculture and wildlife • No ancient woodland • Local Nature Reserve at Romney Warren (east of New Romney) • Small part of Kent Downs Area of Outstanding Natural Beauty south of Royal Military Canal • Dungeness, Romney Marsh and Rye Bay Ramsar sites in centre, south-west and west of Walland Marsh • Dungeness, Romney Marsh and Rye Bay Site of Special Scientific Interest in centre, south-west and west of Walland Marsh • Local Wildlife Sites at Dymchurch Pasture, Ditches and Pond, Midley Chapel Pasture, Hawthorn Corner (south of Old Romney), St George's Churchyard, Ivychurch and St Augustine's Churchyard, Snave • Agricultural land quality: Most land across the area, particularly in centre, is Grade 1, with extensive Grade 2 land around the edges and a few much smaller pockets of Grade 3 land • Kent CC state that there is a high risk of surface water flooding here which is difficult to mitigate • Kent CC state that this area is important ecologically | |

| Criterion | Considerations | Overall Assessment |
|------------------------------------|--|--|
| <p>Transport and accessibility</p> | <ul style="list-style-type: none"> • A259 Hythe to New Romney designated as Main Internal Link in the Core Strategy • A259 New Romney to Rye designated as Primary External Connection in the Core Strategy • A2070/A259 New Romney to Ashford designated as Primary External Connection in the Core Strategy • NCN 2 runs through this area to the east of Newchurch, south towards St Mary in the Marsh, and southeast towards Old Romney where NCN 2 continues south along Midley Wall towards Lydd. NCN 11 joins Midley Wall south of Old Romney and runs northwest to Brookland and Fairfield. • Bus routes 100/101/102 provide services from Dymchurch to Folkestone, Dover and Hastings • Shepway has its own light rail service, the Romney, Hythe and Dymchurch Railway (RHDR). The route has seven stations with Burmarsh Road, Dymchurch and St Mary’s Bay stations located within this character area. The service generally caters to tourists but is also a well-used school route for children. • The A259 provides access to this area from Folkestone and Hythe in the east and runs along the coast through Dymchurch and St Mary’s Bay before heading southwest to New Romney, Brenzett and Brookland, providing access to Rye and Hastings further to the west. At Brenzett the A259 meets the A2070 which provides access to Ashford to the north. • This area is rural and remote in places with the majority of the area not served by bus and with no mainline rail stations (excepting the remote station of Appledore on the border with Ashford Borough), therefore private vehicle travel will contribute to a significant number of trips and any strategic-scale development here would result in significant new car journeys • A total of four sites have been allocated within the Places and Policies Local Plan (October 2016) for this character area. • Development options would need to consider the capacity of low order and rural roads to accommodate an increase in traffic, as well as the impact on local junctions around the main routes i.e. the A259 and A2070. • Potential impacts on the A259 Lydd Road / B2075 Romney Road junction will need to be considered, amongst others. • Rother DC note poor transport links westward from this area |  |

| Criterion | Considerations | Overall Assessment |
|----------------------------------|--|--------------------|
| Geo-environmental considerations | <ul style="list-style-type: none"> • Three former landfills: Orgarswick, (accepted inert, industrial, commercial, household and liquids/sludges), New Romney, on the boundary line between Character Area 6 and 5, thus included in both character areas (accepted inert, industrial, commercial and household and Liquids/sludges) and Stockbridge Farm located outside northern boundary of Area 5. • Area is not in an SPZ • Groundwater vulnerability is a minor aquifer of high and intermediate vulnerability associated with the bedrock (Wealden Group) Secondary A aquifer and the Secondary A aquifer of the superficial deposits (alluvium and occasional peat) where these are present (within the central section of the area around Brookland, Snargate, Snave, Brenzett and Old Romney) • The area is not in drinking water safe guard zone, but is within a Surface Water NVZ in the central and west of Character Area • There are no groundwater abstractions. • There are no Active Mineral Sites. However, there are potentially a couple former workings along the south east boundary. • Along the northeast boundary there are superficial deposits which are landslide deposits • There is minimal urban development. Made Ground unlikely to be present over much of the area. • The area is not in an area affected by radon. | |

| Criterion | Considerations | Overall Assessment |
|---------------------------------------|--|--------------------|
| Infrastructure capacity and potential | <ul style="list-style-type: none"> • Core Strategy designates Dymchurch as Rural Centre • Core Strategy designates St Mary's Bay, Brenzett and Brookland as Primary Villages • Core Strategy designates Burmarsh, Ivychurch and Newchurch as Secondary Villages • Core Strategy identifies New Romney as Major Area of Change with Potential Green Infrastructure Connections with Surrounding Landscape (town in Area 6, but implications for Area 5) • Core Strategy identifies connections between Romney Marsh and Ashford and Rother as strategic green infrastructure opportunity • Core Strategy identifies potential Climate Change Mitigation Measures for the coastline • Rural Services Study 2011 notes that St Mary in the Marsh suffers from limited services but is in close proximity to Dymchurch which is well-served • Green Infrastructure Report 2011 lists Romney Marsh as a key feature of Shepway's green infrastructure, and forming a Biodiversity Opportunity Area • Core Strategy identifies Romney Marsh Rye and Rye Bay Habitat as Strategic Green Infrastructure Opportunity • Flooding/drainage infrastructure difficult to implement due to flat topography • Romney Warren Country Park contributes to green infrastructure • Flooding/drainage infrastructure difficult to implement due to flat topography • Romney Marshes Area Internal Drainage Board is concerned that accumulation of small scale development would make management of surface water and drainage difficult • Affinity Water states there is capacity locally in terms of water infrastructure • Kent CC note that New Romney Household Waste Recycling Centre has additional capacity • Kent CC note some educational capacity at Brenzett • UK Power Networks note that there is some electrical network capacity • Three primary schools • No secondary schools • 1 GP surgery • No dentists or libraries | |

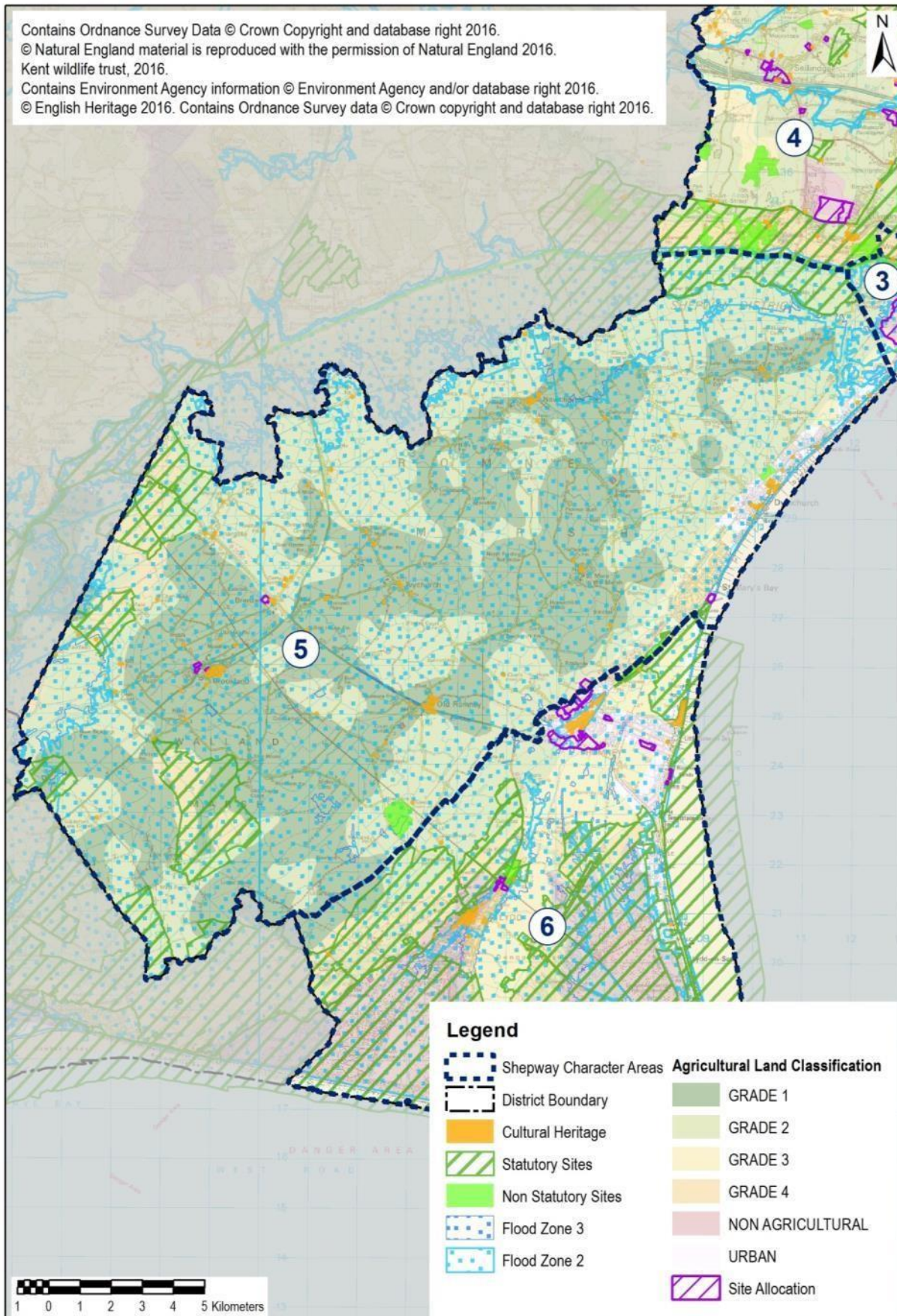
| Criterion | Considerations | Overall Assessment |
|--------------------------|--|--------------------|
| Landscape and topography | <ul style="list-style-type: none"> • Within Natural England’s NCA 123: Romney Marshes. • Largely within the overarching Romney Marshes character area as defined in the Landscape Assessment of Kent 2004. • Within the Romney Marshes District Character Area as defined in the Shepway Core Strategy 2013. • A narrow strip of land along the northern boundary of the area is within the North Downs SLA as designated under Saved Policy CO4 of the Shepway District Local Plan Review 2006. • With the exception of urban areas and a narrow strip of land designated as the North Downs SLA, it is wholly covered by the Romney Marshes LLA as designated under Saved Policy CO5 of the Shepway District Local Plan Review 2006. • A narrow strip of land along the northern boundary of the area is within the Kent Downs AONB. The eastern boundary of the High Weald AONB is just over a kilometre west of the area in the neighbouring districts of Ashford and Rother. • The area is part of the broad flat low-lying landscape of the Romney Marshes. The area has very limited tree cover with an expansive, flat and open character, which would be compromised by strategic-scale urban development. • Built development or land uses in the area with visual impact consist of electricity generation and transmission infrastructure including a large number of wind turbines in the south-west of the area, solar farms, and several high voltage power line routes. • Natural England note that area is visible from, and forms part of the setting for, Kent Downs AONB, making it less suitable for development. • Contains all of LCAs 21, 23 and 24, and parts of LCAs 20, 22 and 25 from the HLLA. • LCA 21 is described as being of High sensitivity as a result of its positive landscape quality, rarity, representativeness of the area, good recreational value and perceptual aspects. It has a higher susceptibility to development. • LCA 23 is described as being of High sensitivity as a result of its good conservation interests, rarity, representativeness of the area and perceptual aspects; however it has limited recreation value. It is highly susceptible to development. • LCA 24 is described as being of High sensitivity as a result of its good conservation interests, rarity, representativeness of the area and perceptual aspects; however it has limited recreation value. It is highly susceptible to development. • LCA 20 is described as being of Medium sensitivity with good conservation interests and recreational value; however it is less representative of the wider area and is considered to have a moderate susceptibility to development. • LCA 22 is described as being of High sensitivity as a result of its rarity, representativeness of the area, good recreational value and perceptual aspects, and moderate susceptibility to development. • LCA 25 is described as being of High sensitivity as a result of its rarity, representativeness of the area, conservation interests and perceptual aspects; however it has poor recreational value. It has a high susceptibility to development. | |

| Criterion | Considerations | Overall Assessment |
|-------------------------|---|--------------------|
| Heritage considerations | <ul style="list-style-type: none"> • Conservation areas located in the town centre of Dymchurch, along the crossroads of the A259 and Mill Road in Dymchurch, the villages of Newchurch, Old Romney and Brookland. • Cluster of listed buildings within Dymchurch and Newchurch. • Scheduled Monuments located in south of area; two near Snargate, to the west of Brenzett Green, to the west of Blackmanstone Bridge, two adjacent to Chapel Farm, Royal Military Canal Path on the northern boundary of the area, within the centre of Dymchurch, and adjacent to Sutton Farm,. • Listed buildings of interest include Grade I Church of St Peter and St Paul located at Newchurch, Grade I Church of St Mary the Virgin at St Mary in the Marsh, Grade I Church of St George at Ivychurch, Grade I Church of St Clement in central Old Romney, Grade I Church of St Thomas A Becket and mounting block attached (west of area), Grade I Church of St Augustine and detached belfry (centre of Brookland), and four Grade II* Churches. • Kent County Council has stated that the area is less suitable for development because of Martello towers and 20th century defences along the coast, and inland, a number of historic sea walls and drainage systems as well as medieval and post-medieval high status sites. • Historic England states that this area would be unsuitable for development due to its historic landscape and character. | |
| Housing demand | <ul style="list-style-type: none"> • The character area has average house prices for Shepway • Prices are lower in Burmarsh, Dymchurch and Newchurch. • The central area, north of St Mary in the Marsh has a cluster of high house prices • To the west of Ivychurch. Brenzett, Brookland and to the south-west of Old Romney house prices are considerably lower. • To the south-west of Brookland, there is a small area of higher house prices. • The CIL and Whole Plan Economic Viability Assessment showed low residential values (below £2,150 per square metre) in Burmarsh, Dymchurch and St Mary's Bay • However, the Viability Assessment also showed medium (£2,300-£2,450 per sqm) values in Brenzett • The Viability Assessment showed high residential values (above £3,350 per sqm) in Brookland, Ivychurch and Newchurch | |
| Regeneration potential | <ul style="list-style-type: none"> • Character area joint most deprived of all six • Majority of the area is within 20-40% most deprived. • Small portion along seafront is 40-60%. | |

| Criterion | Considerations | Overall Assessment |
|---------------------------------------|---|--------------------|
| Economic development potential | <ul style="list-style-type: none"> • Census 2011 shows relatively lower density of employment compared to more urban parts of Shepway • Only character area that does not include a Major Employment Site in the Core Strategy • Core Strategy designates Dymchurch as Local Centre for economic development. • The A259 and the A2070 run through the area, but access fairly limited when taking into account to the size of the character area. • There are no train stations within the character area. • Dungeness Nuclear Power Station and Lydd Airport (both within Area 6) provide employment for Area 5 residents | |
| Spatial opportunities and constraints | <ul style="list-style-type: none"> • Settlement in the area is limited and focused along the coast including the settlements of Dymchurch, and St Mary's Bay. There are a number of small scattered villages and farmsteads located across the marshes. Thus, little risk of coalescence • Small size of settlements means either dispersed approach to development or single new settlement would be most appropriate in this location • However, dispersed approach to development could have negative impact on village heritage assets • A2070 could have potential to act as an anchor for new settlement or as a defensible boundary • However, remote, open area with few other man-made or natural defensible boundaries • Need to avoid risk of coalescence between Dymchurch and St Mary's Bay • Need to avoid risk of coalescence between Dymchurch and Hythe | |

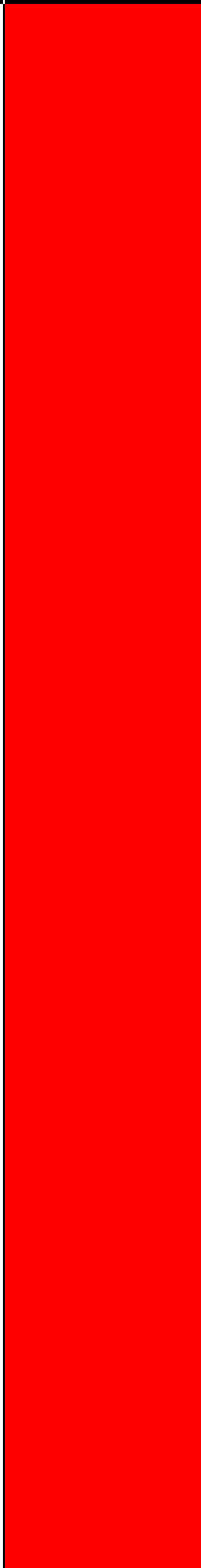
| Criterion | Considerations | Overall Assessment |
|--|----------------|--------------------|
| <p>Conclusion- Key Strategic Constraints identified for Area 5</p> <p>Area 5's key strategic, spatial constraints (illustrated in Figure 11) are considered to be environmental, landscape, heritage and transport criteria. This area scored poorest, on average, across all criteria, largely because of the fact that it comprises entirely Flood Zone 2 and 3 land and therefore an assessment of unsuitability for development would be consistent with national policy and guidance on planning for flood risk.</p> <p>The landscape derives much of its character and heritage from the very fact that it is open and undeveloped, which also reduces the spatial opportunities for development to benefit from defensible boundaries. The area also includes extensive Grade 1 agricultural land and, around its northern and western boundaries, large scale environmental and landscape designations. Partly as a result of all of these considerations, the area is the least developed of the five and as such has a very limited transport network, resulting in few economic opportunities.</p> <p>Though the area has some identified housing and regeneration need, the quantity, range and extent of development constraints strongly suggests that the past approach of non-strategic development focussed on meeting local needs will continue to be appropriate into the future. As such, the overall conclusion is that Area 5 is unsuitable for strategic growth and should therefore be eliminated from further analysis. This assessment is made with particular reference to spatial planning principles 3, 4, 5, 6, 9, 10 and 14 (see Table 1).</p> | | |

Figure 11: Results of environmental constraints mapping for Area 5- Romney Marsh and Walland Marsh



3.21 Area 6 (Lydd, New Romney and Dungeness)

| Criterion | Considerations | Overall Assessment |
|---------------------------|--|--------------------|
| Environmental constraints | <ul style="list-style-type: none"> • Fluvial and/or tidal flood risk is high (Flood Zone 3, >1% AEP fluvial event, >0.5% AEP tidal event). This risk is primarily from tidal flooding; however main rivers are present and also likely to pose a risk within Area 6. • The majority of Area 6 is in an 'Area Benefitting from Flood Defences' and therefore flood risk is considered residual in the event of a breach or overtopping of defences. Exceptions include coastal areas in the south and east, including eastern areas of New Romney. • Areas south of Dungeness Road are shown to be at low to significant hazard in the event of a breach or overtopping event during present day conditions (up to 2015). • During climate change (up to 2115) events large areas are at risk from a breach and / or overtopping of defences, resulting in a significant hazard. • The majority of New Romney including an area to the north is not shown to be at residual risk from tidal flooding, whilst some areas to the south are only shown to be at low to moderate flood hazard. However these areas are still located within Flood Zone 3 (i.e. high risk, >0.5% AEP) and other Character Areas should be considered first for strategic-scale development. • Area 6 is predominantly at very low risk from surface water flooding (<0.1% AEP). • Particularly extensive and overlapping network of natural designations enclosing Lydd on its north, west and southern sites (but New Romney to a lesser extent) • Ramsar site at Dungeness, Romney Marsh and Rye Bay • Dungeness, Romney Marsh and Rye Bay Site of Special Scientific Interest • Dungeness, Romney Marsh and Rye Bay Special Protection Area • Marine Special Protection Area at Dungeness to Pett Level • Special Area of Conservation at Dungeness • National Nature Reserve at Dungeness • RSPB Reserve at Dungeness • Kent Wildlife Trust Nature Reserve at Romney Marsh (east of New Romney) • Lydd Common and Pastures Local Wildlife Site (north of Lydd) • Agricultural land quality: The majority of the land across the area, particularly to the south, is non-agricultural. Further north, the land is a mixture of Grades 3 and 4 • Kent County Council notes high risk of surface water flooding due to ground conditions and topography | |

| Criterion | Considerations | Overall Assessment |
|------------------------------------|---|--|
| <p>Transport and accessibility</p> | <ul style="list-style-type: none"> • A259 New Romney to Rye designated as Primary External Connection in the Core Strategy • A2070/A259 New Romney to Ashford designated as Primary External Connection in the Core Strategy • B2075 New Romney to Lydd designated as Main Internal Link in the Core Strategy • Core Strategy identifies New Romney as location for Key Highway Improvements • NCN 2 runs along Midley Wall joining Dennes Lane towards Lydd High Street where the route continues southwest towards the coast along Jurys Gap Road. • Bus route 102 provides a service between Lydd and Dover, linking Lydd-on-Sea, New Romney, Dymchurch, Hythe, Folkestone and Dover. • Shepway has its own light rail service, the Romney, Hythe and Dymchurch Railway (RHDR). The route has seven stations with New Romney, Romney Stands and Dungeness stations located within this character area. The service generally caters to tourists but is also a well-used school route for children. • This character area also benefits from London Ashford Airport at Lydd, which accommodates corporate and private jets, training, cargo, and scheduled services to northern France. • Planning permission implemented for the expansion of Lydd Airport but successful completion depends on landownership issues being resolved • Access to this relatively remote, rural area is provided from the A259 at New Romney to the north with the remainder of the network consisting of low order roads. There are no mainline rail services and there is limited bus services, therefore private vehicle travel will contribute to a significant number of trips. As such, this is not considered a suitable location for strategic-scale development in transport terms • Development options would need to consider the capacity of low order and rural roads to accommodate an increase in traffic, as well as the impact on local junctions in the two main areas of New Romney and Lydd. • Potential impacts on the A259 High Street / B2071 Station Road junction will need to be considered, amongst others. • Kent CC note numerous important rights of way here including the England Coast Path national trail in a comparatively undeveloped area of the coastline • Kent County Council states that the area has poor transport connections • Rother DC note poor links westward between this area and Rother District |  |

| Criterion | Considerations | Overall Assessment |
|----------------------------------|--|--------------------|
| Geo-environmental considerations | <ul style="list-style-type: none"> • Four former landfills: Lydd (accepted inert, industrial, commercial and household), Whitehall (accepted inert waste), Hamilton Quarry (accepted inert waste). New Romney landfill is on the boundary line between Character Area 6 and 5 and thus has been included in both character areas (accepted inert, industrial, commercial and household and liquids/sludges). • The area is in an SPZ 1, 2 and 3 in the vicinity of Denge Marsh. There are at least 15 individual SPZ1 designations. • The groundwater vulnerability is generally that of a minor aquifer with high vulnerability (associated with both the superficial and bedrock). The section around Lydd and to the north is of intermediate vulnerability. • The superficial deposits (Beach Deposits, Storm Beach Deposits and Tidal Flat Deposits) are secondary A aquifer. They are present in over 80% of the area. The bedrock (Wealden Group) is also designated as a Secondary A aquifer. • The area is not in a drinking water safe guard zone. It is within a surface water NVZ encroaching on northwest boundary of area west of Lydd • There are five groundwater abstractions (4 large and 1 medium abstraction). The abstractions include mineral washing, non-evaporative cooling associated with electricity and general industrial/commercial/public Services and process water from construction • There are four active mineral sites. These include Denge and Romney Pits, Dungeness Point, Scotney Court and Lydd Ranges (all sand and gravel extraction). There are also a number of former mineral sites throughout the area • There is minimal urban development. However, the area is dominated by mineral workings. Therefore, Made Ground is likely to be present. • The area is not in an area affected by radon. | |

| Criterion | Considerations | Overall Assessment |
|---------------------------------------|---|--------------------|
| Infrastructure capacity and potential | <ul style="list-style-type: none"> • Core Strategy designates New Romney as Strategic Town • Core Strategy designates Lydd as Service Centre • Core Strategy designates Greatstone-on-Sea as Primary Village • Core Strategy identifies New Romney as Major Area of Change with Potential Green Infrastructure Connections with Surrounding Landscape • Core Strategy identifies potential Climate Change Mitigation Measures for the coastline • Core Strategy identifies Romney Marsh Rye and Rye Bay Habitat as Strategic Green Infrastructure Opportunity • Green Infrastructure Report 2011 lists Romney Marsh as a key feature of Shepway’s green infrastructure, and forming a Biodiversity Opportunity Area • Core Strategy Inspector’s Report concludes that New Romney is the most sustainable location for growth in this character area • Rural Services Study 2011 notes that New Romney has good range of retail services • Same study notes that Lydd has more limited choice of shops compared to New Romney • Flooding/drainage infrastructure difficult to implement due to flat topography • Romney Marshes Area Internal Drainage Board is concerned that accumulation of small scale development would make management of surface water and drainage difficult • Three primary schools and a secondary school • Secondary school recently redeveloped with improved facilities • A number of GP and dentist surgeries, though capacity not known • Two libraries | |

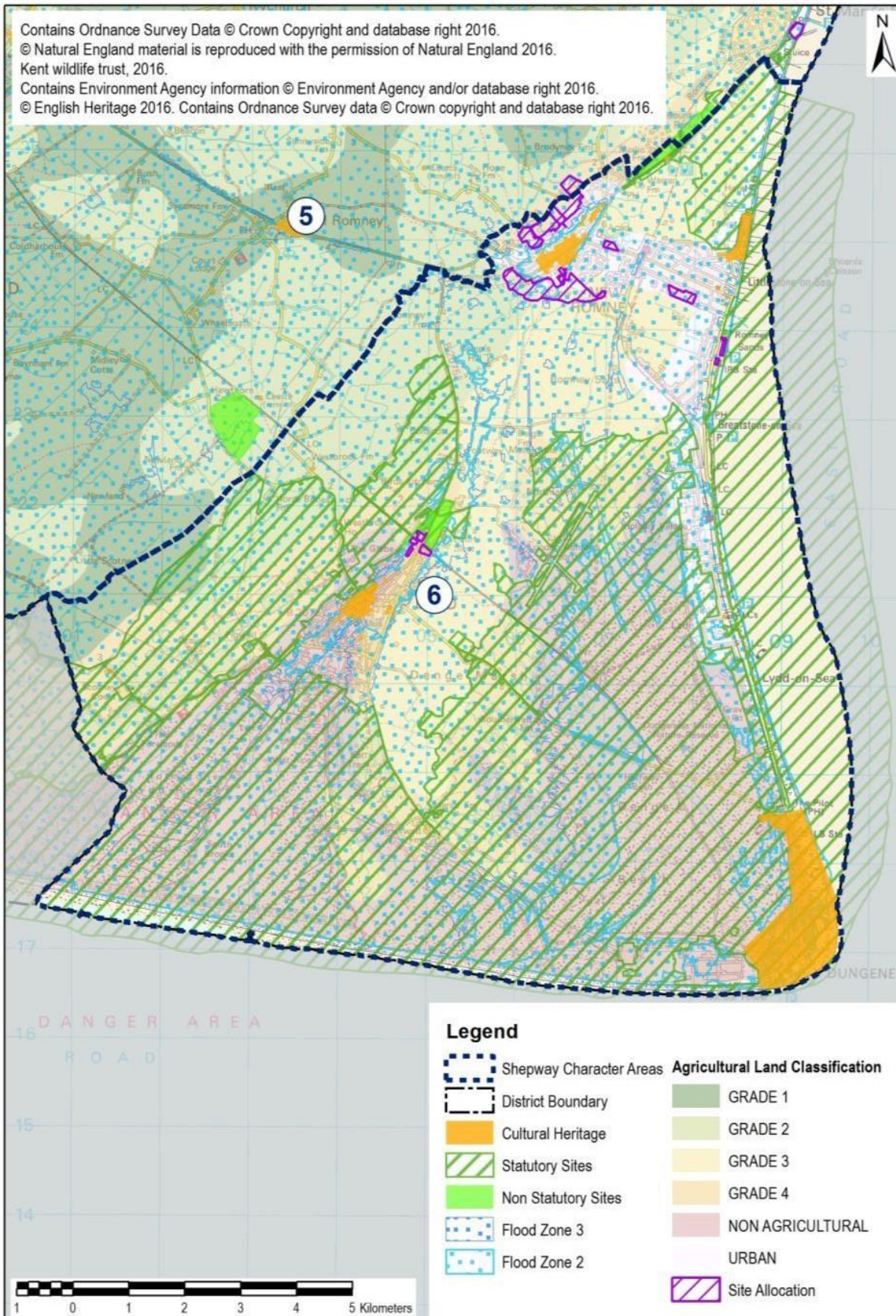
| Criterion | Considerations | Overall Assessment |
|--------------------------|--|--------------------|
| Landscape and topography | <ul style="list-style-type: none"> • Within Natural England’s NCA 123: Romney Marshes. • Within the overarching Romney Marshes character area as defined in the Landscape Assessment of Kent 2004. • Within the Romney Marshes District Character Area as defined in the Shepway Core Strategy 2013. • The coastline in the south of the area is within the Dungeness SLA as designated under Saved Policy CO4 of the Shepway District Local Plan Review 2006. • Land not designated as Dungeness SLA is largely within the Romney Marshes LLA, as designated under Saved Policy CO5 of the Shepway District Local Plan Review 2006. • The area is not covered by any National Level landscape designations. • The area is on the south-east edge of the broad flat low-lying landscape of the Romney Marshes. The area has almost no tree cover with an expansive and open character, which would be significantly compromised by strategic-scale development. • Notable built development or land uses in the area with visual impacts includes Dungeness Nuclear Power Station on the south coast and its associated electricity transmission infrastructure consisting of high voltage power line; Lydd Ranges, which are part of the MOD Defence Training Estate; and New Romney Industrial Estate at New Romney. • Contains all of LCA 26, and parts of LCAs 20, 22 and 25 from the HLLA. • LCA 26 is described as being of High sensitivity as a result of its rarity, representativeness of the area, conservation interests, recreational value, perceptual aspects, and cultural associations. It has a high susceptibility to development. • LCA 20 is described as being of Medium sensitivity with good conservation interests and recreational value; however it is less representative of the wider area and is considered to have a moderate susceptibility to development. • LCA 22 is described as being of High sensitivity as a result of its rarity, representativeness of the area, good recreational value and perceptual aspects, and moderate susceptibility to development. • LCA 25 is described as being of High sensitivity as a result of its rarity, representativeness of the area, conservation interests and perceptual aspects; however it has poor recreational value. It has a high susceptibility to development. | |

| Criterion | Considerations | Overall Assessment |
|-------------------------|---|--------------------|
| Heritage considerations | <ul style="list-style-type: none"> • Dungeness SAC covers over half of the area in the south. • Cluster of listed buildings within Lydd and New Romney. • Scheduled Monuments located at Lade Gravel Pit adjacent to Greatstone-on-Sea (acoustic mirrors), and centre of New Romney. • Listed buildings of interest include Grade I Church of St Nicholas located in south-west New Romney, Grade I Church of All Saints (central Lydd), and Grade II* Dungeness Lighthouse in Lydd. • Conservation areas located at Littlestone-on-Sea, town centre of New Romney, Lydd, and at Dungeness. • Kent County Council has stated that the area is less suitable for development due to several areas of archaeological importance associated with the early development of Romney Marsh and its settlements, in particular New and Old Romney and Lydd which have produced extensive prehistoric, early medieval and medieval remains. Along the coast towards Dungeness are a number of important military sites including Lade Fort and a number of post-medieval batteries. At Dungeness there are a number of maritime heritage assets including the old lighthouse, coastguard dwellings and the fishermen's huts on the beach. • Historic England state that this area would be less suitable for development due to historic landscape and character. | |
| Housing demand | <ul style="list-style-type: none"> • The character area has the lowest house prices in Shepway • Low prices are in part due to the flood risk the area suffers from • The area in the far northern corner has slightly higher house prices, alongside Lade. • There are two other small areas of higher house prices, north of Lydd and the airport. • The CIL and Whole Plan Economic Viability Assessment showed low residential values (below £2,150 per square metre) in Lydd • However, the Viability Assessment also showed medium (£2,300-£2,450 per sqm) values in Greatstone-on-Sea, Littlestone and New Romney | |
| Regeneration potential | <ul style="list-style-type: none"> • Character area joint most deprived. • Majority of the area is within 20-40% deprivation. • Area to the east at Lydd-on-Sea is within 40-80% deprivation | |

| Criterion | Considerations | Overall Assessment |
|---------------------------------------|---|--------------------|
| Economic development potential | <ul style="list-style-type: none"> • Census 2011 shows relatively lower density of employment compared to more urban parts of Shepway with exception of Dungeness Nuclear Power Station • Core Strategy designates site at New Romney and site at Lydd as Major Employment Sites • Core Strategy designates New Romney as Town Centre for economic development • Core Strategy designates Lydd as District Centre for economic development. • The A259 runs through the north of the area. However the rest of the area is lacking in strategic roads. • There are no railway stations within this character area. • Existing main employment at New Romney, Lydd and the nuclear power plant at Dungeness. • Dungeness B power plant will be decommissioned in 2028 with no replacement planned • Dungeness A is in the lengthy process of decommissioning • Planning permission for the expansion of Lydd Airport that could provide more jobs if landownership issues are resolved | |
| Spatial opportunities and constraints | <ul style="list-style-type: none"> • With exception of larger settlements of Lydd and New Romney, sparse pattern of settlement- therefore, most appropriate spatial pattern of development likely to be urban extensions to these two towns • North of New Romney town centre identified as broad location for housing growth within Core Strategy • Small area south of New Romney also identified for housing growth within Core Strategy • Little risk of coalescence between settlements in this location • Open, flat land with few obvious man-made or natural defensible boundaries to development | |

| Criterion | Considerations | Overall Assessment |
|---|----------------|--------------------|
| <p>Conclusion- Key Strategic Constraints identified for Area 6</p> <p>Area 6's key strategic, spatial constraints (illustrated in Figure 12) are considered to be environmental. Like Area 5, the extent of Flood Zone 2 and 3 land is significant here, although there is much land in the eastern half of the area outside Zones 2 and 3. However, the areas outside the floodplain, including almost all land around the urban edge of Lydd, is covered by multiple and extensive environmental designations. The heritage designation at the tip of Dungeness is also relatively extensive.</p> <p>As with Area 5, though to a lesser extent, the transport network is restricted due to the area's remoteness from large-scale population centres, and its economic potential is limited for the same reason. Like Area 5, much of the area's character derives from its open landscape, unusual for South-East England, and as such there are fewer spatial opportunities for defensible boundaries to development.</p> <p>Though the area has some identified regeneration need, the quantity, range and extent of development constraints strongly suggests that the past approach of non-strategic development focussed on meeting local needs will continue to be appropriate into the future. As such, the overall conclusion is that Area 6 is unsuitable for strategic growth and should therefore be eliminated from further analysis. This assessment is made with particular reference to spatial planning principles 3, 4, 5, 6, 8, 9, 10 and 14 (see Table 1).</p> | | |

Figure 12: Results of environmental constraints mapping for Area 6- Lydd, New Romney and Dungeness



3.22 Evidence gaps

It is recognised that no study, particularly one operating at a strategic level, will ever be able to state definitively that all possible data has been taken into account; equally, there is a requirement for any data-gathering exercise to have a defined cut-off point to allow sufficient time for analysis and conclusions to be drawn.

The need for a strategic landscape appraisal was identified by the Council before this project started, hence the High Level Landscape Appraisal being progressed alongside and informing this report. Having reviewed a range of strategic-level evidence across Shepway, AECOM agrees that there was insufficient previous landscape data to draw on.

However, now that a wide range of other data has been identified and collated, it is not considered that there is any other specific topic where information for Shepway District is lacking at a strategic level.

This does not, however, guarantee that all evidence required will be present at a site-specific level for the Phase 2 report, which follows this High Level Options report. As such, AECOM will continue to monitor the coverage and quality of all evidence and data on an ongoing basis until the conclusion of the Strategic Growth Options Study.

4 Stakeholder Workshop

4.1 Introduction

As a central element of the Strategic Growth Options work, a High Level Options workshop was held in the Shepway Council buildings on the 30th November 2016. Attendance consisted of statutory consultees and other significant stakeholders, such as service providers, neighbouring Local Authorities, environment groups, transport authorities, and the County Council.

The workshop was deliberately held at a point in the High Level Options report development at which AECOM had gathered and analysed the data presented in Chapter 3 above, but before detailed conclusions on high-level options and/or locations for growth had been developed. This enabled the workshop to fulfil two vital objectives:

- Firstly, to validate and, where necessary, challenge before detailed conclusions were drawn from the data and evidence gathered; and
- Secondly, to invite workshop participants to move towards their own conclusions on where the evidence and data was suggesting would be appropriate high-level options for the location of strategic-scale development.

AECOM therefore presented study findings to date to workshop participants, and, following a question and answer session, attendees were then invited to participate in a table exercise aimed at translating the opportunities and constraints identified within Shepway into conclusions on high-level options for growth.

Alongside the results of the table exercise, many consultees provided verbal and written comments. Both of these were captured and used to inform the relevant chapter of this report. All information was anonymised to maximise the chances of the information given being technical and impartial.

This chapter summarises the outcomes of the high-level options workshop.

4.2 Table exercise

Workshop attendees were allocated between four tables, with a range of organisations, viewpoints and technical expertise on each table. Each table was provided with mapping of strategic constraints as illustrated in Figures 3-12 of this report. Each table was also provided with an A0-sized version of Figure 2 showing base Ordnance Survey mapping and the boundaries of the six character areas.

Each table was also supplied with pink cardboard squares representing the approximate land needed for 6,500 dwellings²² and supporting infrastructure. Each square represented the land needed for 1,000 dwellings at a settlement density. A settlement density is gross because it includes land for non-residential uses such as open space, schools, retail, employment and so on alongside houses. Based on AECOM's knowledge and experience, this settlement density is approximately 20 dwellings per hectare, and this was the measure used in the table exercise.

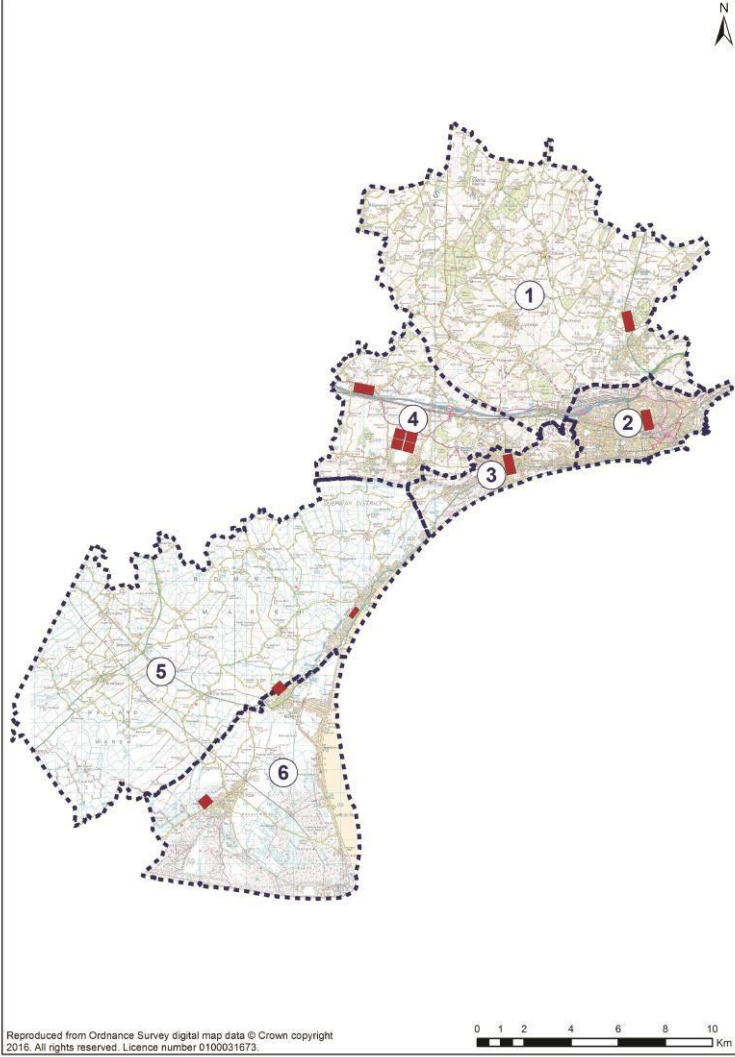
We asked each table to develop one or more options for how dwellings could be accommodated on currently undeveloped land (i.e. recognising that densification of existing urban areas is outside the

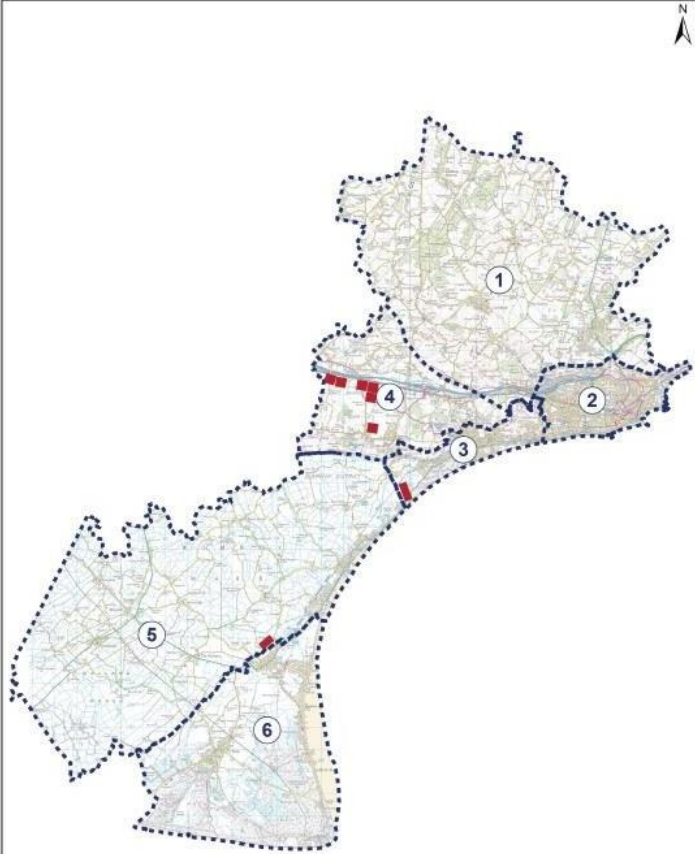
²² The figure of 6,500 is broadly similar to the number of net new dwellings required over the Core Strategy Partial Review period as suggested by the emerging Shepway SHMA. In this sense, the table exercise differs from the Strategic Growth Options Study as, for the sake of practicality, the table exercise had to be provided with an upper limit on dwellings numbers. As previously stated, the Growth Options Study has no preconceptions or upper limit on total number of dwellings required, as its focus is only on the suitability or otherwise of land.

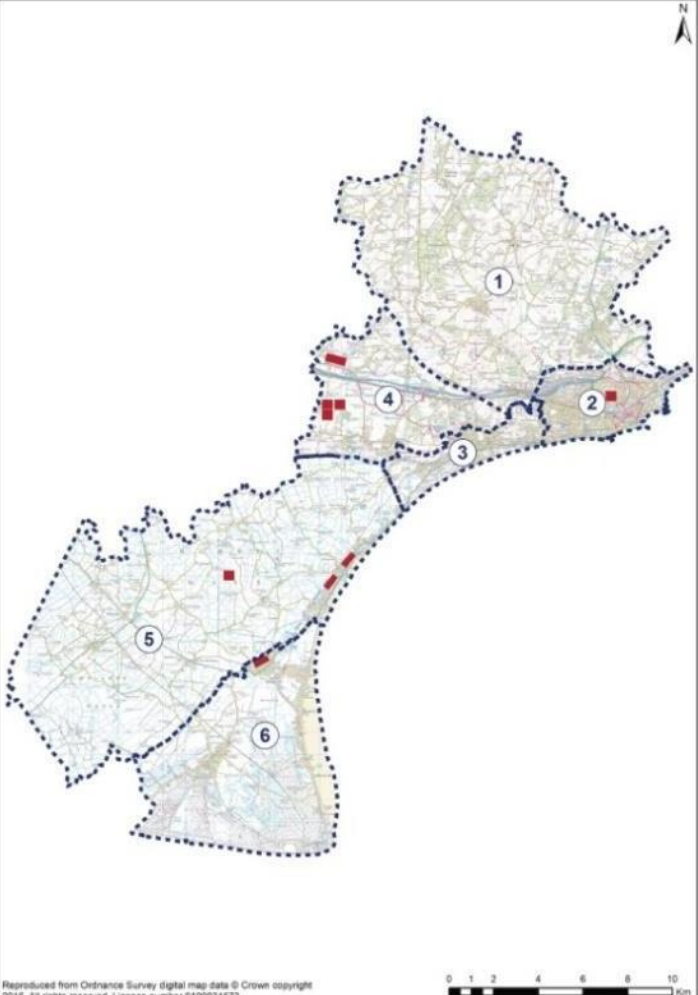
scope of the Strategic Growth Options study). We also asked each table to justify all development distribution choices based on their professional knowledge and experience and the constraints mapping presented. Other than the constraints mapping provided, participants were not directed, verbally or otherwise, about which area(s) might be more suitable for development.

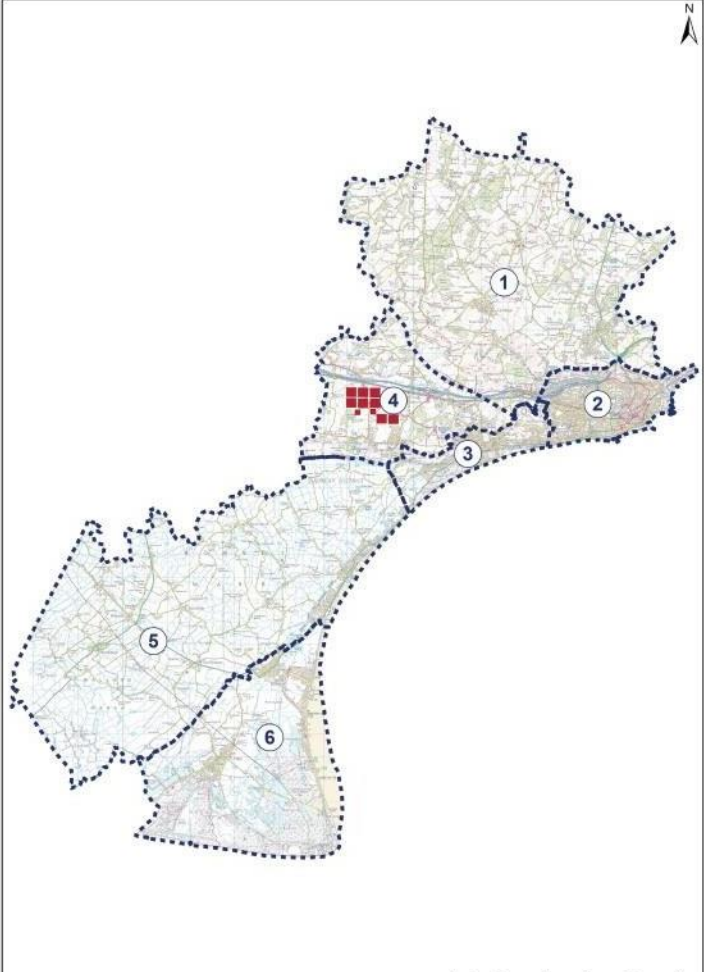
Table 4 shows each of the seven approaches taken to housing distribution.

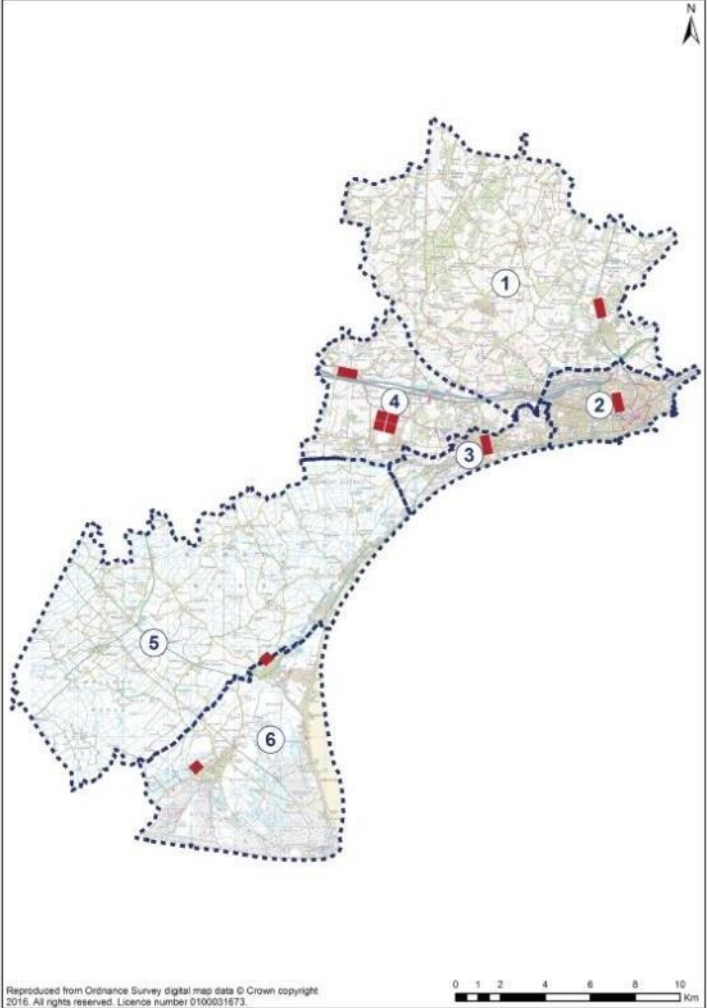
Table 4 – Illustrated results of High Level Options workshop table exercise

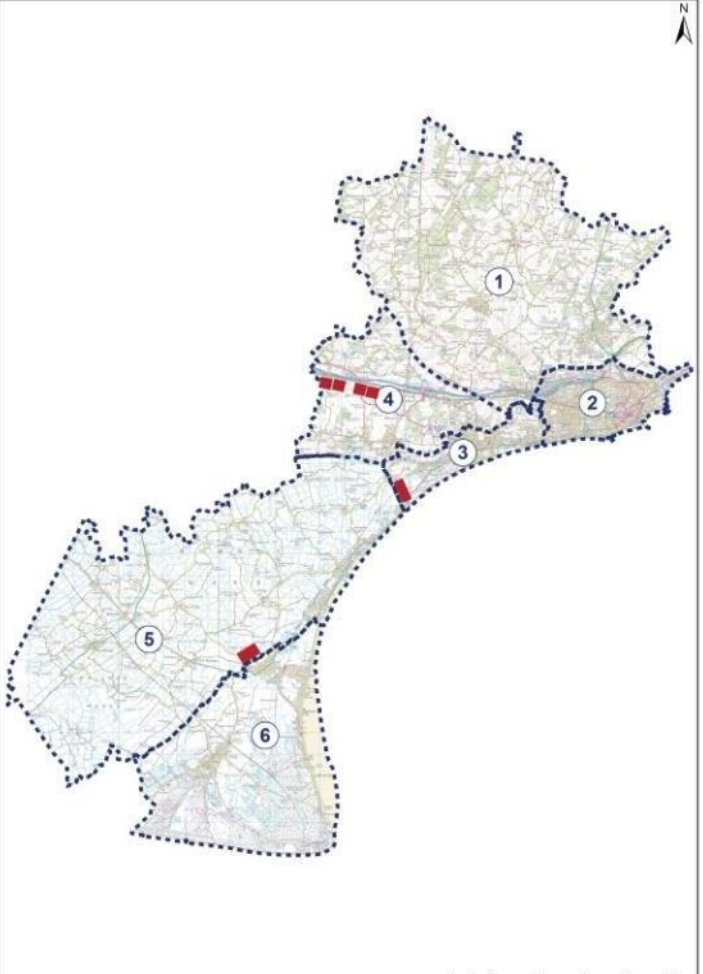
| Approach | Description | Illustration |
|--------------------------|--|---|
| <p>Approach 1</p> | <p>Most housing located in Area 4 with 2,000 houses south of the M20 near Westenhanger and 1,000 houses north of the M20 in Sellindge</p> <p>750 houses in Area 1, south of Hawkinge along the A20 and A260</p> <p>500 houses on western boundary of Area 3</p> <p>250 houses between Dymchurch and St Mary's Bay in Area 5</p> <p>2,000 homes at New Romney in Area 6</p> |  <p>Reproduced from Ordnance Survey digital map data © Crown copyright 2016. All rights reserved. Licence number 0100031673.</p> |

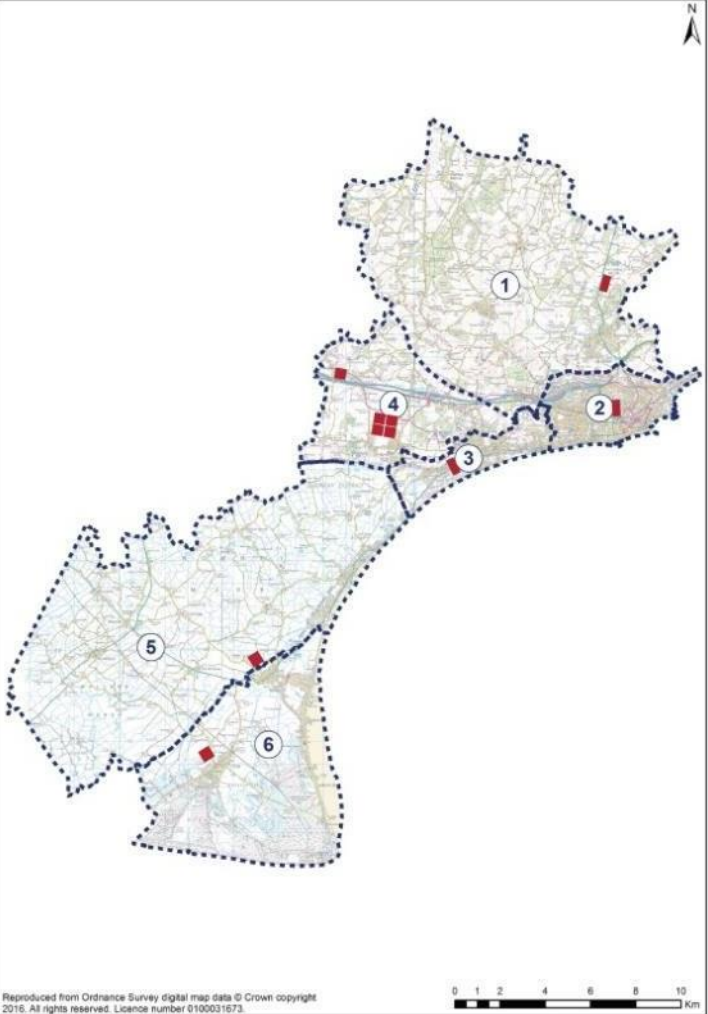
| Approach | Description | Illustration |
|--------------------------|--|---|
| <p>Approach 2</p> | <p>Most housing located in Area 4 with 2,000 homes south of the M20 near Harringe Court, a further 2,500 west of Westenhanger and 1,000 homes between Lypne and Otterpool Lane – in a linear pattern along the M20</p> <p>500 homes located on western boundary of Area 3</p> <p>500 homes located north of New Romney in Area 5</p> |  <p>The illustration is a map showing six numbered areas (1-6) outlined with a dashed black line. Area 1 is at the top, Area 2 is to the right, Area 3 is in the middle, Area 4 is to the left of Area 3, Area 5 is at the bottom left, and Area 6 is at the bottom right. A red dashed line with square markers indicates a route starting in Area 4, passing through Area 3, and then through Area 5. A north arrow is in the top right corner, and a scale bar (0-10 km) is in the bottom right corner. Small text at the bottom left of the map area reads: 'Reproduced from Ordnance Survey digital map data © Crown copyright 2016. All rights reserved. Licence number 0100031673.'</p> |

| Approach | Description | Illustration |
|--------------------------|---|---|
| <p>Approach 3</p> | <p>Majority of housing located in Area 4, with 500 homes north of the M20 and A20, near Stone Hill and 3,000 homes south of the M20 around Harringe Court</p> <p>1,000 homes within Folkestone (Area 2)</p> <p>In Area 5, 1,000 homes in a new settlement in the centre of Romney Marsh, 250 homes at Dymchurch and 250 homes at St Mary's Bay</p> <p>500 homes at New Romney in Area 6</p> |  <p>Reproduced from Ordnance Survey digital map data © Crown copyright 2016. All rights reserved. Licence number 0100031673.</p> |

| Approach | Description | Illustration |
|-------------------|--|--|
| Approach 4 | All housing located in Area 4 south of the M20 |  <p>The illustration is a map showing six numbered areas (1-6) defined by dashed black lines. Area 4 is highlighted with a red grid pattern. The map includes a north arrow in the top right corner and a scale bar at the bottom right, ranging from 0 to 10 kilometers. The map data is reproduced from Ordnance Survey digital map data © Crown copyright 2016, with a licence number of 0100031673.</p> |

| Approach | Description | Illustration |
|--------------------------|---|---|
| <p>Approach 5</p> | <p>Most housing located in Area 4, with 4,000 homes located to the south of M20 and 500 homes located north of the M20</p> <p>500 homes located at Densole (Area 1)</p> <p>500 homes located within Folkestone (Area 2)</p> <p>500 homes are located within Saltwood/Hythe (Area 3)</p> <p>250 at New Romney and 250 at Lydd (Area 6)</p> |  <p>Reproduced from Ordnance Survey digital map data © Crown copyright 2016. All rights reserved. Licence number 0100031873.</p> |

| Approach | Description | Illustration |
|--------------------------|---|---|
| <p>Approach 6</p> | <p>Most housing located within Area 4, with 3,000 homes south of the M20 near Harringe Court and 2,500 south of the M20 near Westenhanger, in a linear arrangement</p> <p>500 homes west of Hythe (Area 3)</p> <p>500 homes north of New Romney (but in Area 5)</p> |  <p>The illustration is a map of a coastal region in Kent, UK, divided into six numbered areas (1-6) outlined with a dashed black line. Area 1 is the northernmost part. Area 2 is to the east of Area 1. Area 3 is a narrow strip between Area 2 and Area 4. Area 4 is a long, narrow strip along the coast, highlighted with a red dashed line, representing the linear housing arrangement. Area 5 is to the west of Area 4, and Area 6 is to the south of Area 4. A north arrow is in the top right corner. A scale bar at the bottom right shows distances from 0 to 10 kilometers. Small text at the bottom left reads: 'Reproduced from Ordnance Survey digital map data © Crown copyright 2016. All rights reserved. Licence number 0100031673.'</p> |

| Approach | Description | Illustration |
|--------------------------|---|--|
| <p>Approach 7</p> | <p>Most housing located within Area 4, with 4,000 homes south of the M20 at Westenhanger. 500 homes north of the M20</p> <p>500 homes located at Densole (Area 1)</p> <p>500 homes within Folkestone (Area 2)</p> <p>500 homes within Hythe (Area 3)</p> <p>250 homes north of New Romney (but in Area 5)</p> <p>250 homes at Lydd (Area 6)</p> |  <p>Reproduced from Ordnance Survey digital map data © Crown copyright 2016. All rights reserved. Licence number 0100031673</p> |

Across all seven approaches, a total of 46,500 'homes' were placed. Table 5 aggregates all houses placed by character area to provide an at-a-glance summary of the results of the table exercise.

Table 5: Summary of all houses placed in High Level Options workshop table exercise

| Character area | Aggregate number of houses placed | Aggregate number of houses placed, % of total ²³ |
|---------------------------|-----------------------------------|---|
| Area 1 (Kent Downs) | 1,750 | 3.9% |
| Area 2 (Folkestone) | 2,000 | 4.4% |
| Area 3 (Hythe) | 2,500 | 5.5% |
| Area 4 (M20/HS1 corridor) | 33,000 | 72.5% |
| Area 5 (Romney Marsh) | 3,000 | 6.6% |
| Area 6 (Dungeness) | 3,250 | 7.1% |

Table 5 makes it clear that Area 4, the M20/HS1 corridor, was by far the most commonly selected location for new development, with more than seven times more houses placed than within Area 6 (Dungeness), the second most commonly selected. Folkestone (Area 2) and the Kent Downs (Area 1) were the two areas selected least often.

As well as capturing the spatial distribution of each approach, we also asked the groups to elaborate on the reasoning behind their decisions. Although these additional details were not provided for every approach, those received are set out below.

Approach 1's main aim was to disperse the housing across the majority of Shepway. The table would like to expand New Romney to create a larger settlement. The housing proposed in Area 3 would be at Nickolls Quarry. There was also an expansion of Hawkinge proposed.

Approach 2 took the view that Area 1 and most of Area 5 should be ruled out entirely for strategic growth due to AONB and flood risk constraints respectively. However, it was considered that expanding New Romney by 500 homes would help contribute to the long term sustainability of the town. There was also a suggestion that further land at Nickolls Quarry in Area 3 should be promoted for residential instead of commercial development as this is likely to be more viable. Within Area 4, the former racecourse site has been selected for 2,500 homes due to good transport access and with the M20 spatially separating growth from nearby built up areas. The far west of Area 4 has been selected for 3,000 homes which could include possible cross-boundary discussions with Ashford Borough Council and the realignment of the A20. It was considered that the distribution of growth in Area 4 between two new settlements would help mitigate visual and other impacts on the setting of Kent Downs AONB.

Approach 3 considers that there is potential for 1,000 within the existing built-up area of Folkestone. In Area 4, housing was placed to the west to mitigate impacts on the AONB and to promote the potential for joint working with Ashford. Around 1,000 homes were placed across Area 5 in existing settlements, including 200 in Dymchurch. However, it is considered that sustainability considerations, including a lack of public transport, significantly limit growth in this area. New Romney is also considered a suitable location for growth due to its perceived relative freedom from landscape and environmental constraints.

²³ May not sum to 100% due to rounding

Approach 4, which placed all housing in Area 4, was justified by participants on the grounds that this area has the greatest quantity of un-designated and un-constrained land within it.

Finally, **Approach 7** was justified on the grounds of infrastructure delivery. Some growth in Lydd, New Romney, and Hawkinge was considered appropriate due to the relatively poor quality of local agricultural land. Within Area 4, it was considered that a location close to the boundary with Ashford, including joint working if necessary, might be justifiable. It is also considered that Areas 2 and 3 may have potential for a small amount of growth but subject to the important consideration of protecting the strategic gap between Hythe and Folkestone.

4.3 Using workshop outputs

By bringing technical experts together, the workshop built on and clarified the emerging data and evidence presented in Chapter 3. For the workshop to maximise value, however, the conclusions of this report need to take into account the views of its participants.

The workshop outputs as described in this chapter will be applied as appropriate not only to inform the High Level Options presented in Chapter 5, but also to inform the more detailed, site-specific work in our forthcoming Phase 2 report. For example, where the approaches taken in the table exercise justified the distribution of growth **within** a single area as well as between areas, the rationale for doing so, such as for example mitigating visual impacts on the Kent Downs AONB, may very well be relevant at a later stage when it is time to define specific boundaries of suitable land.

The table exercise showed Area 4 was by far the most commonly selected area (almost three out of every four houses placed was placed there). It was also the only area selected as part of all seven approaches and the only one to accommodate all development in a single location (Approach 4). This accords, in general terms, with what other a wide range of data and evidence suggests about the suitability of Area 4 relative to many other locations.

However, it was interesting to see that six out of the seven approaches forming the outputs from the table exercise included land in other areas. While this is welcomed in the sense that it helps expand the number and range of High Level Options, it is clear that some workshop suggestions would not accord with national planning policy.

For example, Approach 3's suggestion of a new settlement of 1,000 dwellings in the centre of Area 5 would be very likely to fail the sequential test for development in flood zones given the extent of land in the district at significantly lesser risk of flooding. Equally, it would be very difficult to justify to any Planning Inspector a development of 250 dwellings or more within the Kent Downs AONB (Approaches 1, 5 and 7) given the extent of land available outside its boundaries.

Some approaches also involved densification of existing settlements, including Folkestone and Hythe. While it is indeed possible that there may be the potential for Shepway to meet a proportion of its housing demand in this way, as noted previously, detailed analysis of the feasibility of this option is outside the scope of the Strategic Growth Options Study.

The fact that the workshop outputs include some suggestions not supported by planning policy is not necessarily surprising, because the majority of participants were not town planners. However, as the Strategic Growth Options Study is a document informing planning policy, in cases where workshop outputs or suggestions are in direct conflict with national or local planning policy, AECOM's approach will always be to resolve the conflict in favour of national or local policy. Workshop outputs that do not conflict with policy or other evidence will be taken forward as appropriate within the remainder of the Strategic Growth Options Study.

5 Development of High Level Options

5.1 Bringing together the data

For this High Level Options report to add value to the strategic planning process in Shepway, it must bring together the evidence and data gathered so far into a coherent narrative. That evidence and data has been gathered from a range of policy and supporting documents at national, regional and local level, from the work carried out by technical specialists at AECOM and from the statutory consultees and other relevant stakeholders who returned survey proformas and attended the High Level Options workshop in Folkestone.

5.2 Emerging results

Taking the outputs of the workshop together with the traffic-light exercise, there was general consistency between the two, allowing for the fact that some of the outputs of the workshop would not be supported by planning policy and/or were outside the scope of the High Level Options study.

Areas considered unsuitable for strategic development

The evidence indicates that Areas 1, 2, 3, 5 and 6 are not suitable for housing growth at a strategic level. As noted previously, this does not necessarily rule out smaller development opportunities of fewer than 250 homes within their boundaries. A summary of conclusions for each area considered unsuitable for large-scale growth based on AECOM analysis and workshop outputs appears below.

Area 1

Area 1's key strategic, spatial constraint is the Kent Downs Area of Outstanding Beauty, which covers the entire area. National policy is unambiguous in stating that the AONB designation makes the area unsuitable for strategic-scale development. Other significant constraints include multiple environmental designations and a rolling landscape of scattered historic villages and farms, many with heritage constraints.

Although flood risk is generally low, and the area benefits from access to the M20, there are no railway stations and the area is considered less suitable on the economic development potential criterion as a result. Although it is true that housing demand is likely high in the area, this consideration is not considered to outweigh the many other constraints on development, particularly the AONB designation.

In general, workshop participants appeared to agree with AECOM's own assessment of the constraints here, because collectively they placed only 3.9% of all housing within Area 1, it thus being the least popular choice for development, though Approaches 1 and 7 supported growth at Hawkinge²⁴ and Approach 5 supported development at Densole.

The overall conclusion, supported by workshop participants, is that Area 1 is not suitable for strategic growth and as such should be eliminated from further analysis. This assessment is made with particular reference to spatial planning principles 3, 5, 6, 8 and 14.

²⁴ Though Hawkinge is entirely within the Kent Downs AONB, it has seen significant housing growth in recent years, and this may have influenced Approach 1. The growth at Hawkinge was, however, thanks to a large growth allocation in the Kent Structure Plan in the 1990s. The national and local planning policy context have changed significantly since that time and this scale of growth would not be considered appropriate within an AONB today.

Area 2

Area 2's key strategic constraint is considered to be a simple lack of space, with the area failing on the spatial opportunities and constraints criterion for this reason. Of all character areas, Area 2 in fact offers the widest range of criteria supportive of growth, including low flood risk and minimal environmental designations, excellent transport and other infrastructure, much land free from heritage designations and land mostly favourable in landscape terms. The only problem is that almost all of this land is already developed.

AECOM's analysis also identified opportunities for regeneration and potential for economic development. However, the area is to an extent a victim of its own suitability- this potential having been identified and acted upon long before the start of this study.

As such, there is simply insufficient land remaining for further strategic-scale development for the purposes of this study. However, this does not exclude the possibility of the Council identifying appropriate infilling opportunities as part of a separate exercise.

Recognising this significant constraint, and aware that identifying smaller urban infill opportunities was not within the scope of the High Level Options identification process, the workshop participants appeared to concur with this assessment, placing only 4.4% of all houses placed within Area 2 (as part of Approaches 3, 5 and 7). This made it the second-least popular workshop choice for housing growth across all six character areas.

The overall conclusion is that Area 2 is not suitable for strategic growth and as such should be eliminated from further analysis. This assessment is made with particular reference to spatial planning principles 1 and 14.

Area 3

Area 3's key strategic, spatial constraints (illustrated in Figure 9) are considered to be environmental, landscape and spatial. The environmental constraints relate to the significant areas of Zone 2 and 3 floodplain, particularly in the western half of the area, but also to the scale of ecological designations, in particular Hythe Ranges Local Wildlife Site. The Kent Downs AONB and its setting is also a significant landscape constraint, and the town centre conservation area is extensive.

Transport infrastructure and economic opportunities are also more constrained than in Area 2, the other main urban character area.

At the workshop, only 5.5% of houses were placed in Area 3, reflecting the fact that almost all of the land within it is constrained in one way or another. Many of these houses were placed at Nickolls Quarry as part of Approaches 2 and 6²⁵, but, without a detailed assessment of opportunities for mitigation, this would be inconsistent with national policy on the sequential approach to flood risk.²⁶ As such, it was regarded as only the fourth most suitable area for growth.

The overall conclusion is therefore that Area 3 has no potential for strategic growth. This assessment is made with particular reference to spatial planning principles 1, 2, 4, 5, 6 (specifically with respect to the potential for use of previously-developed land as an urban extension of Folkestone), 9 and 12.

²⁵ Approaches 5 and 7 also considered Area 3 suitable for some growth, but through infill within Hythe.

²⁶ The existing development at Nickolls Quarry was permitted in 2008 and the national and local planning policy context have changed significantly since that point- additionally it was permitted only subject to extensive and site-specific flood mitigation measures. Though Shepway DC advises that there could be further residential potential at Nickolls Quarry, this would be subject to detailed discussion with the Environment Agency. It is likely that in any case this would comprise fewer than 250 homes and therefore non-strategic development outside the scope of this report.

Area 5

Area 5's key strategic, spatial constraints are considered to be environmental, landscape and transport criteria. Additionally, this area scored poorest, on average, across all criteria, largely because of the fact that it comprises entirely Flood Zone 2 and 3 land and therefore an assessment of unsuitability for development would be consistent with national policy and guidance on planning for flood risk.

The landscape derives much of its character and heritage from the very fact that it is open and undeveloped, which also reduces the spatial opportunities for development to benefit from defensible boundaries. The area also includes extensive Grade 1 agricultural land and, around its northern and western boundaries, large scale environmental and landscape designations. Partly as a result of all of these considerations, the area is the least developed of the five and as such has a very limited transport network, resulting in few economic opportunities.

The workshop selected Area 5 as the third most popular for development. For many Approaches this was related to a perceived need for urban extension to New Romney, itself in Area 6 but bordering Area 5.

However, as stated previously in Section 4.3, our approach must be to assume that where workshop outputs are in conflict with national or local planning policy, it is planning policy that takes priority and on this basis AECOM continues to consider Area 5 unsuitable for strategic growth and that it should therefore be eliminated from further analysis. This assessment is made with particular reference to spatial planning principles 3, 4, 5, 6, 9, 10 and 14.

It would not, however, be appropriate to dismiss entirely the fact that a majority of the workshop Approaches (specifically, Approaches 1, 2, 3, 6 and 7) supported extensions of 250 or more dwellings at New Romney²⁷, and AECOM recognises that housing and regeneration need remain strong in Area 5. However, the quantity, range and extent of development constraints strongly suggests that the past approach of non-strategic development focussed on meeting local needs will continue to be appropriate into the future. Certainly, it seems that it would not be sustainable to place a blanket ban on all development here.

Area 6

Area 6's key strategic, spatial constraints are considered to be environmental. Like Area 5, the extent of Flood Zone 2 and 3 is significant here, although there is much land in the eastern half of the area outside Zones 2 and 3. However, the areas outside the floodplain, including almost all land around the urban edge of Lydd, is covered by multiple and extensive environmental designations. The heritage designation at the tip of Dungeness is also relatively extensive.

As with Area 5, though to a lesser extent, the transport network is restricted due to the area's remoteness from large-scale population centres, and its economic potential is limited for the same reason. Like Area 5, much of the area's character derives from its open and undeveloped landscape, unusual for South-East England, and as such there are fewer spatial opportunities for defensible boundaries to development.

The workshop selected Area 6 as the second most popular for development. Approaches 1, 3, 5 and 7 in particular proposed strategic-scale urban extensions at New Romney and Lydd.

Again, our approach must be to assume that where workshop outputs are in conflict with national or local planning policy, it is planning policy that takes priority and on this basis AECOM continues to consider Area 6 unsuitable for strategic growth and it should therefore be eliminated from further analysis.

²⁷ Approach 3 also considered there was potential for non-strategic growth at Dymchurch (200 dwellings).

It would not, however, be appropriate to dismiss entirely the fact that several of the workshop Approaches supported growth in Area 6, and AECOM recognises that housing and regeneration need are strong here. However, the quantity, range and extent of development constraints strongly suggests that the past approach of non-strategic development focussed on meeting local needs will continue to be appropriate into the future. As with Area 5, it would not be sustainable to place a blanket ban on all development in this location.

This assessment is made with particular reference to spatial planning principles 3, 4, 5, 6, 8, 9, 10 and 14.

Area considered to have potential for strategic development

By contrast, parts of Area 4 appear to be relatively more free from strategic constraints to development and as such these locations will be investigated in more detail as part of the Phase 2 work, investigating potential at a site-specific level. The fact that a location is relatively free from strategic constraints does not guarantee it is also free from site-specific constraints. As such, it is possible or even probable that some of the areas identified at this stage as having potential may, on closer investigation, prove to be unsuitable for strategic-scale development.

Area 4

Area 4's key strategic, spatial constraints (illustrated in Figure 10) are considered to be environmental and landscape. Though there is more extensive land free from direct constraint in Area 4 than any other, there are nevertheless ecological and heritage designations scattered throughout this area, as well as spatial constraints including existing villages, site allocations and transport infrastructure, including land earmarked for Operation Stack.

The most significant constraint is considered to be the proximity of the Kent Downs AONB, with development in its setting needing to have appropriate regard to the AONB's special characteristics and reasons for designation. The area performs particularly well in terms of transport access and potential for economic development, and this helps explain why its performance on the infrastructure criterion is relatively strong for a largely rural area. National policy is clear that the proximity of the AONB, though certainly a constraint, does not rule out a more detailed investigation of the extensive land free from designations and direct constraints in this area, particularly given that other national policy supports the proposed development of Otterpool Park Garden Town in this location. The former racecourse is a previously-developed site that could play a part in the proposed Garden Town.

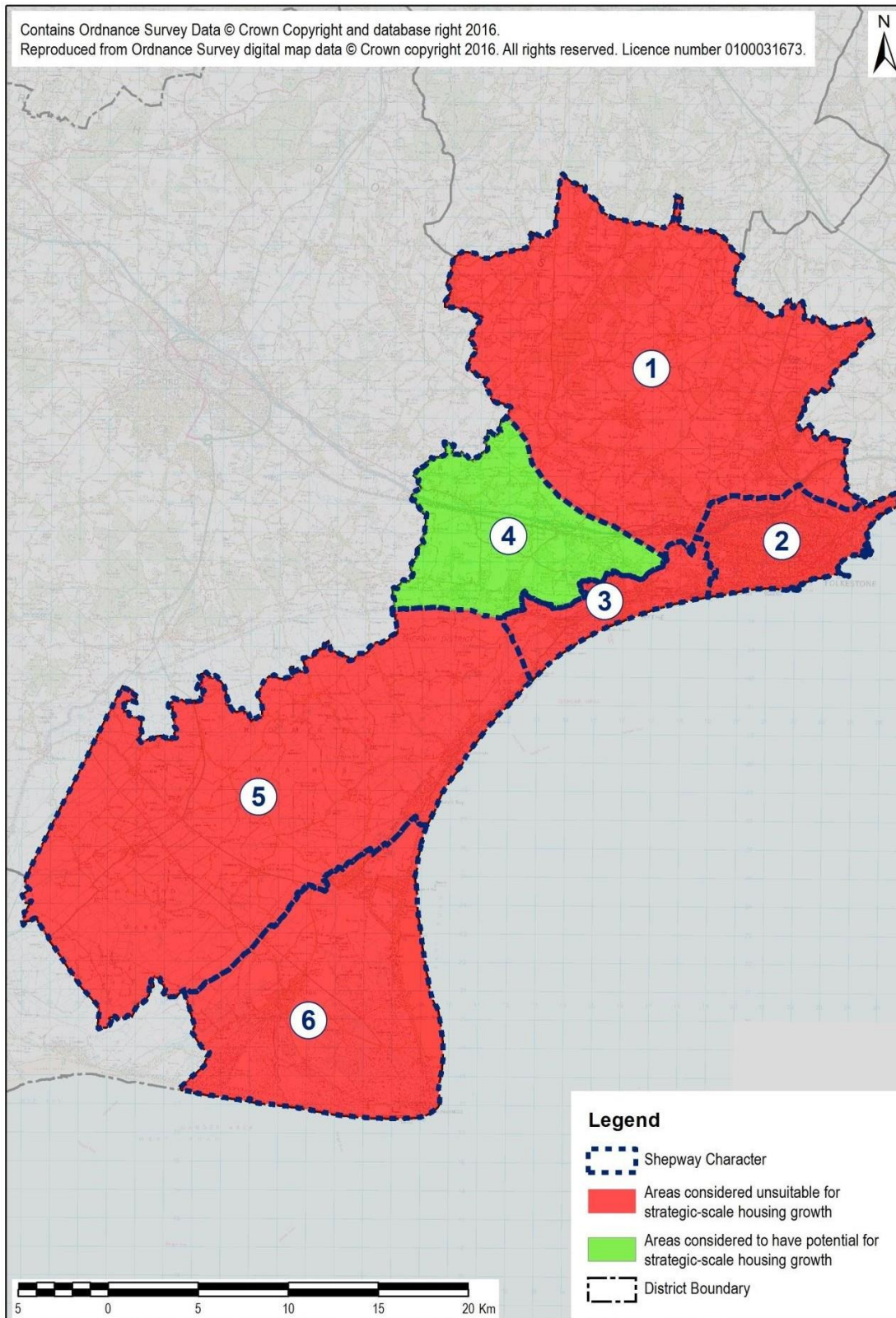
Workshop participants placed 72.5% of all houses in Area 4, more than ten times more than the second-most popular area. It was the only area to feature in all seven Approaches, as well as the only area to include all development at a single location one (Approach 4). This reflects Government support for Otterpool Park and is a clear endorsement of AECOM's emerging conclusion that this Area has potential to accommodate strategic-scale growth. Area 4 appears at this stage to have more land free from strategic constraints than any of the other areas.

As such, the overall conclusion is that Area 4 may have opportunities to accommodate strategic growth and therefore will be carried forward into Phase 2 analysis, with an appropriate focus on the setting of the Kent Downs AONB as a constraint and Otterpool Park Garden Town as an opportunity. This assessment is made with particular reference to spatial planning principles 1, 2, 3, 4, 5, 6 (specifically with respect to the former racecourse site), 9, 10, and 12.

Summary of emerging results

The strategic results of the High Level Options analysis are summarised in Figure 13 below.

Figure 13: Emerging results of high-level analysis of suitability for strategic development across Shepway



To show in more detail which areas of land within Area 4 have most potential for development, Figure 14 below shows the spatial location of selected key constraints identified through our analysis.

The location of these key constraints enables four areas to be defined which are relatively freer from strategic constraints. These four areas are lettered A to D and are marked in grey on Figure 14. Areas A to D form the starting point for the forthcoming Stage 2 analysis. Not every constraint is shown on these maps- for example, there will be individual listed buildings scattered throughout the four areas whose settings will need to be protected from inappropriate development impacts. Equally, there may be opportunities for development within A to D not immediately apparent at this spatial scale of analysis.

It is important to note that there is no guarantee at this stage that any or all of Areas A to D will be suitable for large-scale development. It is entirely possible that some or all areas may be subject to significant constraints less apparent at a strategic level of analysis.

5.3 High-level options for growth

Now that all technical conclusions have been presented, it is considered that this report has identified **five** high-level options at this stage, which are as follows:

High Level Option 1: Concentration of all new development needed at new settlement(s) or expanded existing settlement(s) in Area 4, the only location in Shepway with sufficient land free from strategic-level constraints for this to be a possibility; or

High Level Option 2: Some new development concentrated in Area 4, with non-strategic opportunities across the rest of Shepway, potentially including Nickolls Quarry²⁸ (outside the scope of this report) maximised; or

High Level Option 3: Where more development is needed than can be provided by either High Level Options 1 or 2, the remainder of Shepway's housing need to be provided by neighbouring authorities around Shepway; or

High Level Option 4: Any combination of Options 1, 2 and 3 depending on level of need and other relevant factors.

The decision on which high-level options to progress will therefore depend on how much land within Area 4 is also suitable in terms of site-specific constraints. However, it is only the Phase 2 report that will be able to answer this question.

5.4 Next steps

As the objective of this report is to assess the potential for strategic-level development in Shepway District only, a detailed investigation of the feasibility of Options 2, 3, and 4 is outside the scope of this study. Nevertheless, our Phase 2 report will be able to determine:

- Feasibility of High Level Option 1; and thus
- The extent to which SDC needs to investigate the feasibility of Options 2, 3 and 4.

If High Level Option 1 is considered feasible within the constraints to development, then the Council is less likely to need to investigate Options 2, 3, and 4 in significant detail, though it could demonstrate it has considered them in outline to meet the Sustainability Appraisal objective of considering 'reasonable alternatives'.

The next step for the Strategic Growth Options Study is therefore to investigate in detail the site-specific constraints to and opportunities for development in locations A, B, C, and D as part of Phase 2 of the Strategic Growth Options Study.

²⁸ As previously noted, further residential development at Nickolls Quarry is not committed at the time of writing and would be subject to Environment Agency agreement.

6 Technical Appendices

6.1 Appendix A: Review of national and local planning policy

Introduction

This appendix reviews relevant provisions of the national and local policy documents forming the context for planning at Shepway. Where information was common to more than one document, the source used comprised either:

- The most up-to-date assessment; or
- Adopted policy text; or
- Both of the above.

Housing

National policy

National Planning Policy Framework (NPPF)

The NPPF was adopted in March 2012. The document states that at its heart is a presumption in favour of sustainable development, which should be seen as 'a golden thread running through both plan making and decision-taking'.

Specific points of relevance include the following:

Paragraph 17: Allocations of land for development should:

- Prefer land of lesser environmental value, where consistent with other policies;
- Encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value; and
- Actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.

Paragraph 37: Planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities.

Paragraph 38: For larger scale residential developments in particular, planning policies should promote a mix of uses in order to provide opportunities to undertake day-to-day activities including work on site. Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties.

Paragraph 50: To deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should plan for a

mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community.

Department of Communities and Local Government Press Release, November 2016

In November 2016, the Department of Communities and Local Government issued a press release that effectively made development of a new locally-led Garden Town at Otterpool Park national planning policy.

In the press release, Housing Minister Gavin Barwell MP states that a new Garden Town in Shepway offers a unique opportunity to boost the local economy, jobs and provide new homes.

The press release continues:

'This new locally-led Garden Town at Otterpool Park, Shepway in Kent will be built on previously developed land and public sector land and will deliver up to 12,000 new homes along with schools and other essential facilities. Otterpool Park Garden Town will be supported with £750,000 of additional government capacity funding that will help kick-start work and enable the local council to take forward their proposal.'

Local policy

Shepway Core Strategy 2013

The key local policy document relating to Shepway District Council is the adopted Core Strategy, which identifies, through Policy SS2: Housing and the Economy Growth Strategy, a requirement for up to 8,000 dwellings from 2006/7 to 2025/26 . This equates to a minimum of 350 dwellings a year.

Other policies with direct relevance for residential development in Shepway include:

Policy SS1 District Spatial Strategy: Priority for new development will be on previously-developed land in the Urban Area. The majority of the Urban Area housing development will take place in Folkestone, to enhance its role as a sub-regional centre. Development to meet strategic needs will be led through strategically allocated developments at Folkestone Seafront and Shorncliffe Garrison, Folkestone, and the delivery of strategic mixed-use development at Hythe.

Development in the open countryside and on the coast will only be allowed exceptionally, where a rural/coastal location is essential.

Policy SS6 Spatial Strategy for Folkestone Seafront: Folkestone Seafront is allocated for mixed-use development, providing up to 1,000 homes, in the region of 10,000 sqm of commercial floorspace, sports facilities and infrastructure.

Policy SS7 Spatial Strategy for Shorncliffe Garrison, Folkestone: The Shorncliffe Garrison complex is allocated for a predominantly residential development of around 1,000 dwellings to 2026, new community facilities, associated enhancements to green infrastructure and upgrades to travel networks.

Policy CSD1 Balanced Neighbourhoods for Shepway: The creation of balanced and popular neighbourhoods through high-quality design proposals which address identified affordable housing needs is promoted. All housing development should include a broad range of tenures.

Policy CSD2 District Residential Needs: Residential development and new accommodation should be designed and located in line with the Spatial Strategy's approach to managing demographic and labour market changes in Shepway and meeting the specific requirements of vulnerable or excluded groups existing with the district. At least half of new homes by 2026 will be three bedroom (or larger) dwellings.

Policy CSD8 New Romney Strategy: A broad location for residential development to the north of the town centre is recommended. The development as a whole should provide around 300 dwellings and a range and size of residential accommodation, including 330% affordable housing.

Policy CSD9 Sellindge Strategy: A major residential-led development in Sellindge parish is recommended. Total residential development will not exceed approximately 250 dwellings with around 30% affordable housing.

Places and Policies Local Plan (Preferred Option, 2016)

Policy HB1 Quality Places Through Design: Proposals should:

- Make positive contribution to its location and surroundings, enhancing integration whilst also respecting existing buildings and land uses.
- Facilitate and enable circulation and ease of movement within the locality for all users.
- Create, enhance, improve and integrate areas of public open space, green infrastructure, biodiversity and other public realm assets.
- Provide a clear definition between the public and private realm.

Policy HB2 Cohesive Design: Any proposals should ensure that the local character is protected, particularly with regards to sky and tree lines and the protection of spaces between buildings. Major developments should integrate into the neighbourhood, create a place, and streets and homes for all.

Employment

National policy

NPPF

Paragraph 21:

- Plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries;
- Support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area; and
- Identify priority areas for economic regeneration, infrastructure provision and environmental enhancement.

Local policy

Shepway Core Strategy 2013

Policy SS1 District Spatial Strategy: The majority of Shepway's commercial floorspace will be developed in Folkestone, to enhance its role as a sub-regional centre.

Policy SS2 Housing and the Economy Growth Strategy: Approximately 20ha gross of industrial, warehousing and offices (B classes) is targeted between 2006/7 and 2025/26. Approximately 35,000sqm gross of goods retailing (Class A1) is targeted between 2006/7 and 2025/26.

Shepway District Local Plan Review (2006): Policies Applicable 2013 Onwards

Policy E2: Planning permission for business and commercial development or redevelopment will be granted on the new employment opportunity sites listed below:

- Shearway Business Park, Folkestone (use class B1/B2/B8)
- Cheriton Parc, Folkestone (use class B1)
- Link Park, Lympe (use class B1/B2/B8)
- Phase III and Phase IV Land, Mountfield Road, New Romney (use class B1/B2/B8)
- Hawkinge West (use class B1/B8)
- Nickolls Quarry, Hythe

Policy E6a: The District Planning Authority will not permit proposals that would result in the loss of employment uses within or adjoining rural villages.

Places and Policies Local Plan, Preferred Options 2016 (Site Allocations)

Policy E1 Employment Sites: The sites identified below are protected for business uses under use classes B1, B2 and B8, unless otherwise stated.

| Site | Floorspace (m2) | Uses |
|---|-----------------|------------------|
| Shearway Business Park, Folkestone | 14,700 | B1 – B8 |
| Cheriton Parc, Folkestone | 15,000 | B1a |
| Ingles Manor, Folkestone | 2,000 | B1 |
| Hawkinge West, Hawkinge, Folkestone | 30,000 | B1 & B8 |
| Nickolls Quarry, Hythe | 21,000 | B1 |
| Link Park (Areas 1 & 2) Lympne Hythe | 73,175 | B1, B1c, B2 & B8 |
| Mountfield Road Phase 3 & 4, New Romney | 9,000 | B1, B1c, B2 & B8 |
| Harden Road, Lydd | 840 | B1 & B1a |
| Dengemarsh Road, Lydd | 11,725 | B1 Mixed |

Policy E2 Tourism: Proposals that will provide new, or an upgrade to, sustainable tourism facilities including; hotels, guesthouses, bed and breakfast, self-catering accommodation and new visitor attractions will be permitted provided that the location is well related to the highway network and is accessible by a range of means of transport including walking and cycling and by public transport.

Transport

National policy

NPPF

Paragraph 30: In preparing Local Plans, local planning authorities should support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport.

Paragraph 35: Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. Therefore, developments should be located and designed where practical to:

- Accommodate the efficient delivery of goods and supplies;
- Give priority to pedestrian and cycle movements, and have access to high quality public transport facilities;
- Create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, avoiding street clutter and where appropriate establish home zones

Local policy

Shepway Core Strategy Local Plan (2013)

Policy SS3 Place-Shaping and Sustainable Settlements Strategy: Ensuring development is suited to the locality and its needs, and transport infrastructure (particularly walking/cycling). Efficient use should be made of central land in town centres or in easy walking distance of rail and bus stations.

Shepway District Local Plan Review (2006): Policies Applicable 2013 Onwards

Policy SD1: Shape new development patterns in a way which reduces the need to travel, especially by car, and increases the attractiveness of walking, cycling and public transport.

Policy TR2: Where major new developments are proposed, permission will not be granted unless provision is made in the layout to allow penetration by buses.

Policy TR6: New development will not be permitted unless provision is made for the needs of pedestrians. The layout and design of development should provide for safe, attractive and convenient pedestrian routes, particularly to public transport routes.

Places and Policies DPD (Preferred Option, 2016)

Policy HW4 Protecting and enhancing rights of way: Planning permission will be granted for development likely to give rise to increased travel demands, where the site has (or will attain) sufficient integration and accessibility by walking and cycling including:

- Provision of new cycle and walking routes that connect to existing networks, including the wider Rights of Way network, to strengthen connections between villages, principal towns, market towns, and the wider countryside;

- Protection and improvement of existing cycle and walking routes, including the Rights of Way network, to ensure the effectiveness and amenity of these routes is maintained, including through maintenance, crossings, signposting and waymarking, and, where appropriate, widening and lighting; and
- Provision of safe, direct routes within permeable layouts that facilitate and encourage short distance trips by walking and cycling between home and nearby centres of attraction, and to bus stops or railway stations, to provide real travel choice for some or all of the journey.

Heritage

National policy

NPPF

Paragraph 59: Planning policies and decisions should aim to ensure that developments respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation.

Paragraph 132: Substantial harm to or loss of a grade II listed building, park or garden should be exceptional. Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, grade I and II* listed buildings, grade I and II registered parks and gardens, and World Heritage Sites, should be wholly exceptional.

Paragraph 137: Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites and within the setting of heritage assets to enhance or better reveal their significance.

Local policy

Shepway District Local Plan Review (2006): Policies Applicable 2013 Onwards

Policy SD1: Preserve and enhance built and cultural heritage.

Places and Policies DPD (Preferred Option, 2016)

Policy HE1 Heritage Assets: The District Council will grant permission for proposals which promote an appropriate and viable use of heritage assets, consistent with their protection and conservation, particularly where these bring redundant or under-used buildings and areas back into use or improve public accessibility to the asset.

Policy HE2 Archaeology: Important archaeological sites, together with their settings, will be protected and, where possible, enhanced. Development which would adversely affect them will not be permitted.

Landscape

National policy

NPPF

Paragraph 109: The planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, geological conservation interests and soils.

Local policy

Shepway Core Strategy 2013

Policy SS3 Place-Shaping and Sustainable Settlements Strategy: Development within Shepway is directed towards existing sustainable settlements to protect the open countryside and the coastline.

Policy CSD4 Green Infrastructure of Natural Networks, Open Spaces and Recreation: Development must not jeopardise the protection and enhancement of the distinctive and diverse local landscapes in Shepway. Planning decisions will have close regard to the need for conservation and enhancement of natural beauty in the AONB and its setting, which will take priority over other planning considerations.

Shepway District Local Plan Review (2006): Policies Applicable 2013 Onwards

Policy SD1: Protect and enhance areas of countryside that are of special quality, particularly the Kent Downs Area of Outstanding Natural Beauty.

Shepway Places and Policies Consultation Document 2016 (Preferred Option)

Policy NE3 To protect the District's landscapes and countryside: Planning permission will be granted where it can be demonstrated that all the following criteria have been met:

- The natural beauty and locally distinctive features of the AONB are conserved and enhanced;
- Proposals reinforce and respond to, rather than detract from, the distinctive character and special qualities of the AONB;
- Either individually or cumulatively, development does not lead to actual or perceived coalescence of settlements or undermine the integrity or predominantly open and undeveloped, rural character of the AONB and its setting;
- Special Landscape Areas are defined as follows; North Downs (including the scarp and crest), Old Romney Shoreline and Dungeness.
- Local Landscape Areas are defined as follows; Romney Marsh, Sandgate Escarpment and Seabrook Valley, Eaton Lands, Cooling Land and Enbrook Valley and Mill Lease Valley.

Policy NE9 Development Around the Coast: The District Planning Authority will give long term protection to the Folkestone and Dover Heritage Coast and to the areas of undeveloped coast. Within these areas development will not be permitted unless proposals preserve and enhance natural beauty, landscape, heritage, scientific and nature conservation value.

Agricultural Land

National policy

NPPF

Paragraph 112: Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.

Local policy

Shepway Places and Policies Consultation Document 2016 (Preferred Option)

Policy HW3 Development proposals should not result in the loss of the best and most versatile agricultural land (Grades 1, 2 and 3a) unless there is compelling and overriding planning reason to do so and mitigation is provided through the provision of an allotment where there is the demand.

Ecology

National policy

NPPF

Paragraph 110: Plans should allocate land with the least environmental or amenity value, where consistent with other policies in this Framework.

Paragraph 117: To minimise impacts on biodiversity and geodiversity, planning policies should:

- plan for biodiversity at a landscape-scale across local authority boundaries;
- identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation;
- promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan;
- aim to prevent harm to geological conservation interests; and
- where Nature Improvement Areas are identified in Local Plans, consider specifying the type of development that may be appropriate in these Areas.

Local policy

Shepway District Local Plan Review (2006): Policies Applicable 2013 Onwards

Policy SD1: Protect and enhance designated or proposed sites of wildlife importance.

Shepway Places and Policies Consultation Document 2016 (Preferred Option)

Policy NE2 Biodiversity: Planning permission will be granted for development where it can be demonstrated that the following criteria have been met:

- The biodiversity value of the site is safeguarded;
- Demonstrable harm to habitats or species which are protected or which are of importance to biodiversity is avoided or mitigated;
- The proposal protects, manages and enhances the District's network of ecology and biodiversity sites, including the international, national and local designated sites (statutory and non-statutory), priority habitats, wildlife corridors and stepping stones that connect them.

Open Space

National policy

NPPF

Paragraph 74: Existing open space, sports and recreational building and land, including playing fields, should not be built on subject to specific exceptions.

Local policy

Shepway District Local Plan Review (2006): Policies Applicable 2013 Onwards

Policy SD1: Maintain and enhance the provision of recreational open space, amenity land and tree and hedgerow cover

National policy

NPPF

Paragraph 23: Planning policies should define a network and hierarchy of centres that is resilient to anticipated future economic changes.

Paragraph 24: When considering edge of centre and out of centre proposals, preference should be given to accessible sites that are well connected to the town centres.

Flood risk

National policy

NPPF

Paragraph 100: Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere. Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change, by:

- applying the Sequential Test;

- if necessary, applying the Exception Test;
- safeguarding land from development that is required for current and future flood management; and
- where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to facilitate the relocation of development, including housing, to more sustainable locations.

Paragraph 101: The aim of the Sequential Test is to steer new development to areas with the lowest probability of flooding. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding.

Paragraph 102: If, following application of the Sequential Test, it is not possible, consistent with wider sustainability objectives, for the development to be located in zones with a lower probability of flooding, the Exception Test can be applied if appropriate.

Local policy

Shepway District Local Plan Review (2006): Policies Applicable 2013 Onwards

Policy SD1: Prevent negative impacts on coastal protection, flood defence, land drainage and groundwater resources.

Shepway Places and Policies Consultation Document 2016 (Preferred Option)

Policy NE8 Integrated Coastal Zone Management: Proposals and initiatives in coastal areas will be supported that promote the following general objectives:

- Facilitate the economic, environmental and social wellbeing of the area;
- Address proposals for the coastline and coastal communities set out in Coastal Defence Strategies and Shoreline Management Plans;
- Contribute to greater safeguarding of property from flooding or erosion and/or enable the area and pattern of development to adapt to change, including the relocation of current settlement areas, and vulnerable facilities and infrastructure that might be directly affected by the consequences of climate change;
- Improve infrastructure to support sustainable modes of transport, especially cycleways, bridleways and footpaths, including the National Coastal Footpath.

Infrastructure

Local policy

Shepway Core Strategy 2013

Policy SS3 Place-Shaping and Sustainable Settlements Strategy: Development must address social and economic needs in the neighbourhood and not result in the loss of community, voluntary or social facilities.

Policy SS5 District Infrastructure Planning: Infrastructure that is necessary to support development must exist already, or a reliable mechanism must be available to ensure that it will be provided at the time it is needed.

Policy CSD4 Green Infrastructure of Natural Networks, Open Spaces and Recreation: Green Infrastructure (GI) will be protected and enhanced and the loss of GI uses will not be allowed.

Shepway District Local Plan Review (2006): Policies Applicable 2013 Onwards

Policy U2: Developments must be connected to the nearest available mains drainage system with capacity to serve the development.

Geo-Environmental

National policy

NPPF

Paragraph 120: To prevent unacceptable risks from pollution and land instability, planning policies and decisions should ensure that new development is appropriate for its location. Where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner.

Paragraph 121: Planning policies and decisions should also ensure that the site is suitable for its new use taking account of ground conditions and land instability, including from natural hazards or former activities such as mining, pollution arising from previous uses and any proposals for mitigation including land remediation or impacts on the natural environment arising from that remediation.

Local policy

Shepway District Local Plan Review (2006): Policies Applicable 2013 Onwards

Policy BE19: Planning permission for development within the area defined on the Proposals Map will not be granted unless investigation and analysis is undertaken which clearly demonstrates that the site can itself be safely developed and that the proposed development will not have an adverse effect on the slip area²⁹ as a whole. This is referring to land instability within Shepway.

Shepway Places and Policies Consultation Document 2016 (Preferred Option)

Policy NE6 Land Stability: The Council will look favourably on schemes that can bring unstable land back into use, subject to other planning considerations.

Policy NE7 Contaminated Land: Development will be permitted on contamination land subject to the identification of and commitment to implementation of practicable and efficient measures taken to treat, contain and/or control any contamination.

²⁹ Areas of Folkestone, Sandgate and Hythe are susceptible to land instability and problems have occurred including damage to buildings due to land slippage.

Appendix B: Review of relevant evidence base documents

Introduction

This appendix reviews relevant provisions of the evidence base documents forming the context for planning in and around Shepway. It is presented by topic in the same order as the policy review in Appendix A. Within each topic, documents are presented in chronological order by year, with the most recently produced documents first.

Housing

Authority Monitoring Report (2015)

The Authority Monitoring Report notes that across Shepway:

- 124 affordable dwellings were delivered during the year, representing 89% of the number of affordable dwellings required annually to meet the affordable housing target in the Core Strategy
- For the period 2014 to 2015, 83 dwellings out of a possible 348 were 3 or more bedroom dwellings, which represents a percentage of 27%. This was below the target of 50% of completions to consists of 3 (or more) bedroom dwellings
- In terms of affordable homes built to Lifetime Homes standard, there were 4 developments with a total of 47 units built during the period, 30% of which were built to lifetime homes standard

In the 9 year period leading up to 31 March 2015, 2,348 dwellings were delivered in Shepway. This represents a cumulative under delivery of 802 dwellings. Factoring in the estimate for 2015/16, this leads to an under delivery of 786 dwellings over a 10 year period.

One hundred and ninety-two homes have been built so far at the new major residential development at Nickolls Quarry. This development will include a major community facility.

During this year, 1,049 sq. m of B-class development was completed in the District, with a further 541 sq. m under construction at the time of the Commercial Information Audit. However, 2,728 sq. m of B-class employment was lost during the same period to other uses.

East Kent Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (April 2014)

According to this assessment, there are 164 individuals or 42 households comprising Gypsies and Travellers in Shepway. This includes the form of private sites with permanent planning permission, unauthorised developments, 32 households in bricks and mortar accommodation, one authorised and one unauthorised Travelling Showpeople site.

The survey conducted by the assessment showed that majority of Gypsies and Travellers on all the sites were settled with very little travelling or intention to travel. They have long-standing and strong local connections.

There is no sign that growth in this section of the population will slow significantly. The need calculated for Gypsy and Traveller and Travelling Showpeople populations is 7 new residential pitches/plots between 2013 and 2027.

Strategic Housing Land Availability Assessment [SHLAA] (2011/12)

The Strategic Housing Land Availability Assessment (SHLAA) is a technical document comprising a list of sites that might have some potential for housing development at some stage in the future. The SHLAA forms part of the evidence base to support the delivery of land for housing in the District over the period 2011/12 to 2030/31.

The 2011/12 SHLAA contains the following information:

- a list of all sites or broad locations that have been considered for development, cross-referenced to their locations on maps, indicating which sites have been excluded due to national policies, designations and other suitability criteria;
- an assessment of each site or broad location, in terms of its suitability, availability and achievability to determine whether a site is realistically expected to be developed and when;
- the potential type and quantity of development that could be delivered on each site/broad location, including a reasonable estimate of build-out rates, setting out how any barriers to delivery could be overcome and when;
- an indicative trajectory of anticipated development; and
- a summary for the whole of the District indicating the total numbers of dwellings considered to be deliverable and developable in 5-year periods.

The document updates key elements in the original SHLAA, in particular refreshing information on site capacities, exact boundaries, and taking into account recent planning applications. It supports the housing figures presented in the Shepway Core Strategy.

The sites included in the SHLAA comprise:

- former Local Plan allocations in Shepway which have not been implemented (for housing, employment or other uses);
- sites submitted through “Calls for Sites” as part of the preparation of the SHLAA;
- sites of 10 or more dwellings where planning permission has recently lapsed, or where a planning application has been withdrawn or refused (including those sites dismissed on appeal);
- vacant and surplus public sector land; and
- sites with extant planning permission (outline and full) for housing, including sites where the Council has resolved to grant permission subject to signing a s106 Agreement.

The assessment of suitability is based upon the following criteria:

- the development plan: national and local planning policies set out in NPPF and adopted and emerging Local Plan documents;
- protection of international and national biodiversity designations (SAC, SPA, RIGS³⁰, SSSI);
- protection of national heritage assets (such as historic parks and gardens, or sites which include Scheduled Monuments and listed buildings);
- presence and extent of Flood Zones;
- appropriateness and likely market attractiveness for the type of development proposed;
- environmental/amenity impacts experienced by would-be occupiers, existing residents and neighbouring areas.
- proximity of the site to the towns and Local Service Centres
- scale of site in relation to the existing settlement and its development needs

As a result of the assessment of suitability, sites which do not meet the following criteria have been assessed as unsuitable for development:

- sites which are contrary to national and local adopted planning policies;
- sites which are not within or on the immediate edge of an identified settlement; and
- sites which are of an inappropriate scale to the existing settlement.

The SHLAA conclusions for Shepway is that the district has a total potential capacity of 8,543, which includes all sites that are deliverable and developable.

Strategic Housing Market Assessment for East Kent Sub-Region [SHMA] (2009)

The Sub-regional Housing Market Assessment (SHMA) informs Shepway's dwelling target in the Core Strategy. The SHMA covers East Kent Sub-Region housing market.

The critical challenge for this sub-region is tackling the impact of an ageing population, especially one where the proportion of very elderly people is forecast to increase.

The East Kent economy is relatively weak and uncompetitive when compared to other parts of Kent and the South East. Although there is a reasonable stable employment pattern, there are elements of a second tier, less robust economy, especially in coastal towns. The role of housing in turning round economic performance is both to provide appropriate and attractive housing products for higher earners and to ensure that local young families can stay in the sub-region.

Linked to regenerating the economy, there are ambitious plans for housing growth in the region, with an additional 44,400 homes projected to be developed by 2026 in East Kent Sub-Region.

³⁰ Regionally Important Geological and Geomorphological Sites

Shepway CIL and Whole Plan Economic Viability Assessment (Dixon Searle, 2014)

The aim of the CIL and Whole Plan Economic Viability Assessment is to provide robust viability evidence base to inform and support the development of a Community Infrastructure Levy associated with and based on the Local Plan, and to provide recommendations on the appropriate level of CIL whilst maintaining viable development taking into account the cumulative impact of Local Plan policies.

In high level terms, the Study finds that values across Shepway vary significantly across the district but also with significant variation within the main settlement of Folkestone (which contains amongst both the highest and lowest values seen in the district). Higher values are also seen within Hythe and the northern rural AONB areas of the district with amongst the lowest values seen in parts of Folkestone and Lydd. A range of values is seen in other areas of the district as described in more detail within this report.

This points to CIL differentiation being a necessary and appropriate consideration for the Council, certainly at least at the level that parts of Folkestone and the southernmost area including Lydd will need some significant differential treatment.

It is considered that overall, CIL will need to be set in a range between £0 and £125/m². The Council need to consider CIL rates differentiation by location of residential development. It is recommended that 4 CIL charging rate zones will be required respecting the viability evidence as follows. For ease of reference each of these set of characteristics is lettered (A to D):

- a. Folkestone (lower end values) & Lydd area (viability scope – A) ;
- b. Romney Marsh (rural and coastal) and north Folkestone fringe / Hawkinge (B);
- c. West of Folkestone (Sandgate) and Hythe (C);
- d. North Downs rural area settlements (D)

The Council will need to continue to operate its overall approach to parallel obligations (s.106 and other policy requirements) in an adaptable way; reacting to and discussing particular site circumstances as needed (and supported by shared viability information for review). CIL will be fixed, but will need to be viewed as part of a wider package of costs and obligations that will need to be balanced and workable across a range of circumstances. **Employment**

Shepway Employment Land Review (2011)

The ELR provides an assessment of supply and demand of employment land in the district to form an evidence base to support the review of policies and preparation of Shepway's Core Strategy. The ELR is used by the District Council to inform its future approach to the provision, protection, release or enhancement of employment land and premises.

The main employment areas examined in the study were within Folkestone, as well the employment areas at Hythe, Link Park, New Romney, Lydd and the nuclear power plant at Dungeness.

The majority of existing employment sites are well functioning, predominantly industrial, clusters of employment land, categorised as good to average quality. Most have good/very good access to the strategic road network via the M20 and the continent via the Channel Tunnel. Whereas industrial space

is relatively evenly spread across the District, office space is far more concentrated within Folkestone and, to a lesser extent, Hythe.

It was estimated that 25-30,000 m² more office space and 35-40,000 m² of industrial employment space would be needed until 2026 in Shepway.

It was identified that there was almost 25,000 m² of employment space in outstanding but unimplemented permissions. Most of this permitted space (41%) was for B1 uses, with 37% for B8 and 17% for B2 use. Over two thirds of all this permitted space is on three industrial sites, Stonegate Farmers, Mountfield Industrial Estate and Link Park.

In 2008, there was an estimated 64 ha of employment land recorded as available for development in Shepway. This was made up of 43.3 ha allocated sites, 18.3 ha of developments not started on sites with planning permissions, and 2.2 ha on existing sites without planning permission. There is about 13,400 m² of available vacant commercial space within the district. However, it is possible that this is an underestimate of vacancy due to omissions from commercial property databases.

The general market view was that most forms of industrial and commercial property were catered for at some level in the District and there were few obvious gaps in types of provision. The main gaps indicated by the study were a need for more industrial land for development, along with modern industrial premises, and particularly small industrial accommodation to meet the expansion needs of local businesses.

Transport

Shepway District Council – Transport Strategy (2011)

Safety and signage were considered to be necessary for walking within Shepway either as a form of leisure, or for community purposes. The geography of the District, and specifically the topography in coastal areas such as Folkestone town centre, can be a hindrance to walking.

Safety is a primary concern for cyclists for both commuting and leisure purposes. Further issues with cycling include gaps in the cycle network and legibility and signage for cyclists.

Bus access to the rural areas of the district has been identified as a priority for action, along with frequency of service. In addition, links to rail stations were identified as an area that could be improved upon.

Accessibility to rail stations, especially by bus, needs to be improved. There is also a need for car and bicycle parking provision at stations.

Highway safety and capacity of links and junctions are priorities for the road network. In terms of parking, priorities include:

- Parking demand associated with major employers;
- Parking associated with new developments;
- On street parking provision (in towns and town centres);
- Off street parking provision and space utilisation;

- Parking at rail stations; and
- Cycle parking facilities.

Local Transport Plan for Kent 2011-16

The Local Transport Plan (LTP) sets out Kent's policies and delivery plans for the management and improvement of the local transport network from 2011 to 2016. It is a concise and focussed document that provides Kent's residents and businesses with a clear picture of the County Council's transport priorities at a time of significant economic and environmental challenges.

Kent is an international gateway, with cross-Channel traffic through the Port of Dover and the Channel Tunnel continuing to increase. Kent's airports have plans to expand and are essential catalysts in regenerating their local areas. The planned growth is expected to generate 250,000 extra journeys on Kent's roads by 2026. Coupled with the forecast increase in international traffic, tackling congestion is therefore one of the County Council's priorities.

Kent's population is ageing which will put pressure on the local community services. Providing access to these services for those without a car will continue to be a challenge. Kent also has the largest carbon emissions of any local authority area in the UK.

Five themes were developed for the LTP:

- Growth Without Gridlock
- A Safer and Healthier County
- Supporting Independence
- Tackling a Changing Climate
- Enjoying Life in Kent

Budget allocations for transport will affect Shepway through 'a safer and healthier county' scheme being partly located in the local authority. These include safety schemes, safe routes to school, walking routes and bus route to hospitals. Shepway will also benefit from the 'supporting independence' scheme which provides access to jobs and services for people without access to a private car. Finally Shepway will benefit from the 'Enjoying Life in Kent' scheme that improves access to opportunities and reduces impact of transport on Kent and its communities.

Landscape

High Level Landscape Appraisal (AECOM, 2017)

The High Level Landscape Appraisal divides Shepway into twenty-six Landscape Character Areas (LCAs) and gives each a score based on landscape value, susceptibility to change and sensitivity to change. The scores and detailed conclusions for each LCA have been taken into account as appropriate within the High Level Options Report and are summarised below.

| Landscape Character Area | Corresponding High Level Options Character Area | Landscape Value | Landscape Susceptibility | Landscape Sensitivity |
|---|---|-----------------|--------------------------|-----------------------|
| LCA 01: Elmsted Valley | 1 | +4 | +2 | +6 |
| LCA 02: Elhampark Wood | 1 | +7 | +2 | +9 |
| LCA 03: Elham Valley | 1 | +5 | +2 | +7 |
| LCA 04: Hawkinge | 1 | +1 | 0 | +1 |
| LCA 05: Postling Vale | 1 + 4 | +5 | +2 | +7 |
| LCA 06: Stanford | 4 | -2 | 0 | -2 |
| LCA 07: Tolsford Hill | 1 | +7 | +2 | +9 |
| LCA 08: North Downs Ridge | 1 + 2 | +7 | +2 | +9 |
| LCA 09: Sellindge | 4 | 0 | 0 | 0 |
| LCA 10: M20 and HS1 Corridor | 1 + 2 + 4 | -7 | -1 | -8 |
| LCA 11: Lympne | 4 | -1 | 0 | -1 |
| LCA 12: Brockhill | 4 | +6 | +2 | +8 |
| LCA 13: Greensand Ridge | 3 + 4 | +7 | +2 | +9 |
| LCA 14: The Warren Cliffs | 2 | +8 | +2 | +10 |
| LCA 15: Folkestone | 2 | -2 | -2 | -4 |
| LCA 16: Hythe and Saltwood Wooded Valleys | 1 + 3 | +5 | +2 | +7 |
| LCA 17: Hythe Wooded Hills | 3 | +1 | 0 | +1 |
| LCA 18: Hythe Coast | 3 | +2 | -2 | 0 |
| LCA 19: Hythe Ranges | 3 | -6 | -1 | -7 |
| LCA 20: Romney Marsh Coast | 5 + 6 | +1 | 0 | +1 |

| Landscape Character Area | Corresponding High Level Options Character Area | Landscape Value | Landscape Susceptibility | Landscape Sensitivity |
|---------------------------------------|---|-----------------|--------------------------|-----------------------|
| LCA 21: Romney Marsh Proper Farmlands | 3 + 5 | +5 | +1 | +6 |
| LCA 22: Brookland Farmlands | 5 + 6 | +4 | 0 | +4 |
| LCA 23: The Dowels Farmlands | 5 | +3 | +2 | +5 |
| LCA 24: Highknock Channel Farmlands | 5 | +3 | +2 | +5 |
| LCA 25: Walland Marsh Farmlands | 5 + 6 | +3 | +2 | +5 |
| LCA 26: Dungeness | 6 | +6 | +2 | +8 |

Ecology

Kent Biodiversity Action Plan

The following Biodiversity Action Areas fall within Shepway:

- Dover and Folkestone Cliffs and Downs (High Level Options Report Character Areas 1 and 2)
- East Kent Woodlands & Downs (Character Area 1)
- Mid Kent Greensand and Gault (Character Areas 3, 4 and 5)
- Romney Marsh and Rye Bay (Character Areas 5 and 6)

Rother and Shepway Core Strategies: Habitat Regulations Assessment 2011

This document covers the Dungeness, Romney Marsh and Rye Bay SSSI. There are four European site designations that are underpinned by the SSSI: Dungeness SAC; Dungeness to Pett Level SPA; Dungeness, Romney Marsh and Rye Bay pSPA³¹; and Dungeness, Romney Marsh and Rye Bay pRamsar site³².

Dungeness is a shingle beach of international importance, being the UK's largest shingle structure. It has the most diverse and extensive examples of stable vegetated shingle in Europe.

³¹ Potential Special Protection Area

³² Proposed Ramsar site

Open Space

Shepway Open Spaces: Sports & Recreation Report 2011

The study highlights the existing surplus/shortfall in sports pitches:

- A surplus at all times of the week for football;
- Shortfalls in cricket for juniors of a limited scale;
- A surplus at all times of the week for rugby, but a significant shortfall in junior rugby pitches on a Sunday; and
- A surplus at all times of the week for rugby, but some shortfalls in junior rugby pitches on a Saturday.

In summary, there are surpluses for all adult pitches throughout the week. Nevertheless, junior sports provision could improve.

There are four current major green spaces within Shepway: the Coastal Park at Folkestone, Brockhill Country Park at Hythe, Dungeness National Nature Reserve and The Warren at Folkestone.

Overall, Shepway has a good quantity of sports pitches, parkland and play spaces.

Retail

Rural Services Study 2011

The analysis (reviewed by parish) states that New Romney has the widest range of services and as such acts as a service hub. The Lydd area is similar in providing a wide range of services but has a more limited choice of shops compared to New Romney and does not feature a secondary school. Even though Hawkinge is one of the more populated parishes, it lacks more traditional services, such as a petrol station.

St Mary in the Marsh suffers from limited services within its boundaries but is in close proximity to Dymchurch which is well-served. Swingfield has a relatively large population but lacks a food shop and health services.

Retail Need Assessment Study 2010 Update

By 2026 a requirement of 6,000m² is identified for convenience goods. However, the construction of a new supermarket at Bouverie Place and a new supermarket under construction in Hythe will result in a negative floorspace requirement of 8,900m² by 2026. By 2026 a requirement of 15,000m² is identified for core comparison goods.

However, the construction and opening of Bouverie Place reduces the requirement to 3,500m² by 2026. The need for bulky goods is identified as 12,500m² across the district at 2026 which reduces to 10,800m² after current commitments are taken into account.

Flood Risk

Strategic Flood Risk Assessment 2015

Shepway has a coastal frontage extending for 41 kilometres between its eastern boundary at Folkestone's Gault Clay cliffs to the shingle barrier beach at Lydd. Much of this land lies below the mean high water level and consequently the majority of Shepway's coastal frontage is protected by sea defences.

The north of Shepway has a couple of rivers running through it, including the Nailbourne and East Stour River. However there are no extensive flood plains associated with any of these rivers. The southern half of Shepway is almost entirely Flood Zones 2 and 3. The exception to this is the area around Lydd.

Water Cycle Report 2011

In Shepway there are two primary river basins; the Rother to the west and the Stour in the east. The Rother catchment covers Dungeness and Romney Marsh. The volume and quality of water on the Marsh is vital for both agriculture and wildlife. The Stour catchment covers the northern section of the District.

Infrastructure

Shepway LDF Green Infrastructure Report 2011

Key features of Shepway's Green Infrastructure include:

- Four BOAs (Romney Marsh, Mid-Kent Greensand & Gault, Dover & Folkestone Cliffs and Downs, and East Kent Woodlands and Downs) and 23 BAP Habitats;
- Four Natura 2000 sites (Dungeness SAC, Dungeness to Pett Level SPA, Folkestone to Etchingill Escarpment SAC, and Parkgate Down SAC);
- 12 SSSIs covering 28% of the district's land;
- 40 Local Wildlife Sites covering 6% of the district's land;
- One 1,023ha NNR (Dungeness) and a further 237ha of NNRs (Ham Street Woods and Wye Downs) in close proximity to the district;
- Two Local Nature Reserves (Folkestone and Romney Warren);
- Two Kent Wildlife Trust Reserves, Park Gate Down (Hector Wilks Reserve) and Yocketts Bank;
- One RSPB Reserve (Dungeness);
- Linear features including extensive beaches, cliff-tops and the Royal Military Canal;
- Major accessible woodlands (485ha at Park Wood and Elham Park Wood);

- The Folkestone and Sandgate “Green Chain” linking urban and urban fringe sites including the Seabrook Valley, Folkestone Downs, Sandgate Escarpment, the Leas and Coastal Park and the East Cliff and Warren; and
- Folkestone and Hythe’s urban GI including parks, gardens and boulevards and open spaces at the Coastal Park, Folkestone and Royal Military Canal, Hythe.

Appendix C: Letter and pro-forma sent to national stakeholders

3 November 2016

Dear Sir/Madam,

SHEPWAY GROWTH OPTIONS STUDY- SHEPWAY CORE STRATEGY REVIEW

AECOM have been commissioned by Shepway District Council to undertake a growth options study across the District. The context for this study is an emerging 'Objectively Assessed Housing Need' figure for Shepway predicted to be in the region of around 633 new homes per year between 2014 and 2037 (Shepway Strategic Housing Market Assessment, 2016). This figure does not represent the level of housing that will be set in the Core Strategy Review, it is simply an estimate of housing need at this stage.

The study's objective is to establish opportunities and constraints to housing and employment growth across Shepway, including, where relevant, suitable mitigation measures. Based on the evidence gathered, including from this focused consultation exercise with specialist stakeholders, the study will recommend which areas and/or directions for growth would be most suitable and deliverable. This will form part of the evidence base for future Local Plan documents and will help inform the Council's response to planning applications.

An important element of the study is to engage with sub-regional, regional and national stakeholders to test their views on the relative merits of the six strategic character locations defined for the purposes of the study (please see map attached and the table below). This requires us to understand the constraints and opportunities which each location presents.

We are therefore seeking your professional views on these indicative / potential directions for growth (using the form below) and asking for any specific technical information that you or your organisation may have on constraints, opportunities and requirements within each area.

Please note that we are already aware of a number of large-scale constraints, as per the description of each area provided below. We are therefore more interested to hear your local priorities and strategies affecting each area that we may not be otherwise aware of. Please add as much text as you consider necessary in the last two columns and on additional pages.

We would very much appreciate a response as soon as possible, but by **Friday 18th November** at the latest. With this in mind, responses by email to the address below would be preferred.

If you require any further information please do not hesitate to contact me. In the meantime, thank you again in advance for your assistance with this important study.

Yours sincerely,



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| Character area | Description | Brief description of area and/or strategic constraints of which AECOM is already aware | Please indicate the suitability of housing /employment growth in this location relative to other directions. Please give a score of 1, 2 or 3, where 1 = favourable, 2 = neutral and 3 = unfavourable | Reason(s) for judgement | Any other relevant information you have on this location e.g. any particular constraints, opportunities or requirements relevant to this potential growth direction |
|----------------|---------------------------------|--|---|-------------------------|---|
| 1 | Kent Downs | The whole of Area 1 is designated as AONB. However, we are interested to know if any factors would support limited growth here. | | | |
| 2 | Folkestone and surrounding area | The built-up area of Folkestone itself is outside the scope of this study, and land to the east and north is AONB. | | | |
| 3 | Hythe and surrounding area | The built-up area of Hythe itself is outside the scope of this study, and much surrounding land is AONB. | | | |
| 4 | Sellindge and surrounding area | This area is free from AONB designation and large-scale floodplain. | | | |
| 5 | Romney Marsh and Walland Marsh | This area comprises large-scale floodplain. However, we are interested to know if any factors would support limited growth here. | | | |

| Character area | Description | Brief description of area and/or strategic constraints of which AECOM is already aware | Please indicate the suitability of housing /employment growth in this location relative to other directions. Please give a score of 1, 2 or 3, where 1 = favourable, 2 = neutral and 3 = unfavourable | Reason(s) for judgement | Any other relevant information you have on this location e.g. any particular constraints, opportunities or requirements relevant to this potential growth direction |
|----------------|--------------------------------|--|---|-------------------------|---|
| | | | | | |
| 6 | Lydd, New Romney and Dungeness | Most of this area is large-scale floodplain, but we are interested to know if any factors would support limited growth here, particularly in the limited areas outside the floodplain. | | | |

Appendix D: Response from national and sub-regional stakeholders

The following national and sub-regional stakeholders were invited to respond to the questionnaire set out in Appendix C and were invited to the High Level Options stakeholder workshop. This table sets out which stakeholders responded to the questionnaire and/or attended the workshop.

| National or sub-regional stakeholder | Response to questionnaire received? | Attended stakeholder workshop? |
|---|-------------------------------------|--------------------------------|
| Affinity Water | Yes | No |
| Ashford Borough Council | No | No |
| Canterbury City Council | No | Yes |
| Dover District Council | No | No |
| East Sussex County Council | No | No |
| Environment Agency | No | No |
| HCA | No | Yes |
| Highways England | No | No |
| Historic England | Yes | No |
| Kent Downs AONB | Yes | Yes |
| Kent County Council | Yes | Yes |
| Kent Wildlife Trust | Yes | Yes |
| Marine Management Organisation | Yes | No |
| Natural England | Yes | Yes |
| Network Rail | No | No |
| Romney Marsh Area Internal Drainage Board | Yes | No |
| Rother District Council | Yes | Yes |
| South East Local Economic Partnership | No | No |
| Southeastern Railway | No | Yes |
| Southern Water | No | Yes |

| National or sub-regional stakeholder | Response to questionnaire received? | Attended stakeholder workshop? |
|--------------------------------------|-------------------------------------|--------------------------------|
| Sport England | No | No |
| Thanet District Council | No | Yes |
| UK Power Networks | Yes | Yes |

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