Shepway District Council

Proposed Leisure Centre and Mixed-Use Development at Princes Parade Hythe

Environmental Statement

Non-Technical Summary

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Contents

Figures

1. Introduction

Background

1.1 Shepway District Council Strategic Development Projects are bringing forward proposals for a mixed-use development on land at Princes Parade in Hythe. The site location is shown on **Figure 1**. The proposals qualify as a Schedule 2 development under the Town and Country Planning (Environmental Impact Assessment) Regulations, 2015, being an "urban development project" greater than 5 hectares in area (Schedule 2, 10[b]). As a result, the proposals should be the subject of an environmental impact assessment (EIA) if they are predicted to give rise to "likely significant effects".

1.2 The site is subject to a range of environmental sensitivities. These include flood risk, visual impact, proximity to the Royal Military Canal (a Scheduled Monument and Local Wildlife Site) and the presence of contamination from historic landfill activities. As a result, a possibility of significant effects cannot be ruled out, and it was decided that an EIA should be carried out. The preparation of a voluntary EIA is acknowledged as a legitimate approach in the Planning Practice Guidance (PPG).

1.3 The EIA process commenced in the autumn of 2016, in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations, 2011, which were the prevailing regulations at the time. A Scoping Opinion was issued by the LPA on 30th August, 2016. New EIA Regulations came into force in May, 2017. Since the EIA was well advanced by this time, and had been scoped under the 2011 Regulations, these are considered to provide the appropriate regulatory context. The changes introduced by the 2017 Regulations are not fundamental in any event.

Structure of the ES

1.4 The ES comprises three volumes as follows:

1. a Non-Technical Summary (NTS);
2. a Main Report; and
3. a series of Technical Annexes.

1.5 The Main Report comprises the following chapters:

1. Introduction
2. EIA Process
3. Environmental Policy Context
4. Baseline Conditions
5. Proposed Development
6. Cultural Heritage
7. Ecology
8. Flood Risk and Drainage
9. Geo-Environment
10. Landscape and Views
11. Socio-Economics
12. Transport
13. Summary of Mitigation and Effects

1.6 The Technical Annexes present a range of supporting information related to the assessment topics, together with standalone reports required by the planning process. They are as follows:

1. Scoping Opinion and Report

2. Cultural Heritage (supporting figures and photos)
3. Ecology
4. Flood Risk Assessment (FRA, including Surfacewater Drainage Strategy)
5. Geo-Environment
6. Landscape and Visual Impact Assessment (LVIA)
7. Socio-Economics (policy references)
8. Transport Assessment (TA)
9. Lighting Assessment

1.7 This document comprises the Non-Technical Summary. Its purpose is to summarize the main aspects of the EIA process, the existing environment, the proposed development and the predicted effects in non-technical language.

2. EIA Scope and Methodology

2.1 A Scoping Report was submitted to the LPA as the basis of a request for a Scoping Opinion. The Scoping Report and Opinion are presented in **Technical Annex 1**.

Assessment Topics

2.2 The topics assessed in the EIA are set out below, together with the relevant references from Schedule 4 of the 2011 Regulations.

Topic	Schedule 4 Ref
Cultural Heritage	Architectural and Archaeological heritage
Ecology	Fauna, Flora
Flood Risk and Drainage	Water, Population
Geo-Environment	Soils, Water
Landscape and Views	Landscape
Socio-Economics	Population
Transport	Population

Topics Scoped Out

2.3 A number of topics have been excluded (i.e. scoped out) of the assessment, either because significant effects were predicted to be unlikely or because it could be anticipated that any such effects could be avoided through mitigation. These topics were as follows:

Topic	Justification
Agricultural Land	The site is not in agricultural use.
Air Quality	The site is not located within an AQMA and the development would not affect any AQMAs. Dust emissions during construction would be controlled in accordance with best practice so as to minimise any risk of significant effects. Operational impacts (mainly traffic) would be insufficient to have a measurable impact on local air quality.
Archaeology	Most of the site is assumed to retain no original heritage potential, having been largely disturbed. However, buried features associated with the canal may remain; a pre-construction evaluation will be carried out to confirm the presence of any such features, and mitigation will be implemented if necessary
Climate Change /Sustainability/ Energy	Effects relating to GHG emissions are highly unlikely to be significant. A separate energy strategy has been prepared, which demonstrates how the development would minimise its GHG emissions, provide for climate change adaptation and achieve relevant sustainability targets.
EMR, Electromagnetic Interference and Odour	The development would not introduce any relevant sources of impact.
Land Use	The site is largely inaccessible and in unproductive use. Since accessible public open space would be re-provided as part of the development, its land-use impacts would be mainly beneficial.
Lighting	Although not a formal EIA topic, a lighting assessment has been carried out and forms one of the technical annexes within the ES. The assessment of other topics has taken this into account.
Microclimate (sunlight/ daylight and wind)	No tall buildings are proposed. The buildings would be set back sufficiently from the canal for overshadowing not to be a concern.

Mineral Resources	Workable gravel deposits are assumed to have already been extracted.
Natural Resources	The development is not of a type that will require a high consumption of such resources. Best practice will be adopted to meet relevant targets (e.g. waste recycling, sustainable energy).
Noise and Vibration	The site is not subject to any existing sources of noise or vibration that could have amenity implications for the new residents or render it unsuitable for the proposed uses. Construction would not take place sufficiently close to residential properties, or for a sufficient length of time, to give rise to noise or vibration that could have amenity or structural implications. Construction noise and vibration would be managed on the basis of best practicable means to minimise any risk of nuisance. The operational development is unlikely to give rise to any measurable levels of vibration.
Utilities	Statutory undertakers would be responsible for any off-site upgrades and associated assessment.
Waste	Wastes arising during construction would be subject to a Site Waste Management Plan (SWMP), and are unlikely to give rise to any particular environmental concerns. Operational waste would be managed in accordance with LPA requirements.
Water Supply/Use	This has been addressed under sustainability separate to the ES.

Other Aspects of the Assessment

2.4 The assessment has addressed all the mandatory and other relevant matters set out in Schedule 4 of the Regulations, specifically:

- The main alternatives addressed during development of the proposals, together with the reasons for rejecting them, including consideration of their environmental effects.

- Effects arising both from construction and from the permanent features and operation of the development have been assessed. Effects relating to decommissioning are not considered to be relevant for a project of this type.

- Effects have been categorised, in accordance with standard EIA practice, on the basis of their value (positive, negative etc), sequence (direct, indirect etc), occurrence (short/long-term) and permanence, as appropriate for each topic. The significance of effects has been stated in each case and the basis for this conclusion explained.

- Measures proposed or required to mitigate (avoid, reduce or compensate for) significant adverse effects, together with the mechanism for delivering them, have been identified.

- Cumulative effects resulting from interaction between this development and any relevant committed developments have been considered. These schemes have comprised the residential developments at Imperial Green and Shorncliffe Garrison, and the new accommodation for the Seapoint Canoe Centre.

- Consultation has taken place with relevant officers within the LPA and with statutory agencies as necessary.

Approach to Mitigation

2.5 As the assessment has progressed, requirements for mitigation have been identified. These measures have been adopted where they are considered to be practicable,

affordable and effective, as reflected in current good practice. They fall into two main categories:

- Measures incorporated into the design, examples of which include the proposed surfacewater drainage system and landscaping; and

- Measures to be implemented through management (e.g. as part of a Construction Environmental Management Plan or CEMP).

2.6 Detailed measures would be agreed, on the basis of the recommendations and assumptions set out in this ES, as reserved matters. The assessment has considered both the potential effects that may arise in the absence of mitigation, and the residual effects assuming that the measures are effective.

3. The Site and its Context

Application Site

3.1 The application site is 10.07 hectares in area, comprising a triangle of land bounded to the north by the Royal Military Canal, to the south by Princes Parade and to the west by the Hythe Imperial golf course.

3.2 The site lies at an elevation of about 6-7m AOD, which is broadly the same as that of Princes Parade. It slopes down to the canal and to the western boundary, representing a level change of c3-4m. The eastern end of the site is occupied by a public car park, with an adjoining playground and picnic area, together with temporary facilities used by the canoe club. The remainder of the site is occupied by tall ruderal vegetation, together with areas of scrub (blackthorn, bramble, willow etc) and ephemeral vegetation/bare ground.

3.3 The site is publicly accessible, via a path from close to the car park/play area, although access to much of it is precluded by the dense vegetation. A public right-of-way (PROW) adjoins the western boundary, linking a footbridge over the canal with Princes Parade. A second footpath runs across the centre of the site, linking Sea Road with Princes Parade via another footbridge (Seaview Bridge). Princes Parade is a secondary road linking Hythe and Sandgate, providing an alternative to the main A259/Seabrook Road.

Site History

3.4 The site originally formed part of a shingle ridge and by the end of the 19thc had been excavated for gravel, with the western part laid out as a recreation ground. Gravel extraction appears to have continued up to the mid-20thC, after which most of the site was used as a landfill for wastes such as demolition rubble, scrap metal and household refuse. From the 1980s, the western part was occupied by a highways maintenance depot, whilst canal dredgings were tipped on the eastern part and were then spread across the site, which was allowed to re-vegetate.

Landuse Context

3.5 The residential area of Seabrook lies to the north of the site, beyond the canal. The terrain rises conspicuously beyond Seabrook Road, forming an escarpment that is partly wooded and partly built-up, with most properties having seaward views across the general area of the site. Development extends northwards up the valley of the Seabrook Stream, a minor watercourse that flows into the canal, and westwards towards Hythe, the centre of which is located about 1.5km from the site. Development also extends eastwards below the escarpment to Sandgate, about 1.5km from the site. The crest of the escarpment is occupied by military uses associated with Shorncliffe Camp, with the built-up area of Coolinge and Folkestone to the east.

3.6 The area has a high level of recreational use. Much of this is focussed on the beach, which is accessed from Princes Parade, where parking is available. The canoe club has permission to erect a purpose-built clubhouse on land immediately to the north of the canal opposite the car park (Ref Y14/1428/SH). A designated walking/cycling route, the Royal Military Canal Path, runs along the northern side of the canal. To the west, beyond the golf course, lies the Hythe Imperial Hotel and a recently-completed residential development at Imperial Green.

Planning Context

3.7 Planning policy for Shepway is set out in the Shepway Core Strategy Local Plan, adopted in September 2013. This includes a range of policies supporting the delivery of sustainable

development that improves the economic, social and environmental conditions of the area, a target to deliver at least 400 homes per annum by 2026, the provision of 30% affordable housing within major residential schemes, and the expanding and upgrading of visitor and leisure attractions in Hythe.

3.8 The Princes Parade site is covered by saved policy LR9 of the Shepway District Local Plan Review 2006, which seeks to provide an adequate level of public open space for leisure, recreational and amenity purposes by protecting existing and potential areas of open space and by facilitating new provision. In addition, the eastern part of the site is covered by saved policy TM8, which supports the granting of planning permission for small-scale, low-rise recreational/community facilities. The policy specifies that any such facility should be of high-quality design, should take advantage of and enhance the appearance of the canal and the coastline, should ensure that the majority of the site remains open and should not adversely affect the character of the canal.

3.9 The Shepway Places and Policies Local Plan, Submissions Draft, was published in July 2016. This includes draft Policy UA25, which allocates the site at Princes Parade for "mixed-use redevelopment to include public open space, leisure, small-scale commercial uses and up to 150 residential dwellings."

4. The Proposed Development

Background

4.1 The core objective of the development is to provide a new Leisure Centre to replace Hythe Swimming Pool, which was opened in 1975 and has reached the end of its operational life. A feasibility study carried out in 2012 concluded that the Princes Parade site offered the most appropriate, available and developable location for a viable leisure facility.

4.2 The leisure centre would need to occupy only part of the site, with the remainder providing opportunities for a mixed-use development of housing and small-scale commercial space, together with areas of enhanced public realm and green space. These uses would not only complement the leisure centre in functional terms, but would also provide essential funding, whilst representing a step-change in the amenity of what is currently an under-utilized and only partially accessible site.

Layout

4.3 The illustrative masterplan is shown in **Figure 2**. Its main components are as follows:

- Re-alignment of Princes Parade along the northern edge of the site. This not only frees-up the seaward frontage to be re-designed as a promenade, but removes severance between the site and the beach, and helps to maintain a sense of openness along the canal.

- Location of the leisure centre at the eastern end of the site. This location responds to the existing focus of recreational uses such as the Seapoint Canoe Centre and play area, and allows for an appropriate design relationship to be developed with the larger-scale properties in Sandgate.

- Clusters of residential development extending along the central part of the site, exploiting its seaward aspect, with opportunities for commercial uses such as shops and cafes fronting onto the promenade;

- A network of public realm and green space, including open space at the western end of the site to complement the adjoining golf course, a landscaped buffer along the canal, more formal spaces associated with the housing and leisure centre, and enhanced permeability between the canal and the beach; and

- A parking strategy that includes designated spaces for residents, parking for leisure centre users, and replacement public parking for the informal parking that currently occurs along Princes Parade.

Quantum and Mix of Development

4.4 The leisure centre will provide 2,961sqm of floorspace across two storeys, accommodating competition and teaching pools, a fitness suite, studio space and ancillary facilities. The residential element will comprise up to 150 dwellings, of which 30% (up to 45) would be affordable. The net residential density would be 71 units per hectare, which is more than double the minimum (30 units per hectare) recommended in the Local Plan, and is intended to optimize the environmental potential and sustainability of the site.

4.5 The dwellings would comprise a mix of apartments (mainly within the eastern development zone) and terraced/semi-detached housing (mainly in the western zone). The commercial uses would be accommodated within a single building overlooking a central open space, comprising ground-floor restaurant/café/shops and a small boutique hotel on upper floors.

4.6 Approximately half (4.92ha) of the site is to be retained as public realm/green space. The main spaces will comprise:

- A western space adjoining the golf course, existing pedestrian route and replacement public parking (see below), which would include a play area and be of informal design;
- A central space that provides a focus for the residential and commercial uses, and incorporates the existing pedestrian route between the central footbridge and the beach;
- A linear space along the northern boundary that provides a buffer to the canal and enhanced connectivity within the site;
- A more urban space to the east of the Leisure Centre, incorporating the re-located play area; and
- A kilometre-long promenade that accommodates walking, cycling, running and sitting, and links the development with the beach.

Building Heights and Massing

4.7 The key massing principles are as follows:

- All built development to be set at a minimum ground-floor level of +7.8mAOD, as advised by the Environment Agency to minimize flood risk;
- Buildings on the south-eastern part of the site, adjoining the leisure centre, would be of up to 4 storeys;
- Buildings facing the canal within the eastern development zone would be up to 3 storeys;
- The commercial building fronting onto the central open space would be up to 4 storeys; and
- Buildings within the western development zone would generally be 2.5 storeys, with some of 3 storeys facing the central open space and promenade.

Access and Circulation

4.8 The key access principles are as follows:

- Relocation of Princes Parade through the site, to form the northern edge of the built development. This will discourage the use of this route as an alternative to the A259/Seabrook Road, and opens up the seaward frontage of the site.
- Re-provision of the public car parking currently provided along Princes Parade in the form of parking along the realigned road and a new car park at the western end of the development.
- Widening and re-modelling of the promenade to become a pedestrian-priority zone of high-quality design.
- Vehicular access to the residential courts and commercial uses via a series of secondary streets from the realigned road.

- Access to the leisure centre and associated parking also gained from the realigned road.

- Retention of the pedestrian route across the site from the central footbridge, supplemented by an east/west link along the canal corridor. Public access through the residential zones would be confined to residents and service vehicles.

4.9 Parking would be provided as follows:

- Resident, visitor and disabled parking serving the residential accommodation, to meet adopted standards and based on the unit mix at reserved matters stage;

- A minimum of 100 public spaces, partially replacing the parking currently available along Princes Parade; and

- 108 spaces serving the leisure centre (further details are provided below).

Mitigation

4.10 A Construction Environmental Management Plan (CEMP) or similar would be adopted as a pre-commencement condition, on the basis of the recommendations and assumptions set out in this ES. Monitoring would ensure that these measures are effective. Mitigation by design has been one of the core principles behind the masterplanning process, influencing in particular the layout and massing, and the arrangement and treatment of open space. Ongoing management of the developed site would prioritise environmental measures, such as through a Landscape and Ecological Management Plan.

Alternatives

4.11 Since a previous study by the LPA confirmed the current site to be the preferred location, it has not been necessary to consider alternative sites. The main alternatives for EIA purposes have therefore comprised different approaches to the masterplanning of the development.

5. Predicted Effects and Proposed Mitigation

5.1 This chapter summarises the potential and residual effects, and describes the proposed mitigation, for each assessment topic. Where relevant, effects relating to the construction phase are considered first, followed by the effects of the completed development. The final section addresses cumulative effects.

Cultural Heritage

Royal Military Canal (RMC)

5.2 The RMC is of national significance, to which its setting makes an important contribution, since it allows the defensive role of the canal to be appreciated. The application site adjoins the canal and forms part of its immediate setting. Harm has already been caused to the setting of the canal by land-raising within the site and by the construction of Princes Parade and the associated sea-wall, since these changes have obstructed the original line of sight from the canal to the sea.

5.3 The proposed development would introduce built development onto the site, thereby reducing its openness. This would further influence the visual relationship between the canal and the foreshore, and would alter the perceived contrast between the built-up and elevated area to the north of the canal and the open area of former beach to the south. Whilst this is considered to be harmful, the fabric and role of the canal would remain intact and readily understood, such that the degree of harm to its illustrative and aesthetic value is considered to be "less than substantial" in NPPF terms.

5.4 In addition, the development would provide enhanced public access to the site and its canal frontage. Opportunities would be provided for installing interpretation panels, heritage trails and associated facilities to improve public appreciation of the canal. Funding from the development would contribute to the restoration and repair of the drawbridge redoubt, wharf and canal banks. Pre-construction investigations would take place within the site to confirm whether any buried features associated with the canal (a former seawall and ditch) may remain. These initiatives would provide a degree of mitigation, such that the impact on the communal value of the canal is also considered to be less than substantial.

5.5 The categorization of heritage harm set out in the NPPF does not relate precisely to the concept of EIA significance. It has therefore been assumed for the purposes of this assessment that any harm is potentially significant, with the NPPF categorization then used to qualify the degree of harm. In this case, the degree of harm is considered to be moderate (i.e. somewhere in the middle of the less than substantial bracket).

Other Assets

5.6 The development lies within the setting of other 19thC defensive works that would have had a visual and functional relationship with the canal, and are scheduled monuments, namely the Shorncliffe (drawbridge) Redoubt, Shorncliffe Battery, and Martello Towers 8 and 9. These assets are not readily accessible to the public (Martello Tower 8 is a private dwelling), and the visual relationship between the site and the martello towers in particular has been compromised by the growth of vegetation and built development. The impact of the development would be most apparent from the redoubt, from which there is currently an open view towards the sea. The degree of harm to the setting of these assets is considered to be less than substantial.

5.7 Princes Parade is an undesignated heritage asset, comprising a Victorian seawall, esplanade and former tramway. The modern road would be re-directed through the site, allowing the parade to be remodelled as a pedestrian promenade, and its sea defences

upgraded. This would amount to a less than substantial impact on its significance. The route of the former Sandgate branch railway, also undesignated, would be unaffected by the proposals.

Ecology

5.8 During construction, the site would experience extensive clearance and disturbance. Whilst most of the site is of limited habitat value, the area of grassland adjoining Princes Parade is of local importance, particularly as a habitat for invertebrates. In the absence of mitigation, the loss of this area would amount to a moderate adverse effect.

5.9 The site is used by several protected species, including common toad, reptiles (slow-worm, grass snake and common lizard), bats, and birds such as Cetti's warbler, house sparrow and reed bunting. In the absence of mitigation, the effects due to physical disturbance and habitat loss would be minor adverse for common toad and birds, and moderate adverse for reptiles and bats. Temporary lighting could also deter foraging bats. Any accidental killing of individual animals would be categorised as a major adverse effect.

5.10 Work such as vegetation clearance, remediation and landscaping will take place in close proximity to the canal, which is of county-level importance as eutrophic standing water habitat and a Local Wildlife Site. In the absence of mitigation, accidental spillages or uncontrolled disposal of wastes could contaminate runoff into the canal, resulting in moderate or major adverse effects.

5.11 A range of protective measures will be implemented as part of the CEMP. These are anticipated to include:

- Pollution prevention (e.g. waste disposal protocols and remedial drainage);
- Demarcation of fenced no-go areas;
- Creation of compensatory grassland and scrub habitats as permitted by phasing;
- Supervised clearance and erection of "herptile" fencing;
- Trapping and translocation of reptiles to created or enhanced off-site habitats;
- Nesting bird surveys or clearance of nesting habitat outside the breeding season; and
- Controls on temporary lighting.

5.12 On the assumption that these measures are effectively implemented and monitored, the residual effects during construction are predicted to be negligible in all cases except for those relating to breeding reed bunting and the loss of on-site grassland/invertebrate habitat, which would be minor adverse.

5.13 The completed development will represent a fundamental change to the habitat status of the site, as well as introducing potential sources of impact such as physical barriers to movement, lighting, human disturbance, inappropriate management, traffic and predation by pets. In the absence of mitigation, the effects on the numbers of common toad and reptiles are anticipated to be minor to major adverse, and moderate to major adverse respectively. The potential effect on foraging bats due to the introduction of lighting is predicted to be moderate adverse.

5.14 Compensatory habitat for a range of species will be created within the substantial areas of green space to be retained and re-provided within the development. A Landscape and Ecological Management Plan will protect the long-term value of these habitats, including foraging, shelter and breeding opportunities for protected species (e.g. house sparrow boxes and reptile hibernacula). Selected mitigation measures will be incorporated by design, e.g. the location and specification of lighting to avoid light spill onto the canal or adjoining habitats.

5.15 With the adoption of such measures, the residual long-term effects on protected species are predicted to become negligible in all cases, except for a minor adverse effect on reptiles (due to cat predation) and a major adverse effect on common toad (if individual animals are accidentally killed on the road).

Flood Risk and Drainage

5.16 The Royal Military Canal is classified as a "main river" and receives flow from the Seabrook Stream and other catchments to the north. The EA Flood Map locates the site within Flood Zone 3a, which denotes a "high probability" of flooding. However, most of the site has been raised at least 3m above the level of the canal, and the risk of fluvial flooding is therefore considered to be low. A similar level of risk has been identified for other non-tidal sources (e.g. groundwater and sewers).

5.17 The main flooding risk relates to possible over-topping of the sea defences under storm surge conditions. Redevelopment of the site would introduce a substantial number of "more vulnerable" receptors (i.e. residents), creating a potential for a substantial adverse effect. However, ground-floor levels would be set at a minimum agreed with the EA, and the nearest properties would be set back behind a secondary seawall, to be constructed to the rear of the remodelled promenade. As a result, the residual effect would be reduced to moderate adverse. The potential effects associated with other flooding sources are anticipated to be moderate adverse, reducing to minor adverse with the incorporated mitigation.

5.18 The proposals would represent a fundamental change to the runoff characteristics of the site, which in combination with an assumed high level of sensitivity for the canal could in the absence of mitigation give rise to a major adverse effect. However, runoff would be discharged to the foreshore, ensuring that there would be virtually no change in runoff to the canal, and that the residual effect would be negligible.

5.19 The extent of site disturbance, together with the known presence of contamination and the high sensitivity of the canal, creates a potential for a major adverse effect if polluted runoff occurs during construction. However, the remediation of contamination, together with adherence to best practice during activities such as dewatering, would reduce the residual effect to moderate adverse. With incorporated mitigation, including the use of oil interceptors on drainage from trafficked areas, the residual effect of pollution from the completed development is predicted to be minor adverse. The foul drainage network will be upgraded to accommodate the discharge from the development, such that any effects due to surcharging would be avoided.

Geo-Environment

5.20 Site investigations and monitoring have indicated the widespread presence of contamination within made ground across the site, including elevated concentrations of polycyclic aromatic hydrocarbons (PAH), lead, arsenic (one recorded exceedance) and asbestos (but at non-hazardous concentrations). The concentrations of hydrocarbons are present at levels sufficient to pose a risk to human health, whilst phytotoxic metals are present at levels sufficient to affect plant growth. Ground gas is also present at levels that could pose a risk if allowed to collect in unventilated spaces.

5.21 However, there is no evidence that this contamination is causing environmental harm or poses a risk to current users of the site. The hydrocarbons, for example, are relatively immobile, whilst the canal is separated hydraulically from the site (probably by a clay lining installed during its construction). In addition, the site is well vegetated, providing little opportunity for people to come into contact with contaminated material.

5.22 Uncontrolled disturbance of the site during construction could mobilize contaminants (e.g. in dust emissions and runoff, or during piling), giving rise to a potential for moderate adverse effects associated with the following:

- Disposal of excavated material (some of which would be hazardous waste);
- Risk to site workers (due to contact, ingestion/inhalation or exposure to ground gas);
- Contamination of controlled waters (groundwater and the canal);
- Accidental spillage (e.g. of oils or cement slurry); and
- Damage to polymeric services.

5.23 A potential for minor adverse effects has been identified in relation to the risk of contaminated dust emissions or mobilization of contaminants within groundwater or runoff, affecting off-site habitats such as the canal.

5.24 Any sources of ground contamination or gas that may remain at completion of the development could pose a residual risk to the surrounding environment and to occupants or users of the site. The associated effects would be negligible adverse for users of the leisure centre (since significant excavation would be required and users would be separated from any contaminated soil by the building structure); minor adverse for new residents without gardens; and moderate adverse for new residents with gardens and users of public open space. The potential effects on off-site receptors would be negligible, except for the effect on controlled waters, which would be minor.

5.25 In practice, mitigation in accordance with the regulatory regime would ensure that an acceptable level of residual risk would be achieved. The principal measures during construction would include:

- Further gas and groundwater monitoring;
- Analysis and remediation of contaminated soils and groundwater;
- Protocols for the handling and off-site disposal of hazardous wastes;
- Health and safety procedures to protect on-site workers; and
- Monitoring and control of activities capable of spreading contamination.

5.26 The engineering and design of the development would incorporate a range of measures to minimize the residual risk from any remaining contamination. These would include:

- Gas protection for potentially vulnerable spaces (e.g. basements);
- Use of contaminant-resistant materials for utilities and foundations; and
- Use of clean cover, break-layers and imported topsoil for all areas of landscaping.

5.27 As a result, the residual effects during construction would be negligible. The residual long-term effects would be minor beneficial, since the remediation and containment of site contamination would neutralize the environmental and health risks it currently represents.

Landscape and Views

5.28 The construction works would substantially alter the character of the site, as vegetation is removed, earthmoving takes place and the built development takes shape. However, the works would be phased, with later phases grassed temporarily following initial remediation work, and the impacts during any one phase would be temporary. The effects on views and character are therefore not anticipated to be significant, except for the permanent loss of vegetation, which would amount to a major to moderate effect.

5.29 On completion, the increase in built development and loss of openness would give rise to a moderate adverse effect on site character; a major to moderate adverse effect on the RMC and Imperial Hythe local landscape character area (LLCA); and a moderate to minor

adverse effect on the Princes Parade Coastline LLCA. As a result, three of the assessment views would experience moderate adverse effects, relating to users of Princes Parade and the public open space at the eastern end of the canal, and to residents south of Hospital Hill; whilst two of the views would experience major to moderate adverse effects, relating to users of the Seaview Footbridge and associated PROW, and residents to the north of the canal who enjoy seaward views across the site.

5.30 Once landscaping has become established, the moderate adverse effect on site character would remain, due to the net increase in built development, but the effects on the RMC and Imperial Hythe Coastal Strip LLCA and the Princes Parade Coastline LLCA would decrease to moderate adverse and minor adverse respectively. In addition, the adverse effects on the assessment views and receptors would decrease to moderate to minor in three cases and to moderate in two cases.

Socio-Economics

5.31 During construction, the development would provide 644 net job years of temporary employment, contributing more than £10 million in gross value added (GVA) to the local economy. These would amount to minor beneficial effects.

5.32 The completed development would give rise to the following beneficial effects:

- Direct provision of 45-50 jobs (excluding those transferred from Hythe Pool);
- Indirect employment generated by additional spending by the 354 new residents
- Additional GVA of >£750,000 generated by the overall increase in employment;
- Provision of up to 150 new homes = 37.5% of the district's annual housing target;
- Provision of up to 45 affordable homes = 45% of the district's annual target.

5.33 Each of these effects is considered to be of minor significance. In addition, the leisure centre will replace Hythe Pool, which is subject to significant constraints on availability due to repeated closure for repairs. The centre will also address the under-supply of swimming pools and health/fitness facilities within the district. This is considered to amount to a beneficial effect of moderate significance. The development will re-provide the Seabrook play area as part of a total of 1.02ha of children's play space, which will meet the needs of the new residents.

5.34 The only potentially adverse effects would relate to the following:

- Additional demand for primary healthcare, amounting to an extra six patients per GP if spread across the 58 GPs within a 5km radius, which amounts to a negligible effect;

- Additional demand for education, amounting to 22 primary school places and 16 secondary school places. Since there is no spare capacity at the nearest primary school (Seabrook), this is regarded as a minor adverse effect, although there are 54 surplus primary places with a 3km radius). In addition, there are 747 surplus secondary school places within a 5km radius, such that the additional demand represents a negligible effect.

- The development would result in a net loss of 3.91ha of semi-natural green space, which amounts to a minor adverse effect. However, 3.85ha of green space would be re-provided within the scheme, which is more than is required to meet the needs of the new residents. Furthermore, the re-provided space would be more accessible and of higher quality than the existing site, whilst the Folkestone/Hythe area currently has an over-provision of green space.

5.35 Overall, the beneficial effects would demonstratively outweigh the adverse effects. It is anticipated that additional capacity at Seabrook Primary School would be provided through CIL contributions, thereby mitigating the adverse effect on education and reducing it to negligible significance.

Transport

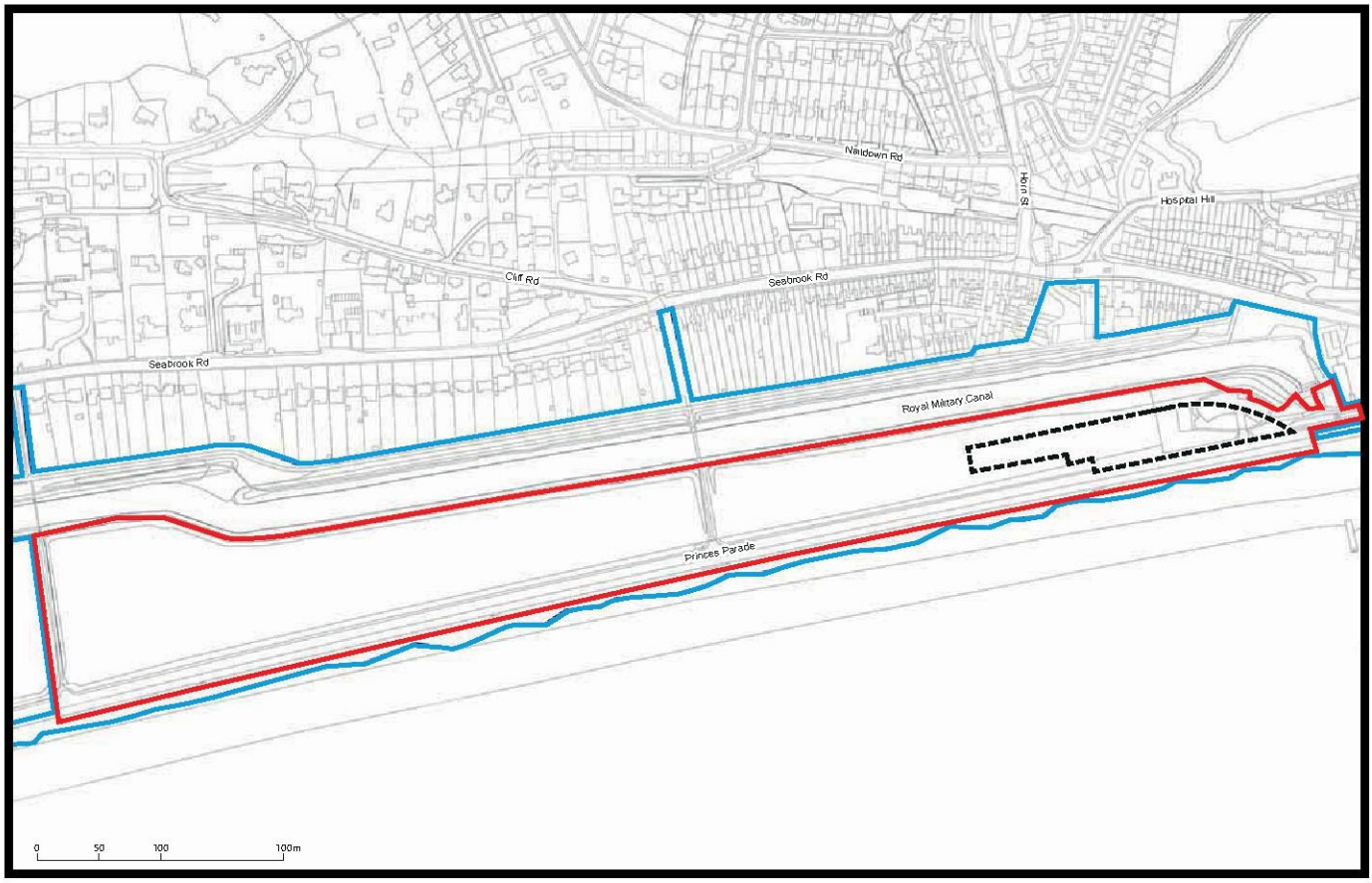
5.36 During the construction phase, additional traffic (notably HGVs) and highway/utility works would cause a degree of delay and inconvenience, amounting to a minor adverse effect. However, this would be temporary, and would be minimized by traffic management measures as part of the CEMP.

5.37 Traffic generated by the completed development would lead to some reduction in capacity at key junctions in peak periods, causing additional driver delay. The greatest increase in traffic flows would occur at Twiss Road/South Road, averaging 14.5%, whilst the longest delay would be at Seabrook Road/Princes Parade, at 3.38 seconds. These impacts are not considered to be significant. Increased demand for public transport, particularly bus services, is also not anticipated to be significant.

5.38 The development includes a range of measures to improve pedestrian/cycle access. These include the remodelling of Princes Parade to provide a promenade with pedestrian/cycle priority, a reduction in speed limit on the diverted road, the provision of formal crossing points, and enhanced links to the existing network along the canal and seawall. These measures amount to a major beneficial effect, and would readily accommodate the increased demand from the development.

Cumulative Effects

5.39 For the majority of topics, either no cumulative effects have been identified (flood risk and drainage, geo-environment and transport), or any potential effects are not anticipated to be significant (ecology, landscape and views, socio-economics and transport). The main potential for such effects relates to socio-economics, where the beneficial (e.g. housing supply) and adverse (e.g. education capacity) effects could be increased. However, on the assumption that school capacity is increased in line with CIL contributions from residential developments, there should be no net effect.



Application Site

Other Land in Ownership of Applicant

Boundary of Detailed and Outline Areas

FIGURE 1

Application Site

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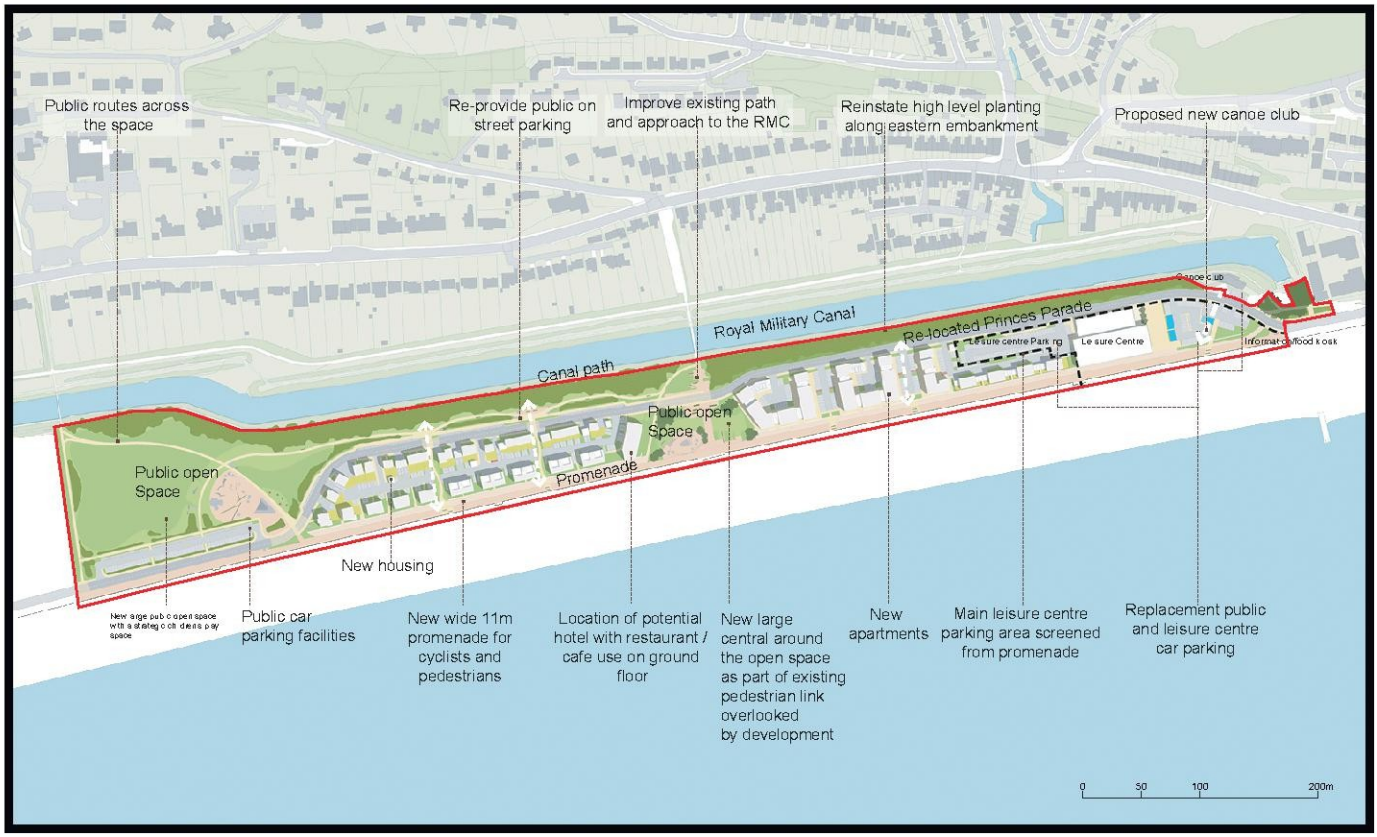

Application Site

FIGURE 2

Illustrative Masterplan

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