Sustainability Appraisal (SA) of the Shepway Core Strategy

SA Report

October 2012

Prepared for
Shepway District Council
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<td>October 2012</td>
<td>SA Report published for consultation alongside a schedule of proposed modifications to the Shepway Core Strategy following the outcomes of the Examination in Public hearing sessions held in May 2012</td>
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INTRODUCTION
URS is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Shepway Core Strategy. SA is a mechanism for considering the impacts of a draft plan, and alternatives, in terms of sustainability issues, with a view to avoiding and mitigating adverse impacts and maximising the positives. SA of Core Strategies is a legal requirement.

It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which were prepared in order to transpose into national law the EU Strategic Environmental Assessment (SEA) Directive. The Regulations require that a report is published for consultation alongside the draft plan that ‘identifies, describes and evaluates’ the likely significant effects of implementing ‘the plan, and reasonable alternatives’. The report must then be taken into account, alongside consultation responses, when finalising the plan.

The Regulations prescribe the information that must be contained within the report, which for the purposes of SA is known as the ‘SA Report’. Essentially, there is a need for the SA Report to answer the following four questions:

1. What’s the scope of the SA?
   - This is an opportunity to present a review of sustainability issues that exist in relation to the plan and identify those that should be a particular focus of the SA (given that issues are potentially numerous, and SA should be focused and concise)

2. What has Plan-making / SA involved up to this point?
   - Prior to preparing the draft plan there must be (as a minimum) one plan-making / SA iteration at which point alternative approaches to addressing key plan issues are subjected to SA and findings taken on-board by the plan-makers.

3. What are the appraisal findings at this current stage?
   - i.e. what are the predicted sustainability effects of the draft plan and what changes might be made to the plan in order to avoid or mitigate negative effects and enhance the positives.

4. What happens next?
   - In particular, there is a need to think about how the effects of the plan will be monitored once it is adopted and being implemented.

These ‘SA questions’ are derived from Schedule 2 of the Regulations, which present the information to be provided within the report under a list of ten points. Table 1.1 makes the links between the ten Schedule 2 requirements and the four SA questions. Appendix I of this SA Report explains the process of ‘making the links’ in more detail.

The four SA questions are answered in turn across the four subsequent parts of this Report.

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1. The Core Strategy is a ‘Local Plan’ as defined by the Town and Country Planning (Local Planning) (England) Regulations 2012 and hence an SA Report must be published for consultation alongside the document, which in this case is the Shepway Core Strategy Proposed Submission Document July 2011 as amended by the Proposed Modifications Autumn 2012 Consultation.
2. Directive 2001/42/EC
3. Regulation 12(2)
Table 1.1: Questions that must be answered (sequentially) within the SA Report

<table>
<thead>
<tr>
<th>SA QUESTION</th>
<th>SA SUB-QUESTION</th>
<th>CORRESPONDING REQUIREMENT (THE REPORT MUST INCLUDE…)</th>
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<tr>
<td>What's the scope of the SA?</td>
<td>What's the Plan seeking to achieve?</td>
<td>• An outline of the contents and main objectives of the plan</td>
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<td></td>
<td>What's the sustainability 'context'?</td>
<td>• The relationship of the plan with other relevant plans and programmes&lt;br&gt;• The environmental protection objectives, established at international or national level, relevant to the plan</td>
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<td></td>
<td>What's the sustainability 'baseline' at the current time?</td>
<td>• The relevant aspects of the current state of the environment&lt;br&gt;• The environmental characteristics of areas likely to be significantly affected</td>
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<td></td>
<td>How would the baseline evolve without the plan?</td>
<td>• The likely evolution of the current state of the environment without implementation of the plan</td>
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<td></td>
<td>What are the key issues that should be a focus of SA?</td>
<td>• Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance</td>
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<td>What has Plan-making / SA involved up to this point?</td>
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<td>• An outline of the reasons for selecting the alternatives dealt with (and thus an explanation of why the alternatives dealt with are 'reasonable')&lt;br&gt;• The likely significant effects on the environment associated with alternatives / an outline of the reasons for selecting preferred alternatives / a description of how environmental objectives and considerations are reflected in the draft plan.</td>
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<tr>
<td>What are the appraisal findings at this current stage?</td>
<td></td>
<td>• The likely significant effects on the environment associated with the draft plan&lt;br&gt;• The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan</td>
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<tr>
<td>What happens next (including monitoring)?</td>
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<td>• A description of the measures envisaged concerning monitoring</td>
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PART 1: WHAT’S THE SCOPE OF THE SA?
INTRODUCTION (TO PART 1)

4.1.1 This is Part 1 of the SA Report, the aim of which is to introduce the reader to the scope of the SA. In particular, and as required by the Regulations\(^4\), this Chapter answers the series of questions below.

<table>
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<tr>
<th>SA QUESTION ANSWERED</th>
<th>CORRESPONDING REQUIREMENT (THE REPORT MUST INCLUDE…)</th>
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Consultation on the scope

4.2.1 The Regulations require that: *When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies.* In England, the consultation bodies are Natural England, The Environment Agency and English Heritage.\(^5\) As such, these authorities were consulted on the scope of this SA in late 2007. This consultation was achieved by providing a ‘Scoping Report’ for their comment. The general public were also consulted on the scope at this time. The document was amended to reflect consultation responses (in early 2008) and is available at: [http://www.shepway.gov.uk/content/view/1791/206/](http://www.shepway.gov.uk/content/view/1791/206/).

\(^4\) Environmental Assessment of Plans and Programmes Regulations 2004

\(^5\) In-line with Article 6(3) of the SEA Directive, these consultation bodies were selected because ‘by reason of their specific environmental responsibilities,[they] are likely to be concerned by the environmental effects of implementing plans and programmes.’
5 WHAT IS THE PLAN SEEKING TO ACHIEVE?

The SA Report must include…

- An outline of the contents, main objectives of the plan

5.1.1 The Core Strategy is a long-term plan forming the first and most important element of the planning policy ‘framework’ for Shepway. It is about ‘spatial planning’; bringing together the aims and actions of the government, local councils, residents, businesses and voluntary groups, by managing land-use and development spatially. The Core Strategy sets out to address three strategic ‘challenges’, under which sit a series of more specific ‘aims’:

- The challenge to improve employment, educational attainment and economic performance in Shepway:
  - Increase the population of settlements and their prosperity;
  - Enhance the viability/vitality and appeal of Town Centres; with Folkestone as a major commercial, cultural and tourism centre featuring upgraded connections and public realm;
  - Achieve real terms increases in gross incomes;
  - Grow the proportion of residents with higher level qualifications;
  - Deliver a flexible supply of employment land in terms of location, size and type;
  - Maximise the efficient use of infrastructure and secure further improvements unlocking the development of priority sites, communities and areas;
  - Provide housing of a quality and type suited to long term economic development needs;
  - Regenerate deprived neighbourhoods, including Central and Northern Folkestone and in pockets within Romney Marsh; and
  - Expand cultural and creative activity in the District, with refurbished premises and spaces in Folkestone’s old town forming a vibrant Creative Quarter visitor attraction.

- The challenge to enhance the management and maintenance of the rich natural and historic assets in Shepway:
  - Enhance the connectivity of green infrastructure and make a positive contribution to managing the impacts of climate change through adaptation and mitigation;
  - Minimise local carbon emissions, maintain air quality, control pollutants and promote sustainable waste management;
  - Protect and enhance habitats and species to sustain biodiversity, particularly where of international and national significance including a focus on Dungeness and Folkestone Warren;
  - Manage sensitive landscapes shaping the character of the District, especially on the edge of settlements or within the Kent Downs AONB and its setting;
  - Increase the efficiency of water management to maintain local water resources and to improve the quality of watercourses and the sea;
  - Maintain the sense of openness and tranquillity of the countryside and undeveloped coast;
  - Manage coastal environments strategically to ensure resilience to climate change processes, reducing the risk to life and property from flood hazards, and managing coastal utilisation for recreational purposes;
– Enhance the character and function of Shepway's historic towns and villages, and historic assets/visitor attractions; and
– Promote choice in means of transport through opportunities for walking and cycling and improved public transport networks and information.

• The challenge to improve the quality of life and sense of place, vibrancy and social mix in neighbourhoods, particularly where this minimises disparities in Shepway.
  – Maintain cohesive neighbourhoods and encourage increased voluntary activity, the retention of viable local community buildings and civic interest in community development;
  – Ensure choice of good quality residential accommodation is maximised within individual neighbourhoods and villages, with a mix of housing size, type and tenure;
  – Assist in meeting the essential needs of vulnerable local social groups and provide more properties that allow people to remain living independently;
  – Improve sports facilities and reduce relative disparities in the health of communities;
  – Increase access to services that are appropriate to the needs of the local population and maintain essential rural services;
  – Improve the urban environment, including the usage and sense of security of key public spaces including major parks, town centres and public transport stations;
  – Reintegrate physically divided or highly linear villages and neighbourhoods through central social infrastructure or community development;
  – Improve Town Centre environments, facilities and communications for businesses and visitors in the Romney Marsh area; and
  – Consolidate communities that are hosting significant new developments including at Hawkinge and Hythe.

5.2

What’s the plan not trying to achieve?

5.2.1

It is important to emphasise that the Core Strategy is a strategic document. The Core Strategy allocates two large sites for development that are considered pivotal for the future of the District (i.e. of ‘strategic importance’), but does not go as far as to allocate smaller sites or set policies for Development Management. This detail will be added in later local plan documents. The strategic nature of the Core Strategy is reflected in the scope of the SA.
6 WHAT’S THE SUSTAINABILITY ‘CONTEXT’?

The SA Report must include…

- The relationship of the plan with other relevant plans and programmes
- The environmental protection objectives, established at international or national level, relevant to the plan

6.1 Introduction

6.1.1 An important step when seeking to establish the appropriate ‘scope’ of an SA involves reviewing ‘sustainability context’ messages (e.g. relating to objectives or issues) set out within relevant published plans, policies, strategies and initiatives (PPSIs).

6.1.2 The sustainability context presented within the 2008 Scoping Report requires some updating. In particular, there is a need to reflect the National Planning Policy Framework (NPPF) which, read as a whole, constitutes the Government's view of what sustainable development in England means in practice for the planning system. Other recent PPSIs are also reviewed in order to ensure the net is cast suitably wide.

6.2 Air Quality

The National Planning Policy Framework (2012)

6.2.1 The NPPF makes clear that planning policies should be compliant with and contribute towards EU limit values and national objectives for pollutants; and states that new and existing developments should be prevented from contributing to, or being put at unacceptable risk from, or being adversely affected by unacceptable levels of air pollution. This includes taking into account Air Quality Management Areas (AQMAs) and cumulative impacts on air quality.

Additional PPSIs

6.2.2 The Air Quality Strategy sets out air quality objectives and policy options to further improve air quality in the UK. This is supplemented by more recent guidance on how air pollution and climate objectives can be realised together through an integrated policy approach (Box 6.1).


The Air Quality Strategy sets out plans to improve and protect air quality in the UK. It considers ambient air quality only, leaving occupational exposure, in-vehicle exposure and indoor air quality to be addressed separately. The strategy sets health-based objectives for nine main air pollutants. Performance against these objectives is monitored where people are regularly present and might be exposed to air pollution.

Given the rapid development of climate change focused policy since the publication of the Air Quality Strategy, additional guidance has been published on the synergies between these two issues. In particular, it notes the potential for additional health benefits through the closer integration of climate and air pollution policy. It is suggested that co-benefits can be realised through a variety of means, including promoting low-carbon vehicles and renewable energy.

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8 Benzene; 1,3-butadiene; carbon monoxide (CO); lead; nitrogen dioxide (NO2); ozone; particles (PM10); sulphur dioxide (SO2); and polycyclic aromatic hydrocarbons.
6.3  Biodiversity and Open Space

The National Planning Policy Framework (NPPF, 2012)\(^9\)

6.3.1 In order to contribute to the Government’s commitment\(^10\) to halt the overall decline in biodiversity, the NPPF states that the planning system should look to minimise impacts on biodiversity, with net gains in biodiversity achieved wherever possible.

6.3.2 The NPPF states that planning policies should promote the ‘preservation, restoration and recreation of priority habitats, ecological networks’ and the ‘protection and recovery of priority species’. The NPPF contains a commitment to ‘plan for biodiversity at a landscape-scale across local authority boundaries’.

6.3.3 The NPPF calls upon local authorities to set criteria based policies for the protection of internationally, nationally and locally designated sites, giving weight to their importance not just individually but as a part of a wider ecological network.

6.3.4 Positive planning for ‘green infrastructure’ is recognised as part of planning for ecological networks. Green infrastructure is defined as being: ‘a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities’.

Additional PPSIs

6.3.5 In addition to the NPPF, it is worthwhile taking note of the initiatives presented within the recent Natural Environment White Paper and related documents (Box 6.2). The latest developments in relation to the Wildlife Trusts’ ‘Living Landscapes’ initiative and recent guidance on biodiversity and green infrastructure provides further supporting detail (Box 6.3).


\(^10\) At the European level, a new EU Biodiversity Strategy was adopted in May 2011 in order to deliver on the established Europe-wide target to ‘halt the loss of biodiversity and the degradation of ecosystem services in the EU by 2020’.
The NEWP sets out the importance of a healthy, functioning natural environment to sustained economic growth, prospering communities and personal well-being. It was in part a response to the UK’s failure to halt and reverse the decline in biodiversity by 2010 and it signalled a move away from the traditional approach of protecting biodiversity in ‘nature reserves’ to adopting a landscape approach to protecting and enhancing biodiversity. The NEWP also aims to create a green economy in which economic growth and the health of our natural resources sustain each other and markets, business and Government better reflect the value of nature. It includes commitments to:

- Halt biodiversity loss, support functioning ecosystems and establish coherent ecological networks by 2020;
- Establish a new voluntary approach to biodiversity offsetting to be tested in pilot areas;
- Enable partnerships of local authorities, local communities and landowners, the private sector and conservation organisations to establish new Nature Improvement Areas; and
- Address barriers to using green infrastructure to promote sustainable growth.
- In terms of urban green infrastructure, the NEWP recognises that it is ‘one of the most effective tools available to us in managing environmental risks such as flooding and heatwaves’.

The NEWP drew on the findings of the National Ecosystem Assessment (NEA), a major project that was able to draw conclusions on the ‘substantial’ benefits that ecosystems provide to society directly and through supporting economic prosperity. The NEA identified development as a key driver of loss and biodiversity offsets as a possible means of increasing ‘private sector involvement in conservation and habitat creation’. The Government has also published ‘Biodiversity 2020’, which builds on the Natural Environment White Paper and sets out the strategic direction for biodiversity policy for the next decade. In relation to planning, it states that the objective should be to: ‘guide development to the best locations, encourage greener design and enable development to enhance natural networks’.

The Wildlife Trusts ‘Living Landscapes’ initiative focuses on the conservation of biodiversity over large areas of land where habitats are fragmented. Within ‘Living Landscapes’, a spatial approach to ecological restoration is applied with the aim of:

- Protecting and maximising the value of areas that are already rich in wildlife;
- Expanding, buffering, and creating connections and stepping stones between these areas; and
- Making the wider landscape more permeable to wildlife.

It is hoped that this restoration will both provide a healthy environment in which wildlife can thrive and enhance those natural processes that benefit people. A partnership approach is called for, with local government, agencies, the private sector and voluntary bodies required to act together.

In support of this landscape scale approach and the NPPF’s call for positive planning for green infrastructure (GI), the TCPA and the Wildlife trusts have produced guidance on ‘Planning for Biodiversity’. It notes that as well as benefitting biodiversity, green infrastructure can help to ‘deliver and complement some of the services currently provided by hard engineering techniques’. Local authorities are called upon to ‘identify strategic GI within Local Plans’ and also focus on making the built environment permeable for wildlife.

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6.4 Climate Change Mitigation and Adaptation

The National Planning Policy Framework (2012)

6.4.1 The NPPF identifies as a ‘core planning principle’ the need to ‘support the transition to a low carbon future in a changing climate’. A key role for planning in securing radical reductions in GHG emissions is envisioned, with specific reference made to meeting the targets set out in the Climate Change Act 2008. Specifically, planning policy should support the move to a low carbon future through:

- planning for new development in locations and ways which reduce GHG emissions;
- actively supporting energy efficiency improvements to existing buildings;
- setting local requirements for building’s sustainability in a way that is consistent with the Government’s zero carbon buildings policy;
- positively promoting renewable energy technologies and considering identifying suitable areas for their construction; and
- encouraging those transport solutions that support reductions in greenhouse gas emissions and reduce congestion.

6.4.2 The NPPF requires Local Plans to take account of the effects of climate change in the long term, taking into account factors such as ‘flood risk, coastal change, water supply and changes to biodiversity and landscape. Planning authorities are encouraged to ‘adopt proactive strategies’ to adaptation. New developments should be planned so that they avoid increased vulnerability to climate change impacts. Risks should be managed through adaptation measures including the well planned green infrastructure.

6.4.3 In terms of flooding, the NPPF calls for development to be directed away from areas highest at risk, with development ‘not to be allocated if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding’. Where development is necessary, it should be made safe without increasing levels of flood risk elsewhere. The NPPF also states that local planning authorities should avoid ‘inappropriate development in vulnerable areas or adding to the impacts of physical changes to the coast’ in order to reduce the risk from coastal change.

Additional PPSIs

6.4.4 The role that local authorities can play in reducing emissions is the subject of recent Committee on Climate Change guidance. This is summarised below in Box 6.4, alongside further information on the future of low-carbon district heating networks. Box 6.5 meanwhile discusses the new approaches to flood risk management brought about through the 2010 Flood and Water Management Act. This is supplemented with additional information on the benefits of using Sustainable urban drainage Systems (SuDs) in developments. Finally, Box 6.6 highlights the importance of considering the social dimensions of vulnerability to climate change when producing adaptation policy.

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16 The Climate Change Act 2008 sets targets for greenhouse gas (GHG) emission reductions through action in the UK of at least 80% by 2050, and reductions in CO2 emissions of at least 26% by 2020, against a 1990 baseline.
Planning functions are described as being a ‘key lever in reducing emissions and adapting localities to a changing climate’, with it considered particularly important that local authorities use these to:

- Enforce energy efficiency standards in new buildings and extensions;
- Reduce transport emissions by concentrating new developments in existing cities and large towns and/or ensuring they are well served by public transport;
- Work with developers to make renewable energy projects acceptable to local communities;
- Avoid increasing the area’s risk to climate change impacts by locating new development in areas of lowest flood risk; and
- Plan for infrastructure such as low-carbon district heating networks, green infrastructure and sustainable drainage systems.

With regards to the latter point on low-carbon district heating networks, the DECC produced document ‘The future of heating’ provides further guidance. It points out that around half (46%) of the final energy consumed in the UK is used to provide heat, contributing roughly a third of the nations greenhouse gas emissions. Renewable heat currently represents 1% of heat generation in the UK, although this is expected to grow significantly if decarbonisation targets are to be met. The Government’s vision is of: ‘buildings benefiting from a combination of renewable heat in individual buildings, particularly heat pumps, and heat networks distributing low carbon heat to whole communities...focusing first on the energy efficiency of our buildings...’

### Box 6.5: ‘Flood and Water Management Act’\(^{19}\) (2010) and ‘Planning for SuDs’\(^{20}\) (2010)

The Flood and Water Management Act highlights that alternatives to traditional engineering approaches to flood risk management include:

- Incorporating greater resilience measures into the design of new buildings, and retro-fitting at risk properties (including historic buildings);
- Utilising the environment, such as management of the land to reduce runoff and harnessing the ability of wetlands to store water;
- Identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere;
- Planning to roll back development in coastal areas to avoid damage from flooding or coastal erosion; and
- Sustainable drainage systems (SuDS)
  - N.B. The government proposes that the provisions of Schedule 3 to the Flood and Water Management Act 2010 will come into force on the 1st of October 2012 and will make it mandatory for any development in England or Wales to incorporate SuDs.

In relation to SuDS, further guidance is provided in the document ‘Planning for SuDs’. This report calls for greater recognition of the opportunities for multiple benefits that water management can present. It suggests that successful SuDS are capable of ‘contributing to local quality of life and green infrastructure’.

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\(^{17}\) Committee on Climate Change (2012) How local authorities can reduce emissions and manage climate risk [online] available at:


\(^{20}\) CIRIA (2010) Planning for SuDs – making it happen [online] available at:
[http://www.ciria.org/service/knowledgebase/AM/ContentManagerNet/ContentDisplay.aspx?Section=knowledgebase&NoTemplate=1&ContentID=18465](http://www.ciria.org/service/knowledgebase/AM/ContentManagerNet/ContentDisplay.aspx?Section=knowledgebase&NoTemplate=1&ContentID=18465) (accessed 07/12)
Box 6.6: ‘Climate change, justice and vulnerability’

This report calls for greater recognition of the social dimensions of vulnerability to climate change when considering adaptation policy. It notes that how badly a person or group will be affected by an extreme weather event is determined not only by their exposure to the event, but also on their vulnerability. This combination of factors can be described in terms of ‘Climate Disadvantage’. This is a function of:

a. the likelihood and degree of exposure to a hazard; and

b. individual or group vulnerability with regards to such hazards.

Once recognised, these social dimensions of vulnerability require a widening of the scope of climate adaptation policy to take into account a broader set of concerns than has traditionally been the case. These concerns will include a number of areas of social policy which are not specifically concerned with climate change. For instance, a variety of social factors can affect the capacity of households to prepare for, and respond to and recover from flooding:

- Low-income households are less able to take measures to make their property resilient to flooding and to respond to and recover from the impacts of floods
- The ability to relocate is affected by wealth, as is the ability to take out insurance against flood damage.
- Social networks affect the ability of residents to respond to flooding. For example, by providing social support and a response network, and by improving the local knowledge base.

6.5 Community, Health and Social Inclusion

The National Planning Policy Framework (2012)

6.5.1 The social role of the planning system is defined in the NPPF as ‘supporting vibrant and healthy communities’, with a ‘core planning principle’ being to ‘take account of and support local strategies to improve health, social and cultural wellbeing for all’.

6.5.2 The NPPF advises that planning policies should promote the retention and development of local services and community facilities such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship. The NPPF states that ensuring that there is a ‘sufficient choice of school places’ is of ‘great importance’. To this end, local authorities are called upon to take a ‘proactive, positive and collaborative approach’ to bringing forward ‘development that will widen choice in education’.

6.5.3 Specific protection and promotion of town centres is encouraged. Specifically, local planning authorities should ‘define the extent of town centres’ and set policies that ‘make clear which uses will be permitted in such locations’, and ‘promote competitive town centres that provide customer choice and a diverse retail offer and which reflect the individuality of town centres’.

Additional PPSIs

6.5.4 Further policy background is provided by the ‘Marmot review’ which discusses the relationship between planning and health and the Heath and Social Care Act 2012, which reflects the changing legislative environment relating to local government and health (Box 6.7). This is followed by details of the East Kent Local Strategic Partnership’s long term sustainable community strategy (Box 6.8). Finally, Box 6.9 considers local food production.


‘Fair Society, Healthy Lives’ (‘The Marmot Review’) investigated health inequalities in England and the actions needed in order to tackle them. Subsequently, a supplementary report was prepared providing additional evidence relating to spatial planning and health. It does so on the basis that that there is: ‘overwhelming evidence that health and environmental inequalities are inexorably linked and that poor environments contribute significantly to poor health and health inequalities’.

It highlights three main policy actions to ensure that the built environment promotes health and reduces inequalities. These should be applied on a universal basis, but with a scale and intensity that is proportionate to the level of disadvantage. Specifically these actions are to:

- ‘Fully integrate the planning, transport, housing, environmental and health systems to address the social determinants of health in each locality’
- ‘Prioritise policies and interventions that both reduce health inequalities and mitigate climate change by: improving active travel; improving good quality open and green spaces; improving the quality of food in local areas; and improving the energy efficiency of housing’
- ‘Support locally developed and evidence-based community regeneration programmes that remove barriers to community participation and action; and reduce social isolation’.

The increasing role that local level authorities are expected to play in producing health outcomes is well demonstrated by recent Government legislation. The Health and Social Care Act 2012 transfers responsibility for public health from the NHS to local government24, giving them a duty to improve the health of the people who live in their areas. This will require a more holistic approach to health across all local government functions.

Box 6.8: ‘Lighting the way to success: Sustainable Community Strategy’ (2009)25

‘Lighting the Way to Success’ is a long-term sustainable community strategy for the East Kent region in 2030 produced by the East Kent Local Strategic Partnership25. It sets out a vision in which East Kent will have blended the best of its ‘coastal location, landscape, culture and heritage for the benefit of all of its communities’. Its objectives include:

- Fairer, stronger and healthier communities, in resurgent coastal towns,
- High quality homes and a high quality of life; and
- A high quality, integrated transport network, with reduced congestion and pollution, offering a wide choice of accessible transport to all sections of the community.

Box 6.9: ‘Environmental Audit Committee – Sustainable Food’27 (2012)

This report highlights the lack of government guidance on providing communities with better access to local and sustainable food through Local Plans. It suggests that such guidance should encourage provisions within Local Plans that take account of such access and ‘ensure that communities are provided with open spaces to grow their own produce’.

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24 Upper tier and unitary local authorities


26 covering the districts of Canterbury, Dover, Shepway and Thanet

6.6 Cultural Heritage

The National Planning Policy Framework (2012)

6.6.1 The NPPF states that local planning authorities should set out in their local plan a ‘positive strategy’ for the ‘conservation and enjoyment of the historic environment’, including those heritage assets that are most at risk. Assets should be recognised as being an ‘irreplaceable resource’ that should be conserved in a ‘manner appropriate to their significance’, taking account of ‘the wider social, cultural, economic and environmental benefits’ that conservation can bring, whilst also recognising the positive contribution new development can make to local character and distinctiveness.

Additional PPSIs

6.6.2 Of further interest is the following summary of the Government’s vision and relevant strategic aims in relation to the historic environment (Box 6.10).


This document sets out the Government’s vision for the historic environment. It calls for those who have the power to shape the historic environment to recognise its value and to manage it in an intelligent manner in light of the contribution that it can make to social, economic and cultural life. Also of note is the reference to promoting the role of the historic environment within the Government’s response to climate change and wider sustainable development agenda.

6.7 Economy & Employment

The National Planning Policy Framework (2012)

6.7.1 The NPPF highlights the contribution the planning system can make to building a strong, responsive economy by: ‘Ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure’.

6.7.2 There is an emphasis on capitalising on ‘inherent strengths’, and to meeting the ‘twin challenges of global competition and of a low carbon future’. There is a need to support new and emerging business sectors, including positively planning for ‘clusters or networks of knowledge driven, creative or high technology industries’.

6.7.3 Furthermore, the NPPF states that local plans should support the sustainable growth and expansion of all types of business and enterprise in rural areas and promote the development and diversification of agricultural and other land-based rural businesses.

Additional PPSIs

6.7.4 In Box 6.11 below, the Government’s Local Growth White Paper is summarised. This is supplemented by information from two reports, the first of which focuses on local parades of shops, and the latter on rural economy (Box 6.12). Finally, the South East LEP and the Shepway Economic Development Strategy provide details of regional and local level aspirations (Box 6.13).

Box 6.11: The Local Growth White Paper

Government interventions should support investment that will have a long term impact on growth, working with markets rather than seeking to create artificial and unsustainable growth. In some cases this means focusing investment at areas with long term growth challenges, so that these areas can undergo transition to an economy that responds to a local demand. Places that are currently successful may also wish to prioritise activity to maximise further growth by removing barriers, such as infrastructure constraints. However, the White Paper also emphasises that: ‘This does not mean that every place will grow at the same rate or that everywhere will, or will want to, become an economic powerhouse. Long term economic trends make differences in economic performance inevitable and these can and do change over time’.

Specific examples of areas where it makes sense for Government intervention to tackle market failures include: investment in infrastructure; tackling barriers such as transport congestion and poor connections; other support to areas facing long term growth challenges where this can help them manage their transition to growth industries; and strategic intervention where it can stimulate private sector investment in new green technology in strategic locations.

Finally, the White Paper identifies that economic policy should be judged on the degree to which it delivers strong, sustainable and balanced growth of income and employment over the long-term. More specifically, growth should be: broad-based industrially and geographically, ensuring everyone has access to the opportunities that growth brings (including future generations), whilst also focused on businesses that compete with the best internationally.


Despite their local economic and social importance, shopping parades have been subject to a continued decline. In order to buck this trend, the report suggests the need for appropriate policy responses. It is suggested that:

- The diversity of neighbourhood parades is recognised through flexible policy initiatives. These responses should look to ‘reinforce local distinctiveness and community value, and develop the social function of neighbourhood parades’ with a view to underpinning ‘ongoing commercial viability’.
- The role of local parades in developing local economies by ‘providing a ‘seed-bed’ function for start-up businesses’ could be enhanced through the focused support for their ‘enterprise formation and employment growth potential’.

Another important area of concern for local economic growth is rural areas. The ‘significant untapped potential’ of rural areas to contribute to economic growth and employment is the focus of the report ‘Missing Links’. It considers distance to market to be a crucial concern and calls for the improvement of transport links and the provision of adequate digital infrastructure.


The South-East LEP33 sets out as its mission the creation of ‘the most enterprising economy in England. In order to achieve this aim, it sets out a number of objectives that are to be achieved over the next twenty years. Of particular relevance in this case are the following:

- Every community across the LEP will be served by super-fast (100 mbps or greater) broadband networks; and
- There will be a steady flow of public and private investment in strategic infrastructure, including creating even better connections to key global markets.

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33 encompassing East Sussex, Essex, Kent, Medway, Southend and Thurrock
On a more local level, the Shepway Economic Development Strategy sets out a vision for the District where, by 2017: ‘Shepway will have built upon its current strengths and will be making positive strides towards becoming a high quality coastal district offering a strong combination of creativity, successful education facilities, a skilled workforce that meets the needs of local businesses, new developments that inspire confidence and accessible business support that acts as a catalyst for growth’

6.8 Gypsy & Travellers

The National Planning Policy Framework (2012)

6.8.1 Whilst the NPPF does not set out any specific policies on Gypsy and Travellers, it does state that the framework should be read alongside the ‘Government’s planning policy for traveller sites’. In addition, local authorities, when preparing plans relating to travellers sites, should ‘have regard to the policies in [the] Framework so far as relevant’.

Additional PPSIs

6.8.2 The following is a summary of the Government’s policy on planning for Gypsy, Traveller, and Travelling Showpeople sites (Box 6.14):

Box 6.14: Planning policy for traveller sites

Travellers should be treated in a fair and equal manner that facilitates their traditional and nomadic way of life, whilst also respecting the interest of the settled community. Local authorities are called upon to make their own assessment of need for traveller sites, using a robust evidence base and effective engagement with stakeholder groups and other local authorities. Pitch targets (Gypsy and Travellers), and plot targets (Travelling Showpeople) should be set, with a five year supply of specific deliverable sites identified.

Aims include:
- Ensuring that local authorities work collaboratively to meet the need for sites;
- Promoting more private traveller site provision, whilst recognising that there will be those that cannot afford private sites;
- Reducing the number of unauthorised development and encampments;
- Ensuring that Local Plans include, fair, realistic and inclusive policies;
- Enabling the provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure; and
- Having due regard for the protection of local amenity and environment.

6.9 Housing

The National Planning Policy Framework (2012)

6.9.1 The NPPF states that local planning authorities should meet the ‘full, objectively assessed need for market and affordable housing’ in their area. With a view to creating ‘sustainable, inclusive and mixed communities’ authorities should ensure provision of affordable housing onsite or externally where robustly justified. Plans for housing mix should be based upon ‘current and future demographic trends, market trends and the needs of different groups in the community’. Larger developments are suggested as sometimes being the best means of achieving a supply of new homes, with these to be developed in accordance with the ‘principles of Garden Cities’.
### Additional PPSIs

6.9.2 Of further interest are the objectives of the Government in terms of housing, as laid out in its 2011 housing strategy (Box 6.15). This is supplemented by a summary of recent progress on housing issues.

**Box 6.15: ‘Laying the foundations’ (2011) and ‘The Housing Report’ (2012)**

The Government’s housing strategy ‘Laying the Foundations’ sets out a number of key objectives, including in relation to the quality of homes. The ‘Housing report’ report collates the official figures available on housing in order to establish whether the Government’s approach to housing is succeeding. A challenge identified for the Government is to produce a step change in housing in order to meet the nations needs and aspirations, especially given that: ‘Many of the external pressures on the housing market, ranging from a growing and ageing population to falling incomes, are likely to intensify over the coming years’.

The Government’s performance is analysed under a number of main headings, the following of which are of significance:

- **Housing Supply**: A small increase of new build is recorded, but this is from a historically low base. The number of completions in 2011 was 38% below the 2007 peak.
- **Overcrowding**: This situation is worsening, and current measures to tackle under-occupation may not necessarily resolve the problem.
- **Homelessness**: There has been a large increase in homeless acceptances and rough sleepers, with this problem potentially exacerbated by further cuts to Housing benefit during 2013.
- **Empty Homes**: Despite 720,000 homes currently being classed as empty, the situation seems to be an improving one. This is particularly the case with long-term empty homes, which are an issue in Shepway.
- **Home Ownership**: House prices are relatively steady, sales are up, and affordability is increasing. However, homeownership rates are falling and there is a decline in low cost ownership sales. Home ownership remains out of reach for most people.

### Landscape

The National Planning Policy Framework (2012)

6.10.1 The NPPF states that the planning system should protect and enhance valued landscapes. Particular weight is given to ‘conserving landscape and scenic beauty’. According to the NPPF, ‘great weight’ should be given to the conservation of the landscape and scenic beauty of Areas of Outstanding Natural Beauty (AONB), which have the ‘highest level of protection’ in this regard. The conservation of cultural heritage and wildlife in these areas is also an ‘important consideration’

6.10.2 The NPPF calls for planning policies and decisions to ‘encourage the effective use of land’ through the reuse of land which has been previously developed, ‘provided that this is not of high environmental value’. Whilst there is no longer a national requirement to build at a minimum density, the NPPF requires local planning authorities to ‘set out their own approach to housing density to reflect local circumstances’. The value of best and most versatile agricultural land should also be taken into account.

6.10.3 In relation to the coast, the NPPF states that local planning authorities should maintain the character of such areas by ‘protecting and enhancing distinctive landscapes’, including in those areas that have been defined as Heritage Coast. Authorities should also look to improve ‘public access to and enjoyment of the coast’.

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Additional PPSIs

6.10.4 The Kent Downs AONB management Plan provides further local level guidance on the protection and enhancement of these important landscapes (Box 6.16).

Box 6.16: Kent Downs AONB - Management Plan (2009-2014)\(^6\)

This recent update to the management plan for the Kent Downs AONB sets out to secure the natural beauty, special landscape character and community vitality of the area. It includes a ‘Vision for 2029’ which describes how the area can respond to change in a manner which preserves the AONB for future generations. It sets out the need for the Kent Downs to be a landscape in which change (e.g. development or climate change related) supports the distinctive features of the AONB.

6.11 Soils

The National Planning Policy Framework (2012)

6.11.1 In relation to conserving and enhancing the natural environment, the NPPF calls upon the planning system to protect and enhance soils. It should also prevent new or existing development from being ‘adversely affected’ by the presence of ‘unacceptable levels’ of soil pollution or land instability and be willing to remediate and mitigate ‘despoiled, degraded, derelict, contaminated and unstable land, where appropriate’.

6.12 Transport and Accessibility

The National Planning Policy Framework (2012)

6.12.1 In terms of transport and travel policies, the NPPF notes that these will have an important role in ‘contributing to wider sustainability and health objectives’. It calls for the transport system to be balanced ‘in favour of sustainable transport’, with developments to be located and designed to facilitate these modes of travel. In order to minimise journey lengths for employment, shopping, leisure and other activities, the NPPF calls for planning policies that aim for ‘a balance of land uses’. Wherever practical, key facilities should be located within walking distance of most properties.

Additional PPSIs

6.12.2 The following report (Box 6.17) examined the barriers and drivers relating to walking and cycling in the UK and suggests policies that could result in an increase in uptake. This is of importance given the need for a shift towards more sustainable modes of transport.

Box 6.17: ‘Understanding Walking and Cycling’\(^7\) (2011)

This report looks to understand why sustainable and active travel is relatively uncommon in British towns when, potentially, higher levels of walking and cycling could reduce congestion, improve local environmental quality, improve personal health and reduce transport-related greenhouse gas emissions. It recognises that physical infrastructure alone is not sufficient, with a more holistic approach required to incentivise such journeys. Creating a safe physical environment for pedestrians and cyclists – e.g. through fully segregated cycle path; and restrictions on vehicle access – is one important measure.


6.13 Waste

The National Planning Policy Framework (2012)

6.13.1 The NPPF does not contain any specific waste policies. Nonetheless, local authorities who are preparing waste related plans should have regard to the policies within the framework so far as they are relevant.

Additional PPSIs

6.13.2 The case for action and the steps required to move towards more sustainable waste management system is set out in a recent Government review of waste policies. This document is summarised below in Box 6.18.


This report recognises that environmental benefits and economic growth can be the result of a more sustainable approach to the use of materials. As such, it sets out a vision to move beyond our current ‘throwaway society’ to a ‘zero waste economy’. The report recognises that planning will play a critical role in delivering this ambition. In terms of planning for waste the report notes that local authorities should consider the infrastructure needs of their community from the earliest stages of developing their local policies and plans. It also states that local communities should benefit from the hosting of waste facilities.

6.14 Water Quality and Water Resources

The National Planning Policy Framework (2012)

6.14.1 In relation to water resources, the NPPF states that local planning authorities should produce strategic policies to deliver the provision of a variety of infrastructure, including that necessary for water supply.

Additional PPSIs

6.14.2 The recent Government White Paper on Water provides further key background on the issues of water quality and resources (Box 6.19)


This document sets out the Government vision for a more resilient water sector and scenario where water is valued as the precious resource it is. It states the measures it will take to tackle issues such as poorly performing ecosystems, and the combined impacts of climate change and population growth on stressed water resources.

Commitments are made in the White Paper to ‘encourage and incentivise water efficiency measures’ at the demand side. Through these measures and the demand management measures set out in Water Resource Management Plan’s for water companies, the government aspires to reduce average demand to 130 litres per head, per day by 2030.

The avoidance of pollution is also a consideration. As an element of this the Government will ‘consult on a national strategy on urban diffuse pollution in 2012’. This will focus on a number of key sources, including runoff from roads and industrial estates.

38 National waste planning policy will be published as part of the National Waste Management Plan for England
7 WHAT’S THE SUSTAINABILITY ‘BASELINE’?

The SA Report must include…

● The relevant aspects of the current state of the environment
● The environmental characteristics of areas likely to be significantly affected

7.1 Introduction

7.1.1 Another important step when seeking to establish the appropriate ‘scope’ of an SA involves reviewing the situation now (‘baseline’) for a range of sustainability issues. Doing so helps to enable identification of those key sustainability issues that should be a particular focus of the appraisal, and also helps to provide ‘benchmarks’ for the appraisal of significant effects.

7.1.2 The SA Scoping Report (2008) sets out a clear picture of baseline conditions in Shepway District for a range of sustainability issues. This Chapter presents a summary, updated to reflect current conditions where relevant.

7.2 Air Quality

7.2.1 Shepway District currently has no Air Quality Management Areas. In 2011, all prescribed air quality objectives were met. Highest levels of air pollution are found at busy roadside sites in Folkestone town. Additional monitoring sites have been placed in the Lydd and Hawkinge in anticipation of heavy development commencing in these areas.

7.3 Biodiversity and Open Space

Biodiversity

7.3.1 Shepway District contains a wide range of habitats; including species rich chalk grassland, ancient woodland, low lying marsh, shingle, and dune areas. Two areas (Dungeness and the Folkestone to Etchinghill Escarpment) have been designated Special Areas of Conservation (SACs). Dungeness is also a National Nature Reserve.

7.3.2 There are 13 SSSIs in Shepway District of varying condition. Eight of these are considered to be in a ‘favourable’ condition and three in ‘unfavourable recovering’ condition. One site is classified as ‘Unfavourable no change’ and another ‘Unfavourable declining’.

7.3.3 There is a significant amount of Ancient Woodland in Shepway, concentrated to the west, northwest and north of Folkestone. 26 out of these 40 sites are considered to be in positive management. The distribution of this woodland is patchy leading to limited ecological connectivity between the areas, although there are some less fragmented areas in the Northwest of the District.

7.3.4 The District contains 40 Local Wildlife Sites of sub regional importance. Located mainly to the west and north of Shepway these sites are mainly woodland and species rich grassland sites, in comparison to the District’s SSSIs, which are primarily coastal or wetland habitats.

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7.3.5 In support of a ‘Living Landscapes’ approach, the existing pattern of Biodiversity Action Plan (BAP) and other important habitats in Kent has been mapped to identify areas where there is the potential for the maintenance and enhancement of large scale ecological networks. Four networks in Shepway were identified, with these being:

- Dover and Folkestone downs and cliffs (KT08)
- Low Weald woodlands (KT14)
- Romney Marsh and Rye Bay (KT15)
- East Kent woodlands and downs (KT07)

7.3.6 Finally, it is important to note that some brownfield sites in Kent support nationally and internationally important invertebrate communities.

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45 Wildlife Trust (2006) A Living Landscape for the South East Kent
Open Spaces

7.3.7 Shepway features a number of significant open spaces. These include the Coastal Park in Folkestone and Brockhill Country Park in Hythe. Two even larger greenspaces with appeal in Shepway and beyond are Dungeness National Nature Reserve and The Warren, Folkestone.46

7.3.8 In 2010/11 Lower Leas Coastal Park, Brockhill Country Park and the Royal Military Canal retained their Green Flag status. This was in recognition of their value to local people as a recreational resource.47

7.3.9 The majority of parks and major open spaces of Shepway are within urban areas; predominantly Folkestone. Dialogue with local residents in the District has established there is widespread demand for additional parks and greenspace in a number of communities, including in the rural areas.

7.3.10 No losses of open space were reported in 2010/11. Two areas in Hawkinge gained areas of open space, these being Atkinson Road (approx. 0.7 hectares) and Campbell Road (approx. 1.5 hectares).48

7.4 Climate Change Mitigation and Adaptation

7.4.1 In terms of renewable energy, 26 wind turbines have been constructed at Little Cheyne, East Guldeford near Brookland. These have the capacity to generate approximately 52 and 78MW, which is enough to power around 33,000 homes49. No on-shore renewable energy developments or installations were given planning permission or completed during the 2011 annual monitoring period.50

7.4.2 Risk of flooding is a major concern in Shepway with 55% of the District at or below sea level. Virtually all of the Romney Marsh area is within a flood zone due to its topography. However, the degree of risk varies to a large degree within the area dependent on factors such as topography, hydrological features and position in relation to flood defences.51

7.4.3 In terms of climate change adaptation, flood defence works are being undertaken at sites across the District. These include a £30 million defence scheme at Dymchurch, covering 2.2km of coastline. This is one of six projects in the ‘Folkestone to Cliff End Strategy’, which is envisaged to protect 14,000 dwellings across Romney Marsh.52

7.5 Cultural Heritage

7.5.1 There is a wealth of notable heritage in the District. This includes Iron Age and Roman settlements, medieval churches, Tudor castles and Napoleonic fortifications53. The District contains over a thousand Listed Buildings and Scheduled Ancient Monuments, with over a hundred of these listed as Grade I or Grade II*.54

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48 ibid
51 Strategic Flood Risk Assessment (May 2009)
53 ibid.
7.5.2 Listed buildings are not evenly distributed throughout the District. Concentrations are to be found in the Folkestone area, which is home to 200, and in Hythe and Elham, which feature 100 each. Shepway District Council has designated 21 Conservation Areas, which make up 1% of the District’s land area.54

7.5.3 There are seven buildings in Shepway which are listed on English Heritage’s Buildings at Risk Register.55 These are:

- Dymchurch Redoubt, Hythe Ranges – Part of the Martello system. Martello towers are small defensive forts built during the early 19th century
- Martello Tower No.4, The Leas
- Martello Tower No.5, Folkestone
- Martello Towers Nos. 6 and 7, Shorncliffe Camp, Folkestone
- Martello Tower No.9, Shorncliffe Camp, Folkestone
- The Parish Church of St Mary and St Eanswythe, Church Street, Folkestone, Shepway, Kent
- Dymchurch Redoubt, Hythe Ranges, Hythe, Shepway, Kent

7.6 Community, Health, and Social Inclusion

7.6.1 According to 2011 Census data, the population of Shepway stood at 108,800 people.56 This represents a rise of 11,800 people (12.3%) since the 2001 census.57 Shepway’s population is predicted to rise by 13.5% over the period 2010-2035.58

7.6.2 A small majority of those living in Shepway dwell in urban areas (60.2%), with the remaining 39.8% to be found living in rural areas.59 Approximately 1 in 10 people in Shepway (9%) live in isolated dwellings, hamlets or small villages (below 1,000 people). Romney Marsh ward is the largest and the most sparsely populated area in the District.60

7.6.3 A high proportion of Shepway’s population is aged 65 or above, with the District ranking in the top 20% of authorities in England in terms of this indicator. Around 34% of all households include people over the state retirement age.61 Shepway is forecast to continue to have a large proportion of older people in its population compared to the KCC average over the period 2010-2035. This will be in conjunction with a decline in the number of residents who are of working age (16-64).

7.6.4 Compared to other English authorities, Shepway ranks highly for the proportion of people with limiting long term illness. A high percentage claim disability related benefits, with the District ranked amongst the top 20% of authorities in England for this indicator62.

62 ibid
7.6.5 Life expectancy at the age of 65 for females in Shepway stands at 21.4 years, which is 3.1 years higher than males in the District. This figure is above the Kent County Council (KCC) average of 20.8 and the average for England (20.6). For males in Shepway, life expectancy at age 65 is 18.3 years. This is below the KCC average (18.5) years, but above the national average of 18 years.\(^{63}\)

7.6.6 The chart below (Figure 7.3) is drawn from a modelled estimate of the range in life expectancy at birth across the whole population of the Shepway area from most to the least deprived. Based on death rates over the period 2006-2010 this reveals a range in life expectancy between the most and least deprived members of the population as 9.4 years in males and 6.9 years in females.

*Figure 7.3: Health inequalities in Shepway*\(^{64}\) The points on this chart show the average life expectancy in each tenth of the population of the area.

Deprivation

7.6.7 The Index of Multiple Deprivation (2010) dataset identifies relative deprivation for ‘Super Output Areas’, which are geographical areas of a similar size to electoral wards. An examination of the 2010 Index of Multiple Deprivation data (Figure 7.5) reveals that:

- Shepway is ranked 90th in the IMD out of 326 local authorities nationally, placing it within the bottom 20-40% of all districts by this measure. It is the 8th most deprived local authority in the South East region.
- All of the 20% most deprived SOAs in the District are to be found in or around the urban area of Folkestone. Four of these SOAs face particularly severe levels of deprivation, with the most deprived of these having been ranked 581st out of 32,482 SOAs nationally.
- Whilst much deprivation is concentrated in the urbanised coastal areas of the District, there are also significant areas of high deprivation in the rural South.
- The majority of least deprived SOAs in Shepway are located in the north of the District, in the vicinity of the M20 motorway, the Kent Downs and on the outskirts of Folkestone/Hythe.

7.6.8 In 2007 the least deprived SOA in Shepway ranked 30,824th nationally, whilst in 2010 the least deprived SOA ranked 28,308th nationally. However, it is important to note that deprivation remains focused around the urbanised coastal area and the rural south.

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Figure 7.4: Shepway Super Output Areas classified according to ‘multiple deprivation’ 2010 (with most deprived SOA highlighted)\textsuperscript{65}

**Services**

7.6.9 Folkestone has the largest concentration of shops and services in the District. However, due to geographic factors, residents in the west of the District at New Romney may choose to visit Ashford, whilst those to the north around Elham and Stelling Minnis may look to Canterbury. Hythe and New Romney maintain a mixture of essential services and goods provision. Other centres, such as Sandgate and Lydd, have continued to retain convenience goods and local service provision in their small retail units.\textsuperscript{66}

7.6.10 Hawkinge is an area that has seen major population growth over the last decade. With this being the case, it is important new provision is made which meets key community, economic and social needs.\textsuperscript{67}

7.6.11 In terms of rural services, around 52\% of rural buildings are within 0.5 mile of a post office service and nearly 50\% of rural buildings are within walking distance (500 metres) of a primary school. However, in general, the rural areas of the District are more deprived in respect of housing and barriers to services.\textsuperscript{68} In terms of walking distances to healthcare services, rural areas in Shepway have approximately half the level of access than urban areas. This relative isolation from health services is coupled with a generally older population.\textsuperscript{69}

\textsuperscript{65} Data available [online] from: www.neighbourhood.statistics.gov.uk


\textsuperscript{67} ibid


7.7 Economy & Employment

7.7.1 The recent economic performance of Shepway has been characterised by high unemployment and long-term contraction of established local industries. There has been relatively strong growth in certain areas, such as business financial and other services; however, this has been insufficient to offset the losses to the Shepway’s manufacturing base, and distribution and catering sectors. Shepway’s future growth is likely to be characterised by continuing rationalisation of traditional manufacturing activities and shift into the service sector, including some movement into higher value activities.\(^\text{70}\)

7.7.2 Unemployment in Shepway has decreased from 4.5% (March 2010) to 4.0% (March 2011) based on people claiming Jobseeker’s Allowance. The District’s unemployment level in March 2010 exceeds the regional (2.6%) and national (3.7%) average. Youth unemployment during 2010/11 stood at 8.8%, more than double the rate than amongst those aged 25-49 (4.3%). Levels of youth unemployment are higher than South East (5%) and National levels (7.2%)\(^\text{71}\).

7.7.3 Levels of unemployment within the rural areas of Shepway in 2009 ranged from 1.3% of the working population in Elham and Stelling Minnis, up to 4.7% in Lydd. This compares with 4.2% of the population claiming Job Seeker’s Allowance across the entire District. These figures suggest that some rural areas had lower levels of unemployment. However, issues of job quality and remuneration may remain a concern in these areas.

7.7.4 A large proportion of the employment available within the District is relatively low paid. Employment within higher skilled managerial and professional occupations is comparably low in relation to overall Kent and South East England levels.\(^\text{72}\) Employment in the knowledge economy has seen a decline from its peak of 15% in 2007, in contrast to Kent as a whole which has seen a steady overall rise over the period 2003-2010 (Figure 7.5).\(^\text{73}\)

![Figure 7.5: Percentage of employees in the knowledge economy](image)

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\(^{70}\) Employment Land Review (January 2011)


\(^{74}\) Ibid.
7.7.5 Shepway does have a number of economic strengths. These include its good transport accessibility, including the M20 motorway, High Speed rail links to London, and proximity to the Channel Tunnel. Wage levels and land/building costs are low for the South East region, while housing is relatively affordable. Economic weaknesses include its relative remoteness, relatively low rates of entrepreneurship and few residents with higher skills.75

7.7.6 Due to the coastal nature of the District, the tourism, leisure and hospitality sector represent a significant proportion of the local economy. Research conducted in 2009 estimates that this sector contributes £219.3 million to the local economy and supports around 4,000 job. This equates to approximately 11-12% of total jobs in the District.76

7.7.7 Folkestone is the District’s main centre, with the largest concentration of shops and services in Shepway and a key focus for growth. It has suffered a decline over recent years but continues as a tourist destination. It also features insurance and financial services companies, and developing cultural and creative activities. Figures for June 2011 reveal that 74 retail units were vacant in Folkestone Town Centre. This represents a vacancy rate of 18.2% against a national average of 12.9%. Regeneration is ongoing in the Creative Quarter and Old Town of the Town Centre. In the Creative Quarter over 40 properties have been restored and leased to creative businesses and individuals.77

7.7.8 Outside of Folkestone, the main centres of economic activity and employment are industrial estates within the larger towns. On Romney Marsh it is Lydd Airport and Dungeness Power Station that provide much of the employment.78 Having been an element of the Romney Marsh economy for around 50 years, Dungeness A nuclear power station is currently being decommissioned, with this work to be mostly completed by 2015. Dungeness B nuclear power station is still operational but decommissioning is set to commence in 7-12 years time.79 At present the Government has not included Dungeness as a site for new generation power stations due to concerns over potential damage to the Dungeness Special Area of Conservation.80

7.8 Gypsy & Travellers

7.8.1 Due to historical and geographical reasons there is a long-term tendency of relatively limited local need for Gypsy and Traveller accommodation.81 A 2007 assessment of the needs of Gypsies and Travellers identified a possible need for 3 accommodation pitches between 2007 and 2017.82

7.9 Housing

7.9.1 The Housing stock in the District is relatively old, with almost 80% constructed prior to 1980, 42% prior to 1945 and 32% prior to 1919. The worst housing conditions are focused in the older pre-919 housing stock. There are currently around 450 long-term empty homes in the District.83

76 ibid
77 ibid
79 ibid
81 Traveller Sites Statement - Shepway District Council
7.9.2 House prices have fallen form a peak in 2007, but remain relatively buoyant. The average price of a home stands at £206,412, which is considerably higher than the national average. Highest values are found in the vicinity of Hythe and in rural areas of the District.84

7.9.3 Affordability of housing is a major issue, with an identified need for 1,318 additional affordable homes per year. The average annual gross household income in Shepway is approximately £32,106.85 Average house prices in 2011 stood at more than six times the average household income in the District. The problem of accessing the housing market is regarded as being most acute for newly emerging households, households with children and single income households. For newly forming households average house prices are closer to 9.5 times the average household income.86 More households in the District are looking to affordable housing provision to meet their need, with the number of people registered on the Shepway Housing Waiting List having increased by approximately 14% between January 2010 and January 2011. Some of the most acute levels of need for affordable housing are to be found in the rural areas.87

7.9.4 Key challenges to housing delivery include the development restrictions posed by the Kent Downs AONB and a lack of large sites, which limits the potential to deliver affordable housing. During the period 2010/11 there were 151 dwelling completions in Shepway, whilst 19 dwellings were lost. Therefore, in total 132 net additional dwellings were delivered. It is expected that approximately 163 dwellings will be completed in 2011/2012 (current year). During the period 2010/11 there were 51 new affordable dwelling completions88. Housing delivery figures in Shepway over the period 2005/06-2009/10 reveal that housing delivery has been dwindling in the Romney Marsh area and that the number of affordable homes as a proportion of the District total has been rising.89

7.9.5 Shepway currently has the lowest average household size in the county, with this partly driven by the older age profile of the District.90 In 2001 the average household size in Shepway was 2.28; by 2006 this had decreased to 2.23.91 Between 2006 and 2026 the average household size in Shepway is predicted to decline from 2.23 persons per dwelling to 2.04 or less. Due to the declining trend in household size 4300 new dwellings would need to be constructed in Shepway by 2026 due to new household formation alone (no net migration). Building only enough homes to meet the demand from the current population would result in a workforce decline of 12% due to the ageing population of the District.

7.9.6 Homelessness in Shepway is a growing issue. The number of households that have approached the Council for help with housing difficulties has risen from 714 in 2009/10 to 987 households in 2010/11. This represents an increase of approximately 38%.92
7.10 Landscape

7.10.1 Shepway features a variety of landscape types, from chalk downland and wooded valleys to areas of marshland. The District of Shepway spans three National Character Areas:

- The southern half of Shepway is within the Romney Marsh NCA
  - A flat, open and agricultural landscape, with distinctive drainage dykes, marshes and open skies. Dungeness is the largest shingle foreland in Europe, with a real sense of isolation and remoteness especially along the coast. 20th century development is evident in the towns along the coastal strip. Much of this area is dominated by the imposing power station and associated transmission lines. Past gravel extraction pits, now flooded, military uses and expanding holiday resorts add to the general clutter along the coast.

- The Wealden Greensand NCA runs in a narrow band west from Folkestone
  - Belt of Greensand typified by woodlands, scattered settlements and scarp / dip-slope topography. The East Kent section has a gentler, more open aspect and can be described as less intimate and less distinctive than other areas. It is also more marked by development, with the presence of major towns and communication corridors.

- The northern quarter of the District lies within the North Downs NCA
  - Distinctive chalk downland with a steep scarp, and broad dip slope incised by valleys or ‘combes’. Unimproved, species rich grassland and ancient woodland are found on some less fertile soils, although much of the lower dip slope in Kent is fertile and is used for intensive arable agriculture. Rural with scattered and distinctive farmsteads and large houses.

7.10.2 The District is fringed by the sea and has over 20 miles of coastline. Over 33% of the District falls within the Kent Downs Area of Outstanding Natural Beauty. A section of Shepway’s coast is designated Heritage Coastline. The District also features a number of Local Landscape Areas. In the main these cover Romney Marsh and also parts of the Sandgate Escarpment and Seabrook Valley, Eaton Lands, Coolinge Lane, Enbrook Valley and Mill Lease Valley.33

7.11 Soils

7.11.1 According to the 2002 Agricultural Land Classification Survey approximately 60% of the District’s land area is defined as ‘Excellent’ or ‘Very Good’ for agricultural purposes.34 Romney Marsh is one of the most productive areas of agricultural land in the South East. Virtually all of the ‘Grade I’ agricultural land in the District is within Romney Marsh ward. During the 2010/11 period there was been no major loss of agricultural land in this area.35

7.11.2 There are a range of potentially contaminated sites within the District of which the council is aware. Contamination can be the result of historic land uses and current uses such as the handling and storage of fuels and the transportation and storage of waste.

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7.12 Transport and Accessibility

7.12.1 Whilst the District is primarily of a rural nature, there have been significant improvements in transport connections in and out of Shepway over recent decades. Rail services in and of the District have been improved by the High Speed 1 domestic rail service that began to operate in December 2009. According to Southeastern this service has been steadily drawing additional users from around Kent who wish to take advantage of the reduced journey times it offers to and from central London. All of the four railway stations in Shepway provide direct connections to Dover to the east and Ashford to the northwest, as well as direct rail access into London, at London Bridge, via Ashford and Tonbridge. Of the four stations, it is noted that Folkestone Central is the most intensely used, with it benefiting from mainline and high speed rail services and its location within Folkestone town centre.

7.12.2 Census information indicates that as of 2001 approximately 59% of the Shepway working population travel to work by car, which is a slightly higher than the average for England. Of those who drive to work, approximately 65% travel to work by car within the District itself. There is a lower than average modal share of bus use, with 4% travelling to work by this means in comparison to 8% across England. In March 2011 the Shepway Joint Transport Board adopted the Shepway Cycling Plan. This plan recognises the scope for people to switch to using the bicycle to make local trips, particularly across the Romney Marsh, and in parts of Hythe and Folkestone where there is a flat terrain.

7.13 Water Quality and Water Resources

7.13.1 The condition of the aquifers under Shepway in terms of both water quality and quantity is a matter of concern. It is important that new development does not place undue additional strain on these natural water reserves. The Stour Catchment is of particular importance as it contains the District’s principal aquifers.

7.13.2 The majority of surface water bodies in Shepway have been classified as having a ‘moderate’ ecological status. Some areas to the north of the District are classified as being ‘poor’, but none receive the lowest category of ‘bad’. The Seabrook Stream is the only current example of a water course in ‘good’ condition.

7.13.3 The South East Water Resource Management Plan concludes that demand for water is unlikely to outstrip supply over the Shepway Core Strategy period. The report noted that with ‘Code 3’ water efficiency levels supported as a minimum, a house building rate of 400 dwellings per annum could be accommodated during this period.

7.13.4 The settlements of Shepway have a good level of coverage from waste water treatment works (WWTWs). Most of them have at present or as planned sufficient capacity to meet planned growth. The link between the Westenhanger area and the Sellindge WWTW is regarded as being problematic.

98 ibid
99 ibid
101 ibid
102 ibid
103 Shepway Water Cycle Study
104 ibid
105 The adopted guidance note ‘Securing Sustainable Residential Development’ became a material consideration in determining planning applications from 7th January 2008. All new build residential development is now required to achieve a minimum Code Level 3 rating. (Source: Shepway AMR 2011)
8 HOW WOULD THE BASELINE EVOLVE WITHOUT IMPLEMENTATION OF THE PLAN?

The SA Report must include…

- The likely evolution of the current state of the environment without implementation of the plan

8.1.1 Just as it is important for the scope of SA to be informed by an understanding of current baseline conditions, it is also important to ensure that thought is given to how baseline conditions might ‘evolve’ in the future under the ‘no plan’ / ‘business as usual’ scenario. The following bullets list a range of ‘future baseline’ issues that should be a focus of SA / provide benchmarks for the identification of significant plan effects:

- The natural environment will be affected by climate change, particularly at the coast. Species and habitats will be put under strain by shifting ‘climate envelopes’ and constrained water resources. The ability of species populations to shift and adapt could be hindered by the inhospitable nature of the wider landscape outside of nature reserves.

- Hotter and drier summers will place a further strain on water resources and will affect the wellbeing and vulnerability of particular communities and social groups, including the elderly.

- Sea level rise and more extreme rainfall patterns will increase flood hazard, particularly within the low-lying parts of the District.

- A knock-on effect of an ageing population is that the 'typical household' will become much smaller, which means that with no additional housing the population of the District will fall. An ageing population will also mean that additional strain is put on community infrastructure in the future.

- The combined effect of high-speed rail and other improvements to Folkestone town centre should improve the image of the area as a business location. The District is also expected to capitalise on emerging strengths in terms of ‘creative industries’ (centred on the Creative Quarter in Folkestone) and its existing base in financial and business services. In general, changes ‘in the pipeline’ for Folkestone have the potential to improve business perceptions of the town and hence the District, but will not in themselves lead to economic ‘step change’ in the short/medium term.

- The opportunity to do business from home may result in the design and flexibility of accommodation becoming even more important, whilst traditional commercial areas face pressure from declining demand or a need to find a new purpose.

- There are a number of potential major developments that may have some bearing on Shepway’s economy in the future. Lydd Airport and Dungeness represent important economic assets for the Romney Marsh area, and if expansion/replacement of both proceeded, could provide more, better paid and local jobs. Development of a new reactor at Dungeness in the near future is looking increasingly unlikely as a result of emerging Government policy.
9 WHAT ARE THE KEY ISSUES THAT SHOULD BE A FOCUS OF THE APPRAISAL?

The SA Report must include…

- Any existing environmental problems which are relevant to the plan

9.1 Introduction

9.1.1 Drawing on the review of the sustainability context and baseline, the 2008 SA Scoping Report was able to identify a range of sustainability issues that should provide a methodological framework for the appraisal, ensuring it remains focused. These issues were then further refined and a concise list of sustainability ‘objectives’ identified.

Table 9.1: Sustainability objectives and sub-objectives from the SA Scoping Report

1. Conserve and enhance biodiversity

- Protect against direct impacts to important habitats and species (e.g. as a result of development in close proximity to a SSSI, locally designated site or other important site such as a biodiversity rich brownfield site)
- Protect against indirect impacts to important habitats and species including from:
  - Diffuse forms of pollution
  - Disruption to water resources
  - Loss of habitat quality in the ‘wider countryside (which will increase the ecological isolation of important habitat patches)
  - Hindrance of natural processes (such as at the coast) or the active management of semi-natural habitats
- Create local biodiversity enhancements through the incorporation of biodiversity rich green space and other features with new development, which contributes to wider ecological networks where possible
- Promote other actions which contribute to targets set out in the Kent BAP

2. To conserve, enhance and make accessible the District’s countryside, heritage and historic environment

- Protect the most valued and sensitive landscapes
- Promote the distinctiveness of landscape character including enhancement where appropriate
- Promote and enhance the distinctiveness of townscapes and the built environment, including through promotion of cultural facilities and a local ‘arts scene’
- Protect valued heritage and historical features in towns, the countryside and along the coast
- Protect and enhance the settings of valued heritage and historical features
- Improve access to valued heritage and historical features for local people and visitors to the District

3. To maintain and enhance the water quality of the District’s waterways and coasts, and achieve sustainable water resources management

- Encourage the allocation and location of new development where water abstraction can occur sustainably
- Promote sustainable design and construction measures that reduce water consumption and result in decreased run-off of polluted water (including during construction phase)
- Target the use of SUDS where this might protect and enhance the water environment
- Prevent impacts from other sources of point source and diffuse pollution
4. **Increase energy efficiency in the built environment, and the proportion of energy use from renewable sources**
   - Promote high sustainable design and construction standards so that Shepway can stay on course to meet the Government target of all new residential development being zero carbon by 2016 (including the integration of decentralised small scale renewable energy and CHP schemes as part of suitable development)

5. **To take an integrated approach to the reduction of flood risk**
   - Avoid development in locations at risk from flooding and mitigate any residual flood risk through appropriate measures including through design
   - Promote the incorporation of SUDS in sensitive locations where increased run-off could result in increased flood risk
   - Take account of future climate change in terms of flooding inland and at the coast (including consideration of the potential for green space and coastal habitat to mitigate flood risk)

6. **To reduce waste generation and promote sustainable management of waste**
   - Take steps to reduce waste arisings including from new development
   - Promote the integration of facilities to enable efficient recycling as part of new developments

7. **To improve efficiency in land use through the re-use of previously developed land and existing buildings and promote urban renaissance**
   - Strictly adhere to targets for development on previously developed land
   - Protect the District's resource of highly productive agricultural land
   - Make use of brownfield sites to promote urban renaissance
   - Encourage the re-use of materials in construction

8. **To promote economic growth and competitiveness**
   - Aim to improve the relatively poor economic performance of Shepway in comparison to the wider sub-region and region
   - Address barriers to economic growth (other than those addressed by other sustainability objectives)
   - Promote appropriate investment in the area, whilst protecting the diversity of existing businesses, particularly small businesses
   - Promote a diversity of retail provision including through the protection of local centres and smaller centres selling comparison goods
   - To develop a dynamic, diverse and knowledge based economy that excels in innovation with higher value, lower impact activities
   - Promote sustainable tourism

9. **To ensure high and stable levels of employment so that everyone can benefit from economic growth**
   - Promote employment in areas where unemployment is high, which reflects the skills and aspirations of local people

10. **To ensure that everyone has the opportunity to live in a decent and affordable home**
    - Promote a high proportion affordable housing as part of new developments
    - Provide affordable housing in locations where there is an identified need
    - Promote an appropriate mix of housing sizes and tenures to ensure that people are able to remain in the District as their circumstances change
11. To create and sustain vibrant and sustainable communities
   - Promote high quality and well used public space, community and cultural facilities
   - Promote social inclusion and integration of people from different cultures and backgrounds

12. To reduce inequalities poverty, deprivation and social exclusion
   - Ensure that existing locational inequalities as well as inequalities amongst different sectors of the population, are addressed in all decision making
   - Promote good access to services and facilities

13. To raise educational attainment and develop opportunities for everyone to acquire the skills needed to find and remain in work
   - Promote good access to educational and training opportunities for all sectors of the population, particularly amongst deprived communities

14. To improve the health and well-being of the population and reduce inequalities in health
   - Promote healthy and active lifestyles through encouraging walking and cycling as well as the protection and provision of sporting, recreational and community facilities
   - Promote access to local multifunctional open space and green space, as well as rivers/canals, the countryside and the coast
   - Ensure good accessibility to healthcare services
   - Reduce crime and the fear of crime, including through ‘designing out crime’
   - Consider the air quality and other impacts on health that might result from specific developments, including major roads

15. To promote sustainable access, reduce car dependency, road congestion and associated pollution by promoting sustainable locations for development and improving travel choice
   - Promote compact, mixed-use development with good accessibility to local services, facilities and employment by sustainable transport, walking and cycling
   - Reduce car dependency by providing services and facilities accessible by sustainable modes of transport, particularly in rural areas
   - Promote major trip generating development, including freight generating development, in locations that will provide opportunities for sustainable modes of transport and not result in increased congestion
   - Address congestion in the District, particularly where it may impact on the health of residents as a result of localised poor air quality
PART 2: WHAT HAS PLAN-MAKING / SA INVOLVED UP TO THIS POINT?
10 INTRODUCTION (TO PART 2)

The SA Report must include...
- An outline of the reasons for selecting the alternatives dealt with
- The likely significant effects on the environment associated with alternatives / an outline of the reasons for selecting preferred alternatives / a description of how environmental objectives and considerations are reflected in the draft plan

10.1.1 What this means in practice is that, although only one SA Report must be prepared – an SA Report for publication alongside the draft Plan (i.e. this report) – there must be at least one prior plan-making / SA iteration at which point alternatives are appraised. The SA Report must then present (and explain) the alternatives, present their appraisal and ‘tell the story’ of how this appraisal has informed development of the draft plan.

10.2 Alternatives for what?

10.2.1 The Regulations state only that the SA Report should present an appraisal of the ‘plan and reasonable alternatives taking into account the objectives and geographical scope of the Plan’. It is difficult to know precisely how to interpret this. In practice, local authorities in England tend to consider reasonable alternatives for a reasonable range of the key issues addressed along the course of plan-making.

10.2.2 The ‘key plan issues’ considered further within this Part of the SA Report are as follows:

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10.3 Structure of Part 2

10.3.1 For each key plan issue, the following questions are answered:
- Why is this a key plan issue?
  - Where appropriate, there is also a discussion of related issues for which alternatives have not been considered
- What are the reasonable alternatives?
  - Where appropriate, there is also a discussion of other alternatives that have not been considered
- Why has the preferred approach been selected?
  - As part of the answer to this question an explanation is given as to how the selection of a preferred approach reflects the findings of SA. To further illuminate this explanation Appendices II – XI of this SA Report present appraisal findings for each issue / set of alternatives.

104 That ‘reasonable alternatives’ should take into account the objectives and geographical scope of the plan is stating the obvious, and does not get us any closer to answering the question: Alternatives for what?

105 The European Guidance on Implementation of the SEA Directive gives slightly more clarity, stating that ‘In practice, different alternatives within a plan will usually be assessed’ (e.g. different means of waste disposal within a waste management plan...).
11 TIME HORIZON OF THE PLAN

11.1 Why is this a key plan issue?

11.1.1 The length of the plan period is clearly a significant issue as it provides the time frame over which the policies and proposals contained within the document will be implemented, and hence provides certainty for those looking to invest in the District. In particular, those wishing to develop housing and bring forward associated infrastructure will wish to know the lifetime of the policy framework and the timeframe over which policy commitments will be implemented.

11.2 What are the reasonable alternatives?

11.2.1 The National Planning Policy Framework (NPPF) requires that local plans be drawn up over a 15 year time horizon and be kept up to date (paragraph 157). More specifically in terms of housing the NPPF states that local authorities should identify a supply of specific, developable sites or broad locations for growth, for years 6 to 10 and where possible, for years 11 to 15 (paragraph 47). Initially, the intention was that the Shepway Core Strategy would run from 2006 to 2026. However, given that the adoption of the Core Strategy is now likely to be in 2013, there is a clear reason for giving consideration to an extended time horizon.

11.2.2 The following two Core Strategy time horizons have been considered:

1. A timeframe for the Core Strategy covering the period 2006 to 2026
2. A timeframe for the Core Strategy covering the period 2006 to 2031

11.3 Why has the preferred approach been selected?

11.3.1 The Council’s preferred approach is Alternative 2. This approach is preferred primarily on the basis of SA findings.

11.3.2 The two alternatives perform very similarly in terms of the majority of SA objectives, but Alternative 2 performs better in terms of three socio-economic objectives as it would not only enable the plan to present a housing target to 2026 but also a long term housing aim to 2031.

11.3.3 Specifically, Alternative 2 performs better in terms of:

- Re-use of previously developed land (SA Objective 7) - by aligning the timescale of the Core Strategy with the predicted phasing for the strategic site proposals.
- Ensuring that everyone has the opportunity to live in a decent and affordable home (SA Objective 10) - by specifying a long term aim for housing delivery (with a timescale that is greater than the 15 years required by the NPPF) therefore enabling longer term housing needs to be addressed by the Council and its partners.
- Creating and sustaining vibrant and sustainable communities (SA Objective 11) - by specifying a long term aim for housing delivery Alternative 2 would better enable longer term physical and community infrastructure to be planned and delivered. In particular, Alternative 2 would provide a greater level of certainty to infrastructure providers and funders to allow them to plan and deliver necessary infrastructure.

11.3.4 SA findings are presented in full in Appendix II.
12 GROWTH QUANTUM

12.1 Why is this a key plan issue?

12.1.1 The choice of growth quantum is one of the most important decisions made through the Core Strategy. Hence, it is important that the Council’s preferred approach is justified by a consideration of alternative approaches.

12.2 What are the reasonable alternatives?

12.2.1 The following alternative ‘growth quantums’ have been considered:

1 Fundamental Shift
   - This would involve delivering 850 dwellings p.a. and hence involve a radical shift away from long established trends in Shepway's development. The philosophy is based on a desire to meet aspirations for a ‘world-class economy’ in East Kent.

2 Maximise Development Opportunities
   - This would involve delivering 550 dwellings p.a. and would entail major change for the District, with growth of a substantial scale (against current trends) as an over-riding priority

3 Selective Approach to Change
   - This would involve delivering 400 dwellings p.a. and would support targeted change.

4 Minimise Change whilst Promoting Sustainable Development
   - This would involve delivering 290 dwellings p.a. and would allow a clear focus on smaller-scale or fewer initiatives.

Why has the option of delivering more than 850 dwellings p.a. not been considered?

Evidence from Shepway’s Strategic Housing Land Availability Assessment (SHLAA) suggests a higher figure would not be deliverable. As well as insufficient availability of deliverable and developable land, there are significant questions as to whether the market would be able to bring forward the level of housing and employment associated with this option. This option would also have a significantly negative environmental impact and, in order to be delivered, would require major development within the Area of Outstanding Natural Beauty (AONB) and in areas of significant flood risk.

Why has the option of delivering fewer than 290 dwellings p.a. not been considered?

Demographic analysis and evidence of local employment demand, taken together, highlight how a low housing growth strategy would constrain the achievement of much needed economic growth in Shepway, through failing to ensure an adequate local workforce (see discussion in Box 12.1). The need for economic growth is reflected in the fact that Shepway's economy has a history of underperformance, and this has led to low wage levels and significant areas of deprivation. The Index of Multiple Deprivation (IMD) 2010 places Shepway as the 97th most deprived local authority area in England (out of 354) and the 2nd most deprived in Kent (after Thanet). The position of Shepway, relative to other areas, has worsened since 2007 (ranking 114) indicating that the District is vulnerable to a worsening in the national economic situation. Economic growth opportunities also exist, and with this in mind it would be unreasonable to restrict the local workforce available for existing businesses and potential inward investors.
Box 12.1: Demographic analysis and evidence of local employment demand

- Although partly relating to wider trends, demographic change in Shepway over the next 20 years may prove especially acute. The District will see a significant increase in the number of residents of post retirement age under any foreseeable scenario, with a corresponding reduction in the number of residents that are of working age (16 to 64).
- The average household size in Shepway is set to decline over the period 2006 to 2026 from 2.23 persons per dwelling to 2.04 (or less) persons per dwelling. This means that, if there were no house-building, the population of Shepway would decline in total size.
- To meet the future needs of current Shepway residents alone (a zero net migration situation) a total of 4300 new dwellings (215 per annum) would need to be constructed by 2026 due to new household formation. However, even if housing needs were met, the workforce would decline by 5000 people (12%) by 2026.
- The demand for labour in Shepway over the period 2006 to 2026, as identified within the Shepway Employment Land Review is set to increase from 38,800 to 42,800; with the actual labour supply in 2006 estimated at 41,500. The figures on the demand for labour clearly contain a number of assumptions and may be subject to change especially due to a range of macro-economic factors. However the basic message is clear.

12.3 Why has the preferred approach been selected?

12.3.1 The Council’s preferred approach is Alternative 3. This approach is preferred primarily on the basis of SA findings. Although all alternatives are associated with positives and negatives, it is Alternative 3 that would best balance socioeconomic and environmental considerations.

12.3.2 SA findings are presented in full in Appendix III. The following is a summary.

Economic considerations

The need for housing growth to support economic growth and regeneration is highlighted by the available evidence-base, which points to demand for labour in Shepway exceeding the local supply. However, it is also recognised that deliverability of a highly ambitious strategy would be questionable, and would involve a significant risk of failure given that other towns are also well placed for growth (i.e. competition is stiff). The appraisal is able to conclude that Alternative 3 is appropriate as it would allow a focus on known opportunities / areas of known competitive advantage.

Social considerations

12.3.3 The SA highlights that Alternative 3 would support targeted regeneration, but questions whether this scale of growth would be able to ‘stretch’ to meeting regeneration needs in all parts of the District.

Environmental considerations

12.3.4 Alternative 1 would almost certainly have an unacceptable environmental impact, and Alternative 2 would also probably result in unacceptable harm to areas of high environmental quality (e.g the AONB). Other notable environmental issues that would constrain achievement of Alternatives 1 or 2 include: water resource availability; the need to protect the sensitive water environment; and the need to ‘allow space’ for climate change adaptation. The appraisal concludes that Alternative 3 would not necessarily result in environmental limits being breached (given the assumption that growth will be implemented alongside a host of mitigating and proactive policy to protect and enhance the environment). However, there is a degree of uncertainty surrounding this conclusion.
13 THE BROAD SPATIAL APPROACH TO ACCOMMODATING GROWTH

13.1 Why is this a key plan issue?

13.1.1 The choice of a broad spatial approach to growth is one of the most important decisions made through the Core Strategy. Hence, it is important that the Council’s preferred approach is justified by a robust evidence-base. In light of this, it was considered important to subject alternative approaches to SA.

13.2 What are the reasonable alternatives?

13.2.1 Two alternative broad spatial approaches to growth were subjected to SA:

1) Growth focused on the main settlements plus Romney Marsh
2) Growth focused on the main settlements and a corridor of land to the west of Folkestone/Hythe, plus Romney Marsh

N.B. The District’s main settlements are Folkestone, Hythe, New Romney, Hawkinge and Lydd, as shown in Figure 13.1; whilst the extent of the corridor of land to the west of Folkestone/Hythe is shown in Figure 13.2.

Figure 13.1: Main settlements in Shepway
13.2.2 A starting point when identifying reasonable alternative broad spatial approaches to growth was the evidence provided by the Strategic Housing Land Availability Assessment (SHLAA) – see Figure 13.3. This study shows that sites potentially suitable for development are concentrated in the urban areas, largely on brownfield land, and that there are also some potentially suitable large greenfield sites to the west of Folkestone/Hythe. Development to the west of Folkestone/Hythe (e.g. at Sellindge, Lympne and Folkestone Racecourse), would also be well placed to make best use of existing transport infrastructure. Thinking long term, it was thought that a strategic corridor could help to capitalise on potential synergies with growth in Ashford Borough (see Box 13.1), although it is recognised that planned growth here is focused primarily at Ashford itself and not at the Eastern extent of Ashford Borough.

13.2.3 Further justification for this range of alternatives (specifically the idea of focusing growth at ‘the Romney Marsh area’) also comes from the evidence gathered in 2008, at which time Shepway Council consulted on four ‘conceptual’ broad spatial approaches that could be taken to growth. One approach focused on ‘Maximising the character and potential of broad areas’. It was suggested at the time that the District was best viewed as comprising of three broad areas (the North Downs, Folkestone/Hythe and Romney Marsh), with each of these areas sharing opportunities, constraints and priorities from a planning perspective. Sustainability Appraisal was undertaken of these ‘conceptual alternatives’ at the time, and the conclusion was that ‘maximising the character and potential of broad areas’ had its plus points, but that there was a risk that the rural south of the District would be branded a ‘no go area’ for further development and investment because of environmental sensitivities.
Figure 13.3: Locations potentially suitable for development as identified through the SHLAA
Box 13.1: Summary of growth in Ashford

Shepway adjoins Ashford Borough Council, an area with substantial housing and employment growth envisaged within their adopted Core Strategy plan period (2006 to 2021). Understanding Shepway’s relationship with regard to land west of Folkestone in close proximity to a large growth point within the County is important in respect of guiding which spatial approach would be the most sustainable:

- Policy CS2 (The Borough Wide Strategy) provides the quanta of development expected in neighbouring Ashford: ‘land for about 16,770 new dwellings and related uses, and about 16,700 additional jobs plus contingency allowances of about 10% and 40% respectively will be identified within the Ashford Growth Area’.

- Policy CS3 (Ashford Town Centre Development) states that the majority of this growth shall be directed toward Ashford Town centre: ‘specific site allocations will be made through the Town Centre Area Action Plan…Development of the town centre is a priority and sites will be identified for an additional 8,000 jobs and up to about 2,500 new dwellings by 2021.’

- The 2010 Ashford Town Centre Area Action Plan (AAP) plans flexibly for even more housing growth in the town centre than was previously envisaged in the Core Strategy (based partly on recent Secretary of State decisions to allow development to proceed on a number of large sites): ‘The sites allocated in this AAP could accommodate some 3,100 dwellings…it is possible that not all of the allocations will be fully developed by the end of the Plan period and the higher figure helps to provide confidence and a degree of flexibility in meeting the required overall residential figure for the Town Centre, as set out in Policy CS3. This position will require ongoing monitoring, and the approach also makes no assumption in relation to windfall developments in the town centre, some of which are, nevertheless, likely to come forward in the Plan period’.

- Similarly, in light of a new Employment Land Review, the AAP plans to increase the amount of office floorspace previously set out in the Core Strategy (76,200 sq.m): ‘...in order for the Ashford Growth Area as a whole to meet its job creation targets by 2021, there should a greater focus on the delivery of town centre office development in the order of 93,000sqm by 2021’. The approach to retail and leisure floorspace remains largely unchanged with a slight reduction in the target based on new developments since 2008, while revisions to office floorspace figures are predicted to increase overall job numbers for the town centre to the order of approximately 150-1000 above the total Core Strategy estimate of 8,000 (Paragraph 2.4, Ashford Town Centre AAP, 2010).

13.3 Why has the preferred approach been selected?

13.3.1 The Council’s preferred broad spatial approach is to focus growth on the District’s main settlements, plus the Romney Marsh area. This approach has the potential to meet housing needs over the plan period and in turn achieve the objective of promoting economic growth and competitiveness. As such, the ‘corridor’ approach is deemed to be unnecessary within the plan period. The corridor approach is not without its merits, but would be associated with significant environmental drawbacks. A benefit of focusing growth on the District’s main settlements, plus the Romney Marsh area, is that it will enable a clear focus on delivering urban regeneration and addressing problems of rural isolation.

13.3.2 This conclusion is broadly in-line with SA findings, which are presented in full within Appendix IV of this report.
14 STRATEGIC SITES / BROAD LOCATIONS

14.1 Why is this a key plan issue?

14.1.1 In addition to establishing a broad spatial approach to growth there is also a need for the Core Strategy to ‘allocate’ strategic sites for growth (i.e. sites of such a scale that their successful and early delivery is of critical importance to the maintenance of the required housing supply) and identify other broad locations where there is the intention to allocate land for development. The need to select strategic sites / broad locations is the issue under consideration within this Chapter.

Box 14.1: Why consideration is not given to less-strategic locations for change

The default position is that the spatial approach to growth outside of strategic sites and broad locations should be in-line with the settlement hierarchy, i.e. should accord with the existing size of settlements. There is no evidence to suggest that any reasonable alternative approach exists.

One alternative approach was considered (albeit briefly) in 2008, when the Council consulted on the (somewhat conceptual) idea of taking a ‘local hinterlands’ approach to growth in the District that would see the District as a series of towns and villages (and surrounding hinterlands) that should grow with a view to being mostly self-sufficient. This suggested approach was also subjected to SA at the time, which suggested that this approach (at least in the short to medium term) would result in major draw-backs from a perspective of wishing to encourage more sustainable transport and travel patterns.

Another reason why it is not considered appropriate for the Core Strategy to prescribe the approach to growth outside of strategic sites / broad locations (aside from stating the default position of development in-line with the settlement hierarchy) relates to the fact that there are now provisions (through the Localism Act) for local groups to prepare Neighbourhood Development Plans where the community feels growth related opportunities exist that should be realised.

14.2 What are the reasonable alternatives?

14.2.1 Seven locational options were subjected to SA:

- Folkestone Seafront
- Shorncliffe Garrison
- New Romney
- Hawkinge
- Sellindge
- Lympne
- Folkestone Racecourse

Why were these options selected?

14.2.2 These are mainly locations where large sites have been shown by the SHLAA to be available and potentially deliverable. The one exception is Hawkinge. No large site has been shown by the SHLAA to be available and potentially deliverable; however, Hawkinge has been given consideration nonetheless as a potential locational option on the basis that it is one of the District’s main towns.
14.3 Why has the preferred approach been selected?

14.3.1 The preferred approach is to allocate Folkestone Seafront and Shorncliffe Garrison as Strategic Sites and identify New Romney and Sellindge as Broad Locations. These findings are broadly in-line with the findings of the Sustainability Appraisal (see Appendix V).

14.3.2 The two Folkestone sites are located within the existing urban area on brownfield land and hence are most appropriate. These are both large sites, i.e. capable of delivering over 500 dwellings.

14.3.3 The broad location identified at New Romney is shown to perform well in terms of SA objectives, although it performs poorly in terms of biodiversity. From a District wide flood risk perspective, development within the Romney Marsh Area is not sequentially an ideal location; however, it is recognised there is a need for development on the Marsh to ensure other (socio-economic) sustainability issues are addressed. Growth of New Romney would ensure affordable housing needs can be met within the Romney Marsh character area whilst reinforcing the role of the town as a viable service centre for the surrounding area.

14.3.4 Sellindge is a well served rural settlement, outside of a protected landscape within the North Downs character Area. Further growth at a scale suitable to the settlement (i.e. at a scale that would not overload services) would lead to benefits in terms of providing affordable housing and improving the townscape and environmental quality of the settlement.

14.3.5 Hawkinge, despite being one of the District’s service centres is not a preferred location on the basis that it is located in the AONB. More generally, it is suggested that local needs are best met by consolidating the level of growth set out in the Shepway District Local Plan Review. Also, as discussed above, no suitable strategic sites were identified by the SHLAA.

14.3.6 In relation to Lympne, the appraisal showed this to perform poorly as a locational option (but recognised that there is some potential for growth at Lympne to meet local need and to ensure the sustainability of the settlement). Specifically:

- Development at Lympne would result in the loss of greenfield land with potential negative implications for biodiversity;
- Lympne is located in countryside adjoining the AONB and therefore significant development would be likely to lead to negative effects on the countryside;
- Strategic development would require considerable upgrading of sewerage infrastructure; and
- New residents would be largely dependent on private transport to access services.

14.3.7 Development at Folkestone Racecourse would be of a strategic scale and seek to cross subsidise the delivery of a new racecourse. However, this level of growth is not commensurate with the scale of the existing settlement and could have significant landscape impacts. Whilst the proposal could provide a new primary school, the development would be reliant on larger existing settlements, such as Folkestone and Ashford or Sellindge to meet its residents’ needs. Despite good public transport this could lead to a significant increase in private transport journeys with an impact on the local highway network. Overall, the Council concludes that strategic scale development at Folkestone Racecourse would only merit being supported were sufficiently strong justification made, backed by robust evidence.
15 FOLKESTONE SEAFRONT

15.1 Why is this a key plan issue?

15.1.1 As well as identifying Strategic Sites and Broad Locations the Core Strategy must also establish policy to guide growth and change more generally at each. This Chapter focuses on the policy approach to growth at Folkestone Seafront.

15.2 What are the reasonable alternatives?

15.2.1 Four alternative approaches were subjected to SA:

1) Mixed-use development of **up to 1,000 homes** and in the region of 10,000sqm of commercial floorspace (A use classes, B1, C1, D1, D2 and sui generis) together with beach sports/sea sport facilities and associated on- and off- site community and physical infrastructure
   - In-line with Policy SS6 as included in the July 2011 Submission Core Strategy, amended by the 2012 Proposed Modifications

2) Mixed use development of **up to 1,000 homes** and a minimum of 10,000sqm commercial floorspace including (retail and office space), enhanced sports and cultural facilities and associated infrastructure
   - In-line with Policy SS6 as included in the July 2011 Submission Core Strategy

3) Mixed used development of approximately **800 homes**, with restaurant/bar uses, with potential for enhanced sports facilities and associated infrastructure
   - In-line with Policy FH2 as included in the summer 2009 Preferred Options document

4) Mixed-use developments including **500 homes**, leisure/tourism uses, restaurants, retail, associated parking and improved pedestrian/cycle links
   - In-line with Policy HO2A from the Shepway District Local Plan Review and the associated requirements of Policies FTC6-8

15.3 Why has the preferred approach been selected?

15.3.1 The preferred approach for Folkestone Seafront is Alternative 1. This approach should maximise the efficient use of this key urban site through the provision of a high quantum of residential development. This approach performs better than Alternative 2 on the basis that it is more prescriptive regarding the range and mix of non-residential uses. Alternative 1 is also supported by the landowners and is backed by a very high degree of evidence relating to its deliverability including a comprehensive Masterplan document. In light of these facts, there can be confidence that Alternative 1 would contribute significantly to the urban regeneration of Folkestone whilst ensuring that masterplanning and design measures take into account the sensitive characteristics of this location.

15.3.1 This conclusion is broadly in-line with SA findings, which are presented in full within **Appendix VI** of this report.
SHORNCLIFFE GARRISON, FOLKESTONE

16.1 Why is this a key plan issue?

16.1.1 As well as identifying Strategic Sites and Broad Locations the Core Strategy must also establish policy to guide growth and change more generally at each. This Chapter focuses on the policy approach to growth at Shorncliffe Garrison, Folkestone.

16.2 What are the reasonable alternatives?

16.2.1 Four alternative approaches were subjected to SA:

1) Predominantly residential development with up to 1,200 homes by 2031 and an improved military establishment, in addition to the provision of new community facilities and associated infrastructure upgrades. Proposals must be designed to achieve high standards of environmental performance and be accompanied with a recreational access strategy and townscape, heritage and archaeological analysis in order to assess impacts on local Natura 2000 site(s) and heritage assets
   - In-line with Policy SS7 as included in the July 2011 Submission Core Strategy, amended by the 2012 Proposed Modifications

2) Predominantly residential development (up to 1,200 homes by 2031) and an improved military establishment, in addition to the provision of new community facilities and associated infrastructure upgrades
   - In-line with Policy SS7 as included in the July 2011 Submission Core Strategy

3) Allocation for at least 900 homes, with improved Ministry of Defence facilities, provision of open space and community facilities and associated infrastructure
   - In-line with Policy FH3 as included in the summer 2009 Preferred Options document

4) Residential development permitted in the existing built up areas of the site, with no quantum specified. Proposals subject to sufficient protection, re-provision and/or enhancement of open space and school playing fields commensurate with growth
   - In-line with Policy HO3 from the Shepway District Local Plan Review and the associated requirements of policies LR9 and LR12

16.3 Why has the preferred approach been selected?

16.3.1 The redevelopment of Shorncliffe Garrison would have significant sustainability benefits. It represents efficient use of a previously developed site, will support improved health and well-being amongst the neighbouring communities; will enable the provision of educational facilities; and will enable the provision of infrastructure that in turn should support a shift towards more sustainable patterns of travel.

16.3.2 Alternative 1 is considered to have benefits over and above the other options tested given that a more stringent policy approach will ensure high standards in relation to the environmental performance of built development (e.g. in terms of water efficiency). This policy approach will also help to ensure opportunities are realised in terms of biodiversity enhancement and the retention and enhancement of heritage assets.

16.3.3 This conclusion is broadly in-line with SA findings, which are presented in full within Appendix VII of this report.
17 NEW ROMNEY

17.1 Why is this a key plan issue?

17.1.1 As well as identifying Strategic Sites and Broad Locations the Core Strategy must also establish policy to guide growth and change more generally at each. This Chapter focuses on the policy approach to growth at New Romney.

17.2 What are the reasonable alternatives?

17.2.1 Five alternative approaches were subjected to SA:

1) Provision of approximately 300 dwellings to the north of the town centre and enhancement of New Romney as a key market town and service centre for Romney Marsh, providing: a range of services and attractions for local residents and tourists; expansion of employment on the Mountfield Road Industrial Estate; improved vehicular and pedestrian/cycle linkages to the town centre (including amelioration of highway impacts); upgrade of school playing field facilities; and an enhanced public realm. Proposals must integrate with the natural boundary currently defined by Cockreed Lane, as well as neighbouring previously developed land to the north east of Cockreed Lane and follow the recommendations within the Shepway Strategic Flood Risk Assessment.
   - In-line with Policy CSD8 as included in the July 2011 Submission Core Strategy, amended by the 2012 Proposed Modifications

2) Provision of approximately 300 dwellings to the north of the town centre and enhancement of New Romney as a key market town and service centre for Romney Marsh, providing: a range of services and attractions for local residents and tourists; expansion of employment on the Mountfield Road Industrial Estate; improved vehicular and pedestrian/cycle linkages to the town centre (including amelioration of highway impacts); upgrade of school playing field facilities; and an enhanced public realm.
   - In-line with Policy CSD8 as included in the July 2011 Submission Core Strategy

3) Housing-led development of the site to the west of New Romney Town providing around 400 homes including affordable housing and family sized dwellings. Development should meet level 4 of the Code for Sustainable Homes and consider site-wide solutions for low carbon/renewable heat and power. Proposals should be brought forward as a comprehensive masterplan, with phasing, and should include consideration of: sustainable modes of transport; landscaping/Green Infrastructure impacts (development shall not extend to the north of Cockreed Lane); flood risk; integration with the existing grain of development; and aligned with local policies for design, climate change and infrastructure. Preparatory studies will examine biodiversity, highways/transport, flooding and archaeological considerations. Provision for new infrastructure will be based on a detailed appraisal.
   - In-line with Policy RM2 as included in the 2009 Preferred Options document

4) The provision of a broad location for residential development of over 1000 dwellings including consideration of development to the east of the town at Littlestone.
   - In-line with the alternative to Policy RM2 as presented in the 2009 Preferred Options document

5) No broad location at New Romney
   - In-line with the alternative to Policy RM2 as presented in the 2009 Preferred Options document
17.3 Why has the preferred approach been selected?

17.3.1 The preferred approach for New Romney (Alternative 1) involves support for residential development to the north of the town centre, the further development of the Mountfield Road industrial estate and the reinforcement of the role of New Romney as a key market town and service centre through the consolidation and improvement of the high street. This approach balances the need for a flexible approach to securing the residential development needed to support the future needs of the town, and is therefore assessed as being achievable and deliverable. This preferred approach also has a positive impact in terms of promoting sustainable patterns of travel by seeking to locate residential development within walking distance of key local services, including the local primary school and the high street. It is recognised that constraints exist – in terms of flood risk, impact on bio-diversity and landscape – that require further attention through detailed masterplanning and design.

17.3.2 This conclusion is broadly in-line with SA findings, which are presented in full within Appendix VIII of this report.
18  SELLINDEGE

17.1  Why is this a key plan issue?

18.1.1  As well as identifying Strategic Sites and Broad Locations the Core Strategy must also establish policy to guide growth and change more generally at each. This Chapter focuses on the policy approach to growth at Sellindge.

18.2  What are the reasonable alternatives?

18.2.1  Five alternative approaches were subjected to SA:

1) Limited residential development on land in the centre of Sellindge providing no more than 250 homes, including affordable housing and enabling a central village green/common, a more pedestrian/cycle friendly Ashford Road, and other community facilities. Proposals should be brought forward as a comprehensive masterplan and should include consideration of delivery of a core area (bulk of identified land south of the A20) in parallel with/advance of any development to the west, north or east of it.
   - In-line with Policy CSD9 as included in the July 2011 Submission Core Strategy, amended by the 2012 Proposed Modifications

2) Limited residential development on land in the centre of Sellindge providing no more than 250 homes, including affordable housing and enabling a central village green/common, a more pedestrian/cycle friendly Ashford Road, and other community facilities. Proposals should be brought forward as a comprehensive masterplan and should include consideration of delivery of a core area (bulk of identified land south of the A20) in parallel with/advance of any development to the west, north or east of it.
   - Permission for private residential development sites outside of the defined settlement boundaries and not considered in the Rural Masterplanning Project will be refused.
   - In-line with Policy CSD9 as included in the July 2011 Submission Core Strategy

3) Housing-led development of land at Sellindge East (north of the motorway and A20) providing around 300 homes including affordable housing, lifetime homes and family sized dwellings. Development should meet level 4 of the Code for Sustainable Homes and consider site-wide solutions for low carbon/renewable heat and power. Proposals should be brought forward as a comprehensive masterplan, with phasing, and should include consideration of: open space and recreational facilities (including contributions to improving local play space and biodiversity); flood risk and sewer infrastructure; and sustainable modes of transport and parking. Provision for new infrastructure will be based on a detailed appraisal.
   - In-line with Policy ND3 as included in the 2009 Preferred Options document

4) Development of approximately 58 hectares of land between Moorstock and Sellindge to provide between 500 and 1000 new homes.
   - In-line with the alternative to Policy ND3 as presented in the 2009 Preferred Options document

5) The inclusion of no specific policy within the Core Strategy supporting mixed use development at Sellindge
   - In-line with the alternative to Policy ND3 as presented in the 2009 Preferred Options document
18.3 Why has the preferred approach been selected?

16.6.1 The preferred approach for Sellindge (Alternative 1) recognises the need for a suitable level of residential development to be secured at Sellindge to meet local housing needs (whilst also supporting District needs) linked to the need to secure improvements to local transport and community infrastructure. The approach reflects the collaborative work undertaken by the local planning authority and local community, in accordance with the principles of localism, an approach that is required to continue through future master-planning processes. It is considered that the selected approach will bring sustainability benefits in terms of creating sustainable and vibrant communities (including through supporting a new village green) and ensuring access to decent and affordable homes.

18.3.1 This conclusion is broadly in-line with SA findings, which are presented in full within Appendix IX of this report.
19 FOLKESTONE RACECOURSE

19.1 Why is this a key plan issue?

19.1.1 Folkestone Racecourse is outside of the District’s main towns (i.e. growth here would not be in-line with the preferred broad spatial approach to growth) and also has not been shown to perform well as a location for growth when compared against other potential locations for growth (see Chapter 14). As such, it can be argued that determining ‘the approach that should be taken to growth at Folkestone Racecourse is not a key plan issue. Having said this, questions around growth at Folkestone Racecourse are contentious, and therefore it is helpful to present a consideration of the ‘do-nothing’ approach alongside approaches to growth that could (hypothetically) be taken.

19.2 What are the reasonable alternatives?

19.2.1 Four alternative approaches were subjected to SA:

1) Folkestone Racecourse is not allocated within the Shepway Core Strategy.

2) Folkestone Racecourse is allocated for a mixed use development providing up to 820 homes including provision of affordable housing. Redevelopment should provide a reconfigured racecourse, grandstand, conferencing and associated leisure facilities and other rural employment, together with a primary school, community facilities, public open spaces (and an enhanced setting for Westenhanger Castle/nearby AONB), and upgraded railway station facilities (including new access and parking). Development should meet level 3 (or higher) of the Code for Sustainable Homes, with water efficiency of 90 litres/person/day or better and allow for convenient waste recycling. Proposals should be brought forward as a comprehensive masterplan or an outline/detailed planning application for the whole site with phasing that expedites delivery of a new racecourse and timely delivery of infrastructure. Proposals should consider: sustainable modes of transport; the Newingreen (A20/A261/Stone Street) junction and onward transport arrangements for users of the railway station; flood risk/wastewater infrastructure and interaction with blue and green infrastructure; landscaping; and the existing built form of settlements within the wider North Downs area.
   - In-line with Policy SS8 as included in the July 2011 Submission Core Strategy

3) The Folkestone Racecourse site is allocated for a high quality mixed use development providing at least 400 homes, including affordable housing and lifetime homes. Development should meet level 4 of the Code for Sustainable Homes and consider site-wide solutions for low carbon/renewable heat and power. Proposals should be brought forward as a comprehensive masterplan and should include consideration of: local policies for design and infrastructure; retention and improvement of the racecourse; enhancement of the historic setting/integration with the Westenhanger Castle and Medieval barns; provision of a village centre providing local shops and space for small businesses (B1), community facilities and open space; sustainable modes of transport and a new access road from the A20; flood risk and sewerage infrastructure.
   - In-line with Policy ND2 as included in the 2009 Preferred Options document

4) Proposals for the intensification of uses at Folkestone Racecourse involving the development of additional leisure, recreational, tourism and exhibition facilities will be permitted subject to proposals meeting all of the following criteria: amenity, environmental and highway considerations and compliance with countryside conservation policy; provision of a flood risk assessment; and Proposals protect the nationally important historic buildings, archaeological remains and setting of the Westenhanger castle complex.
   - In-line with Policy LR5 of the Shepway Local Plan
19.3 Why has the preferred approach been selected?

17.3.1 Alternative 1 (no strategic site) is the preferred approach. This reflects the fact that the Core Strategy should have a strong urban focus and there is a lack of clear evidence regarding the benefits and deliverability of strategic development at this location. It is not possible to conclude which of Alternatives 2 and 3 might perform better at the current time given the evidence available.

19.3.1 This conclusion is broadly in-line with SA findings, which are presented in full within Appendix X of this report.
20 GREEN INFRASTRUCTURE

20.1 Why is this a key plan issue?

20.1.1 Alongside the establishment of a spatial strategy for the District, the Core Strategy also has to address a range of thematic policy issues. Many of these issues can be addressed without alternatives having been subjected to SA; however, for the issue ‘green infrastructure’ a consideration of alternatives is justified.

20.2 What are the reasonable alternatives?

20.2.1 Three alternative approaches were subjected to SA:

1) An approach in-line with Policy CSD4 of the 2011 Core Strategy (as modified), which emphasises:
   - Avoidance of net loss in biodiversity
   - Increasing the quantity of GI, maximising opportunities for net biodiversity gain.
   - Positive approach to areas of high landscape quality or coastal / recreational potential
   - GI protected and enhanced, with loss not allowed unless in full accordance with national policy or a significant quantitative or qualitative benefit is realised
   - Planning decisions to prioritise status of AONB over other planning considerations, with development not to jeopardise protection or enhancement of local landscapes
   - Planning decisions to reflect the need for high quality open spaces

2) An approach in-line with Policy CSD4 of the 2011 Core Strategy, which emphasises:
   - Loss of GI will not be allowed, other than where a significant quantitative or qualitative net GI benefit is realised and the strategic aims of the plan are furthered.
   - Development of GI will be acceptable in suitable locations where sustainable transport improvements are provided
   - Development of GI will be acceptable where sufficient contribution is made to the provision and management of greenspaces
   - GI managed with a strategic focus on climate change effects, avoidance of fragmentation, expanding of greenspace functions and tackling deficiencies.
   - Major development on the edge of settlements to provide green and open space with landscaping and biodiversity provisions on-site

3) An approach in-line with Policy GS1 of the 2009 Preferred Options document, which emphasises:
   - An integrated approach with measures to tackle climate change, enhance and protect strategic landscapes and biodiversity
   - The promotion of new habitats and improvements of linkages, including large-scale habitat preservation, restoration and the creation of a coherent ecological network.

20.3 Why has the preferred approach been selected?

20.3.1 The Council's preferred approach reflects the findings of SA (see Appendix XI). In terms of environmental objectives, Alternative 3 is not sufficiently detailed to effect change as effectively as Alternatives 1 or 2. Alternative 1 performs the strongest of the three alternatives due to the strong support given to re-provision and protection against loss of Green Infrastructure (GI) assets.
PART 3: WHAT ARE THE APPRAISAL FINDINGS AND RECOMMENDATIONS AT THIS CURRENT STAGE?
21 INTRODUCTION (TO PART 3)

The report must include...

- The likely significant effects on the environment associated with the draft plan approach
- The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the plan

21.1.1 As such, this Chapter 23 presents an appraisal of the July 2011 Shepway Core Strategy plus proposed modifications.

21.1.2 Chapter 24 then discusses overall conclusions at this current stage, whilst Chapter 25 summarises outstanding recommendations.

22 METHODOLOGICAL APPROACH

22.1.1 The appraisal identifies ‘significant effects’ on the baseline / likely future baseline associated with the draft plan, drawing on the sustainability objectives identified through scoping (see Part 1) as a methodological framework.

22.1.2 Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the policy measures under consideration. The ability to predict effects accurately is also limited by understanding of the baseline and (in particular) the future baseline.

22.1.3 Because of the uncertainties involved, there is a need to exercise caution when identifying effects.\textsuperscript{106} In light of this, where significant effects are predicted this is done with an accompanying explanation of the assumptions made. In many instances it is not possible to predict significant effects, but it is possible to comment on the merits of the draft plan in more general terms.

22.1.4 It is important to note that effects are predicted taking into account the criteria presented within Regulations.\textsuperscript{107} So, for example, account is taken of the duration, frequency and reversibility of effects as far as possible. The potential for ‘cumulative’ effects is also considered.\textsuperscript{108} These effect ‘characteristics’ are described within the appraisal as appropriate.

22.1.5 Finally, although the primary focus of attention of the appraisal at this stage is ‘the draft plan’, it is also helpful to break the appraisal down somewhat by considering the implications of specific components of the plan. To this end, the following symbols are used to indicate the broad ‘implications’ of each of the policies within the plan:

<table>
<thead>
<tr>
<th>Symbol</th>
<th>Description</th>
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<tr>
<td>🌟</td>
<td>Positive implications.</td>
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<tr>
<td>↔</td>
<td>No implications.</td>
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<tr>
<td>🍆</td>
<td>Negative implications.</td>
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<tr>
<td>?</td>
<td>Uncertain implications.</td>
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22.1.6 It’s important to note that these symbols are not used to indicate significant effects.

22.1.7 Chapter 23 presents the appraisal of the draft plan within 15 separate tables – one for each of the sustainability objectives identified through scoping.

\textsuperscript{106} As stated by Government Guidance (The Plan Making Manual, see http://www.pas.gov.uk/pas/core/page.do?pageId=156210):

“Ultimately, the significance of an effect is a matter of judgment and should require no more than a clear and reasonable justification.”

\textsuperscript{107} Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004

\textsuperscript{108} In particular, there is a need to take into account the effects of the Core Strategy acting in combination with the equivalent plans prepared for neighbouring authorities. Furthermore, there is a need to consider the effects of the Core Strategy in combination with the ‘saved’ policies from the 2006 Shepway Local Plan Review.
## APPRAISAL OF THE JULY 2011 SHEPWAY CORE STRATEGY PLUS PROPOSED MODIFICATIONS

<table>
<thead>
<tr>
<th>Policy</th>
<th>1. To conserve and enhance biodiversity</th>
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<td>Broad Implications</td>
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### Discussion of effects

The preferred approach is to follow an ambitious approach to growth, but one that strikes a balance with the need to protect the District’s important environmental assets. The preferred spatial approach to growth (focused on towns and main villages, plus Romney Marsh) is broadly in accordance with the need to protect environmental assets.

In terms of policy approaches to mitigating negative effects / enhancing the positives, Policies SS2, CSD4 and CSD5 are particularly proactive.

- SS2 seeks to ensure that at least 65% of planned development comes forward on previously developed land.
- CSD4 sets out measures to protect the Green Infrastructure network and ensure opportunities for enhancement are realised.
- Important links are made between CSD4 and CSD5. Specifically:
  - Whilst CSD5 states that: Water reserves and the coastal environment will be maintained and enhanced through Shepway District Council working with partners to manage development and upgrade water infrastructure and quality, and through green infrastructure provisions (policy CSD4).
- Policies SS6 and SS7, while promoting large scale development also make significant provision for protection and enhancement of on and off-site biodiversity as part of the development of these two key sites. It is notable that the supporting text to SS7 (Shorncliffe) cross references to CSD4 and CSD5 in the following way: Improvements to the Seabrook Valley are very important to deliver the overall green infrastructure strategy in Shepway (policy CSD4). Particular attention should be paid to specific opportunities for biodiversity enhancement, with potential functional connections to the SSSI to the west of Seabrook Valley, and facilitating accessible use of the new public open space (consistent with nature conservation objectives). There may also be scope for enhancements contributing to the achievement of Water Framework Directive objectives (see CSD5).

Overall, the effect of the plan is expected that the plan will result in a significant positive effect on the biodiversity baseline at the District scale. There could, however, be some more localised negative effects, particularly at the scale of the Romney Marsh given that the spatial strategy directs growth (including greenfield development) to this area.

**Recommendations:** Ensure a strategic, proactive approach is taken to minimising negative effects to biodiversity at the scale of Romney Marsh (and realising any opportunities that exist).
### SA Objective

**2. To conserve, enhance and make accessible the District’s countryside, heritage and historic environment**

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### Discussion of effects

The preferred approach is to follow an ambitious approach to growth, but one that strikes a balance with the need to protect the District’s important environmental assets. The preferred spatial approach to growth (focused on towns and main villages, plus Romney Marsh) is broadly in accordance with the need to protect the countryside whilst also helping to maintain the vibrancy of historic centres.

In terms of policy approaches to mitigating negative effects / enhancing the positives, Policies SS3, CSD3 and CSD4 are particularly proactive.

- SS3 ensures that development will avoid impacts to the countryside and heritage assets and specifies that “Proposals should be designed to contribute to local place-shaping… by… respecting and enhancing key historic features of conservation interest”
- CSD3 promotes the development of rural tourism, which should have the effect of encouraging sustainable access to the countryside.
  - Having said this, planned growth will inevitably increase pressure on the countryside and heritage/historic features through recreational visits
- CSD4 is proactive in supporting the conservation and enhancement of the countryside, including through a focus on ‘GI strategic fringe zones’ where there should be landscape improvements with a view to better linking green spaces and settlements.
  - CSD4 should also help to preserve the historic character of towns. In particular, it is noted that the policy supports: *Identifying opportunities to expand the GI functions of greenspaces and their contribution to a positive sense of place.*
  - It is important to note that CSD4 will be implemented alongside several important policies from the Shepway Local Plan Review (2006) including LR9 - Protection & Provision of Open Space.

While policies SS6 and SS7 will clearly have an impact on historic environments the policies require developments at the Seafront and at Shorncliffe to take special account of the historic context in which they are set.

Overall, it is expected that the plan will result in a significant positive effect on the baseline, in terms of this objective, at the District scale. This conclusion is reached taking into account the fact that the plan will act cumulatively with a number of “saved” policies from the Shepway District Plan Review (2006) that focus on specific aspects of conservation.

**Recommendations:** Ensure that the Green Infrastructure Strategy is suitably geared towards ensuring that opportunities for GI enhancement within settlement boundaries are realised.
### SA Objective

|--------|-----------------------------|-----------------------|----------------------|--------------------|-------------------------------|---------------------------|------------------------|------------------------|-----------------------------|-----------------------------|-----------------------------|-----------------------------|--------------------------|----------------------|--------------------------|

### Discussion of effects

Growth planned within the Core Strategy will lead to an increase in the demand for water resources in a recognised Water Scarcity Status Area. However, available evidence provided through recalculating the supply and demand figures within Veolia Water SE Water Resource Management Plan suggests that demand will not outstrip the supply of available water resources during the plan period. Having said this, there must be a degree of uncertainty regarding this conclusion, particularly given the uncertainties surrounding changing climate and weather patterns.

In terms of policy approaches to mitigating negative effects / enhancing the positives, Policy CSD5 is particularly proactive, which ensures water saving features will be incorporated within all new development. In addition, Policies for the strategic sites at Folkestone Seafront and Shorncliffe (SS6 and SS7) contain more stringent measures for water efficiency, above the targets set out within the WRMP.

Policy CSD5 also sets out to contribute towards ensuring the quality of waterways and the coastal environment of Shepway. In this respect, it is also noted that growth over the plan period will be directed towards existing settlements in the District, which should help to ensure that sufficient waste water treatment infrastructure is in place. The plan also sets out measures to address localised water quality and infrastructure issues present within and around Romney Marsh and Sellindge. In this respect, it is also noted that the Core Strategy will be implemented alongside ‘saved’ policies from the Shepway District Local Plan Review (2006) that address Sewage & Wastewater Disposal in small (Policy U1) and large (Policy U2) developments.

A final consideration relates to the fact that population and visitor increases (as a result of the focus on tourism development) could also have a detrimental impact on the water quality of the District’s waterways and coast as a result of increased leisure/recreational use of these areas.

Overall, although per capita water use may decrease over time (in the long term) as a result of household water efficiency increasing, it is not possible to conclude that there will be a significant positive effect in terms of water resources management because the fact remains that housing growth is being directed to an area that is water scarce and where there is the potential for problems of water scarcity to worsen in the future. In terms of water quality, the plan will ensure that sufficient measures will be put in place to ensure no negative effects. Overall, the plan has neutral effects.

**Recommendations:** None
SA Objective 4. Increase energy efficiency in the built environment, and the proportion of energy use from renewable sources

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Discussion of effects
Policy SS3 requires that proposals should look to design-in 'appropriate sustainable construction measures' to include 'a proportion of energy from renewable/low carbon sources on new-build development'. Policies for the Strategic Sites at Folkestone Seafort and Shorncliffe go slightly further, requiring that all new development meet Code for Sustainable Homes level 3 or higher.

Overall, it is not clear that the plan shows a level of ambition that will directly lead to a decrease in per capita carbon emissions from the built environment over time; or ensure that growth leads to greater amounts of energy being attained from renewable sources. However, it is recognised that it is difficult to be proactive in relation to sustainable construction at the current time given that there is uncertainty over the role of the Code for Sustainable Homes (with the building regulations should be moving towards carbon neutral homes by 2016). It is noted that the plan does build in flexibility. Overall, the effects of the plan are uncertain.

Recommendation:
- Recognising that there are only two strategic sites, it is suggested that the approach taken at each to ensuring development of energy efficient buildings and use of energy from renewable sources should be ambitious. In particular, consider requiring developers to ensure that opportunities to design-in combined heat and power or district heating schemes are not unduly foreclosed.
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**Discussion of effects**

Although growth planned within Shepway over the plan period may exacerbate the likelihood of flooding within the area, the proposed strategy is to direct the bulk of development towards locations of least flood risk.

The spatial strategy does direct growth to the low lying Romney Marsh area, but the strategy (SS3) is clear that any future allocations must be (sequentially) directed to locations in the Marsh where flood risk is lowest (informed by the Strategic Flood Risk Assessment work that has been completed). Furthermore, Policy SS3 specifies that: *Strategic scale development proposals must be sequentially justified against district-wide site alternatives* (our emphasis). This will further help to ensure that development is not unduly allocated to areas at risk of flooding.

Numerous policy measures within the strategy will help to deliver flood risk management through masterplanning and design. In particular, the implementation of Policy SS3 will ensure the integration of flood risk mitigation into new development. Measures are also incorporated to ensure that specific flood risk issues present within Folkestone, Hythe and New Romney are addressed as part of delivering new development in these areas.

Overall, whilst the spatial strategy does identify a broad location within the low lying Romney Marsh, it does not allocate this site and furthermore puts in place measures to ensure that any future allocation will take careful account of flood risk. As such, it is suggested that the effects of the plan are **uncertain**.

**Recommendations:** None
### SA Objective

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### Discussion of effects

The baseline indicates that Shepway has experienced high waste growth rates, and so it will be important to decouple growth rates from waste generation rates, through movement of the management of waste up the waste hierarchy.

The Core Strategy does not include a thematic policy relating to waste management. However, it is noted that saved policy U10 of the Shepway Core Strategy Review (which will be implemented alongside the Core Strategy) requires that: *Development proposals including commercial or residential uses should include provision for the storage of waste and recyclable materials awaiting collection.*

Also, Policies SS6 (Folkestone Seafront), and SS7 (Shorncliffe Garrison) require that *all buildings [are] designed to allow convenient waste recycling*.

Overall, it is expected that the plan will result in a **neutral effect** given that the factors affecting recycling rates within homes and businesses are wide ranging.

**Recommendations:** None
## SA Objective

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<td>Discussion of effects</td>
<td>The proposed strategy prioritises the re-use of previously developed land within existing settlements in Shepway. This approach will ensure that opportunities for urban regeneration in town and village centres are realised in the short term. A considerable amount of growth is directed to two strategic sites in Folkestone which should lead to particular benefits in terms of the re-use of previously developed land and the promotion urban regeneration. Policies within the plan incorporate measures that will ensure that new development within Folkestone and Hythe responds to the existing urban environment. This will further contribute towards delivering urban regeneration. The Broad Location at New Romney is located on greenfield land, but it is recognised that this location is well suited to supporting the regeneration of the town centre. Overall, the plan will result in significant positive effects. Recommendations: None</td>
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## Discussion of effects

Demographic analysis undertaken for Shepway demonstrates a clear trend towards an increase in the proportion of the District’s population that can be classified as elderly with a corresponding reduction in the proportion of the population that are of working age or younger. Such a trend is likely to have a significantly negative effect upon economic growth and the competitiveness of the District. The preferred growth strategy will help to address this issue by helping to maintain the working age population.

The approach seeks to capitalise on the particular opportunities that present themselves in Shepway, whilst also not seeking to be overly ambitious. It is realistic in terms of employment land with reference to the evidence base.

There is some concern that improved rail linkages will encourage out-commuting, encouraging those with higher skills to make their homes in the area but take their expertise elsewhere, which would have negative implications in terms of this SA objective. However it is hoped that over time there is potential to retain such skills through relocation to, or local business start-ups within Shepway (and hence a longer term positive effect on this objective).

The broad spatial approach of focusing growth on the main settlements will also help to ensure that economic opportunities are realised. There is recognition that vibrant and successful town centres are essential to attract residents and workers (and so critical to offsetting the problem of an ageing population). Perhaps the key town centre issue, which the plan seeks to positively address, relates to changing the perception of Folkestone Town Centre as a location to invest and do business.

Directing growth to Romney Marsh should help to strengthen the local economy and increase competitiveness within this rural area that currently suffers from problems of economic isolation. Specifically, the result of the spatial strategy should be to help ensure that New Romney develops as a viable ‘service town’ for the wider area. Economic growth in the Marsh should help to ensure that it is well placed to capitalise on any opportunities that might arise in the future, including potentially in relation to the expansion of Lydd Airport.

Policies SS4 and CSD3 also positively contribute to the objective of promoting economic growth and competitiveness in rural locations.

Overall, it is expected that the plan will result in significant positive effects in terms of sustainable (long term) economic growth.

**Recommendations:** None
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<td><strong>SA Objective</strong></td>
<td><strong>9. To ensure high and stable levels of employment so that everyone can benefit from economic growth</strong></td>
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<td><strong>Discussion of effects</strong></td>
<td>In April 2010 2,633 people or 4.6% (up 7.3% on April 2009) were JSA claimants in the District. The key issue in the District however is in relation to the concentration of this unemployment in particular locations; and the lack of higher level qualifications. Levels of planned additional commercial provision are ambitious, which is consistent with the objective of achieving high and stable levels of employment. Moreover, it is noted that a spatially targeted approach is taken to growth and regeneration that should help to ensure that access to job opportunities increases in those areas with the greatest levels of unemployment. References are made within several area specific policies to ensuring that opportunities are taken to ensuring that development leads to the enhancement of local skills-base amongst the local workforce. Most notably, Policy CSD6 (Central Folkestone) sets a policy framework to ensure that development within the Central/West Development Arc development contributes to improvements in skills/training in nearby deprived areas, and concludes with the statement: ‘Across these arcs, and within central or deprived places in the town, development bringing investment for schools, new education/training provision and workforce development measures that increase the skills attainment of local people in priority economic sectors, will be acceptable.’ The stringency of references to education and skills within Policy CSD6 partially reflects the influence of earlier plan-making / SA iterations. Overall, the economic growth strategy should help to ensure that there are significant positive effects on the employment baseline; however, the real ability of the Core Strategy to address high unemployment/skills is of course to a large extent dependent on macro-economic factors.</td>
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### SA Objective

#### 10. To ensure that everyone has the opportunity to live in a decent and affordable home

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#### Discussion of effects

Demographic modelling shows over 200 net new dwellings p.a. are required to meet existing needs; however the preferred approach is to set a long term aim of a minimum average of 350 dwellings p.a. until 2030/31. This responds to a number of factors, including the need to achieve economic growth by building more houses for families, demographic change and the underlying strong commercial confidence in residential development. This scale of growth should be sufficient to deliver the appropriate level of new homes within Shepway.

When delivered in combination with Policies CSD1 and CSD2, new housing in Shepway will increase access to affordable housing within the District over the plan period. The broad spatial approach and detailed spatial approach to delivering housing development will contribute towards ensuring that there is sufficient affordable housing located throughout the District, which is appropriate to local needs.

Overall, the plan will have significant positive effects on the ‘housing need’ baseline within Shepway.

**Recommendations:** None
### SA Objective

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| Discussion | The focus on town centres will help to ensure the maintenance of vibrant and sustainable communities. There is also an effort to address social inclusion and integration through improving spatial linkages between homes and jobs.  
The redevelopment of Folkestone Seafront should result in particular benefits given the potential for this scheme to support a vibrant town centre. Similarly broad locations identified at Sellindge and New Romney will have positive effects in terms of creating and sustaining vibrant and sustainable communities.  
The scale of provision of new housing will generate development funds to improve the quality of public space, community and cultural facilities (which will have a positive long term effect on the baseline in terms of this objective).  
Core Strategy policy measures should enhance the positive effects of growth, both in the short and the long term. In particular, the importance of community facilities and well used public space to sustaining vibrant and sustainable communities is reflected. Having said this, there can, of course, be negative effects to local communities in the short term as a result of development, including in relation to construction traffic, noise, etc.  
Overall, the plan will have a significant positive effect on baseline conditions (i.e. it will help to address existing problems) and will help to ensure that new developments are ‘vibrant and sustainable’ in their own right and also well integrated with surrounding neighbourhoods. |
| Recommendations | None |
### SA Objective

**12. To reduce inequalities, poverty, deprivation and social exclusion**

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**Discussion**

Demographic analysis undertaken for Shepway demonstrates a clear trend, over the next 15 years, towards an increase in the proportion of the District's population that can be classified as elderly with a corresponding reduction in the proportion of the population that are of working age or younger. Such a trend would likely have a significantly negative effect upon economic growth in the District and as such the ability to reduce deprivation and social exclusion. The preferred growth strategy will help to address these issues by lessening the extent of this demographic change. A likely result of the growth strategy will be to encourage in-migration of those of working age or with higher level skills whilst at the same time encouraging the retention of existing working age residents by delivering an increased range of employment opportunities and an enhanced education offer. The effect should be to address the current distortion of labour supply and give momentum to the District’s economy, which in turn will enable social exclusion and deprivation to be addressed through regeneration.

The proposed spatial approach takes the dual approach of 1) Prioritising urban regeneration through the provision of new development on brownfield land in accessible locations; and 2) rural regeneration in those areas which are currently suffering multiple deprivation. The spatial strategy will enable development through small/medium scale residential-led development opportunities and a choice of employment sites. It is recognised that future Neighbourhood Plans may provide more definition for the strategy for these areas and that the Council may not wish to be too prescriptive, but local communities may wish to see greater prominence of these issues through recognition in policy.

Numerous policies also make reference to access to skills and training, as well as access to transport infrastructure, both of which as key to unlocking regeneration potential in Shepway. Policy CSD2 seeks to address the specific requirements of vulnerable or excluded groups within the District, for example by requiring 20% of market dwellings, on applicable sites, to meet the Lifetime Homes Standard.

Overall, it is likely the plan will have a **significant positive effect** in terms of reducing inequalities, poverty, deprivation and social exclusion in Shepway.

**Recommendations:** None
|---------|-----------------------------|------------------------|----------------------|--------------------|-------------------------------|----------------------------|-----------------------|--------------------------|-------------------------|----------------------------|----------------------------|----------------------------|----------------------------|----------------------------|----------------|-------------------|--------------------------|--------------------------|-------------------|----------------|----------------|----------------|
| Implications | ↔ ↔ ? ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ | Discussion: Skills attainment is still lower than the national average, which serves as an underlying constraint on the long term growth of the District's economy and must be addressed through social infrastructure investment. The Core Strategy recognises that labour supply must be allied with qualitative measures of training and skills investment, to better utilise human resources within the District.

Policy SS4 requires that "For other employment generating (non-town centre) activities, investment should be directed to designated Major Employment Sites. If suitable sites are shown to be unavailable and unfeasible within any Priority Centre of Activity, development for employment generating uses may only be acceptable in accordance with SS1, SS3 and CSD3 and where demonstrated to be in locations suffering longstanding deprivation, (and subject to directly contributing to local workforce up-skilling...)" [our emphasis].

References are made within several area specific policies to ensuring that opportunities are taken to ensuring that development leads to the enhancement of local skills-base amongst the local workforce. Most notably, Policy CSD6 (Central Folkestone) sets a policy framework to ensure that development within the Central/West Development Arc development contributes to improvements in skills/training in nearby deprived areas, and concludes with the statement: 'Across these arcs, and within central or deprived places in the town, development bringing investment for schools, new education/training provision and workforce development measures that increase the skills attainment of local people in priority economic sectors, will be acceptable.' The stringency of references to education and skills within Policy CSD6 partially reflects the influence of earlier plan-making / SA iterations.

A targeted approach to upskilling and education within Hythe and New Romney is also promoted through Policies CSD7 and CSD8.

Overall, it is predicted that the plan will result in **significant positive effects**.

Recommendations: None
SA Objective | 14. To improve the health and well-being of the population and reduce inequalities in health

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<tr>
<td>Implications</td>
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</table>

**Discussion**

The ambitious approach to growth should contribute towards redressing issues of poor health in Shepway.

Focus is placed on up-skilling, enhanced communication and transport links and good quality housing stock, improving quality of life for disadvantaged communities through raising economic and educational performance and providing more attractive places to live and work. Such an approach necessitates a high growth strategy (to generate the necessary funding to deliver these improvements) which although on the whole will be beneficial to the population’s health, may result in secondary and unintended negative impacts on health for some communities. These may include indirect effects on health through reduced air quality and increased congestion, reduced tranquillity or increased risks (long-term) from flooding or climate change; and are most likely to affect communities within the urbanised area of Shepway.

More generally, the delivery of new housing at a faster rate should drive transformation of the District’s economy and deprived neighbourhoods. This approach should indirectly and over the long term, have a positive impact on improving the health and wellbeing of the population – resulting from improved living conditions, increased housing choice, improvements to public areas, social and community facilities (funded by developer contributions); and increased economic opportunity.

All of the policies in the Core Strategy have some degree of impact on this objective, as the determinants of health and wellbeing are broad, complex and interrelated.

Overall, although high growth strategy may have some unintended consequences for health, the Core Strategy Document attempts to mitigate negative effects and ensure all opportunities are capitalised upon. As such, it is suggested that the plan will have **significant positive effects**.

**Recommendations**: None
<table>
<thead>
<tr>
<th>SA Objective</th>
<th>15. To promote sustainable access, reduce car dependency, road congestion and associated pollution by promoting sustainable locations for development and improving travel choice</th>
</tr>
</thead>
<tbody>
<tr>
<td>Implications</td>
<td>←</td>
</tr>
<tr>
<td>Discussion</td>
<td>The Core Strategy recognises the importance of connectivity to achieving growth, and that recent improvements in the capacity of strategic transport routes serving the main urban area offer the opportunity to transform Shepway’s economic performance. High Speed Rail 1 is recognised as a crucial element for delivery of the growth strategy, both in terms of providing the necessary infrastructure for sustainable commuting which in turn will generate demand for housing, but also in terms of attracting new businesses. Having said this, it cannot be assumed that economic growth within the District will be decoupled from growth in car movements. The focus on brownfield development and existing town centres in the Plan will assist to direct new development to locations which reduce the need to travel, and which support more sustainable modes of travel. Sustainable transport is also supported through site specific and thematic policy. For example, Policy CSD3 (Rural and Tourism Development) directs new tourist development to defined settlements, in recognition that these localities have the greatest potential for sustainable transport choices. Shorncliffe Garrison is well suited to the development of a major new neighbourhood as a result of its accessibility to the motorway and high speed rail services. Close attention would need to be paid to offset the travel impacts of new residents, including through the provision of extensive pedestrian and cycle access routes. With respect to the more isolated Romney Marsh area, development would be directed to New Romney on the basis that it is the most sustainable settlement in terms of the available mix of services, facilities and employment. If the expansion of the airport at Lydd is approved, the subsequent generation of additional trips will need to be addressed. Overall, it is suggested that the plan will have significant positive effects. Recommendations: None</td>
</tr>
</tbody>
</table>
24 CONCLUSIONS AT THIS CURRENT STAGE

24.1 Future growth

24.1.1 Shepway has an ageing population with around 34% of all households including people over the state retirement age. Moreover, Shepway is forecast to continue to have a large proportion of older people compared to the average across Kent. A knock-on effect of an ageing population is that typical households will become much smaller, which means that if no additional housing is provided the population of the District will fall. The flipside of an increasingly elderly population is a fall in the population of those of working age (16-64) or younger. A reduction in the working age population will, in turn, reduce the supply of labour and with it the District’s competitiveness and economic prospects. Increased economic development is essential given levels of unemployment and deprivation in the District (Shepway is the eighth most deprived local authority in the South East). In light of this, there is a strong argument for the Core Strategy to support a relatively significant level of growth which lessens the extent of the forecast demographic change.

24.1.2 The Council has therefore chosen to pursue a reasonably significant level of growth of 400 new dwellings per annum. Although the SA identified positive and negative implications associated with higher and lower levels of growth, the preferred approach was considered to best balance the need for development with the protection of the District’s environment.

24.2 Spatial pattern of development

24.2.1 The preferred broad spatial approach has been determined following the consideration of two alternatives. Both centred on focusing growth in the District’s main settlements, plus within the Romney Marsh character area. Alternative 2, however, also included a focus on additional development along a corridor of land to the west of Folkestone/Hythe.

24.2.2 The Council’s preferred broad spatial approach is to focus growth on the District’s main settlements, plus the Romney Marsh area. This approach has the potential to meet housing need over the plan period and, in turn, promote economic growth and regeneration and combat deprivation. As such, development along the ‘corridor’ to the west of Folkestone/Hythe is not considered necessary in the plan period. Moreover, development along the corridor would be likely to have a negative environmental impact, including in relation to biodiversity and landscape objectives. In addition to development in the main settlements, development within the Romney Marsh area provides an opportunity to address problems of rural isolation and the relatively high levels of deprivation in the District’s rural south. Strategic development at Hawkinge and Lympne has been discounted, partly for environmental reasons.

24.3 Development areas

24.3.1 Seven potential development locations have been considered, located both within the Folkestone and Hythe urban area and within/adjacent to a number of other settlements within the District. The Council’s preferred approach is to allocate Folkestone Seafront and Shorncliffe Garrison as Strategic Sites and identify New Romney and Sellindge as Broad Locations for new development.
24.3.2 The two Folkestone sites benefit from being located within the existing urban area on brownfield land and are capable of delivering significant levels of new housing. As such, development at these sites can help support the regeneration of Folkestone, address housing need and promote further investment in the town. Similarly, development at Sellindge and New Romney will assist in providing new housing, supporting economic growth and creating more sustainable communities. It is noted that a Broad Location is established at New Romney despite the existing flood risk. This decision has been taken in light of the overriding necessity to support economic growth and regeneration in this part of the District, and careful attention has been paid to ensuring that flood risk will be avoided and mitigated.

24.4 Capitalising on development and managing its impacts

24.4.1 The desire to ensure that growth is sustainable in the long term is also reflected in the policy requirements that will be placed on developers. In particular, the Core Strategy includes stringent requirements designed to ensure that development helps to achieve local community benefits (including through initiatives to improve local peoples’ skills) and green infrastructure enhancements. In terms of requirements for new development to be designed to high environmental standards, the Strategy could arguably go further (notwithstanding considerations over the viability of development); however, there is scope to develop further policy in this area and, nationally, building regulations are being progressively tightened.

24.5 Overall conclusion

24.5.1 Overall, the level of future growth supported through the Core Strategy strikes a balance between the need to ensure economic growth and regenerate the urban area and the need to protect the District’s valuable environmental assets. In order to further promote regeneration and community well-being, the Strategy focuses development in the urban area and the rural south, the two areas where deprivation is concentrated. Importantly, the Strategy also includes measures to secure the benefits from development and guard against adverse environmental effects.

25 RECOMMENDATIONS AT THIS CURRENT STAGE

25.1.1 The following is a summary of the recommendations presented within Chapter 22, above. These recommendations will be taken into account when finalising the plan (alongside appraisal findings more generally, and consultation responses received as part of the current consultation).

<table>
<thead>
<tr>
<th>Sustainability Objective</th>
<th>Recommendations</th>
</tr>
</thead>
<tbody>
<tr>
<td>To conserve and enhance biodiversity</td>
<td>Ensure a strategic, proactive approach is taken to minimising negative effects to biodiversity at the scale of Romney Marsh (and realising any opportunities that exist).</td>
</tr>
<tr>
<td>To conserve, enhance and make accessible the District’s countryside, heritage and historic environment</td>
<td>Ensure that the Green Infrastructure Strategy is suitably geared towards ensuring that opportunities for GI enhancement within settlement boundaries are realised.</td>
</tr>
<tr>
<td>Increase energy efficiency in the built environment, and the proportion of energy use from renewable sources</td>
<td>Recognising that there are only two strategic sites, it is suggested that the approach taken at each to ensuring development of energy efficient buildings and use of energy from renewable sources should be ambitious. In particular, consider requiring developers to ensure that opportunities to design-in combined heat and power or district heating schemes are not unduly foreclosed.</td>
</tr>
</tbody>
</table>
PART 4: WHAT ARE THE NEXT STEPS (INCLUDING MONITORING)?
26

INTRODUCTION (TO PART 4)

The SA Report must include…
- A description of the measures envisaged concerning monitoring

26.1.1 As such, this Part of the SA Report explains the next steps that will be taken as part of the plan-making / SA process, including in relation to monitoring.

27

PLAN FINALISATION, ADOPTION AND MONITORING

27.1.1 The Council will now consult on a schedule of proposed modifications to the Core Strategy of July 2011 (following the outcomes of the Examination in Public hearing sessions held in May 2012 and the subsequent Interim Conclusions reached by the Inspector). This SA Report is published alongside the modifications for consultation.

27.1.2 Following this process, it is at the discretion of the Inspector whether hearing sessions are reopened in the early part of 2013. Subsequent to this decision, the Inspector will write his Final Report where he is legally entitled to make ‘Main Modifications’ to the Plan to ensure the soundness of the document. Depending on the Council’s acceptance of these, the Core Strategy will be presented to a meeting of Full Council who then decide whether to formally adopt the Plan as part of the development plan.

27.1.3 At the time of Adoption a ‘Statement’ must published that sets out (amongst other things):
- How this SA Report and responses received as part of the current consultation have been taken into account when finalising the plan; and
- Measures decided concerning monitoring.

27.1.4 At the current stage (i.e. within the SA Report), there is a need to present ‘measures envisaged concerning monitoring’ only. As such, Table 27.1 suggests measures that might be taken to monitor the effects (in particular the negative effects) highlighted by the appraisal of the draft plan (see Part 3 of this SA Report).

Table 27.1: Measures envisaged concerning monitoring.

<table>
<thead>
<tr>
<th>Objective</th>
<th>Significant effect?</th>
<th>Relevant indicators$^{109}$</th>
<th>Gaps in coverage and suggested indicators</th>
</tr>
</thead>
<tbody>
<tr>
<td>Conserve and enhance biodiversity</td>
<td>+ve</td>
<td>- Changes in areas of biodiversity importance (losses or gains)$^{110}$</td>
<td>It is recommended that Shepway District Council explores development of further biodiversity indicators – perhaps related to the extent of biodiversity enhancements in new development.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Amount of eligible open spaces managed to Green Flag Status</td>
<td>Locally specific indicators could be informed by landscape character assessment work, or perhaps landscape scale nature conservation strategy (e.g. strategy for ‘Living Landscapes’),</td>
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<tr>
<td></td>
<td></td>
<td>- Loss/gain of open space with recreational value or potential</td>
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<td></td>
<td></td>
<td>- New recreational facilities providing children’s play areas</td>
<td></td>
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<td>- Completion of major recreational projects at Lower Leas Coastal Park and New Romney</td>
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<tr>
<td></td>
<td></td>
<td>- Loss/Gain of urban open space with amenity value</td>
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<td></td>
<td></td>
<td>- Development within or near sites with conservation value</td>
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</tbody>
</table>

$^{109}$ Details of each indicator are available within the AMR
$^{110}$ The 2008 AMR stated that evidence for this Core Indicator was dependent on the completion of the Kent Habitat Survey, which as of 2011 was still underway.
Indicators could also include:
- Percentage of SSSIs in: a) favourable condition; b) unfavourable recovering; c) unfavourable no change; d) unfavourable declining; and e) destroyed/part destroyed
- Net change in District Wildlife Sites in “Positive Conservation Management”
- Number of Tree Preservation Orders (TPOs) where trees are lost through development

To conserve, enhance and make accessible the District’s countryside, heritage and historic environment

<table>
<thead>
<tr>
<th>Indicator</th>
<th>Status</th>
<th>Additional Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>- Developments within Conservation Areas and Areas of Special Character refused as contrary to Planning Policy protecting character</td>
<td>+ve</td>
<td>- Loss/Gain of: a. Non-listed Buildings b. Listed buildings within Conservation Areas - Implementation of landscaping schemes in new developments - Developments within Areas of Outstanding Natural Beauty (AONB) which adversely affect the natural beauty of the area - Developments within Local Landscape Areas which adversely affect the special character of the area</td>
</tr>
<tr>
<td>- Number and percentage of: a) Listed Buildings; and b) Scheduled Ancient Monuments on Buildings at Risk Register</td>
<td></td>
<td>It could be useful to monitor the success of this strategy, to ensure benefits are being realised and no unforeseen adverse effects arise. It is suggested that the Council may wish to work with English Heritage to identify priority indicators.</td>
</tr>
<tr>
<td>- Percentage of Conservation Areas with appraisals</td>
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</tbody>
</table>

To maintain and enhance the water quality of the District’s waterways and coasts, and achieve sustainable water resources management

<table>
<thead>
<tr>
<th>Indicator</th>
<th>Status</th>
<th>Additional Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>- Number of Planning Permissions granted contrary to the advice of the Environment Agency either on the grounds of flood defence or water quality grounds - Implementation of the Code for Sustainable Homes - Improvement in the quality of bathing water in Shepway</td>
<td>Neutral</td>
<td>Depleted groundwater can manifest itself in poor water quality and the poor quality of aquatic ecosystems. It is suggested that the Council may wish to work with the Environment Agency to ensure monitoring effort is directed towards those watercourses that have the greatest potential to be impacted as a result of future growth.</td>
</tr>
<tr>
<td>- Percentage of river length assessed as: a) good biological quality b) good chemical quality</td>
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<td>Indicators could also include:</td>
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</table>

Increase energy efficiency in the built

<table>
<thead>
<tr>
<th>Indicator</th>
<th>Status</th>
<th>Additional Details</th>
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</thead>
<tbody>
<tr>
<td>- Renewable energy generation by installed capacity and type</td>
<td>Uncertain</td>
<td></td>
</tr>
<tr>
<td>- Percentage of river length assessed as: a) good biological quality b) good chemical quality</td>
<td></td>
<td>Indicators could also include:</td>
</tr>
</tbody>
</table>
### Environment, and the proportion of energy use from renewable sources

- Implementation of the Code for Sustainable Homes
- Decentralised and renewable or low carbon energy sources permitted in major developments
- Total CO₂ emissions per capita

### To take an integrated approach to the reduction of flood risk

<table>
<thead>
<tr>
<th>Category</th>
<th>Effect</th>
<th>Indicators</th>
</tr>
</thead>
</table>
| Uncertain | - Incidents of major flooding as a result of surface water run-off  
- Number of new residential properties in areas of flood risk that are not defended to an appropriate standard | The council may wish to consider more closely (i.e., through a Supplementary Planning Document) the scope of what can and should be achieved in terms of high quality SuDS, which would then also enable the success of policy to be monitored going forward. |

### To reduce waste generation and promote sustainable management of waste

<table>
<thead>
<tr>
<th>Effect</th>
<th>Indicators</th>
</tr>
</thead>
<tbody>
<tr>
<td>Neutral</td>
<td>- New waste recycling facilities</td>
</tr>
</tbody>
</table>
|        | Indicators could also include:  
- Percentage of household waste that is a) reused , b) recycled and c) composted |

### To improve efficiency in land use through the re-use of previously developed land and existing buildings and promote urban renaissance

<table>
<thead>
<tr>
<th>Effect</th>
<th>Indicators</th>
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</thead>
</table>
| +ve | - Previously Developed Land that has been vacant or derelict for more than five years  
- Percentage of new and converted dwellings on Previously Developed Land  
- Total amount of employment floorspace (sq. metres) by type, which is on previously developed land  
- Loss of agricultural land which is identified as being within the best and most versatile |

### To promote economic growth and competitiveness

<table>
<thead>
<tr>
<th>Effect</th>
<th>Indicators</th>
</tr>
</thead>
</table>
| +ve | - Total amount of additional floorspace (sq. metres) that has been developed for employment, by type  
- Employment Land available, by type  
- Total amount of floorspace for 'town centre uses'  
- Changes to the level of retail and office space in town centres in Folkestone, Hythe, New Romney and Lydd  
- Gain/loss in village shops  
- Changes to the amount of town centre retail floor space  
- Changes to shop frontage  
- Loss/gain of hotel space  
- New tourism developments completed  
- Improvement in holiday stock |
|        | If the Council were to define 'categories of success' for the town centre, then it would be possible to monitor the achievement of success going forward.  
Indicators could also include:  
- Percentage of workforce employed in higher occupations (managers and senior officials, professional occupations and associate professional and technical occupations)  
- New business registration rate per 10,000 population |
| To ensure high and stable levels of employment so that everyone can benefit from economic growth | +ve | - | Level of unemployment in the District  
- Loss of employment land in; a. employment/regeneration areas b. local authority areas  
- Loss or gain of agricultural employee dwellings | Indicators could also include:  
- Number in employment in rural areas |
|---|---|---|---|
| To ensure that everyone has the opportunity to live in a decent and affordable home | +ve | - | Net additional dwellings over the previous five year period  
- Net additional dwellings for the current year  
- Net additional dwellings in future years incorporating five year supply of deliverable sites  
- Managed delivery target detailing how housing sites are to come forward over the remaining plan period  
- Gross affordable housing completions  
- Building for Life Assessments to show the level of quality in new housing developments (of 10 units or more) against CABE criteria  
- Achievement of a range of dwelling types and sizes  
- Percentage new dwellings completed at; 1. Less than 30 dwellings per hectare 2. Between 30 - 50 dwellings per hectare 3. Above 50 dwellings per hectare  
- Net additional pitches for Gypsy and Traveller use | Indicators could also include:  
- Housing to meet the needs of older people, assessed by satisfaction of people over 65 with both home and neighbourhood  
- Unfit housing – percentage of overall housing stock not meeting ‘Decent Homes Standard’ |
| To create and sustain vibrant and sustainable communities | +ve | - | Provision of new social and community facilities  
- Loss of community facilities; except where adequate replacement has been made | It is recommend that SDC explore development of further indicators around gauging peoples’ opinions of their local area, particularly those living in and nearby new urban extensions  
Indicators could also include:  
- Reduction in overall crime |
| To reduce inequalities poverty, deprivation | +ve | - |  | The Council might wish to identify particular social groups within |
and social exclusion

Folkestone, and perhaps also the Romney Marsh area, that should be the focus of monitoring.

Indicators could also include:
- Number of Lower Super Output Areas in national most deprived 20%
- Percentage of working age population receiving Employment Support Allowance and incapacity benefits

<table>
<thead>
<tr>
<th>To raise educational attainment and develop opportunities for everyone to acquire the skills needed to find and remain in work</th>
<th>+ve</th>
<th>-</th>
</tr>
</thead>
<tbody>
<tr>
<td>Provision of education and skills training will be primarily the responsibility of the County Council and other delivery partners. It is suggested that the Council might wish to commit to working with these organisations to ensure effective strategy is developed for particular areas of the District on the basis of ongoing monitoring and evaluation.</td>
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<tr>
<td>Indicators could include:</td>
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</tr>
<tr>
<td>- School leaver qualifications - % of school leavers with 5 or more GCSEs at A* to C grades including Maths and English</td>
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</tr>
<tr>
<td>- 16 to 18 year olds who are not in education, employment or training</td>
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<td></td>
</tr>
<tr>
<td>- Proportion of population aged 16-64 qualified to NVQ level 2 or higher</td>
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<td></td>
</tr>
<tr>
<td>- Proportion of population aged 16-64 qualified to NVQ level 4 or higher</td>
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<tr>
<td>- Level of achievement at the Early Years Foundation Stage</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>To improve the health and well-being of the population and reduce inequalities in health</th>
<th>+ve</th>
<th>-</th>
</tr>
</thead>
<tbody>
<tr>
<td>Indicators could also include:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>- Number of designated Air Quality Management Areas (AQMAs)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>- Number of Lower Super Output Areas in national most</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
| To promote sustainable access, reduce car dependency, road congestion and associated pollution by promoting sustainable locations for development and improving travel choice | +ve | Improvements to the transport network which contribute to sustainable transport  
- Provision of new cycle ways/footpaths  
- Implementation of traffic management measures. | For strategic growth locations, the Council might ideally wish to monitor the transport choices taken by new and existing residents.  
Indicators could include:  
- Building for Life Transport criteria – proportion of schemes which achieve 3 out of 5  
- Percentage of residents who travel to work: a) by private motor vehicle; b) by public transport; c) by foot or cycle; and d) work at or mainly at home |
APPENDIX I: EXAMINING REGULATORY REQUIREMENTS

The Introduction to this SA Report explains that, in order to demonstrate compliance with the requirements of the Environmental Assessment Regulations 2004, SA Reports must answer four questions. Table 1.1 of the Introduction then ‘makes the links’ between requirements of the Regs and these four questions. Table 1.1 is reproduced below (as Table A). The right-hand column of Table A does not quote directly from the Regs, but rather reflects a degree of interpretation. As such, Table B explains this interpretation. The following points supplement Table B.

- References to ‘plan or programme’ have been shortened to ‘plan’.
- Reference to ‘the environmental protection objectives, established at international, Community or Member State level…’ is shortened to ‘the environmental protection objectives, established at international or national level…’
- The requirement to provide 1) ‘an outline of the … relationship [of the plan] with other relevant plans and programmes’ and 2) ‘the environmental protection objectives…’ is taken to mean that a review of the relevant context should be provided.
- The requirement to provide an explanation of ‘the way [environmental protection] objectives and any environmental considerations have been taken into account during [plan] preparation’ is taken as indicating that the SA Report must explain how SA has influenced development of the draft plan.
- The reference to issues that might be a focus of SEA is not given prominence. This reflects the fact that these issues are merely suggested; and that a foremost consideration when undertaking SEA should be the fact that the Regulations are of a procedural nature, i.e. do not seek to prescribe substantive issues that should be a focus. These issues are a material consideration nonetheless.
- The need to provide ‘an outline of the reasons for selecting the alternatives dealt with’ is taken to have a duel meaning:
  1) There is a need to justify the range of alternatives considered (and indeed, the range of issues for which alternatives were considered)
  2) There is a need to explain the reasons for selecting preferred alternatives / the preferred approach to addressing each of the key issues in question. This requirement tallies with the requirement to explain ‘the way [environmental protection] objectives and any environmental considerations have been taken into account during [plan] preparation’
- The requirement to explain ‘the likely significant effects…” is assumed to relate to both the draft plan and alternatives.
- The reference to providing ‘a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information’ is not given prominence. This is purely for reasons of brevity. Methodology is explained where relevant in the report.
- Reference to ‘in accordance with Article 10’ is removed for brevity.
- Finally, it will be noted that references to ‘the environment’ have been retained, despite the fact that the starting assumption that there is a need to give particular attention to environmental issues does not apply to SA.
### Table A: Questions that must be answered (sequentially) within the SA Report

<table>
<thead>
<tr>
<th>SA QUESTION</th>
<th>SA SUB-QUESTION</th>
<th>CORRESPONDING REQUIREMENT (THE REPORT MUST INCLUDE...)</th>
</tr>
</thead>
<tbody>
<tr>
<td>What's the scope of the SA?</td>
<td>What's the Plan seeking to achieve?</td>
<td>• An outline of the contents and main objectives of the plan</td>
</tr>
<tr>
<td></td>
<td>What's the sustainability ‘context’?</td>
<td>• The relationship of the plan with other relevant plans and programmes</td>
</tr>
<tr>
<td></td>
<td>What's the sustainability ‘baseline’ at the current time?</td>
<td>• The environmental protection objectives, established at international or national level, relevant to the plan</td>
</tr>
<tr>
<td></td>
<td>How would the baseline evolve without the plan?</td>
<td>• The relevant aspects of the current state of the environment</td>
</tr>
<tr>
<td></td>
<td>What are the key issues that should be the focus of SA?</td>
<td>• The environmental characteristics of areas likely to be significantly affected</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance</td>
</tr>
<tr>
<td>What has Plan-making / SA involved up to this point?</td>
<td></td>
<td>• An outline of the reasons for selecting the alternatives dealt with (and thus an explanation of why the alternatives dealt with are ‘reasonable’)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• The likely significant effects on the environment associated with alternatives / an outline of the reasons for selecting preferred alternatives / a description of how environmental objectives and considerations are reflected in the draft plan.</td>
</tr>
<tr>
<td>What are the appraisal findings at this current stage?</td>
<td></td>
<td>• The likely significant effects on the environment associated with the draft plan</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan</td>
</tr>
<tr>
<td>What happens next (including monitoring)?</td>
<td></td>
<td>• A description of the measures envisaged concerning monitoring</td>
</tr>
</tbody>
</table>
Table B: Interpreting regulatory requirements

<table>
<thead>
<tr>
<th>Interpretation of the requirements (as presented in Table 1A, above)</th>
<th>Requirements of Schedule 2 of the Regs (the report must include...)</th>
</tr>
</thead>
<tbody>
<tr>
<td>An outline of the contents, main objectives of the plan</td>
<td>(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;</td>
</tr>
<tr>
<td>The relationship of the plan with other relevant plans and programmes</td>
<td>(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan;</td>
</tr>
<tr>
<td>The environmental protection objectives, established at international or national level, relevant to the plan</td>
<td>(c) the environmental characteristics of areas likely to be significantly affected;</td>
</tr>
<tr>
<td>The relevant aspects of the current state of the environment</td>
<td>(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;</td>
</tr>
<tr>
<td>The environmental characteristics of areas likely to be significantly affected</td>
<td>(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;</td>
</tr>
<tr>
<td>The likely evolution [of the baseline] without implementation of the plan</td>
<td>(f) the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;</td>
</tr>
<tr>
<td>Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance</td>
<td>(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;</td>
</tr>
<tr>
<td>An outline of the reasons for selecting the alternatives dealt with</td>
<td>(h) an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;</td>
</tr>
<tr>
<td>The likely significant effects on the environment associated with alternatives / An outline of the reasons for selecting preferred alternatives / a description of how environmental objectives and considerations are reflected in the draft plan.</td>
<td>(i) a description of the measures envisaged concerning monitoring.</td>
</tr>
<tr>
<td>The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan</td>
<td></td>
</tr>
<tr>
<td>A description of the measures envisaged concerning monitoring</td>
<td></td>
</tr>
</tbody>
</table>
APPENDIX II: APPRAISAL OF ALTERNATIVE ‘TIME HORIZONS’

Introduction

This appendix presents an appraisal of the following alternative Core Strategy ‘Time Horizons’:
1. A timeframe for the Core Strategy covering the period 2006 to 2026
2. A timeframe for the Core Strategy covering the period 2006 to 2031

The appraisal should be read alongside Chapter 11 of the main report, which explains which approach the Council favours, and why.

Methodology

For each of the alternatives, the appraisal identifies ‘significant effects’ on the baseline / likely future baseline, drawing on the sustainability objectives identified through scoping (see Part 1 of the main report) as a methodological framework.

Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the alternatives policy approaches under consideration. The ability to predict effects accurately is also limited by understanding of the baseline and (in particular) the future baseline.

Because of the uncertainties involved, there is a need to exercise caution when identifying effects. In light of this, a conservative approach is taken when predicting significant effects / predicting the significance of effects. Where significant effects are predicted this is done with an accompanying explanation of the assumptions made.

In many instances it is not possible to predict significant effects, but it is possible to comment on the merits of alternatives in more general terms. This is helpful, as it enables a distinction to be made between alternatives even where it is not possible to distinguish between them in terms of ‘significant effects’.

It is important to note that effects are predicted taking into account the criteria presented within Schedule 2 of the Regs. So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. Cumulative effects are also considered. These effect ‘characteristics’ are described within the appraisal as appropriate.

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111 As stated by Government Guidance (The Plan Making Manual, see http://www.pas.gov.uk/pas/core/page.do?pageId=156210): "Ultimately, the significance of an effect is a matter of judgment and should require no more than a clear and reasonable justification."
112 Environmental Assessment of Plans and Programmes Regulations 2004
113 In particular, there is a need to take into account the effects of the Core Strategy acting in combination with the equivalent plans prepared for neighbouring authorities.
## Appraisal findings

Table presenting an appraisal of the following alternative ‘time horizons’:
1. A timeframe for the Core Strategy covering the period 2006 to 2026
2. A timeframe for the Core Strategy covering the period 2006 to 2031

<table>
<thead>
<tr>
<th>SA Objective</th>
<th>Discussion of significant effects (and discussion of relative merits in more general terms)</th>
<th>Rank of preference</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Alt 1</td>
</tr>
<tr>
<td>1. To conserve and enhance biodiversity</td>
<td>No significant effects. Neither is it possible to differentiate between these alternatives in terms of this objective.</td>
<td>N/A</td>
</tr>
<tr>
<td>2. To conserve, enhance and make accessible the District’s countryside, heritage and historic environment</td>
<td>No significant effects. Neither is it possible to differentiate between these alternatives in terms of this objective.</td>
<td>N/A</td>
</tr>
<tr>
<td>3. To maintain and enhance the water quality of the District’s waterways and coasts, and achieve sustainable water resources management</td>
<td>No significant effects. Neither is it possible to differentiate between these alternatives in terms of this objective.</td>
<td>N/A</td>
</tr>
<tr>
<td>4. Increase energy efficiency in the built environment, and the proportion of energy use from renewable sources</td>
<td>No significant effects. Neither is it possible to differentiate between these alternatives in terms of this objective.</td>
<td>N/A</td>
</tr>
<tr>
<td>5. To take an integrated approach to the reduction of flood risk</td>
<td>No significant effects. Neither is it possible to differentiate between these alternatives in terms of this objective.</td>
<td>N/A</td>
</tr>
<tr>
<td>SA Objective</td>
<td>Discussion of significant effects (and discussion of relative merits in more general terms)</td>
<td>Rank of preference</td>
</tr>
<tr>
<td>------------------------------------------------------------------------------</td>
<td>--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td>-------------------</td>
</tr>
<tr>
<td>6. To reduce waste generation and promote sustainable management of waste</td>
<td>No significant effects. Neither is it possible to differentiate between these alternatives in terms of this objective.</td>
<td>N/A</td>
</tr>
<tr>
<td>7. To improve efficiency in land use through the re-use of previously developed land and existing buildings and promote urban renaissance</td>
<td>By aligning the timescale of the Core Strategy with the predicted phasing for the strategic site proposals Alternative 2 would enable greater scope for bringing forward complex development schemes that improve efficiency in land use through the re-use of previously developed land and buildings that promote urban regeneration. As such, in the long term, Alternative 2 would result in significant positive effects on the baseline.</td>
<td>2</td>
</tr>
<tr>
<td>8. To promote economic growth and competitiveness</td>
<td>No significant effects. Neither is it possible to differentiate between these alternatives in terms of this objective.</td>
<td>N/A</td>
</tr>
<tr>
<td>9. To ensure high and stable levels of employment so that everyone can benefit from economic growth</td>
<td>No significant effects. Neither is it possible to differentiate between these alternatives in terms of this objective.</td>
<td>N/A</td>
</tr>
<tr>
<td>10. To ensure that everyone has the opportunity to live in a decent and affordable home</td>
<td>By specifying a long term aim for housing delivery (with a timescale that is greater than the 15 years required by the NPPF) Alternative 2 would enable longer term housing needs to be addressed and so help to ensure that everyone has the opportunity to live in a decent and affordable home. As such, Alternative 2 is predicted to perform better than Alternative 1. However, it is not clear that Alternative 1 would necessarily result in a significant effect on the baseline given the numerous other factors that affect whether everyone has the opportunity to live in a decent and affordable home.</td>
<td>2</td>
</tr>
<tr>
<td>11. To create and sustain vibrant and sustainable communities</td>
<td>By specifying a long term aim for housing delivery Alternative 2 would better enable longer term physical and community infrastructure to be planned and delivered and so help to ensure vibrant and sustainable communities are created and sustained. In particular, Alternative 2 would provide a greater level of certainty to infrastructure providers and funders to allow them to plan and deliver necessary infrastructure.</td>
<td>2</td>
</tr>
</tbody>
</table>
### Discussion of significant effects
(and discussion of relative merits in more general terms)

<table>
<thead>
<tr>
<th>SA Objective</th>
<th>Rank of preference</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Alt 1</td>
</tr>
<tr>
<td>As such, in the long term, Alternative 2 would result in significant positive effects on the baseline.</td>
<td>N/A</td>
</tr>
<tr>
<td>12. To reduce inequalities, poverty, deprivation and social exclusion</td>
<td>N/A</td>
</tr>
<tr>
<td>13. To raise educational attainment and develop opportunities for everyone to acquire the skills needed to find and remain in work</td>
<td>N/A</td>
</tr>
<tr>
<td>14. To improve the health and well-being of the population and reduce inequalities in health</td>
<td>N/A</td>
</tr>
<tr>
<td>15. To promote sustainable access, reduce car dependency, road congestion and associated pollution by promoting sustainable locations for development and improving travel choice</td>
<td>N/A</td>
</tr>
</tbody>
</table>

### Summary

The two alternatives perform very similarly in terms of the majority of SA objectives, but Alternative 2 performs better in terms of three socio-economic objectives as it would not only enable the plan to present a housing target to 2026 but also a long term housing aim to 2031.

Specifically, Alternative 2 performs better in terms of:

- Re-use of previously developed land (SA Objective 7) - by aligning the timescale of the Core Strategy with the predicted phasing for the strategic site proposals.
- Ensuring that everyone has the opportunity to live in a decent and affordable home (SA Objective 10) - by specifying a long term aim for housing delivery (with a timescale that is greater than the 15 years required by the NPPF) therefore enabling longer term housing needs to be addressed.

- Creating and sustaining vibrant and sustainable communities (SA Objective 11) - by specifying a long term aim for housing delivery Alternative 2 would better enable longer term physical and community infrastructure to be planned and delivered. In particular, Alternative 2 would provide a greater level of certainty to infrastructure providers and funders to allow them to plan and deliver necessary infrastructure.
APPENDIX III: APPRAISAL OF ALTERNATIVE ‘GROWTH QUANTUMS’

Introduction

This appendix presents an appraisal of the following alternative ‘growth quantums’:

1) Fundamental Shift
   - This would involve delivering 850 dwellings p.a. and hence involve a radical shift away from long established trends in Shepway's development. The philosophy is based on a desire to meet aspirations for a 'world-class economy' in East Kent.

2) Maximise Development Opportunities
   - This would involve delivering 550 dwellings p.a. and would entail major change for the District, with growth of a substantial scale (against current trends) as an over-riding priority.

3) Selective Approach to Change
   - This would involve delivering 400 dwellings p.a. and would support targeted change.

4) Minimise Change whilst Promoting Sustainable Development
   - This would involve delivering 290 dwellings p.a. and would allow a clear focus on smaller-scale or fewer initiatives.

The appraisal should be read alongside Chapter 12 of the main report, which explains which approach the Council favours, and why.

Methodology

See description of the methodology in Appendix II, above.
## Appraisal findings

### Table presenting an appraisal of the following alternative ‘growth quantums’:

1. **Fundamental Shift**
2. **Maximise Development Opportunities**
3. **Selective Approach to Change and Opportunities**
4. **Minimise Change whilst Promoting Sustainable Development**

<table>
<thead>
<tr>
<th>SA Objective</th>
<th>Discussion of significant effects</th>
<th>Rank of preference</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>1. To conserve and enhance biodiversity</strong></td>
<td>It is assumed that growth on the scale envisaged by Alternatives 1, 2 and 3 will place pressure on sites that are important for biodiversity as well as areas of urban greenspace (locally important for biodiversity) and greenfield land outside settlement boundaries that contributes to the functioning of the ‘ecological network’ within the District. Furthermore, it is expected that growth (on the scale envisaged by the alternatives) will result in increased recreational use of important ‘biodiversity sites’. As such, Alternatives 1, 2 and 3 would lead to significant negative effects on the baseline in the short to medium term. In terms of the relative merits of alternatives, it is suggested that a higher growth strategy will result in significant effects of a greater magnitude.</td>
<td>4 3 2 1</td>
</tr>
<tr>
<td><strong>2. To conserve, enhance and make accessible the District’s countryside, heritage and historic environment</strong></td>
<td>Alternatives 1 and 2 will result in significant greenfield ‘land take’. Although some new housing would be on land with low landscape value, much of it would be on land with significant landscape value. Hence, it is assumed that Alternatives 1 and 2 would lead to significant negative effects on the baseline in the short to medium term. In terms of the relative merits of alternatives: It is assumed that a higher growth strategy will result in negative effects of a greater magnitude.</td>
<td>4 3 2 1</td>
</tr>
<tr>
<td><strong>3. To maintain and enhance the water quality of the District’s waterways</strong></td>
<td>A Water Cycle Study has been prepared for Shepway that highlights concerns about the condition of aquifers across the District, both in terms of water quality and quantity. The study identifies the importance of new development not placing additional undue pressure on natural water reserves. Although some of the new housing would be for existing residents whose households are getting smaller (e.g. due to divorce), much of the new water would be for new residents.</td>
<td>4 3 2 1</td>
</tr>
</tbody>
</table>
### SA Objective

<table>
<thead>
<tr>
<th>Discussion of significant effects (and discussion of relative merits in more general terms)</th>
<th>Rank of preference</th>
</tr>
</thead>
<tbody>
<tr>
<td>Housing would be for an increasing population and so total water use is likely to increase (even if per capita water use decreases) as a result of growth. Growth will also affect water quality by increasing run-off and sewage that will need treatment. As such Alternatives 1, 2 and 3 would lead to significant negative effects on the baseline in the short to medium term. In terms of the relative merits of alternatives, it is suggested that a higher growth strategy will result in significant effects of a greater magnitude.</td>
<td></td>
</tr>
<tr>
<td>Growth at any of these scales would lead to greater total energy use at the District scale, with resultant increases in terms of greenhouse gas emissions at the District scale. However, climate change mitigation is a 'global issue', i.e. it ultimately doesn’t matter where emissions occur. As such, more important is that the Plan has the effect of reducing per capita CO2 emissions. Growth on scale envisaged by Alternatives 1, 2 and 3 should provide opportunities for sustainable design and construction and the incorporation of energy efficiency requirements within new development, contributing to Government zero carbon development targets. As such, Alternatives 1, 2 and 3 would lead to significant positive effects. In terms of the relative merits of alternatives, it is suggested that a higher growth strategy will result in positive effects of a greater magnitude.</td>
<td>1</td>
</tr>
<tr>
<td>A higher growth strategy would be implemented with a view to addressing relative deprivation in the District, and hence a higher growth strategy would probably be associated with development in the Romney Marsh area where flood risk is an identified issue. However, it is not possible to draw this conclusion with any certainty, and so it is not suggested that any of the alternatives would result in significant effects. More generally, it is assumed that a lower growth strategy would result in it being easier to avoid areas of high flood risk (fluvial and coastal).</td>
<td>4</td>
</tr>
<tr>
<td>High growth in terms of housing and economic output will consequently lead to growth in waste arisings locally. However, it is not thought that there are any local constraints that make good waste management a challenge. As such, it is not suggested that any of the alternatives would lead to significant effects. Just as it is not possible to differentiate between alternatives in terms of ‘significant effects’, neither is it possible to differentiate between the alternatives in more general terms.</td>
<td>N/a</td>
</tr>
</tbody>
</table>
### 7. To improve efficiency in land use through the re-use of previously developed land and existing buildings and promote urban renaissance

Alternatives 1, 2 and 3 would enable opportunities to make use of previously developed land and achieve regeneration within Folkestone. Alternative 4, on the other hand, would likely result in opportunities being missed. An equally important consideration is that Alternatives 1 and 2 would involve significant amounts of development accommodated on greenfield land which would have a negative impact on the retention of the highly productive agricultural land resource within Shepway.

In light of the discussion above, it is suggested that Alternatives 1, 2 and 4 would lead to significant negative effects. Negative effects associated with Alternatives 1 and 2 would be felt in the long term, given that previously developed land would be utilised in the first instance.

<table>
<thead>
<tr>
<th>Rank of preference</th>
<th>Alt 1</th>
<th>Alt 2</th>
<th>Alt 3</th>
<th>Alt 4</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>3</td>
<td>2</td>
<td>1</td>
<td>2</td>
</tr>
</tbody>
</table>

### 8. To promote economic growth and competitiveness

Overall, it is suggested that the scale of commercial growth that would be enabled under Alternatives 2 and 3 would have the effect of rebalancing and increasing the resident population and is realistic in terms of employment land with reference to the evidence base. As such, Alternatives 2 and 3 would lead to significant positive effects on the baseline. Alternative 4 would lead to significant negative effects given that the evidence base points to demand for labour in Shepway exceeding the local supply (in-light of the ageing population).

It is difficult to assess the merits of Alternative 1 as a fundamental shift to high growth would attract a risk of failure, given that other towns (e.g. Dover, Ashford) are also well placed for growth in the region.

<table>
<thead>
<tr>
<th>Rank of preference</th>
<th>Alt 1</th>
<th>Alt 2</th>
<th>Alt 3</th>
<th>Alt 4</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>2</td>
<td>1</td>
<td>1</td>
<td>3</td>
</tr>
</tbody>
</table>

### 9. To ensure high and stable levels of employment so that everyone can benefit from economic growth

Given the scale of the unemployment in the District, the levels of growth associated with Alternatives 2 and 3 would likely help to ensure higher and more stable levels of employment. There would be the opportunity to make the most of the District’s improved communications (road and rail in particular), comparative affordability of housing, quality of life factors and comparatively low costs of employment. As such, Alternatives 2 and 3 would lead to significant positive effects on the baseline. Alternative 3 would lead to particular benefits given that it would lead to a focus on known opportunities / areas of known competitive advantage within the District only. Alternative 2, on the other hand, could lead to more risky investment that could have negative implications for the long term stability of employment.

In terms of Alternative 4, there would be significant negative effects on the baseline given that the evidence base points to demand for labour in Shepway exceeding the local supply. Alternative 1 is considered to be a high risk strategy, with the potential to lead to unsustainable employment growth. It is not possible, however, to predict significant negative effects with certainty.

<table>
<thead>
<tr>
<th>Rank of preference</th>
<th>Alt 1</th>
<th>Alt 2</th>
<th>Alt 3</th>
<th>Alt 4</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>3</td>
<td>2</td>
<td>1</td>
<td>4</td>
</tr>
</tbody>
</table>
### SA Objective

<table>
<thead>
<tr>
<th>10. To ensure that everyone has the opportunity to live in a decent and affordable home</th>
<th>Alternatives 1, 2 and 3 recognise the need to ensure delivery of sufficient housing to meet all aspects of housing need and to provide a housing choice. As such, Alternatives 1, 2 and 3 would lead to significant positive effects on the baseline.</th>
<th>Rank of preference</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Alt 1 Alt 2 Alt 3 Alt 4</td>
</tr>
<tr>
<td></td>
<td></td>
<td>1 2 3 4</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>11. To create and sustain vibrant and sustainable communities</th>
<th>Growth on a larger scale would allow opportunities to be capitalised on to the greatest extent. Having said this, effects would of course be mixed. In terms of some community and well-being issues growth will lead to negative effects and a high growth strategy would make avoiding or mitigating significant effects more of a challenge. For example, it will be difficult to avoid instances where existing ‘community identity and cohesion’ is eroded if it is the case that a high growth strategy is supported. As such, Alternatives (1) and (4) would lead to significant negative effects.</th>
<th>Rank of preference</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Alt 1 Alt 2 Alt 3 Alt 4</td>
</tr>
<tr>
<td></td>
<td></td>
<td>4 2 1 3</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>12. To reduce inequalities, poverty, deprivation and social exclusion</th>
<th>Alternatives 1, 2 and 3 recognise the need to ensure delivery of sufficient housing to meet all aspects of housing need and to provide a housing choice. Equally, Alternatives 1, 2 and 3 seek to achieve economic growth and localised regeneration through development focused at areas of deprivation. Alternative 1, however, could be considered overly ambitious and associated with a risk of failure in the long-term. As such, Alternatives 2 and 3 would have significant positive effects on the baseline. Having said this, there is a question-mark regarding whether Alternative 3 would result in a scale of growth that is able to ‘stretch’ to meeting regeneration needs in all parts of the District. Alternative 4 would fail to address issues of deprivation in Shepway, and there would be the potential for deprivation to worsen in-line with recent trends. As such, Alternative 4 would result in significant negative effects on the baseline.</th>
<th>Rank of preference</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Alt 1 Alt 2 Alt 3 Alt 4</td>
</tr>
<tr>
<td></td>
<td></td>
<td>3 1 2 4</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>13. To raise educational attainment and develop opportunities for everyone to acquire the skills needed to find and remain in</th>
<th>Alternative 1 could well result in a rate of housing growth that outstrips the rate at which supporting community infrastructure can be brought forward. This could have negative implications for educational attainment; however, this effect is uncertain.</th>
<th>Rank of preference</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>? ? ? ?</td>
</tr>
</tbody>
</table>
### SA Objective

| Discussion of significant effects (and discussion of relative merits in more general terms) | Rank of preference |
|---|---|---|---|---|
| Work | | | | |
| 14. To improve the health and well-being of the population and reduce inequalities in health | Alternative 1 could well result in a rate of housing growth that outstrips the rate at which supporting community infrastructure can be brought forward. This could have negative implications in terms of access to health and other community facilities that are important from a well-being perspective; however, this effect is uncertain. | ? | ? | ? | ? |
| 15. To promote sustainable access, reduce car dependency, road congestion and associated pollution by promoting sustainable locations for development and improving travel choice | Alternatives 1 and 2 would require development in areas with low public transport accessibility and could result in development in areas where the result is an unacceptable burden on existing transport and communications infrastructure. However, a higher growth strategy would enable large scale development schemes to come forward that integrate sustainable travel measures. | ? | ? | ? | ? |

### Summary

Although all alternatives are associated with positives and negatives, it is Alternative 3 that would best balance socioeconomic and environmental considerations.

### Economic considerations

The need for housing growth to support economic growth and regeneration is highlighted by the available evidence-base, which points to demand for labour in Shepway exceeding the local supply. However, it is also recognised that deliverability of a highly ambitious strategy would be questionable, and would involve a significant risk of failure given that other towns are also well placed for growth (i.e. competition is stiff). The appraisal is able to conclude that Alternative 3 is appropriate as it would allow a focus on known opportunities / areas of known competitive advantage.

### Social considerations

Alternative 3 would support targeted regeneration, but it is questionable whether this scale of growth would be able to ‘stretch’ to meeting regeneration needs in all
Environment considerations

Alternative 1 would almost certainly have an unacceptable environmental impact, and Alternative 2 would also probably result in unacceptable harm to areas of high environmental quality (e.g. the AONB). Other notable environmental issues that would constrain achievement of Alternatives 1 or 2 include: water resource availability; the need to protect the sensitive water environment; and the need to ‘allow space’ for climate change adaptation. The appraisal concludes that Alternative 3 would not necessarily result in environmental limits being breached (given the assumption that growth will be implemented alongside a host of mitigating and proactive policy to protect and enhance the environment). However, there is a degree of uncertainty surrounding this conclusion.
APPENDIX IV: APPRAISAL OF ALTERNATIVE ‘BROAD SPATIAL APPROACHES TO GROWTH’

Introduction

This appendix presents an appraisal of the following alternative ‘broad spatial approaches to growth’:

1) Growth focused on the main settlements plus Romney Marsh

2) Growth focused on the main settlements and a corridor of land to the west of Folkestone/Hythe, plus Romney Marsh

The appraisal should be read alongside Chapter 13 of the main report, which explains which approach the Council favours, and why.

Methodology

See description of the methodology in Appendix II, above.
### Appraisal findings

Table presenting an appraisal of the following alternative ‘broad spatial approaches to growth’:

<table>
<thead>
<tr>
<th>SA Objective</th>
<th>Discussion of significant effects (and discussion of relative merits in more general terms)</th>
<th>Rank of preference</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. To conserve and enhance biodiversity</td>
<td>The broad spatial approach to growth has important implications for biodiversity. In particular, locating major new development where there is the greatest resource of previously developed land can help to negate the need for greenfield development. A secondary consideration is that concentrating development in urban areas will contribute towards reducing the need to travel and hence reducing nitrogen emissions, noise and disturbance from vehicle movements. As such, it is suggested that Alternative 2 would lead to significant negative effects on the baseline. Significant negative effects associated with Alternative 1 cannot be ruled out, but neither can they be predicted with certainty. A plus point for an urban focus in Shepway is that this will probably not lead to a significant loss of garden land given the availability of large scale brownfield sites.</td>
<td>1     2</td>
</tr>
<tr>
<td>2. To conserve, enhance and make accessible the District’s countryside, heritage and historic environment</td>
<td>The broad spatial approach to growth has important implications for the District’s countryside, heritage and historic environment. Consolidation of development within existing settlements will contribute to the retention and protection of valued and sensitive landscapes, and can also help to regenerate areas of historic importance. A key strategic priority is to accommodate new development outside of the North Downs AONB, and so help to protect the landscape quality of this area over the plan period. Alternative 2 would probably lead to impacts on the AONB or its setting, and so would lead to significant negative effects on the baseline.</td>
<td>1     2</td>
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<tr>
<td>3. To maintain and enhance the water quality of the District’s waterways and coasts, and achieve sustainable water resources</td>
<td>Alternative 1 would help to ensure that existing water-related infrastructure is fully utilised over the plan period. However, it is not possible to assume that development away from existing settlements, including within the corridor of land to the west of Folkestone/Hythe would result in development exceeding the capacity of local water-related infrastructure (which in turn could result in pollution events).</td>
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<tr>
<td>SA Objective</td>
<td>Discussion of significant effects (and discussion of relative merits in more general terms)</td>
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<td>management</td>
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<tr>
<td>4. Increase energy efficiency in the built environment, and the proportion of energy use from renewable sources</td>
<td>It is not possible to predict significant effects associated with either Alternative. However, it is noted that directing growth towards existing main settlements (Alternative 1) should present opportunities for technologies such as district heat and power networks given the likelihood of development at high densities. On the other hand, Alternative 2 could support delivery of other forms of renewable energy project in close proximity to new development (e.g. wind turbines).</td>
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<tr>
<td>5. To take an integrated approach to the reduction of flood risk</td>
<td>The Environment Agency has defined an area comprising most of Romney Marsh, West Hythe and South Hythe, which is susceptible to tidal flooding. Focusing on Romney Marsh, it is possible that Alternative 2 could result in less development in this flood risk area. However, this is uncertain given the fact that development within Romney Marsh is a priority for economic / regeneration reasons. Should development be targeted at the Romney Marsh there can be confidence that this would not come forward in those localities that are at most acute risk from tidal flooding.</td>
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<tr>
<td>6. To reduce waste generation and promote sustainable management of waste</td>
<td>The broad spatial approach will have little or no effect in terms of this sustainability objective. However, it is possible to conclude that a more compact form of development presents opportunities for facilities such as waste consolidation centres.</td>
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<tr>
<td>7. To improve efficiency in land use through the re-use of previously developed land and existing buildings and promote urban renaissance</td>
<td>Alternative 2 would lead to significant loss of greenfield land and so lead to significant negative effects. Alternative 1, on the other hand, would enable prioritisation of development on previously developed land within existing settlements and support refurbishment of existing building stock. Achieving a higher quality built environment is particularly relevant in the case of Folkestone where decades of economic under-performance (in many ways typical of other coastal towns in England) have seen physical decay in parts of the town, particularly at Folkestone Seafront and Harbour, and levels of deprivation becoming established in eastern and central areas of the town. As such, Alternative 1 would result significant positive effects.</td>
<td>1 2</td>
</tr>
<tr>
<td>8. To promote economic growth and competitiveness</td>
<td>Both Alternative 1 and Alternative 2 would support an enhanced role for Folkestone/Hythe as a sub regional centre. Both approaches would probably also support development at an appropriate scale at New Romney and Lydd; however, there is some uncertainty in this respect associated with Alternative 2. It is suggested that both alternatives would lead to significant</td>
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<td>SA Objective</td>
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<tr>
<td>9. To ensure high and stable levels of employment so that everyone can benefit from economic growth</td>
<td>Both Alternative 1 and Alternative 2 would support an enhanced role for Folkestone/Hythe as a sub regional centre. Both approaches would probably also support development at an appropriate scale at New Romney and Lydd. Mixed use development at these locations would stimulate local economic activity and directly contribute to local workforce up-skilling. It is suggested that both alternatives would lead to significant positive effects, although there is some uncertainty associated with Alternative 2.</td>
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<td>10. To ensure that everyone has the opportunity to live in a decent and affordable home</td>
<td>It is not thought that either Alternative would lead to a significant effect. Housing need exists in both the urban areas and more rural areas, but is perhaps most acute in the urban area. Another consideration relates to the potential for brownfield vs. greenfield developments to deliver high proportions of affordable housing.</td>
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<td>11. To create and sustain vibrant and sustainable communities</td>
<td>Focusing employment generating activities in accessible locations such as town centres and in areas suffering longstanding deprivation to stimulate economic activity will have an indirect positive effect on promoting social inclusion and integration -by providing opportunities for people living in deprived neighbourhoods to access employment and participate in the local community. The ‘town centre first’ approach will preserve vitality and viability of town centres and have a positive long term effect. Promoting cultural, community and voluntary facilities in town centres will improve accessibility and thus contribute to achieving well used facilities. Alternative 1 will maximise the potential to focus development in an around town centres. As such, Alternative 1 would lead to significant positive effects on the baseline. Alternative 2 would also probably enable ‘enough’ growth to be targeted at communities where there is a need for growth to maintain vitality, but there is less certainty. Another consideration is that Alternative 2 would lead to new communities on greenfield land. There is every potential for such communities to develop well over time, although it is important to also give consideration to the potential for negative implications for neighbouring existing communities who will experience considerable change to their local environment.</td>
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<tr>
<td>12. To reduce inequalities, poverty, deprivation and social exclusion</td>
<td>The largest cluster of deprivation is found in inner/northern Folkestone, especially within the wards of Folkestone East, Foord and Harvey Central. In the south of the District concentrations of rural economic deprivation are found in and around Lydd and small villages inland (e.g. Brenzett). A national benchmarking study undertaken by DCLG found economic problems in southern Shepway – particularly in Romney Marsh at St Mary’s Bay and Dymchurch, where rural isolation and poor access to services and jobs are likely to be key factors.</td>
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<td>SA Objective</td>
<td>Discussion of significant effects (and discussion of relative merits in more general terms)</td>
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<tr>
<td>10. To reduce locational inequalities</td>
<td>Both spatial approaches to growth could help to address locational inequalities through focusing development at Folkestone/Hythe and Romney Marsh, which in turn should support delivery of necessary transport and social/community infrastructure as well as stimulate local economic activity and related upskilling. There can be a risk of overburdening of existing community facilities and infrastructure, but it is assumed that measures will be taken to ensure that this is not the case. Alternative 1 would lead to more development focused at Folkestone/Hythe and Romney Marsh, and would lead to greater benefits.</td>
<td>Alt 1</td>
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<tr>
<td>13. To raise educational attainment and develop opportunities for everyone to acquire the skills needed to find and remain in work</td>
<td>Concentrating major new development within existing settlements will indirectly assist this objective in the long term, by retaining the necessary critical mass of population to sustain educational and training infrastructure and by locating this infrastructure where it is most accessible to those who require access. There can be a risk of overburdening of existing community facilities and infrastructure, but it is assumed that measures will be taken to ensure that this is not the case.</td>
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<td>14. To improve the health and well-being of the population and reduce inequalities in health</td>
<td>Focusing development at existing settlements (Alternative 1 and, to a lesser extent, Alternative 2), would have a positive, indirect effect in terms of this objective given that retaining the vitality and viability of town centres helps to enhance/retain collective community wellbeing and secure access to health, leisure, shops and recreational facilities in the most accessible locations. A complementary mix of uses within a locality can increase the proportion of people who can travel by walking or cycling, with positive implications for health. Another consideration relates to the impacts of climate change, which can be expected to disproportionately affect elderly populations (who are more vulnerable to extremes of weather). Shepway has an ageing population, and so this is a particular concern. Directing new development to existing settlements with established health services and facilities is an efficient and efficient way to ensure health needs can be met in the most sustainable manner. Alternative 1 would lead to more development focused at the main towns, and hence would lead to greater benefits.</td>
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<tr>
<td>15. To promote sustainable access, reduce car dependency, road</td>
<td>Alternative 1 would direct development to the existing towns, and so help to ensure that ‘need to travel’ is minimised. As such, Alternative 1 would lead to significant positive effects on the baseline. Alternative 2 would direct some growth to the corridor of land to the west of Folkestone/Hythe. This area is served by train stations, although it also has good access to the motorway and so it can be expected that care dependency would be high.</td>
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</table>
SA Objective | Discussion of significant effects (and discussion of relative merits in more general terms) | Rank of preference
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Congestion and associated pollution by promoting sustainable locations for development and improving travel choice | Would be possible to masterplan new communities in such a way that supports ‘walkability’, but the overall effect is likely to be a degree of car dependency. As such, Alternative 2 would lead to significant negative effects on the baseline. | Alt 1 | Alt 2

Summary
Alternative 1 – growth focused at the main settlements plus the Romney Marsh – performs notably better in terms of environmental objectives due to the fact that there would be less need for development of greenfield land. In terms of socio-economic objectives Alternative 1 also performs better, but there is less to choose between the alternatives. In terms of promoting economic growth and competitiveness both approaches would have the potential to support an enhanced role for Folkestone/Hythe as a sub regional centre as well as provide ensure that a suitable amount of growth is targeted to the other main towns and villages.
APPENDIX V: APPRAISAL OF ALTERNATIVE STRATEGIC SITES / BROAD LOCATIONS

Introduction

This appendix presents an appraisal of the following seven locational options:

- Folkestone Seafront
- Shorncliffe Garrison
- New Romney
- Hawkinge
- Sellindge
- Lympne
- Folkestone Racecourse

The appraisal should be read alongside Chapter 14 of the main report, which explains which approach to strategic sites / broad locations the Council favours, and why.

Methodology

See description of the methodology in Appendix II, above.
### Appraisal findings

#### Table presenting an appraisal of the following locational options:

1. Folkestone Seafront
2. Shorncliffe Garrison
3. New Romney
4. Sellindge
5. Hawkinge
6. Lympne
7. Folkestone Racecourse

#### Discussion of significant effects

(and discussion of relative merits in more general terms)

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<th>SA Objective</th>
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<tr>
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<td>Seafront</td>
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<tr>
<td>1. To conserve and enhance biodiversity</td>
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As a large proportion of development is directed towards the built up area of Folkestone, there is less potential for significant adverse effects to biodiversity (particularly the high density of SSSIs and local wildlife sites towards the south of the District) although there may be increased impacts on adjacent coastal habitats as a result.

The spatial Strategy for Shorncliffe Garrison can include a management and accessibility strategy to be put in place to enhance biodiversity and improve access in Seabrook Valley as part of delivering new development in the area.

Growth at New Romney may have some limited implications for the Dungeness SAC and the SSSIs and local wildlife sites located in the surrounding area. New development in New Romney has the potential to have a negative recreational impact on these sensitive areas. Mitigatory policy can require proposals to demonstrate how the development will respond sensitively to its natural...
**SA Objective**

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<th><strong>Discussion of significant effects</strong></th>
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<td>(and discussion of relative merits in more general terms)</td>
<td>Seafront</td>
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<tr>
<td>environment.</td>
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<tr>
<td>Development at <strong>Sellindge</strong> would result in the loss of some green-field land but does provide the opportunity for nature conservation enhancement.</td>
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<tr>
<td>Land at <strong>Hawkinge</strong> is located within the existing settlement boundary and is previously developed. It is not of a strategic scale and its impact is likely to be less than that at Lympne, the Racecourse or Sellindge.</td>
<td></td>
</tr>
<tr>
<td>Development at <strong>Lympne</strong> would result in the loss of greenfield land within the countryside. This is likely to have detrimental biodiversity effects.</td>
<td></td>
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<tr>
<td>Development of <strong>Folkestone Racecourse</strong> would involve largely greenfield development in a rural area (and would be likely to require a degree of culvertiing of the East Stour River), which may have a detrimental impact on biodiversity. Overall, it is suggested that New Romney, Lympne and the Racecourse perform worst, and would lead to significant negative effects.</td>
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</table>

2. To conserve, enhance and make accessible the District’s countryside, heritage and historic environment

| Folkestone has an important cultural heritage baseline and as such there is a need to protect and enhance cultural heritage as part of delivering new development within the town. At **Folkestone Seafront** there is clear potential for policy measures to ensure design of new development is of a high quality and preserves the setting of key heritage features. Similarly, at **Shorncliffe Garrison** there is the potential for development to support good place making through the retention of important features, including heritage assets and reference to former uses on the site. The broad location at **New Romney** is well located in relation to the town centre and policy can require that development responds sensitively to the natural environment and landscape (and

2 | 3 | 5 | 4 | 7 | 6 |
SA Objective | Discussion of significant effects (and discussion of relative merits in more general terms) | Rank of preference
---|---|---
Seafront | | |
Shorncliffe | | |
New Romney | | |
Sellindge | 3 | |
Hawkinge | 4 | |
Lympne | 4 | |
Racecourse | 5 | |

Sellindge is separated from the main urban centres within Shepway (to the south) by the AONB. The level of traffic passing through the AONB may increase as a result of people travelling between Sellindge and Hythe/Folkestone, which would subsequently have a negative impact on the AONB through noise and congestion, impacts on amenity and air quality. However, this impact can be mitigated to a certain extent by requiring new development within Sellindge to incorporate local community facilities as well as measures to reduce the need to travel (although this will not address travel to work movements).

Hawkinge is located within the AONB, although any growth would be focused within the existing settlement boundaries.

Both Lympne and Folkestone Racecourse are in countryside adjoining the AONB and are therefore likely to lead to negative effects on the countryside.

Overall, it is suggested that Sellindge, Lympne and the Racecourse perform worst, and would lead to significant negative effects. It is possible to distinguish between their performance further.

3. To maintain and enhance the water quality of the District’s waterways and coasts, and achieve sustainable water

Shepway is identified as a Water Scarcity area and therefore sustainable water resource management is essential within the District.

There are no identified issues in terms of water availability, water pollution or constraints to sewage treatment capacity in Folkestone, and there is the potential for policy measures to development incorporates measures that will help to ensure appropriate water efficiency levels are achieved.

The importance of protecting the sensitive water environment of the Romney Marsh area is acknowledged. Development at New Romney must set high standards in terms of water saving measures.

There is limited sewage capacity present around Sellindge. The Water Cycle Study which includes
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<th>SA Objective</th>
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<tr>
<td>resources management</td>
<td>a requirement for new development to contribute towards improvements in wastewater infrastructure. These policies will contribute towards addressing localised water quality and resources issues over the plan period.</td>
<td>Seafront</td>
</tr>
<tr>
<td>4. Increase energy efficiency in the built environment, and the proportion of energy use from renewable sources</td>
<td>Development at Folkestone Racecourse and Lympe would require considerable upgrading of sewerage infrastructure, whilst development of Folkestone racecourse would likely require increased culverting of the East Stour River. Overall, it is suggested that Lympe and the Racecourse perform worst, and would lead to significant negative effects.</td>
<td>Seafront</td>
</tr>
<tr>
<td>5. To take an integrated approach to the reduction of flood risk</td>
<td>The choice between locational options does not lead to significant implications in terms of this SA objective.</td>
<td>Seafront</td>
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<td></td>
<td>At Folkestone Seafront opportunities exist to manage and mitigate flood risk and in doing so enhance the public realm.</td>
<td>Seafront</td>
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<td></td>
<td>At New Romney flood risk is a particular consideration. The site is located within Flood Risk Zone 3; however, more detailed flood risk assessment has shown that this location is at the lowest risk of any location within the Romney Marsh area. There is the potential for policy to require proposals for</td>
<td>Seafront</td>
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### Discussion of significant effects
(and discussion of relative merits in more general terms)

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<td>Seafront</td>
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<tr>
<td>new development to: respond sensitively to flood risk (and ensure that flood measures contribute towards the local environment and nature conservation. As such, it is not thought that directing growth towards this location would result in a significant negative effect. The other locational options do not involve any identifiable flood risk.</td>
<td>N/a</td>
</tr>
<tr>
<td>6. To reduce waste generation and promote sustainable management of waste</td>
<td>The choice between locational options does not lead to significant implications in terms of this SA objective.</td>
</tr>
<tr>
<td>7. To improve efficiency in land use through the re-use of previously developed land and existing buildings and promote urban renaissance</td>
<td>At Folkestone Seafront new development should contribute towards delivering high quality development on the seafront that will help to reconnect the town centre with the seafront and hence contribute to wider regeneration objectives for the town. At Shorncliffe Garrison new development will be in keeping with the existing character of surrounding areas and provides an opportunity to re-use some buildings as well as building on previously developed land. Development in more rural areas such as Folkestone Racecourse and Lympne will not contribute towards urban regeneration objectives, nor help to ensure use of PDL is maximised. Development at Hawkinge would be on brownfield and greenfield land but would not be of a scale likely to promote regeneration. Overall, it is suggested that Lympne and the Racecourse perform worst, and would lead to significant negative effects. Folkestone Seafront and Shorncliffe would lead to significant positive</td>
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SA Objective

**Discussion of significant effects**
(and discussion of relative merits in more general terms)

- effects, with Shorncliffe having particular benefits.

8. To promote economic growth and competitiveness

<table>
<thead>
<tr>
<th>Folkestone Seafront</th>
<th>The scale of development that could potentially be delivered (1,000 homes, sports/cultural provision and at least 10,000 sq m retail and offices) would have a major beneficial economic and regenerative impact in the town.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Shorncliffe Garrison</td>
<td>There is the potential for residential led development to also bring with it significant transport improvements and appropriate community infrastructure. If delivered this would have a beneficial economic and regenerative impact in the town.</td>
</tr>
<tr>
<td>New Romney</td>
<td>Development would help to ensure that the town is established as the residential, business, service, retail and tourist centre for the Romney Marsh area. Development would grow the local population and support the retention and attraction of additional businesses in tourism and at the expanded Mountfield Road Industrial Estate.</td>
</tr>
<tr>
<td>Folkestone Racecourse</td>
<td>Provides opportunities for a mixed use development including a reconfigured racecourse, grandstand, conferencing and associated leisure facilities, an enhanced setting/access to Westenhanger Castle and other rural employment. Future development would complement a growing investment in employment and tourist attractions in the western area. Overall, it is suggested that development at a number of the locations would lead to significant positive effects. It is also possible to distinguish between the magnitude of positive effects.</td>
</tr>
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9. To ensure high and stable levels of employment so that everyone can benefit

<table>
<thead>
<tr>
<th>Folkestone and New Romney</th>
<th>Development at <strong>Folkestone</strong> and <strong>New Romney</strong> should help to meet local employment needs. Outside of the main settlements the accessibility of sites to the transport network and employment locations is a key factor. As such, significant positive effects should result.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Folkestone Racecourse</td>
<td>Provides an opportunity for mixed use development that would create employment opportunities that would be accessible to residents of the District’s rural North.</td>
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### Discussion of significant effects (and discussion of relative merits in more general terms)

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<td>from economic growth</td>
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<td>It is noted that one of the District’s major designated employment sites is located adjacent to <strong>Lympne</strong>.</td>
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<tr>
<td>10. To ensure that everyone has the opportunity to live in a decent and affordable home</td>
<td>All of the locational options have the potential to deliver affordable housing subject to viability. Those locational options that have the potential to support larger sites would be able to support a higher proportion.</td>
</tr>
<tr>
<td>11. To create and sustain vibrant and sustainable communities</td>
<td>Development of <strong>Folkestone Seafront</strong> would contribute to the wider objective of enhancing the attractiveness of central Folkestone and its appeal as a cultural and visitor destination. Development at the Seafront would also ensure infrastructure improvements are delivered at a suitably early stage to ensure on-site facilities are able to forester a new sense of place and community. The site lends itself to ground floor active uses and well-used public spaces. Development at <strong>Shorncliffe Garrison</strong> would help to address the housing needs of the western Folkestone area, and would improve ‘social inclusion’. There is a need to provide community infrastructure and public open space, and this could be proactively addressed through development. In a similar vein, development at <strong>New Romney</strong> and <strong>Sellindge</strong> could support residential-led regeneration. In the case of New Romney, housing would help meet local need; whilst housing at Sellindge would help to meet affordable housing needs in the North Downs area. However, it is assumed that development would not just bring forward new housing, but also deliver regeneration through investment in jobs and social infrastructure. Whilst some settlements, such as <strong>Lympne</strong>, may be unsuitable locations to accommodate a strategic level of growth they may be able to accommodate some growth to meet local need and</td>
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## SA Objective

**Discussion of significant effects**  
(and discussion of relative merits in more general terms)

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12. **To reduce inequalities, poverty, deprivation and social exclusion**

Folkestone Seafront is readily accessible for jobs and services. The redevelopment of Folkestone seafront would also provide new community facilities and provide considerable regeneration benefits to the town.

Development at Shorncliffe Garrison would provide a further opportunity to meet the housing needs of western Folkestone, increase housing choice and bring forward much needed services.

Development at New Romney would help to address problems of ‘economic isolation’ and associated rural deprivation. Specifically, it would help to establish New Romney as the primary strategic centre for the area, encouraging economic diversification to support new local jobs.

Development at Sellindge would lead to improved community facilities in the village. Hawkinge is already well provided for in this respect.

Overall, a number of the sites would lead to significant positive effects, and it is possibly to distinguish between the magnitude of these effects to some extent.

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<th>Rank of preference</th>
<th>Seafront</th>
<th>Shorncliffe</th>
<th>New Romney</th>
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13. **To raise educational attainment and develop opportunities**

The larger urban sites are more likely to support this sustainability objective. It is known that development at Shorncliffe Garrison, Sellindge and Folkestone Racecourse would likely result in contributions to new primary schools.
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<tr>
<td>14. To improve the health and well-being of the population and reduce inequalities in health</td>
<td>Improving the vibrancy and mix of uses at <strong>Folkestone Seafront</strong> would enhance its appeal as a cultural and visitor destination – which would have an indirect positive effect in terms of this objective by providing opportunities to engage in cultural and leisure activities, improving the general wellbeing of local people as well as visitors. Affordable housing delivered in this area would improve housing choice and quality and subsequently indirectly address health related issues generated by poor/in appropriate housing.&lt;br&gt;Development at <strong>Shorncliffe</strong> has the potential to improve the local community's wellbeing and health through access to improved sports facilities, new public greenspace, opportunities to travel by walking and cycling and increased housing choice and health care facilities.&lt;br&gt;Development at <strong>New Romney</strong> could promote travel by more healthy means (i.e. walking and cycling) and as such would, along with increased accessibility and enhancement of the High Street, have a positive indirect effect on health in New Romney.&lt;br&gt;Development at <strong>Sellindge</strong> would possibly have positive indirect effects on the wellbeing of this community by improving the central and social heart of the village, providing a village green and introducing measures to reduce the dominance of the A20 within the village.&lt;br&gt;There are existing health centres at Sellindge and at <strong>Hawkinge</strong> that could, in principle, support new development.&lt;br&gt;Overall, a number of the sites would lead to significant positive effects, and it is possibly to...</td>
<td><strong>Seafront</strong></td>
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SA Objective

Discussion of significant effects
(and discussion of relative merits in more general terms)

distinguish between the magnitude of these effects to some extent.

15. To promote sustainable access, reduce car dependency, road congestion and associated pollution by promoting sustainable locations for development and improving travel choice

Development at Folkestone Seafront would likely be in the form of compact, mixed-use development with good accessibility by sustainable modes of transport including bus, walking and cycling. Shorncliffe Garrison is well suited to the development of a major new neighbourhood as a result of its accessibility to the motorway and high speed rail services. Close attention would need to be paid to offset the travel impacts of new residents, including through the provision of extensive pedestrian and cycle access routes.

With respect to the more isolated Romney Marsh area, development would be directed to New Romney on the basis that it is the most sustainable settlement in terms of the available mix of services, facilities and employment. If the expansion of the airport at Lydd is approved, the subsequent generation of additional trips will need to be planned for.

A number of the settlements in the North Downs area lie in close proximity to highway and rail infrastructure, and hence there is an opportunity to capitalise on good connectivity. Development at Hawkinge and Lympne would, however, be largely dependent on private transport to access services. In terms of Folkestone racecourse, it is noted that development would provide some community facilities, but a dependence on larger towns and villages, such as Sellindge for a number of services would be inevitable. The site is adjacent to Westenhanger Station, but car dependency would likely still result in congestion at a key junction without major highway improvements being delivered.

Overall, three of the sites would lead to significant positive effects, and it is possibly to distinguish between the magnitude of these effects to some extent. Hawkinge and Lympne would result in significant negative effects.
Summary

The appraisal demonstrates that the two Folkestone sites located within the existing urban area on brownfield land are most appropriate. These are both large sites, i.e. capable of delivering over 500 dwellings. New Romney is a broad location that is shown to perform well in terms of SA objectives, although it performs poorly in terms of biodiversity and it is not an ideal location in terms of flood risk. Growth of New Romney would ensure affordable housing needs can be met within the Romney Marsh Character Area whilst reinforcing the role of the town. The other large site is Folkestone Racecourse. Development at Folkestone Racecourse would be of a strategic scale and seek to cross subsidise the delivery of a new racecourse. However, this level of growth is not commensurate with the scale of the existing settlement and could have significant landscape impacts. Whilst the proposal could provide a new primary school the development would be reliant on larger existing settlements, such as Folkestone and Ashford or Sellindge to meet its resident’s needs. Despite good public transport this could lead to a significant increase in private transport journeys with impact on the local highway network. Sellindge is a well served rural settlement, outside of a protected landscape within the North Downs character Area. Further growth at a scale suitable to the settlement (i.e. at a scale that would not overload services) would lead to benefits in terms of providing affordable housing and improving the townscape and environmental quality of the settlement. Development at Lympne and Hawkinge performs poorly against the other sites in the appraisal.
APPENDIX VI: APPRAISAL OF ALTERNATIVE APPROACHES TO GROWTH AT FOLKESTONE SEAFRONT

Introduction

This appendix presents an appraisal of the following alternative approaches to growth at Folkestone Seafront. Four alternative approaches were subjected to SA:

1) Mixed-use development of **up to 1,000 homes** and in the region of 10,000sqm of commercial floorspace (A use classes, B1, C1, D1, D2 and sui generis) together with beach sports/sea sport facilities and associated on- and off- site community and physical infrastructure
   - In-line with Policy SS6 as included in the July 2011 Submission Core Strategy, amended by the 2012 Proposed Modifications

2) Mixed use development of **up to 1,000 homes** and a minimum of 10,000sqm commercial floorspace including (retail and office space), enhanced sports and cultural facilities and associated infrastructure
   - In-line with Policy SS6 as included in the July 2011 Submission Core Strategy

3) Mixed used development of approximately **800 homes**, with restaurant/bar uses, with potential for enhanced sports facilities and associated infrastructure
   - In-line with Policy FH2 as included in the summer 2009 Preferred Options document

4) Mixed-use developments including **500 homes**, leisure/tourism uses, restaurants, retail, associated parking and improved pedestrian/cycle links
   - In-line with Policy HO2A from the Shepway District Local Plan Review and the associated requirements of Policies FTC6-8

The appraisal should be read alongside Chapter 15 of the main report, which explains which approach the Council favours, and why.

Methodology

See description of the methodology in Appendix II, above.
## Appraisal findings

Table presenting an appraisal of the following alternative approaches to growth at Folkestone Seafront:

1. Approach in-line with Policy SS6 of the July 2011 Core Strategy, as modified
2. Approach in-line with Policy SS6 of the July 2011 Core Strategy
3. Approach in-line with Policy FH2 of the 2009 Preferred Options document
4. Approach in-line with Policy HO2A from the Shepway District Local Plan Review

<table>
<thead>
<tr>
<th>SA Objective</th>
<th>Discussion of significant effects (and discussion of relative merits in more general terms)</th>
<th>Rank of preference</th>
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<tbody>
<tr>
<td>1. To conserve and enhance biodiversity</td>
<td>There is some potential for impacts to nearby internationally important biodiversity sites. This is particularly the case for Alternative 1 – 3, which would involve more homes. Alternative 1 would involve would involve a policy approach whereby development proposals are required to include an appropriate recreational access strategy to ensure additional impacts to local Natura 2000 site(s) are acceptably mitigated against (in accordance with plan policy CSD4) where as the other alternatives would not.</td>
<td>1 3 3 2</td>
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<tr>
<td>2. To conserve, enhance and make accessible the District’s countryside, heritage and historic environment</td>
<td>Both Alternatives 1 and 2 would involve the design of major redevelopment proposals for Folkestone Seafront to preserve the key heritage assets and archaeological features of the site and be sympathetic to the landscape and coastal character of the area, including the retention of the Inner Harbour Bridge (a Grade 2 listed building). There would also be a requirement to achieve a greater level of connection between the seafront and the Folkestone Town Centre. These approaches would therefore result in a significant positive effect in terms of conserving and enhancing the District’s heritage and historic environment and in making those heritage assets more accessible. Alternatives 3 and 4 would also likely secure a high quality development and enhance the connectivity of Folkestone Seafront, but would include less emphasis on conserving and enhancing the heritage and the historic environment.</td>
<td>1 1 2 2</td>
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<tr>
<td>3. To maintain and enhance the water quality of the District’s waterways and</td>
<td>The quantum of housing does not have a major bearing on performance in relation to this objective. The alternative policy approaches do, however, differ in respect to the stringency of the requirements that would be put on developers. Specifically, Alternatives 1 and 2 require residential building to have a minimum of water efficiency of 90 litres/person/day and therefore takes a positive approach towards achieving sustainable water resource management; whilst Alternatives 3 and 4 do not include any specific requirement to achieve sustainable water resource management.</td>
<td>1 1 2 2</td>
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<tr>
<td>SA Objective</td>
<td>Discussion of <strong>significant effects</strong> (and discussion of <strong>relative merits</strong> in more general terms)</td>
<td>Rank of preference</td>
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<td>coasts, and achieve sustainable water resources management</td>
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<tr>
<td>4. Increase energy efficiency in the built environment, and the proportion of energy use from renewable sources</td>
<td>The quantum of housing does not have a major bearing on performance in relation to this objective. The alternative policy approaches do, however, differ in respect to the stringency of the requirements that would be put on developers. Specifically, Alternatives 1 and 2 require all residential building to achieve a minimum level 3 Code for Sustainable Homes rating. This requires, in terms of energy use and CO2 emissions, a 25% increase over the Target Emission Rate (TER) as determined by the 2006 Building Regulations Standard. No specific standard is specified for non-residential buildings and there is no specific requirement for energy provision from renewable source or on site generation. Alternative 1 perhaps performs slightly better than Alternative 2 as there is a policy reference to ‘all development’ achieving ‘high standards of environmental performance’. Alternative 3 seeks to achieve a high quality design led development that contributes to reducing the impacts of climate change but does not include any specific requirement for the environmental performance of residential and non-residential buildings (or energy provision from renewable source or on site generation). In terms of Alternative 4, Policies FTC4, 5 and 6 of the Shepway District Local Plan Review do not include any specific or non-specific requirements for the environmental performance of residential and non-residential building forming part of the redevelopment of Folkestone Harbour and Seafront.</td>
<td>1 2 3 4</td>
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<tr>
<td>5. To take an integrated approach to the reduction of flood risk</td>
<td>The SFRA shows that whilst there are some significant areas of flood risk adjacent to the harbour, the risk on much of the site is low to moderate. Alternatives 1 and 2 require that all development is located within the site in accordance with national policy on the degree of flood risk and compatibility of specific use and, where necessary, includes design measures to mitigate flood risk. It is expected that the master-planning process, required under this option, can reduce and manage risk (for example through returning some hard standing land back to beach). The Alternative 3 and 4 policy approaches do not include a specific requirement for development to take an integrated approach to the reduction of flood risk, likely to lead to uncertain effects.</td>
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<td>SA Objective</td>
<td>Discussion of <strong>significant effects</strong> (and discussion of relative merits in more general terms)</td>
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<tr>
<td><strong>6. To reduce waste generation and promote sustainable management of waste</strong></td>
<td>The quantum of housing does not have a major bearing on performance in relation to this objective. The alternative policy approaches do, however, differ in respect to the stringency of the requirements that would be put on developers. Alternatives 1 and 2 require that buildings should be designed to allow convenient waste recycling. There is no requirement within the policy for an overall waste management strategy to be prepared for the site although it is considered that this would be a requirement of a planning application for the site, forming part of the required masterplan. The Alternative 3 and 4 policy approaches do not make reference to waste management.</td>
<td>Alt 1</td>
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<tr>
<td><strong>7. To improve efficiency in land use through the re-use of previously developed land and existing buildings and promote urban renaissance</strong></td>
<td>Alternatives 1 and 2 set out to deliver a distinctive, unique and high quality seafront environment through the provision of up to 1000 new homes, small shops, retail services, office and other community and leisure uses on a site that currently lies vacant and where former uses including the operation of a ferry service and a funfair have ceased. As such, the effect would be to secure the efficient re-use of previously developed land, including the retention of some listed building and structures. In turn, the effect should be to promote urban regeneration through the provision of a high quality mixed used scheme. <strong>Significant positive effects</strong> would result. In terms of Alternatives 3 and 4, the lower quantum of residential development could result in a less efficient use of the site. Nonetheless, there could be <strong>significant positive effects</strong>.</td>
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<tr>
<td><strong>8. To promote economic growth and competitiveness</strong></td>
<td>The comprehensive redevelopment of Folkestone Seafront and Harbour forms an overall strategy for the regeneration of the Central Folkestone that includes a range of other implemented and ongoing projects including: The Creative Quarter, Bouverie Place retail development and the Folkestone Coastal Park. The overall aim of this strategy is to improve the vitality; viability and economic performance of Central Folkestone as part of the Shepway Economic Development Strategy which seeks to grow and improve the competitiveness of the local economy. Under Alternative 1 the proposed policy makes provision for 10,000 sq.m. of floorspace comprising small shops and retail services (A class uses), offices (class B1) that should provide significant employment opportunities within this location. This approach is supported by the current owner of the Folkestone Seafront and Harbour site, who has commissioned viability assessment work in relation to a supporting masterplan, and is therefore considered to be the most deliverable of the options presented. <strong>Significant positive effects</strong> would result. The effects of Alternative 2 would be similar, although less detail is provided on the potential mix of non-residential uses.</td>
<td>Alt 1</td>
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### SA Objective

#### Discussion of significant effects
(and discussion of relative merits in more general terms)

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<th>Rank of preference</th>
<th>Alt 1</th>
<th>Alt 2</th>
<th>Alt 3</th>
<th>Alt 4</th>
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and therefore the potential employment benefits are less certain.

Alternative 3 and 4 could also result in positive effects, although it is noted that these approaches are inconsistent with the aspirations of the landowners. It is also noted that Alternative 4 seeks to retain the operation of passenger ferry services and the Harbour Branch Line that are considered to be economically unviable, based on the evidence available.

9. To ensure high and stable levels of employment so that everyone can benefit from economic growth

Alternatives 1 and 2 set out to secure a mixed use development that will provide direct employment, as well as enhancing the vitality, viability and economic performance of Central Folkestone. The range of potential non-residential uses included within the policy should provide a number of employment opportunities, requiring a range of different skill levels, thus meeting the employment needs of a wide range of the local population. As such, these options should result in significant positive effects on the baseline.

Alternative 3 has similar aspirations to those laid out in Alternatives 1 and 2, but without the support for B1 office and D1 hotel uses and therefore potentially narrowing the range of employment opportunities for local people. Whilst this is the case, the employment opportunities this alternative could present may still lead to positive effects.

Although it has similar ambitions to Alternative 1, Alternative 4 is subject to significant concerns over the viability of the passenger ferry services, the viability of the Harbour Branch Line and landowner support. As a result, this option and any employment/economic benefits that might derive from it may not be deliverable, leading to uncertain effects.

10. To ensure that everyone has the opportunity to live in a decent and affordable home

The provision of up to 1000 new homes if supported by Alternatives 1 and 2, of which 300 or 30% (for a lower quantum) will be affordable, subject to viability. In accordance with the District Council’s policy this is likely to be split 60/40 social rented to intermediate market housing. The supporting master-plan indicates that residential development will be split 50/50 between flats and houses, based on a recent market assessment. This option therefore supports the delivery of a range and choice of residential development that will make an important contribution to meeting Shepway’s housing needs, leading to significant positive effects.

Alternative 3 meanwhile requires a lower quantum of overall housing and provides no specific affordable homes target, although a 20% market lifetimes homes target is provided. Overall, it appears likely that this option will contribute less towards achieving this sustainability objective than Alternatives 1 and 2.

With a lower overall quantum of residential development proposed and no affordable housing target, Alternative 4 is likely to contribute less towards this objective.
### SA Objective

**11. To create and sustain vibrant and sustainable communities**

| Alternatives 1 and 2 | Aim to create a new community on previously developed land located to the south of Folkestone Town Centre. This will involve the delivery of a range residential accommodation alongside commercial and leisure facilities, such as a beach sports and water-sports centre. The proposed development could also help to support the shops and other services in Folkestone Town Centre and the neighbouring Creative Quarter. Overall, it is considered that these alternatives have the potential to result in a significant positive effect on the baseline. Alternative 3 has the potential to contribute to this SA objective, but less clarity is provided in terms of the mix of uses supported and the deliverability of the proposals. Meanwhile, Alternative 4 suffers from uncertainty over deliverability and local support. This makes it the least good of the four options. |

**12. To reduce inequalities, poverty, deprivation and social exclusion**

| Given that the Town Centre is a key component of the Shepway Economic Development Strategy that aims to increase the economic prosperity of the District, Alternatives 1 and 2 should help to increase general economic prosperity within Folkestone and Shepway. These alternatives also have the potential to provide local employment for residents of the neighbouring deprived wards of East and Central Folkestone. Significant positive effects should result. In terms of the relative merit of the remaining alternatives: Alternative 3 and particularly Alternative 4 suffer from less certainty over precise benefits and deliverability. |

**13. To raise educational attainment and develop opportunities for everyone to acquire the skills needed to find and remain in work**

| Alternative 1 requires that an appropriate financial contribution is made to meet the additional need for school places generated by the development. This may lead to a positive effect in terms of this objective. Alternatives 2, 3 and 4 do not require such a contribution. As such, there is the potential for these alternatives to result in a negative effect on the baseline. This risk is magnified by the quantum of housing proposed in the case of Alternative 2. |

**14. To improve the health and well-being of the population**

| The provision of outdoor leisure facilities including beach sport and sea sports centres is supported by Alternatives 1 and 2, potentially resulting in positive impacts in terms of improved health and well being. Alternative 3 identifies potential opportunities for water sports and Alternative 4 focuses on the provision of indoor leisure facilities, but these proposals are comparatively unclear. |

### Rank of preference

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<th>SA Objective</th>
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<tr>
<td>11. To create and sustain vibrant and sustainable communities</td>
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<tr>
<td>12. To reduce inequalities, poverty, deprivation and social exclusion</td>
<td>1 2 3 4</td>
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<tr>
<td>13. To raise educational attainment and develop opportunities for everyone to acquire the skills needed to find and remain in work</td>
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<tr>
<td>14. To improve the health and well-being of the population</td>
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and reduce inequalities in health

15. To promote sustainable access, reduce car dependency, road congestion and associated pollution by promoting sustainable locations for development and improving travel choice

Alternatives 1 and 2 support the redevelopment of a previously developed site adjacent to Folkestone Town Centre for a mix of residential, commercial and leisure uses. The location is therefore considered to have a significantly positive effect in terms of this SA objective by locating residents close to services and through the provision of a choice of travel modes. There is a requirement that sufficient contributions are made to highways, public transport and parking arrangements so as to provide connectivity between the Seafront development, the town centre and central and Eastern Folkestone, including improved pedestrian cycle and bus links.

An access and transport strategy that maximises the potential for walking, cycling and use of public transport with particular emphasis on trips to Folkestone Town Centre, is a requirement of Alternative 3, potentially resulting in significant positive effects. Alternative 4 meanwhile includes requirement for improved links to Folkestone Town Centre and adequate parking provision, which will likely achieve lesser effects on the baseline.

Summary

The appraisal has demonstrated that the redevelopment of the Folkestone Seafront and Harbour would have significant sustainability benefits including the regeneration of Central Folkestone, the creation of a range of jobs capable of being accessed by local people, the regeneration of a previously developed site and the promotion of sustainable travel patterns. The process of developing policy for Folkestone dates back over 15 years and has been informed by changing patterns of ownership, the broader regeneration of central Folkestone, the development of complimentary master-plan documents and a number of public consultation events. This evolutionary process has resulted in a number policy proposals, each of which have been tested as part of this process as reasonable alternatives. The appraisal has demonstrated that whilst each has merit, it is Alternative 1, the Council’s preferred policy, which achieves the highest level of sustainability benefits.
APPENDIX VII: APPRAISAL OF ALTERNATIVE APPROACHES TO GROWTH AT SHORNCLIFFE GARRISON

Introduction

As described within Part 2 of the main SA Report document, prior to preparing the draft plan four alternative approaches to the issue of Shorncliffe Garrison were subjected to SA:

1) Predominantly residential development with up to 1,200 homes by 2031 and an improved military establishment, in addition to the provision of new community facilities and associated infrastructure upgrades. Proposals must be designed to achieve high standards of environmental performance and be accompanied with a recreational access strategy and Townscape, heritage and archaeological analysis in order to assess impacts on local Natura 2000 site(s) and heritage assets
   - In-line with Policy SS7 as included in the July 2011 Submission Core Strategy, amended by the 2012 Proposed Modifications

2) Predominantly residential development (up to 1,200 homes by 2031) and an improved military establishment, in addition to the provision of new community facilities and associated infrastructure upgrades
   - In-line with Policy SS7 as included in the July 2011 Submission Core Strategy

3) Allocation for at least 900 homes, with improved Ministry of Defence facilities, provision of open space and community facilities and associated infrastructure
   - In-line with Policy FH3 as included in the summer 2009 Preferred Options document

4) Residential development permitted in the existing built up areas of the site, with no quantum specified. Proposals subject to sufficient protection, re-provision and/or enhancement of open space and school playing fields commensurate with growth
   - In-line with Policy HO3 from the Shepway District Local Plan and the associated requirements of policies LR9 and LR12

The appraisal should be read alongside Chapter 16 of the main report, which explains which approach the Council favours, and why.

Methodology

See discussion within Appendix II, above.
Appraisal findings

Table presenting an appraisal of the following alternative approaches:

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<tr>
<th>SA Objective</th>
<th>Discussion of significant effects (and discussion of relative merits in more general terms)</th>
<th>Rank of preference</th>
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<tbody>
<tr>
<td>1. To conserve and enhance biodiversity</td>
<td>Alternative 1 includes a requirement to incorporate high quality green infrastructure in the design stage and for a management strategy for Seabrook Valley that enhances biodiversity. The policy has been further strengthened by expanding the criterion relating to open space and nature conservation, specifically mitigation for impacts to Natura 2000 site(s). As such, significant positive effects may occur. Alternative 2 also requires that a management strategy is in place to enhance biodiversity and does require the proposal incorporates high quality green infrastructure, however it does not require appropriate mitigation of the effects on Natura 2000 site(s). Alternative 3 provides a lower level of detail on biodiversity, stating only that a masterplan should be produced which provides for enhancements of the local landscape and habitats. As such, it is considered that this alternative will have uncertain effects on the baseline for this objective. Alternative 4 whilst not an allocation, does state that development would be permitted subject to normal environmental considerations, retaining areas of open space and enhancing the current landscape character. Again the lower level of detail provided on biodiversity means that this alternative will have uncertain effects on the baseline.</td>
<td>Alt 1 2 3 4</td>
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<tr>
<td>2. To conserve, enhance and make accessible the District’s countryside, heritage and</td>
<td>An appropriate access strategy and townscape, heritage and archaeological analysis will be required through Alternative 1, potentially resulting in positive effects. Alternative 2 requires that a management strategy is in place to increase accessibility to the countryside where appropriate, but does not refer to the heritage and historic environment. Alternative 3 does not go in to any level of detail on the countryside, heritage and the historic environment, other than to say that a masterplan should be produced which provides for enhancements of the local landscape and habitats. As a result this alternative is could potentially have negative effects. Alternative 4 states the historical and architectural</td>
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| SA Objective | Discussion of **significant effects**  
(and discussion of **relative merits** in more general terms) | Rank of preference |
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<tr>
<td>historic environment</td>
<td>character of the area should be conserved and enhanced, and so may have positive effects.</td>
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<tr>
<td>3. To maintain and enhance the water quality of the District's waterways and coasts, and achieve sustainable water resources management</td>
<td>Under Alternative 1, residential buildings must achieve a minimum water efficiency of 90 litres/ person/ day, which is likely to have a positive effect of water resources management. Alternative 3 sets minimum of level 4 of the Code for Sustainable Homes, which requires a water efficiency of 105 litres/ person/ day. Therefore this is less positive in terms of water resources management. Alternative 2 makes no reference to a minimum level of water efficiency, but does require Code for Sustainable Homes Level 3 or higher as a minimum standard for new development, which includes water efficiency measures. Meanwhile, Alternative 4 broadly mentions permitting development subject to normal amenity, environmental and highway considerations. As a result the effects of this alternative are considered to be uncertain.</td>
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<tr>
<td>4. Increase energy efficiency in the built environment, and the proportion of energy use from renewable sources</td>
<td>Both Alternative 1 and 2 require Code for Sustainable Homes Level 3 or higher as a minimum standard for new development, likely resulting in high levels of energy efficiency. Alternative 1 also states that all development must be designed and constructed to achieve high standards of environmental performance. Alternative 3 requires that a minimum of level 4 of the Code for Sustainable Homes is obtained. Such development could potentially have <strong>significant positive</strong> effects in terms of this objective due to the higher goals set for energy efficiency at this level. Alternative 4 is not an allocation so it provides much less certainty over precise benefits and constraints. Energy efficiency is not dealt with by this alternative, beyond stating that permitting development will be subject to normal amenity and environmental considerations.</td>
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<tr>
<td>5. To take an integrated approach to the reduction of flood risk</td>
<td>The strategic site addressed by all of alternatives is not within an area identified at risk of flooding. Alternatives 1 and 2 require that high quality green infrastructure (GI) is incorporated at the design stage. Sustainable Urban Drainage Systems can be an effective part of GI, potentially resulting in additional positive effects against this objective.</td>
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<tr>
<td>6. To reduce waste generation and</td>
<td>Alternatives 1 and 2 both require Code for Sustainable Homes Level 3 or higher as a minimum standard for new development, with Alternative 1 also stating that all development must be designed and constructed to achieve high</td>
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<td>SA Objective</td>
<td>Discussion of significant effects (and discussion of relative merits in more general terms)</td>
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<tr>
<td>promote sustainable management of waste</td>
<td>standards of environmental performance. This should help to ensure that waste is managed in a more sustainable manner. Alternative 3 meanwhile requires a minimum of level 4 of the Code for Sustainable Homes. Such development could potentially have a significant positive effect on the baseline in terms of this objective. Alternative 4 is not an allocation so it provides much less certainty over precise benefits and constraints. Sustainable waste management is not dealt with by this alternative, beyond stating that permitting development will be subject to normal amenity and environmental considerations.</td>
<td>Alt 1 Alt 2 Alt 3 Alt 4</td>
</tr>
<tr>
<td>7. To improve efficiency in land use through the re-use of previously developed land and existing buildings and promote urban renaissance</td>
<td>The proposed development area for the strategic site is on surplus areas of MOD land, predominantly on previously developed 'brownfield' land which consists of old, inefficient and underutilised buildings that are not suitable for modern defence purposes. As such, despite the loss of some greenfield land, all of the alternatives under consideration should result in a positive effect in terms of this objective.</td>
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</tr>
<tr>
<td>8. To promote economic growth and competitiveness</td>
<td>The proposals outlined in Alternative 1 and 2 for 1,200 dwellings within the main Folkestone/Hythe urban area by 2031 mean that these alternatives may contribute to sustaining the economic viability of these towns, therefore potentially having a positive effect. Alternative 3 may have a lesser degree of economic benefit as the proposal is for fewer dwellings (900 minimum). Alternative 4 does not allocate particular levels of development and so there is less certainty over precise benefits and constraints, leading to uncertainty over the effect it might have in terms of this objective.</td>
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<tr>
<td>9. To ensure high and stable levels of employment so that everyone can benefit</td>
<td>Alternatives 1 and 2 seek to provide a critical mass of housing development to sustain local employment and facilities within the main urban area of the District. These alternatives would also help to ensure the long term presence of the army in Folkestone. These alternatives therefore make a positive contribution to securing existing services and facilities, with the potential to encourage new enterprise. The implications of Alternative 3 are similar to those of 1 and 2. However, the impact maybe less apparent because of</td>
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<tr>
<td>SA Objective</td>
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<td>from economic growth</td>
<td>the reduced number of households. Alternative 4 does not allocate particular levels of development and so there is less certainty over precise benefits and constraints, leading to uncertainty over the effect it might have in terms of this objective.</td>
<td></td>
</tr>
<tr>
<td>10. To ensure that everyone has the opportunity to live in a decent and affordable home</td>
<td>Both Alternative 1 and 2 require the provision of 360 affordable dwellings for the Urban area subject to viability (or if the total residential quantum is less than 1,200 units, 30%) responding to identified social needs. The critical mass of housing provided by this development provides an opportunity for a considerable provision of a range of housing size and tenures including family housing. As such, there is the potential for <strong>significant positive</strong> effects against the baseline. Alternative 3 has similar implications to those of 1 and 2, but because of the reduced number of dwellings proposed there will be less provision of housing types and tenures. Alternative 4 does not allocate particular levels of development and so there is less certainty over precise benefits and constraints, leading to uncertainty over the effect it might have in terms of this objective.</td>
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<tr>
<td>11. To create and sustain vibrant and sustainable communities</td>
<td>There is an existing strong sense of traditional community in this area, which remains vibrant. Alternatives 1 and 2 seek to build on this through a considered design solution for the area of new development. This approach will acknowledge the existing street pattern and look to integrate fully and sensitively with the existing residential neighbourhoods. In addition quality green infrastructure that links to nearby countryside is also likely to have community benefits. Overall, <strong>significant positive</strong> effects are predicted. There are no details on the design of the development for Alternative 3 and so this is considered to have uncertain negative effects. Alternative 4 does not allocate particular levels of development and so there is less certainty over precise benefits and constraints, leading to uncertainty over the effect it might have in terms of this objective.</td>
<td>1 1 2 3</td>
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<tr>
<td>12. To reduce inequalities, poverty, deprivation and social exclusion</td>
<td>Alternatives 1 and 2 set out to increase affordable housing provision, subject to viability, in response to identified need. They will also allow for the delivery of a new primary school and health care facility (and/or delivery of a community/public facility of equal social value). As such, these alternatives will potentially bring about <strong>significant positive</strong> effects. <strong>Significant positive</strong> effects are also predicted for Alternative 3, which requires the provision of 35% affordable housing and 20% lifetime homes. The aims of this alternative are increase local housing choice and affordability, ensure that Cheriton and the wider Folkestone area benefit from additional family housing, and to deliver additional community facilities to Cheriton and Folkestone generally. Alternative 4 does not allocate particular levels of development and so there is less certainty over precise benefits and constraints, leading to uncertainty over the effect it might have in terms of this objective.</td>
<td>1 1 2 3</td>
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| SA Objective | Discussion of **significant effects**  
(and discussion of relative merits in more general terms) | Rank of preference |
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<td>constraints, leading to uncertainty over the effect it might have in terms of this objective</td>
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<tr>
<td>13. To raise educational attainment and develop opportunities for everyone to acquire the skills needed to find and remain in work</td>
<td>Alternatives 1 and 2 should lead to <strong>significant positive</strong> effects in terms of this objective as a result of providing for land and contributions towards a new primary school. Alternative 3 does not directly mention education provision, instead referring more generally to additional community facilities. Given the quantum of housing proposed through this alternative, <strong>significant negative</strong> effects could occur as a result of pressure on existing educational facilities and schemes. Alternative 4 does not include a specified quantum of growth, and so effects are uncertain.</td>
<td>1 1 3 2</td>
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<tr>
<td>14. To improve the health and well-being of the population and reduce inequalities in health</td>
<td>Alternatives 1 and 2 require the provision of an on-site health care facility (and/or delivery of a community/public facility of equal social value) as well as significant opportunity for access to green spaces and the countryside. These alternatives will also retain sports and public open spaces usable for active recreation, plus land at Seabrook Valley released from military use for public and natural open space purposes, increasing accessibility to the countryside where appropriate. It is therefore considered likely that these alternatives will deliver <strong>significant positive</strong> effects in terms of access to health services and facilities. Alternative 3 is potentially capable of achieving similar levels of benefit to Alternatives 1 and 2. However, this policy does not require land to be set aside for a health care facility and so may result in lesser, yet still positive, effects in terms of this objective. Alternative 4 is not an allocation so it provides much less certainty over precise benefits and constraints, leading to uncertainty over its potential effects.</td>
<td>1 1 2 3</td>
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<tr>
<td>15. To promote sustainable access, reduce car dependency, road congestion and associated pollution by</td>
<td>Shorncliffe Garrison is considered to be a highly sustainable location, as it is situated within the main urban area in west Folkestone relating closely to the existing neighbourhood. Both Alternatives 1 and 2 require that significant transport improvements are delivered. This is to involve both on and off site travel infrastructure upgrades, including contributions to improved and extended bus services and further sustainable travel measures for walking and cycling. Connections to Cheriton High Street and Folkestone West railway station will be a priority. In addition the design and layout of the development is required to enhance connectivity from east to west, with a legible network of streets, and a new strong south to north pedestrian/ cycle axis through the site. As a result these alternatives are considered likely to have a</td>
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### Discussion of significant effects
(and discussion of relative merits in more general terms)

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<th>SA Objective</th>
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<tr>
<td>promoting sustainable locations for development and improving travel choice</td>
<td>significant positive effect in terms of this objective. Alternative 3 includes a requirement for an access and transport strategy that maximises the potential for walking, cycling and use of public transport. Vehicular access to the area and proper functioning of highways is also to be ensured, based upon the findings of a transport assessment. However, this approach includes less detail than included in Alternatives 1 and 2. Alternative 4 broadly mentions permitting development subject to normal amenity, environmental and highway considerations. As a result the effects of this alternative are considered to be uncertain.</td>
<td>Alt 1 Alt 2 Alt 3 Alt 4</td>
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### Summary

The appraisal has demonstrated that the redevelopment of Shorncliffe Garrison would have significant sustainability benefits. By focusing new housing development in this urban area, on predominantly brownfield land, the negative impacts on biodiversity and landscape are minimised, whilst the delivery of urban regeneration and the creation of vibrant and sustainable communities are maximised.

The nature of releasing MoD land is complex and the evolution process of developing policy for Shorncliffe Garrison has been partly shaped by the MoD’s ongoing review of landholdings, masterplan work and a number of consultation events. This evolutionary process has resulted in a number of policy proposals, each of which have been tested as part of this process as reasonable alternatives. The appraisal has demonstrated that it is Alternative 1, the Council’s preferred policy, which achieves the highest level of sustainability benefit.
APPENDIX VIII: APPRAISAL OF ALTERNATIVE APPROACHES TO GROWTH AT NEW ROMNEY

Introduction

As described within Part 2 of the main SA Report document, prior to preparing the draft plan, five alternative approaches were subjected to SA:

1) Provision of approximately **300 dwellings** to the north of the town centre and enhancement of New Romney as a key market town and service centre for Romney Marsh, providing: a range of services and attractions for local residents and tourists; expansion of employment on the Mountfield Road Industrial Estate; improved vehicular and pedestrian/cycle linkages to the town centre (including amelioration of highway impacts); upgrade of school playing field facilities; and an enhanced public realm. Proposals must integrate with the natural boundary currently defined by Cockreed Lane, as well as neighbouring previously developed land to the north east of Cockreed Lane and follow the recommendations within the Shepway Strategic Flood Risk Assessment.
   - In-line with Policy CSD8 as included in the July 2011 Submission Core Strategy, amended by the 2012 Proposed Modifications

2) Provision of approximately **300 dwellings** to the north of the town centre and enhancement of New Romney as a key market town and service centre for Romney Marsh, providing: a range of services and attractions for local residents and tourists; expansion of employment on the Mountfield Road Industrial Estate; improved vehicular and pedestrian/cycle linkages to the town centre (including amelioration of highway impacts); upgrade of school playing field facilities; and an enhanced public realm.
   - In-line with Policy CSD8 as included in the July 2011 Submission Core Strategy

3) Housing-led development of the site to the west of New Romney Town providing around **400 homes** including affordable housing and family sized dwellings. Development should meet level 4 of the Code for Sustainable Homes and consider site-wide solutions for low carbon/renewable heat and power. Proposals should be brought forward as a comprehensive masterplan, with phasing, and should include consideration of: sustainable modes of transport; landscaping/Green Infrastructure impacts (development shall not extend to the north of Cockreed Lane); flood risk; integration with the existing grain of development; and aligned with local policies for design, climate change and infrastructure. Preparatory studies will examine biodiversity, highways/transport, flooding and archaeological considerations. Provision for new infrastructure will be based on a detailed appraisal.
   - In-line with Policy RM2 as included in the 2009 Preferred Options document

4) The provision of a broad location for residential development of **over 1000 dwellings** including consideration of development to the east of the town at Littlestone.
   - In-line with the alternative to Policy RM2 as presented in the 2009 Preferred Options document

5) No broad location at New Romney
   - In-line with the alternative to Policy RM2 as presented in the 2009 Preferred Options document

The appraisal should be read alongside Chapter 17 of the main report, which explains which approach the Council favours, and why.

Methodology

See discussion within Appendix II, above.
Table presenting an appraisal of the following alternative approaches:

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<tbody>
<tr>
<td>(1)</td>
<td>Approach in-line with Policy CSD8 of the July 2011 Core Strategy, as modified</td>
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<td>(2)</td>
<td>Approach in-line with Policy CSD8 of the July 2011 Core Strategy</td>
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<td>(3)</td>
<td>Approach in-line with Policy PO RM2 of the 2009 Preferred Options document</td>
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<td>(4)</td>
<td>Approach in-line with the alternative to Policy RM2 (RM2b) as presented in the 2009 Preferred Options document</td>
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<td>(5)</td>
<td>Approach in-line with the alternative to Policy RM2 (RM2a) as presented in the 2009 Preferred Options document</td>
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**SA Objective**

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<tr>
<td>1. To conserve and enhance biodiversity</td>
<td>Alternatives 1 and 2 require measures to provide nature conservation enhancement for the site and community, which will potentially lead to a positive effect in terms of the objective. Alternative 3 requires that development be preceded by a preparatory study examining biodiversity, which makes predicting the effects on biodiversity more uncertain. The allocation of land for the development of over 1,000 homes at the west of outer New Romney and to the east at Littlestone-on-Sea is proposed through Alternative 4. These homes would be in close proximity to the Dungeness Peninsula, a Natura 2000 site. Therefore it is considered possible that indirect negative effects on biodiversity could occur, especially in light of the level of development proposed. Alternative 5 involves no allocation of land for development at New Romney and so has no effects on biodiversity.</td>
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<tr>
<td>2. To conserve, enhance and make accessible the District's countryside, heritage and historic environment</td>
<td>Both Alternative 1 and 2 require development to address archaeological constraints and improve the setting of historic buildings. In addition to this, Alternative 1 looks to ensure that development integrates with the physical environment in a manner which respects the historical character of the town. Alternative 3 requires development to be preceded by a preparatory study examining archaeology and to deliver a design sensitive to the local landscape. However, unlike Alternative 1 and 2, this approach does not include policy requirements to improve the setting of historic buildings. Negative effects in terms of the encroachment of development into the countryside could occur as result Alternative 4, which proposes significant development at the west of outer New Romney and to the east at</td>
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### SA Objective

#### Discussion of significant effects (and discussion of relative merits in more general terms)

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<th>Rank of preference</th>
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<th>Alt 4</th>
<th>Alt 5</th>
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<td>3. To maintain and enhance the water quality of the District’s waterways and coasts, and achieve sustainable water resources management</td>
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<tr>
<td>4. Increase energy efficiency in the built environment, and the proportion of energy use from renewable sources</td>
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<tr>
<td>5. To take an integrated approach to the reduction of flood risk</td>
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Littlestone-on-Sea. Alternative 5 involves no allocation of land for development at New Romney and so has no effects on this objective.

Alternatives 1 and 2 set out criteria calling for flooding and surface water attenuation, including securing visual and nature conservation enhancement. This may contribute towards the quality of the District’s waterways. However, any benefit of these measures is offset by the failure of both of the alternatives to set any minimum standard for water efficiency. With this being the case both alternatives may have negative effects upon the baseline. In contrast by setting Level 4 (4*) of the Code for Sustainable Homes as the target for new development, Alternative 3 should help to ensure a positive effect in terms of sustainable water management.

Alternative 4 involves major development at Littlestone-on-Sea, which is in relatively close proximity to the coastline in comparison to the siting of development under the other alternatives. As such it could have uncertain effects on the quality of the District’s coast. Alternative 5 involves no allocation of land for development at New Romney and so has no effects on this objective.

Alternatives 1, 2 and 4 provide no reference to increasing energy efficiency or obtaining energy from renewable sources. As such, it is considered likely that these alternatives will lead to negative effects in terms of this objective. Alternative 3 meanwhile requires development to meet a minimum of Code for Sustainable Homes Level 4 (4*) and to provide a significant proportion of its energy requirements through decentralised and renewable / low carbon sources. This could result in significant positive effects in terms of this objective.

Alternative 5 involves no allocation of land for development at New Romney and so has no effects on this objective.

Alternatives 1 and 2 set out criteria calling for flooding and surface water attenuation, including securing visual and nature conservation enhancement. The broad location for development covered by these alternatives is considered to be the most sequentially preferable in the Romney Marsh character area for major new development. In addition to this, Alternative 1 includes text stating the recommendations of the Strategic Flood Risk Assessment (SFRA) must be followed. In contrast, Alternative 3 only states that the findings of the SFRA should be followed in determining suitable locations for development and therefore this...
### SA Objective

| Discussion of significant effects  
| (and discussion of relative merits in more general terms) |
| Rank of preference |
| Alt 1 | Alt 2 | Alt 3 | Alt 4 | Alt 5 |

#### 6. To reduce waste generation and promote sustainable management of waste

Alternative 4 proposes development in areas of sequential higher risk of flooding than under options 1, 2 and 3, along with a higher number of proposed homes. Therefore, this alternative could have significant negative effects in terms of this SA objective. Alternative 5 involves no allocation of land for development at New Romney and so has no effects on this objective.

| Option could lead to uncertain negative effects.  
| Alternative 4 proposes development in areas of sequential higher risk of flooding than under options 1, 2 and 3, along with a higher number of proposed homes. Therefore, this alternative could have significant negative effects in terms of this SA objective. Alternative 5 involves no allocation of land for development at New Romney and so has no effects on this objective. |
| 2 | 2 | 1 | 2 | 2 |

#### 7. To improve efficiency in land use through the re-use of previously developed land and existing buildings and promote urban renaissance

Criteria for the development of around 300 homes on a mix of greenfield and brownfield land are set out in Alternatives 1 and 2. Greenfield land makes up a sizeable proportion of greenfield land within the broad location. This is likely to lead to negative effects on the baseline, although the urban density achieved may improve the performance of these alternatives.

Alternative 3 sets out criteria for the development of a larger amount of homes (400) on a greater proportion of greenfield land in comparison to alternatives 2 and 3, so potentially resulting in a greater negative effect for this objective. Alternative 4 meanwhile involves major development at two greenfield sites and so is likely to have a significant negative effect.

Alternative 5 involves no allocation of land for development at New Romney and so has no effects on this objective.

| Criteria for the development of around 300 homes on a mix of greenfield and brownfield land are set out in Alternatives 1 and 2. Greenfield land makes up a sizeable proportion of greenfield land within the broad location. This is likely to lead to negative effects on the baseline, although the urban density achieved may improve the performance of these alternatives.  
| Alternative 3 sets out criteria for the development of a larger amount of homes (400) on a greater proportion of greenfield land in comparison to alternatives 2 and 3, so potentially resulting in a greater negative effect for this objective. Alternative 4 meanwhile involves major development at two greenfield sites and so is likely to have a significant negative effect.  
| Alternative 5 involves no allocation of land for development at New Romney and so has no effects on this objective. |
| 2 | 2 | 3 | 4 | 1 |

#### 8. To promote economic growth and competitiveness

Alternatives 1 and 2 set out criteria for the development of around 300 homes, with new housing development potentially helping to support economic development in New Romney. As such, these alternatives may have a positive effect upon the baseline. These effects may be magnified in the case of Alternative 3, which plans for the development of a larger amount of homes.

Alternative 4 provides an even greater amount residential development than is laid out in Alternative 1 to 3.

| Alternatives 1 and 2 set out criteria for the development of around 300 homes, with new housing development potentially helping to support economic development in New Romney. As such, these alternatives may have a positive effect upon the baseline. These effects may be magnified in the case of Alternative 3, which plans for the development of a larger amount of homes.  
<p>| Alternative 4 provides an even greater amount residential development than is laid out in Alternative 1 to 3. |
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<td>This have a favourable economic impact  on some town centre businesses, but could result in uncertain effects overall given the distance of these homes from established areas of major employment. Alternative 5 involves no allocation of land for development at New Romney and so has no effects on this objective.</td>
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<td><strong>Alt 1</strong> 2 3 4 5</td>
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<tr>
<td>9. To ensure high and stable levels of employment so that everyone can benefit from economic growth</td>
<td>Alternative 1 and 2 set out a range of criteria for the development of a broad location in relatively close proximity to New Romney Town Centre, with improved connectivity for new and existing residents to access the town’s facilities and services and contribute to sustaining the local economy. In addition, Alternative 1 strengthens the contribution development at this broad location should make to public realm improvements and investment priorities within New Romney Town Centre. As such, both alternatives should have a positive effect on the baseline, particularly so in the case of Alternative 1. Alternative 3 also sets out criteria for residential development in relatively close proximity to New Romney Town Centre. However, without direct criteria addressing connectivity and associated improvements to the High Street environment, so resulting in a lesser positive effect. Alternative 4 involves major development in a broad location further away from New Romney Town Centre than under Alternatives 1, 2 and 3 and so is likely to achieve a much reduced level of benefit. Alternative 5 involves no allocation of land for development at New Romney and so has no effects on this objective.</td>
<td><strong>1 2 3 4 5</strong></td>
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<tr>
<td>10. To ensure that everyone has the opportunity to live in a decent and affordable home</td>
<td>Alternatives 1 and 2 set out a criterion stipulating that the development should provide around 300 dwellings of a range of size and type, of which 30% would be affordable (subject to viability). This could potentially result in a significant positive effect in terms of this SA objective. A significant positive effect is also possible in the case of Alternative 3, which stipulates that development should provide around 400 dwellings including 35% affordable housing and a substantial level of family sized homes, in line with the findings of the Strategic Housing Market Assessment. This is broadly similar to Alternatives 1 and 2, although the 35% threshold is slightly higher and with no viability caveat. Alternative 4 could also have a significant positive effect on this SA objective as it involves major residential development. Due to the amount of development proposed this option would be likely to deliver a large quantity of affordable housing and it is likely to increase the range and size of dwellings available. Overall, Alternatives 1 – 4 should result in significant positive effects.</td>
<td><strong>1 1 1 1 2</strong></td>
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### SA Objective

**11. To create and sustain vibrant and sustainable communities**

Alternatives 1 and 2 set out criteria for development in relatively close proximity to New Romney Town Centre and on the edge of existing settlements. These criteria include proposals for improved connectivity in a southerly direction to the Town Centre which will aim to integrate the site with surrounding communities. These measures could potentially result in significant positive effects. In addition, Alternative 1 looks to ensure further that the broad location integrates with its surrounding physical environment. This alternative is therefore considered to have a greater level of positive effect than Alternative 2.

Alternative 3 sets out criteria for a development in relatively close proximity to New Romney Town Centre and on the edge of existing settlements. However, unlike Alternative 1 and 2 there are no associated criteria in relation to integration with the surroundings and Town Centre. Alternative 4 would create communities at a greater distance from New Romney Town Centre than the other proposed alternatives, potentially reducing opportunities to establish community cohesion.

Alternative 5 involves no allocation of land for development at New Romney and so has no effects on this objective.

### Rank of preference

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<th>Objective</th>
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<tr>
<td><strong>11. To create and sustain vibrant and sustainable communities</strong></td>
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### 12. To reduce inequalities, poverty, deprivation and social exclusion

Alternatives 1 and 2 propose development adjacent an existing settlement in relatively close proximity to New Romney Town Centre and seek to improve connectivity to the High Street. In an existing area of deprivation, new development can increase the local population, possibly helping to sustain local facilities and services. Both alternatives also include a criterion for development that will ensure the provision of affordable housing in an area where there is an acute need, although this is subject to viability. Alternative 3 sets out criteria for a development of a slightly higher numbers of homes than under Alternatives 1 and 2, with an access strategy instead of specific criteria for improving connectivity. The threshold level of affordable housing is also set slightly higher, without being subject to viability. Therefore, this alternative may have a greater positive effect.

Alternative 4 would create communities at a distance from New Romney and could represent overdevelopment in the town, placing undue strain on local facilities and services. As such, negative effects may result form this alternative. Alternative 5 involves no allocation of land for development at New Romney and so has no effects on this objective.

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<td><strong>12. To reduce inequalities, poverty, deprivation and social exclusion</strong></td>
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<th>Discussion of significant effects (and discussion of relative merits in more general terms)</th>
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<tr>
<td>13. To raise educational attainment and develop opportunities for everyone to acquire the skills needed to find and remain in work</td>
<td>Alternatives 1 and 2 option sets out criteria for development which include a stipulation for the delivery of measures / contribution to improvement in skills and training in the Romney Marsh area. As such, these alternatives may have a significant positive effect in terms of this objective. Alternative 3 meanwhile sets involves a greater amount of homes, but with no policy criteria in relation to education or skills. Given the increase in population such development would bring, there could be a negative effect on educational and skills due to pressure on existing facilities and schemes. This pressure is likely to be even greater in the case of Alternative 4, which makes provisions for over 1000 homes without reference to education and skills. This could result in significant negative effects against the baseline. Alternative 5 involves no allocation of land for development at New Romney and so has no effects on this objective.</td>
<td>Alt 1</td>
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<tr>
<td>14. To improve the health and well-being of the population and reduce inequalities in health</td>
<td>Alternatives 1 and 2 require development to improve pedestrian/cyclist linkages to the town centre which could serve to encourage healthier modes of commuting by new residents, with positive effects. In addition, Alternative 2 requires provision of Kent County Council land for the upgrade of St Nicholas Primary School playing facilities which could aid in benefiting the health well being of the younger population. Alternative 3 requires development proposals to incorporate an assessment of open space requirements and to produce an access strategy to maximise opportunities for walking and cycling. The effects of this alternative could also be positive overall, although this is dependent on implementation. Major development to the west of outer New Romney and to the east at Littlestone-on-Sea, as proposed through Alternative 4, would place residents further away from New Romney Town Centre and its health and leisure facilities. As such, the effects of this alternative may be negative for this objective. Alternative 5 involves no allocation of land for development at New Romney and so has no effects on this objective.</td>
<td>2</td>
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<tr>
<td>15. To promote sustainable access, reduce car dependency, road congestion and associated</td>
<td>Alternatives 1 and 2 require measures to improve pedestrian / cyclist linkages to the town centre and for the inclusion of cycleways / footpaths within the development. These alternatives are therefore considered to have positive effects in terms of promoting sustainable access. Alternative 3 requires development to be preceded by an access strategy maximising potential for walking, cycling and the use of public transport. This could lead to positive effects, but is dependent on implementation. Alternative 4 involves the allocation of additional land for the development of over 1,000 homes at the west</td>
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<td>SA Objective</td>
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<tr>
<td>pollution by promoting sustainable locations for development and improving travel choice</td>
<td>of outer New Romney and to the east at Littlestone-on-Sea which could lead to an increase in car dependency and associated pollution. As such, significant negative effects are predicted for this alternative. Alternative 5 involves no allocation of land for development at New Romney and so has no effects on this objective.</td>
<td>Alt 1 Alt 2 Alt 3 Alt 4 Alt 5</td>
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**Summary**

A key driver for growth in Romney Marsh is the need to help address existing issues of entrenched deprivation that exist within several communities across the area, as well as to help identified issues of housing need. The majority of SOAs within the Romney Marsh area are amongst the 50% most deprived. Due to environmental constraints (predominantly flood risk), it is not expected that significant growth can come forward at locations within the Romney Marsh character area other than at New Romney (SA Objective 5). The quantum of growth proposed through Alternatives 1 and 2 (around 300 dwellings) will be unlikely to have a significant effect in terms of creating a new supply of labour and increasing the attractiveness of the area for employers. However, it is expected that this quantum of growth will contribute to some degree of locally-focused benefits, for instance through helping to support town centre shops and community facilities. There might be considered to be some environmental benefits associated with a lower quantum of growth, given that this is a relatively sensitive area in terms of environmental concerns.
APPENDIX IX: APPRAISAL OF ALTERNATIVE APPROACHES TO GROWTH AT SELLINDGE

Introduction

As described within Part 2 of the main SA Report document, prior to preparing the draft plan four alternative approaches to the issue of Sellindge were subjected to SA:

Five alternative approaches were subjected to SA:

1) Limited residential development on land in the centre of Sellindge providing no more than 250 homes, including affordable housing and enabling a central village green/common, a more pedestrian/cycle friendly Ashford Road, and other community facilities. Proposals should be brought forward as a comprehensive masterplan and should include consideration of delivery of a core area (bulk of identified land south of the A20) in parallel with/advance of any development to the west, north or east of it.
   - In-line with Policy CSD9 as included in the July 2011 Submission Core Strategy, amended by the 2012 Proposed Modifications

2) Limited residential development on land in the centre of Sellindge providing no more than 250 homes, including affordable housing and enabling a central village green/common, a more pedestrian/cycle friendly Ashford Road, and other community facilities. Proposals should be brought forward as a comprehensive masterplan and should include consideration of delivery of a core area (bulk of identified land south of the A20) in parallel with/advance of any development to the west, north or east of it. Permission for private residential development sites outside of the defined settlement boundaries and not considered in the Rural Masterplanning Project will be refused.
   - In-line with Policy CSD9 as included in the July 2011 Submission Core Strategy

3) Housing-led development of land at Sellindge East (north of the motorway and A20) providing around 300 homes including affordable housing, lifetime homes and family sized dwellings. Development should meet level 4 of the Code for Sustainable Homes and consider site-wide solutions for low carbon/renewable heat and power. Proposals should be brought forward as a comprehensive masterplan, with phasing, and should include consideration of: open space and recreational facilities (including contributions to improving local play space and biodiversity); flood risk and sewer infrastructure; and sustainable modes of transport and parking. Provision for new infrastructure will be based on a detailed appraisal.
   - In-line with Policy ND3 as included in the 2009 Preferred Options document

4) Development of approximately 58 hectares of land between Moorstock and Sellindge to provide between 500 and 1000 new homes.
   - In-line with the alternative to Policy ND3 as presented in the 2009 Preferred Options document

5) The inclusion of no specific policy within the Core Strategy supporting mixed use development at Sellindge
   - In-line with the alternative to Policy ND3 as presented in the 2009 Preferred Options document

The appraisal should be read alongside Chapter 18 of the main report, which explains which approach the Council favours, and why.

Methodology

See discussion within Appendix II, above.
### Appraisal findings

#### Table presenting an appraisal of the following alternative approaches:

<table>
<thead>
<tr>
<th>Approach</th>
<th>Discussion of significant effects</th>
<th>Rank of preference</th>
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<tbody>
<tr>
<td>(1) Approach in-line with CSD9 of the 2011 Core Strategy, as modified</td>
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<tr>
<td>(2) Approach in-line with CSD9 of the 2011 Core Strategy</td>
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<tr>
<td>(3) Approach in-line with Policy PO ND3 of the 2009 Preferred Options document</td>
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<tr>
<td>(4) Alternative ND3a of the 2009 Preferred Options document</td>
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<tr>
<td>(5) Alternative ND3b of the 2009 Preferred Options document</td>
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</table>

#### SA Objective

1. To conserve and enhance biodiversity

Alternatives 1 and 2 provide for open space and new habitats for priority nature species in an area of land that is currently used for agricultural purposes. As such, they may have a positive effect in terms of this objective. Alternative 3 refers to open space provision, but is less prescriptive in terms of enhancement of biodiversity. Being more open to interpretation and therefore less certain to deliver positive biodiversity enhancements, this alternative affects against the baseline are uncertain. Alternative 4 could have a significant negative effect on biodiversity. Currently much of the area is open grazing land interspersed with copses of trees and divided by established hedgerows and hedgerow trees. The area provides valuable habitat for birds and mammals and development on the scale suggested may have a large impact on the flora and fauna of the area. Alternative 5 involves no allocation of land for development at Sellindge and so has no effects on this objective.

2. To conserve, enhance and make accessible the District’s countryside, heritage and historic

Sellindge is essentially rural in its nature, with the lanes and footpaths that surround Sellindge offering significant opportunities for access. Alternatives 1 and 2 will ensure that development should offer a more pedestrian/ cycle friendly A20 through traffic calming, which would ease pedestrian and cycle movement through the centre of Sellindge to open countryside. However, neither of the alternatives set out criteria calling for the assessment of historical and archaeological impacts and their mitigation. As such, the overall effects of these alternatives are uncertain. Alternative 3 includes provision for an access strategy, but is less prescriptive in terms of its outputs than
<table>
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<th>SA Objective</th>
<th>Discussion of significant effects (and discussion of relative merits in more general terms)</th>
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<tr>
<td>environment</td>
<td>Alternatives 1 and 2. The alternative also involves the outward expansion of the village and so may impact upon the countryside. The area covered by Alternative 4 includes a number of public footpaths which could be detrimentally affected or lost, so affecting access. The level of development proposed by this alternative may also result in a large loss of countryside, with potentially significant negative effects on the baseline. Alternative 5 involves no allocation of land for development at Sellindge and so has no effects on this objective.</td>
<td>2 2 1 5 4</td>
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<tr>
<td>3. To maintain and enhance the water quality of the District’s waterways and coasts, and achieve sustainable water resources management</td>
<td>Alternatives 1 and 2 stipulate that developments should contribute to improvements in waste water infrastructure, but do not describe the form that these might take. However, neither of the policies stipulate that new development should include water efficiency measures. Due to this, a negative overall effect on the baseline is predicted. Alternative 3 provides for a minimum of code level 4 for housing development, which equates to water consumption of 105 litres per person per day. This is below current average water consumption within the District at the present time. The option also includes provision for improvements to the sewerage system, although these are not described in detail. This option is predicted to have positive effects for this objective. Alternative 4 includes no details on water efficiency or quality measures. This could result in negative effects given the scale of development proposed. Alternative 5 involves no allocation of land for development at Sellindge and so has no effects on this objective.</td>
<td>2 2 1 5 4</td>
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<tr>
<td>4. Increase energy efficiency in the built environment, and the proportion of energy use from renewable sources</td>
<td>Alternatives 1, 2 and 3 make no reference to energy efficiency or to energy from renewable sources. As such, negative effects are predicted for these alternatives. Alternative 4 may have a larger negative effect given the size of development proposed, although this could also provide economies of scale for investment in renewable energy. In contrast, Alternative 3 makes provision for a minimum of Level 4 of the Code for Sustainable Homes and states that development should obtain a significant proportion of its energy requirements through the use of decentralised and renewable or low carbon sources. It is predicted that this alternative may have a significant positive effect for this objective. Alternative 5 involves no allocation of land for development at Sellindge and so has no effects on this objective.</td>
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| SA Objective | Discussion of significant effects  
(and discussion of relative merits in more general terms) | Rank of preference |
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<tr>
<td><strong>5. To take an integrated approach to the reduction of flood risk</strong></td>
<td>Alternative 3 includes provision for a comprehensive Flood Risk Assessment. None of the remaining alternatives include any criteria relating to flood related issues. This could lead to uncertain effects on the baseline, with development potentially impacting negative on the hydrology of the area. This risk may be higher for Alternative 4, which proposes a slightly higher level of development that Alternatives 1 and 2. Alternative 5 involves no allocation of land for development at Sellindge and so has no effects on this objective.</td>
<td>Alt 1</td>
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<td><strong>6. To reduce waste generation and promote sustainable management of waste</strong></td>
<td>Alternatives 1 and 2 make provisions for the construction of up to 250 new homes. This level of development would require additional provision in terms of dealing with waste. As these alternatives provide no guidance for managing waste sustainably, negative effects are predicted against the baseline. Alternative 4 also fails to outline how waste should be managed, which given the scale of development proposed could result in significant negative effects. The construction of up to 300 new homes, as proposed through Alternative 3, would require additional provision in terms of dealing with waste. The alternative includes provision for Code Level 4 of the Code for Sustainable Homes, which includes consideration of domestic waste disposal, construction waste and composting. As such, significant positive effects are predicted against the baseline. Alternative 5 involves no allocation of land for development at Sellindge and so has no effects on this objective.</td>
<td>3</td>
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<tr>
<td><strong>7. To improve efficiency in land use through the re-use of previously developed land and existing buildings and promote urban renaissance</strong></td>
<td>Whilst development in the centre of Sellindge may result in some degree of urban regeneration, the proposed broad location for development set out in Alternative 1 and 2 is on predominantly greenfield land. Alternatives 3 and 4 meanwhile propose development on entirely greenfield land, with larger amounts of housing growth. This is especially the case with Alternative 4, which proposes between 500 and 1000 new homes. As such, all of these alternatives could result in significant negative effects, with the extent of this effect determined by the footprint of the development that occurs in these broad locations. Alternative 5 involves no allocation of land for development at Sellindge and so has no effects on this objective.</td>
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## SA Objective

### 8. To promote economic growth and competitiveness

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<td>Alternatives 1 and 2 would provide new housing growth in a village location in the largely constrained North Downs Character Area. The maximum of 250 units proposed through these alternatives could support existing shops and services in the village and could encourage new business to locate there, potentially resulting in some positive effect in terms of this objective. The 300 units proposed under this Alternative 3 also have the potential to support economic growth in the village. However, it is possible that Alternative 1 and 2 are stronger in terms of place making, through the creation of a recognisable village centre more likely to create a vibrant and economically active village centre. The size of development site proposed by Alternative 4 may be overly large in comparison to the rest of Sellindge and could create a secondary community adjacent to the existing village. If through over intensification it made Sellindge a less desirable place to live, this alternative could result in a negative effect on the areas economy. Alternative 5 involves no allocation of land for development at Sellindge and so has no effects on this objective.</td>
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### 9. To ensure high and stable levels of employment so that everyone can benefit from economic growth

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<td>This level of housing growth suggested through Alternatives 1, 2 and 3 are unlikely to have any significant impact on economic growth within the District. However, it may make some contribution to its economic stability by providing a higher population which may then make use of local businesses and shops and create demand for small business premises. Alternative 4 would produce a higher local population than the other alternatives. This could be exploited as an opportunity by local businesses, and could help to generate the creation of new small enterprises. Alternatively, over development in the area could place strain on the local job market, with demand for work from the new populace exceeding the number of employment opportunities available. With this being the case, the effects of this alternative are uncertain. Alternative 5 involves no allocation of land for development at Sellindge and so has no effects on this objective.</td>
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### 10. To ensure that everyone has the opportunity to

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<td>Under Alternatives 1 and 2, total residential development will not exceed approximately 250 dwellings, with around 30% of these to be affordable housing, subject to viability. Alternative 3 meanwhile would provide around 300 new homes, including 35% affordable housing and a substantial element of family size houses</td>
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<td>live in a decent and affordable home</td>
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<tr>
<td>11. To create and sustain vibrant and sustainable communities</td>
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<td>12. To reduce inequalities, poverty, deprivation and social exclusion</td>
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<td>13. To raise educational attainment and develop opportunities</td>
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### SA Objective

**for everyone to acquire the skills needed to find and remain in work**

**Discussion of significant effects (and discussion of relative merits in more general terms)**

Alternative 4 makes no mention of providing for education. Given the amount of development proposed in this location there is the potential for this alternative to result in a significant negative effect.

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**14. To improve the health and well-being of the population and reduce inequalities in health**

Alternatives 1 and 2 may help to positively contribute to this objective by providing a more pedestrian/cycle friendly A20 through route. These alternatives also call for proposals to include satisfactory arrangements for the timely delivery of local community facilities, although no specific reference is made to health facilities. Overall, this should result in some positive effect. Alternative 3 is to include an access strategy that maximises the potential for walking, cycling and so could also contribute positively to this objective. Alternative 4 makes no mention of providing for health facilities or healthy modes of transport. Given the amount of development proposed in this location there is the potential for this alternative to result in a negative effect.

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**15. To promote sustainable access, reduce car dependency, road congestion and associated pollution by promoting sustainable locations for development and improving travel choice**

Alternatives 1 and 2 include important highway investment for pedestrians and cyclists on the A20, which may help to promote sustainable modes of transport. However, beyond this it makes no reference to the wider sustainable transport issues, such as the provision of public transport links. As such, these options could produce a lesser positive outcome than Alternative 3, which requires an access strategy that maximises the potential for the use of public transport, as well as for walking and cycling. Alternative 4 is relatively poorly related to the village and so may encourage increased car dependency. This alternative also makes no mention of providing for sustainable modes of transport. Given the amount of development proposed in this location there is the potential for this alternative to result in a significant negative effect. Alternative 5 involves no allocation of land for development at Sellindge and so has no effects on this objective.

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Summary
Alternatives 1 and 2 both perform well for their sustainability, with almost identical performance against the objectives. Important benefits of these alternatives include their emphasis on masterplanning involving extensive community engagement and a recognition that the scale of growth must be contingent on delivery of local infrastructure. Another important sustainability benefit associated with Alternatives 1 and 2 is provision of a new village green, which will provide a focal point for the village and have the effect of increasing compactness and walkability. As such, Alternatives 1 and 2 are clearly the most sustainable means of achieving meeting the objectives of the plan in the Sellindge area.
APPENDIX X: APPRAISAL OF ALTERNATIVE APPROACHES TO GROWTH AT FOLKESTONE RACECOURSE

Introduction

As described within Part 2 of the main SA Report document, prior to preparing the draft plan four alternative approaches the issue of Folkestone Racecourse were subjected to SA:

Four alternative approaches were subjected to SA:

1) Folkestone Racecourse is not allocated as strategic site allocation within the Shepway Core Strategy.

2) Folkestone Racecourse is allocated for a mixed use development providing up to 820 homes including provision of affordable housing. Redevelopment should provide a reconfigured racecourse, grandstand, conferencing and associated leisure facilities and other rural employment, together with a primary school, community facilities, public open spaces (and an enhanced setting for Westenhanger Castle/nearby AONB), and upgraded railway station facilities (including new access and parking). Development should meet level 3 (or higher) of the Code for Sustainable Homes, with water efficiency of 90 litres/person/day or better and allow for convenient waste recycling. Proposals should be brought forward as a comprehensive masterplan or an outline/detailed planning application for the whole site with phasing that expedites delivery of a new racecourse and timely delivery of infrastructure. Proposals should consider: a comprehensive approach for residential development and re-constructing the Racecourse; sustainable modes of transport; the Newingreen (A20/A261/Stone Street) junction and onward transport arrangements for users of the railway station; flood risk/wastewater infrastructure and interaction with blue and green infrastructure; landscaping; and the existing built form of settlements.
   • In-line with Policy SS8 as included in the July 2011 Submission Core Strategy

3) The Folkestone Racecourse site is allocated for a high quality mixed use development providing at least 400 homes, including affordable housing and lifetime homes. Development should meet level 4 of the Code for Sustainable Homes and consider site-wide solutions for low carbon/renewable heat and power. Proposals should be brought forward as a comprehensive masterplan and should include consideration of: local policies for design and infrastructure; retention and improvement of the racecourse; enhancement of the historic setting/integration with the Westenhanger Castle and Medieval barns; provision of a village centre providing local shops and space for small businesses (B1), community facilities and open space; sustainable modes of transport and a new access road from the A20; flood risk and sewerage infrastructure; and climate change mitigation and adaptation. Provision for new infrastructure will be based on a detailed appraisal.
   • In-line with Policy ND2 as included in the 2009 Preferred Options document

4) Proposals for the intensification of uses at Folkestone Racecourse involving the development of additional leisure, recreational, tourism and exhibition facilities will be permitted subject to proposals meeting all of the following criteria: amenity, environmental and highway considerations and compliance with countryside conservation policy; provision of a flood risk assessment; and Proposals protect the nationally important historic buildings, archaeological remains and setting of the Westenhanger castle complex.
   • In-line with Policy LR5 of the Shepway Local Plan

The appraisal should be read alongside Chapter 19 of the main report, which explains which approach the Council favours, and why.

Methodology

See discussion within Appendix II, above.
Appraisal findings

Table presenting an appraisal of the following alternative approaches:

1. No Policy
2. Approach in-line with Policy SS8 of the 2011 Core Strategy
3. Approach in-line with Policy PO ND2 of the 2009 Preferred Options document
4. Approach in-line with Local Plan policy LR5

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<th>SA Objective</th>
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<tbody>
<tr>
<td>1. To conserve and enhance biodiversity</td>
<td>Alternative 2 does not require appropriate mitigation of the effects on Natura 2000 sites or any other requirements to conserve and enhance biodiversity. It does however require the delivery of ‘associated green infrastructure opportunities.’ The building of over 800 properties and a new racecourse facility would significantly intensify its existing use and result in urbanisation of a rural location, albeit opportunities also exist for enhancement. Overall, it is considered possible that a negative effect on biodiversity could occur. The building of over 400 houses and improvements to the racecourse under Alternative 3 would also result in the urbanisation of a rural location and negative effects on biodiversity, although not to the same extent as Alternative 2. Alternative 4 requires that proposals meet environmental considerations. However, it does not qualify what these are. Intensification of the use of the racecourse could have effects on biodiversity; although it is unlikely to be to the same degree as Alternatives 2 and 3 above.</td>
<td>Alt 1 4 3 2</td>
</tr>
<tr>
<td>2. To conserve, enhance and make accessible the District’s countryside, heritage and historic environment</td>
<td>The approach set out in Alternative 2 seeks to directly enhance the setting and access to Westenhanger Castle by relocating race facilities away from its curtilage. Nonetheless, these improvements must be considered against the considerable urbanisation of the immediate locality and the development impact on the immediate countryside and wider landscape, including the outlook over the AONB from which may be impacted upon. As such this option could lead to significant negative impacts. Alternative 3 seeks to ensure development respectfully integrates with the Castle, but does not require the enhancement of its setting. Development of 400 properties could have unqualified impacts on the countryside and wider adjacent AONB. Alternative 4 seeks to protect historic buildings and archaeological interest and the countryside. However, any intensification of use at the existing racecourse site could be of detriment to the castle and SAM setting, leading to an uncertain effect on the countryside and wider AONB.</td>
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<td>SA Objective</td>
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<tr>
<td>3. To maintain and enhance the water quality of the District’s waterways and coasts, and achieve sustainable water resources management</td>
<td>The criteria laid out in Alternative 2 require the agreement of a programme to manage flood risk and drainage, whilst ensuring culverting is minimised for the northern part of the development. As such, the proposal is likely to lead to additional culverting of the river. This alternative also requires the upgrading of strategic wastewater infrastructure and the delivery of multifunctional green infrastructure, which is likely to include SUDs. This alternative also requires a high level of water efficiency of 90l/person/day for all residential development. However, question marks exist in terms of viability and deliverability. Alternative 3 requires a minimum of Code for Sustainable Homes level 4 from 2014 and a BREEAM very good rating, including excellent for water for non residential buildings. Such development could have significant positive effects. This alternative also requires improvements to the sewage system in the area. However, it does not provide the detail of Alternative 2, nor does it require the delivery of green infrastructure and minimal culverting. Alternative 4 meanwhile requires Flood Risk Assessment, but does not provide any guidance for enhancing and maintaining waterways nor achieving standards for sustainable water resource management. As such, a negative effect may be recorded against the baseline.</td>
<td></td>
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<tr>
<td>4. Increase energy efficiency in the built environment, and the proportion of energy use from renewable sources</td>
<td>Alternative 2 requires a minimum of Code for Sustainable Homes Level 3 for all residential development. This could have a positive effect against the baseline by setting minimum standards for energy efficiency. By setting a minimum of Code for Sustainable Homes level 4 from 2014 and a BREEAM very good rating as a minimum standard, Alternative 3 could encourage an even higher level of efficiency, with greater positive effects. Alternative 4 has no energy efficiency or renewable energy requirements and so it is considered that such development could have negative effects in terms of this sustainability objective.</td>
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<tr>
<td>5. To take an integrated approach to the reduction of flood risk</td>
<td>The approach set out in Alternative 2 requires the agreement of a programme to manage flood risk and drainage, whilst ensuring culverting is minimised for the northern part of the development. As such the proposal is likely to lead to additional culverting of the river. This alternative also requires the upgrading of strategic wastewater infrastructure and the delivery of multifunctional green infrastructure, which is likely to include SUDs. Overall positive effects are predicted against the baseline. Alternative 3 requires comprehensive Flood Risk Assessment and improvements to the sewage system in the area.</td>
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<td>does not provide the detail of option 2 nor require the delivery of green infrastructure nor minimal culverting. Alternative 4 also requires a Flood Risk Assessment, but does not provide any guidance or enhancing and maintaining waterways, or for achieving standards for sustainable water resource management. As such, it is difficult to qualify the effects of these alternatives.</td>
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<tr>
<td>6. To reduce waste generation and promote sustainable management of waste</td>
<td>Alternative 2 requires the delivery of significant infrastructure, together with convenient waste recycling. With this being the case, it could achieve a positive effect in terms of this objective. Alternatives 3 and 4 meanwhile provide no guidance regarding waste management. This could result in a negative effect against the baseline for both alternatives.</td>
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<tr>
<td>7. To improve efficiency in land use through the re-use of previously developed land and existing buildings and promote urban renaissance</td>
<td>Whilst Alternative 2 includes some previously developed land, the site is largely greenfield. Development of 820 dwellings would be of an urban density that would maximise land use efficiency. Despite this, the loss of a greenfield land means that a significant negative effect is possible in this case. Alternative 3 also scores a significant negative for its use of greenfield land, with its lower density also offering a lesser degree of efficiency. The intensification of tourism, business and leisure uses at the racecourse through Alternative 4 would also result in development of some degree of greenfield land, although quantities remain uncertain.</td>
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<tr>
<td>8. To promote economic growth and competitiveness</td>
<td>Alternative 2 provides for a reconfigured racecourse, grandstand, conferencing facilities and other leisure and rural employment, including shops and offices. It also seeks to provide a critical mass of housing development, which may help to sustain local employment and economic growth. However this approach also involves a degree of risk – with no evidence provided to demonstrate that should the racecourse be built it would be commercially viable. Overall, the effects of this alternative may be positive. Alternative 3 may not be capable of providing the critical mass of population required to sustain local employment and economic growth. As such, this option is less likely to deliver or sustain economic growth and could lead to negative effects. Alternative 4 is considered to have little positive or negative impact given the scale of development that might</td>
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<td>Occur through intensification.</td>
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<tr>
<td>9. To ensure high and stable levels of employment so that everyone can benefit from economic growth</td>
<td>The approach set out in Alternative 2 provides for a reconfigured racecourse, grandstand, conferencing facilities and other leisure and rural employment, including shops and offices. It also seeks to provide a critical mass of housing development, which may help to sustain local employment. However this approach also involves a degree of risk – with no evidence provided to demonstrate that should the racecourse be built it would be commercially viable. Overall, the effects of this alternative may be positive. Alternative 3 may not be capable of providing the critical mass of population required to sustain local employment opportunities. As such, this option is less likely to deliver or sustain economic growth and related employment, and so could lead to negative effects. Alternative 4 is considered to have little positive or negative impact given the scale of development that might occur through intensification.</td>
<td>2</td>
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<tr>
<td>10. To ensure that everyone has the opportunity to live in a decent and affordable home</td>
<td>Alternative 2 requires the provision of 250 affordable dwellings subject to viability. This could result in a large amount of affordable housing provision within the North Downs Area of the District, meeting an established need. This alternative could therefore lead to a significant positive effect, albeit this is somewhat uncertain for viability reasons. Meanwhile, Alternative 3 requires the provision of 35% affordable housing and 20% lifetime homes. This could also constitute significantly to this objective, albeit to a lesser degree given the lower quantum of housing proposed. Alternative 4 makes no provision for housing at Folkestone Racecourse. Intensification of uses at the site, without a residential component would miss an opportunity to increase affordable housing provision within the North Downs Area.</td>
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<tr>
<td>11. To create and sustain vibrant and sustainable communities</td>
<td>Alternative 2 proposes significant residential development, alongside community facilities and employment uses that could create a functioning community in the area. Its location adjacent to Westenhanger railway station, together with the improvements to the railway station car park and bus access could help to ensure sustainable transport. Overall, the effects of this alternative on the objective could be positive. Alternative 3 proposed a lower quantum of residential development than Alternative 2. A development of 400 units may be unable to support significant community infrastructure upgrades, and so might not be capable of creating a functional community in its own right. Alternative 4 makes no provision for housing at Folkestone Racecourse. Intensification of uses at the site without a residential component is unlikely to contribute to this objective.</td>
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</table>
12. To reduce inequalities, poverty, deprivation and social exclusion

The approach set out on Alternative 2 seeks to provide 30% affordable housing, subject to viability could meet a recognised affordable housing need. As such, positive effects could occur as a result of this alternative. Alternative 2 requires the provision of 35% affordable housing and 20% lifetime homes, which may also lead to a positive effect. However, given the lower quantum of housing this effect may be lesser than through Alternative 2.

Alternative 4 makes no provision for housing at Folkestone Racecourse. Whilst intensification of uses at the site without a residential component would miss an opportunity to increase affordable housing provision within the North Downs Area, it could provide additional employment opportunities in the District with positive effects.

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13. To raise educational attainment and develop opportunities for everyone to acquire the skills needed to find and remain in work

Alternative 2 provides for primary education provision. As a result, it could result in positive effects against the baseline. Alternative 3 makes no provisions for education, skills and employment. Given the scale of the development proposed this could result in a negative effect against the baseline for this objective.

Whilst intensification of the use of the racecourse under Alternative 4 may include opportunities for skills development, this is too uncertain to predict an effect.

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14. To improve the health and well-being of the population and reduce inequalities in health

Alternative 2 seeks to provide opportunities for access to green spaces, community facilities and the surrounding countryside, and so could result in a positive effect in terms of this objective. Alternative 3 seeks to promote a high quality development incorporating 20% Lifetime Homes, which may contribute to the well-being of resident. However, it makes no provisions for onsite community facilities, as per Alternative 2. Given the scale of the development proposed this may therefore result in a negative effect against the baseline.

The intensification of the use of the racecourse under Alternative 4 is unlikely to have an impact upon this objective.

<table>
<thead>
<tr>
<th>Rank of preference</th>
<th>Alt 1</th>
<th>Alt 2</th>
<th>Alt 3</th>
<th>Alt 4</th>
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<td></td>
<td>2</td>
<td>1</td>
<td>3</td>
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</table>

15. To promote sustainable access, reduce car dependency

The approach set out though Alternative 2 proposes a significant quantum of development within a rural location. The policy seeks to maximise public transport access in to the site via bus and to improve station facilities. Community facilities to serve residents and the surrounding area could also be provided, potentially reducing the need to travel larger distances. Despite this, given the location of this alternative it is likely that a significant proportion of journeys will be dependent on private modes of transport and the development of the site to the level proposed by this alternative could

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<th>Rank of preference</th>
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### Discussion of significant effects  
(and discussion of relative merits in more general terms)

<table>
<thead>
<tr>
<th>SA Objective</th>
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<tbody>
<tr>
<td>lead to congestion of the local highway network. As such, a negative effect</td>
<td>Alt 1</td>
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<tr>
<td>Alternative 3 meanwhile proposes 400 dwellings in this rural location. Whilst</td>
<td>Alt 2</td>
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<tr>
<td>the policy seeks to maximise public transport access, the quantum of</td>
<td>Alt 3</td>
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<tr>
<td>development proposed is unlikely to support on site services such as a</td>
<td>Alt 4</td>
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<tr>
<td>primary school, nor fund the required transport improvements to mitigate</td>
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<td>the impact of development. Without the inclusion of on-site community</td>
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<td>facilities it is likely that a significant proportion of journeys will be</td>
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<td>dependent on private modes of transport and the development of the site</td>
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<tr>
<td>could lead to significant congestion of the local highway network. As a</td>
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<td>result of this, significant negative effects are predicted. Alternative 4</td>
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<tr>
<td>has no requirement for public transport upgrades or for improvements to</td>
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<tr>
<td>Westenhanger station. Any intensification of uses at the site could be</td>
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<tr>
<td>highly dependent on private modes of transport. It is not known whether</td>
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<tr>
<td>such intensification would lead to congestion and so the effects of this</td>
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<td>alternative are uncertain.</td>
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### Summary

The above appraisal identifies that both Alternatives 1 and 2 have a number of sustainability benefits, albeit very different in character. Alternatives 3 and 4 meanwhile appear less likely to deliver positive results in terms of the sustainability objectives. Alternative 1 is consistently low ranking, suggesting it is the safest approach to achieving sustainable development within the District. Alternative 2 could provide a considerable opportunity to deliver a high quality, sustainable community in a rural area. However, it carries a number of associated risks, for instance with regard to landscape impact, delivery of economic activity in the long term and making efficient use of land.
APPENDIX XI: APPRAISAL OF ALTERNATIVE APPROACHES TO ADDRESSING GREEN INFRASTRUCTURE

Introduction

As described within Part 2 of the main SA Report document, prior to preparing the draft plan alternative approaches to addressing the issue of ‘green infrastructure’ were subjected to SA. The Council then subsequently selected a preferred approach.

The alternative approaches to green infrastructure subjected to SA were as follows:

1) An approach in-line with Policy CSD4 of the 2011 Core Strategy (as modified), which emphasises:
   - Avoidance of net loss in biodiversity
   - Increasing the quantity of GI, maximising opportunities for net biodiversity gain.
   - Positive approach to areas of high landscape quality or coastal / recreational potential
   - GI protected and enhanced, with loss not allowed unless in full accordance with national policy or a significant quantitative or qualitative benefit is realised
   - Planning decisions to prioritise status of AONB over other planning considerations, with development not to jeopardise protection or enhancement of local landscapes
   - Planning decisions to reflect the need for high quality open spaces

2) An approach in-line with Policy CSD4 of the 2011 Core Strategy, which emphasises:
   - Loss of GI will not be allowed, other than where a significant quantitative or qualitative net GI benefit is realised and the strategic aims of the plan are furthered.
   - Development of GI will be acceptable in suitable locations where sustainable transport improvements are provided
   - Development of GI will be acceptable where sufficient contribution is made to the provision and management of greenspaces
   - GI managed with a strategic focus on climate change effects, avoidance of fragmentation, expanding of greenspace functions and tackling deficiencies.
   - Major development on the edge of settlements to provide green and open space with landscaping and biodiversity provisions on-site

3) An approach in-line with Policy GS1 of the 2009 Preferred Options document, which emphasises:
   - An integrated approach with measures to tackle climate change, enhance and protect strategic landscapes and biodiversity
   - The promotion of new habitats and improvements of linkages, including large-scale habitat preservation, restoration and the creation of a coherent ecological network.

The appraisal should be read alongside Chapter 20 of the main report, which explains which approach the Council favours, and why.

Methodology

See discussion within Appendix II, above.
Appraisal findings

Table presenting an appraisal of the following alternative approaches:

<table>
<thead>
<tr>
<th>SA Objective</th>
<th>Discussion of significant effects (and discussion of relative merits in more general terms)</th>
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<tr>
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<td>Alt 1</td>
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<tr>
<td>1. To conserve and enhance biodiversity</td>
<td>In terms of conserving and enhancing biodiversity, all alternatives require development to take account of the need to protect ecological and biological assets throughout Shepway. As such, <strong>all alternatives would lead to significant positive effects.</strong> In terms of the relative merits of the approaches, Alternative 1 with its focus on providing a ‘net gain’ in biodiversity is likely to have a high level of benefits in terms of this objective. Meanwhile, Alternative 2 includes greater detail than Alternative 3 on the steps that could be taken to increase levels of biodiversity, including making onsite provisions.</td>
<td>![1]</td>
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<tr>
<td>2. To conserve, enhance and make accessible the District’s countryside, heritage and historic environment</td>
<td>Improvements to green infrastructure assets are proposed by all alternatives. These will provide useful linkages between settlements and to the rural fringes of the District, which will contribute towards improving access to the countryside. With this being the case, <strong>all alternatives would lead to significant positive effects.</strong> Alternative 1 performs particularly strongly in terms of this objective, as it calls for planning decisions to prioritise status of AONB over other planning considerations, in order to conserve and enhance the natural beauty of such areas.</td>
<td>![1]</td>
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<tr>
<td>3. To maintain and enhance the water quality of the District’s waterways and coasts, and achieve sustainable water resources</td>
<td>Through the improvements in green infrastructure called for by all of the alternatives, water quality may be improved through improved filtration. A move away from grey infrastructure may also bring about benefits, for instance through the avoidance of coastal squeeze. Given this, <strong>all alternatives would lead to significant positive effects.</strong> With criteria relating to the positive management of areas of high coastal potential, Alternative 1 performs particularly well in terms of the relative merits of each of the alternatives.</td>
<td>![1]</td>
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<td>SA Objective</td>
<td>Discussion of significant effects (and discussion of relative merits in more general terms)</td>
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<td>management</td>
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| 4. Increase energy efficiency in the built environment, and the proportion of energy use from renewable sources | The alternatives are each capable of making a positive impact on Shepway's efforts for increased energy efficiency. For example, increases to GI in urban areas will provide natural forms of cooling and solar shading which in turn could help limit overheating and assist increases in energy efficiency in the built environment. As a result, **all alternatives would lead to significant positive effects.**  
  In terms of the relative merits of these approaches, Alternatives 1 and 2 set out in far greater detail the strategy to be taken to bring about improvements to the Districts GI assets. As such, it is considered likely that they will make a greater contribution towards this objective. | 1 1 2 |
| 5. To take an integrated approach to the reduction of flood risk              | Improvements (quantitatively and qualitatively) in Green Infrastructure assets in the District is actively encouraged by all three alternatives. The delivery of green infrastructure over the plan period within Shepway should contribute significantly towards reducing flood risk in the area. For example, increases to GI in urban areas will help to slow surface water runoff and if properly planned help to guide surface water away from sensitive receptors and towards planned natural spaces e.g. swales. As such, **all alternatives would lead to significant positive effects.**  
  In terms of the relative merits of these approaches, Alternatives 1 and 2 set out in far greater detail the strategy to be taken to bring about improvements to the Districts GI assets. As such, it is considered likely that they will make a greater contribution towards this objective. | 1 1 2 |
<p>| 6. To reduce waste generation and promote sustainable management of waste    |                                                                                               | N/A N/A N/A       |
| 7. To improve efficiency in land use through the re-use of previously developed land and existing buildings | Each alternative proposes enhancement to Shepway’s network of GI, including the promotion of multi-functional uses of land. This is an inherently efficient use of land. For instance, encouraging intensification of use for existing green spaces e.g. community gardens and allotments introduced to low quality/underused parks, and open spaces acting as flood storage space all could represent efficient uses of land. As a result, <strong>all alternatives would lead to significant positive effects.</strong> | 1 1 2 |</p>
<table>
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<tr>
<th>SA Objective</th>
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<th>Rank of preference</th>
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<tr>
<td>and promote urban renaissance</td>
<td>In terms of the relative merits of these approaches, Alternatives 1 and 2 set out in far greater detail the strategy to be taken to bring about improvements to the Districts GI assets. As such, it is considered likely that they will make a greater contribution towards this objective.</td>
<td></td>
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<tr>
<td>8. To promote economic growth and competitiveness</td>
<td>Many GI assets are capable of contributing to economic growth in Shepway e.g. forestry, agriculture, tourism. Each alternative is predicted to have a positive impact in this regard. Given this, all alternatives would lead to significant positive effects.</td>
<td>1 1 2</td>
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<tr>
<td></td>
<td>In terms of the relative merits of these approaches, Alternatives 1 and 2 set out in far greater detail the strategy to be taken to bring about improvements to the Districts GI assets. As such, it is considered likely that they will make a greater contribution towards this objective.</td>
<td></td>
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<tr>
<td>9. To ensure high and stable levels of employment so that everyone can benefit from economic growth</td>
<td>Many GI assets are capable of generating employment within Shepway e.g. forestry, agriculture etc. Each alternative is predicted to have a positive impact in this regard. As a result, all alternatives would lead to significant positive effects.</td>
<td>1 1 2</td>
</tr>
<tr>
<td></td>
<td>In terms of the relative merits of these approaches, Alternatives 1 and 2 set out in far greater detail the strategy to be taken to bring about improvements to the Districts GI assets. As such, it is considered likely that they will make a greater contribution towards this objective.</td>
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<td>10. To ensure that everyone has the opportunity to live in a decent and affordable home</td>
<td></td>
<td>N/A N/A N/A</td>
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<tr>
<td>11. To create and sustain vibrant and sustainable</td>
<td>The alternatives will have a positive effect on this objective as public open space forms an important element of sustainable communities. The alternatives aim to enhance, extend and protect the GI network, which should improve its usability. Given this, all alternatives would lead to significant positive effects.</td>
<td>1 2 3</td>
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<td>SA Objective</td>
<td>Discussion of significant effects (and discussion of relative merits in more general terms)</td>
<td>Rank of preference</td>
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<tr>
<td>communities</td>
<td>In terms of the relative merits of the alternatives, Alternative 1 with its call for development to contribute to a positive sense of place, including the enhancements to public open spaces may contribute particularly strongly towards this objective.</td>
<td>Alt 1</td>
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</table>
| 12. To reduce inequalities, poverty, deprivation and social exclusion        | A thriving and diverse GI network provides opportunities to learn new skills and create opportunities for social cohesion and interaction e.g. allotments/community gardens. As a result, all alternatives would lead to significant positive effects.
   In terms of the relative merits of these approaches, Alternatives 1 and 2 set out in far greater detail the strategy to be taken to bring about improvements to the Districts GI assets. As such, it is considered likely that they will make a greater contribution towards this objective. | 1 | 1 | 2 |
| 13. To raise educational attainment and develop opportunities for everyone to acquire the skills needed to find and remain in work | A thriving and diverse GI network provides opportunities to learn new skills and creates opportunities for education and entrepreneurship e.g. local farmers markets, school vegetable gardens etc. As such, all alternatives would lead to significant positive effects.
   In terms of the relative merits of these approaches, Alternatives 1 and 2 set out in far greater detail the strategy to be taken to bring about improvements to the Districts GI assets. As such, it is considered likely that they will make a greater contribution towards this objective. | 1 | 1 | 2 |
| 14. To improve the health and well-being of the population and reduce inequalities in health | The alternatives will have a positive impact on this objective. By improving access to natural and open spaces and recreational facilities, people will be encouraged to adopt more active and healthy lifestyles and benefit from a more coherent GI network. With this being a case, all alternatives would lead to significant positive effects.
   In terms of the relative merits of these approaches, Alternatives 1 and 2 call for development to contribute to a positive sense of place, including enhancements to outdoor sports facilities As a result, these alternatives may contribute to this objective to a greater degree than Alternative 3. | 1 | 1 | 2 |
| 15. To promote sustainable access, reduce car                               | The ability to access green infrastructure by sustainable modes of transport is important, as inappropriate levels of access by private vehicles can negatively impact on biodiversity, habitats and local communities. The alternatives seek to ensure that strategic GI areas/sites which are likely to attract significant numbers of visitors are managed so | 2 | 1 | 3 |
SA Objective | Discussion of significant effects  
(and discussion of relative merits in more general terms) | Rank of preference |
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<tbody>
<tr>
<td>dependency, road congestion and associated pollution by promoting sustainable locations for development and improving travel choice</td>
<td>as to achieve access by sustainable modes of transport. The focus on improvements to GI in the urban fringe is supported, as these areas are likely to be more accessible by sustainable transport modes. As a result, all alternatives would lead to significant positive effects. In terms of the relative merits of these approaches, Alternatives 2 states that development for GI will be acceptable where in suitable location, or where sustainable transport improvements are provided. This could help to ensure that this alternative contributes to this objective to a greater degree.</td>
<td>Alt 1</td>
</tr>
</tbody>
</table>

**Summary**

In terms of environmental objectives, Alternative 3 is not sufficiently detailed enough to bring about change as effectively as alternative 1 or 2. Alternative 1 performs the strongest of the three alternatives due to the strong support for re-provision and protection against loss of Green Infrastructure (GI) assets (strong support for biodiversity). All alternatives perform well against flood risk due to the potential to slow surface water runoff and guide surface water away from sensitive receptors and towards planned natural spaces e.g. swales. Likewise all alternatives would help to increase GI in urban areas providing natural forms of cooling and solar shading which in turn could help limit overheating. Improvements proposed by all alternatives would provide useful linkages between settlements and to the rural fringes of the District, which will contribute towards improving access to the countryside.

In terms of social sustainability objectives, the alternatives provide a policy framework capable of ensuring open space provision, and measures to enhance, extend and protect the GI network, which should improve its usability for residents and visitors. Moreover, an enhanced GI network can assist in promoting physical activity and create opportunities for enriched education, improved social cohesion and more frequent interaction.

In terms of economic objectives, the alternatives provide a policy framework capable of generating GI related employment (e.g. agriculture and forestry) over the plan period and opportunities to learn new skills. A thriving and diverse GI network provides opportunities for education and entrepreneurship (e.g. local farmers markets, school vegetable gardens etc) as well as performing an important role in attracting tourism to the District.