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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.

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.

WHAT’S THE SCOPE OF THE SUSTAINABILITY APPRAISAL

An important first step in the Sustainability Appraisal process involves establishing the ‘scope’, i.e. those sustainability issues which should be a focus of the SA, and those that should not. In order to establish the scope there is a need to answer a series of questions including:

- **What's the sustainability ‘context’?**
  - Answering this question primarily involves reviewing Government’s National Planning Policy Framework; however, it is also important to ‘cast the net wider’ and consider contextual messages established through other plans, policies, strategies and initiatives.

- **What's the sustainability ‘baseline’?**
  - Answering this question involves reviewing all available data to establish an understanding of the current state of the environment within Shepway, as well as the performance of the District from a socio-economic perspective.

The baseline review highlights that Shepway can be broadly characterised as having: 1) a valued and sensitive natural environment, particularly associated with the North Downs and Romney Marsh character areas (but also, in some respects, the coastal urban area); and 2) an underperforming economy that has resulted in serious problems of relative deprivation within the urban area as well as the rural south.

Drawing on the findings of the context / baseline review, a list of ‘sustainability objectives’ is identified. These provide a methodological framework for the appraisal, ensuring it remains focused.

<table>
<thead>
<tr>
<th>Sustainability objectives identified subsequent to review of the sustainability context and baseline</th>
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<tbody>
<tr>
<td>Conserve and enhance biodiversity</td>
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<td>To conserve, enhance and make accessible the District’s countryside, heritage and historic environment</td>
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<td>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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<td>Increase energy efficiency in the built environment, and the proportion of energy use from renewable sources</td>
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<td>To take an integrated approach to the reduction of flood risk</td>
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<td>To reduce waste generation and promote sustainable management of waste</td>
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<td>To improve efficiency in land use through the re-use of previously developed land and existing buildings and promote urban renaissance</td>
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<tr>
<td>To promote sustainable access, reduce car dependency, road congestion and associated pollution by promoting sustainable locations for development and improving travel choice</td>
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SA REPORT: NON-TECHNICAL SUMMARY 1
WHAT HAS PLAN-MAKING / SA INVOLVED UP TO THIS POINT?

It is a legislative requirement that every Sustainability Appraisal process includes an appraisal of ‘reasonable alternatives’ prior to preparation of the draft plan. The SA Report published alongside the draft Plan (i.e. this report) must then present the appraisal of alternatives and ‘tell the story’ of how consideration of alternatives has informed development of the draft plan. As such, Part 2 of the SA Report presents a consideration of alternatives for the following key plan issues, whilst the Appendices to the SA Report present appraisal findings in full.

1. Time horizon of the plan
2. Growth quantum, i.e. the number of new homes
3. Broad spatial approach to accommodating growth
4. Strategic growth locations
5. Folkestone Seafront
6. Shorncliffe Garrison, Folkestone
7. New Romney
8. Sellindge
9. Folkestone Racecourse
10. Green Infrastructure

WHAT ARE THE APPRAISAL FINDINGS AT THIS CURRENT STAGE?

The main body of the SA Report presents an appraisal of the Core Strategy under 15 headings; one for each of the sustainability objectives discussed above. Set out below are the broad conclusions of SA at this current stage along with a series of recommendations that should be taken into account when finalising the plan.

Future growth

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.

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.

Spatial pattern of development

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.

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.
Development areas

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. 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.

Capitalising on development and managing its impacts

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.

Overall conclusion

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.

Recommendations

<table>
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<th>Sustainability Objective</th>
<th>Recommendations</th>
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<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>
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<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>
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<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>
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WHAT ARE THE NEXT STEPS (INCLUDING MONITORING)?

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.

Following the consultation, 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.

At the time of Adoption a ‘Statement’ will 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.

At the current stage (i.e. within the SA Report), there is a need to present ‘measures envisaged concerning monitoring’ only. Relevant monitoring indicators from the Council’s established monitoring framework are highlighted, and suggestions are made as to how the framework could be enhanced. For example, it is suggested that the Council may wish to work with English Heritage to identify priority indicators to ensure that built heritage assets and the historic environment more generally is well integrated with new development.