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Folkestone & Hythe Core Strategy Review

Sustainability Appraisal Assessment Addendum - Main Modifications to
the Proposed Submission Folkestone & Hythe Core Strategy Review

Prepared by LUC
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DRAFT

Contents

Sustainability Appraisal Addendum	3
Introduction	3
Core Strategy Review examination	4
Proposed main modifications to the Core Strategy Review	4
Reasonable alternatives to the proposed main modifications to the Core Strategy Review	4
Significant effects of the proposed modifications to the Core Strategy Review	5
Cumulative effects of the proposed modifications to the Core Strategy Review	79
Monitoring indicators	79
Appendix 1	80
Consultation Representations on Core Strategy Review SA Report 2019	80
Appendix 2	91
SA Framework for the Folkestone & Hythe Core Strategy Review	91
Appendix 3	98
Baseline and Plans, Programmes and Policies Updates	98

Sustainability Appraisal Addendum

Introduction

- 1.1 Folkestone & Hythe District Council commissioned LUC in October 2016 to carry out a Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) and Habitat Regulations Assessment (HRA) of the Review of the Core Strategy Local Plan. There have been five stages in the Sustainability Appraisal of the Core Strategy Review to date:
- An SA Scoping Report¹ for the Shepway Core Strategy was published for consultation in 2007. In 2017, an SA Scoping Report² for the Core Strategy Review was published.
 - An initial SA Report³ was prepared and consulted upon with the Draft Shepway Core Strategy Review in February 2018.
 - A full SA Report⁴ was prepared and consulted upon with the Proposed Submission Core Strategy Review in January 2019.
 - An SA Addendum⁵ to the full report was prepared to accompany the publication of an updated Core Strategy Review containing a new housing need figure following the publication of the Government's new standard methodology for calculating housing need in February 2020. It considered the implications of the new calculated housing need for the SA findings reported previously.
 - A second SA Addendum⁶ was prepared during the examination of the updated Core Strategy Review at the request of the Planning Inspectors examining the Core Strategy Review. This addendum appraised the likely significant effects of Core Strategy Review policies SS5, SS10, SS11, CSD3, CSD4, CSD6, CSD7 and CSD8.⁷
- 1.2 Following each stage of consultation, all representations relating to the SA process were reviewed. Appendix 1 of the SA Report, consulted upon alongside the Proposed Submission Core Strategy Review in January 2019, contains a summary of the representations received during the consultations on the Scoping Report and initial SA Report. **Appendix 1** in this SA Addendum contains a summary of the representations received during the consultation on the Proposed Submission Core Strategy SA Report. This consultation summary includes SA responses to representations received; however, no updates to the 2019 SA Report were considered necessary. No consultation comments were received with regards to the two published SA addenda.
- 1.3 This current, third SA Addendum has informed all the Council's proposed modifications to the Proposed Submission Core Strategy Review (February, 2020) (referred to hereafter as the SA Addendum). It includes:
- A summary of the Plan examination process to date, including the Inspector's initial findings.

¹ SA of Shepway District Council Local Development Framework Scoping Report, Scott Wilson for Shepway District Council, 2007.

² Sustainability Appraisal Scoping Report for Core Strategy Review, LUC, 2017. Available [here](#).

³ SA of Shepway Draft Core Strategy Review, LUC, 2018. Available [here](#).

⁴ SA of the Folkestone & Hythe Proposed Submission Core Strategy Review, LUC, 2018 Available [here](#).

⁵ SA Addendum for the Proposed Changes to the Proposed Submission Folkestone & Hythe Core Strategy Review, LUC, 2019. Available [here](#).

⁶ SA Addendum for the Core Strategy Review Policies SS5, SS10, SS11, CSD3, CSD4, CSD6, CSD7 and CSD8, LUC, 2020.

See Appendix 1 [here](#).

⁷ The effects of these policies were not reported in detail in the full SA Report at an individual policy level because it was considered that the policies had not changed enough to generate new significant effects not previously identified. The effects of these policies were instead reported in Chapter 8 of the full SA Report as part of the assessment of cumulative effects. The Inspectors requested that for the SA to clearly meet the requirements of Section 19(5) of the Planning and Compulsory Purchase Act 2004 it must 'carry out an appraisal of the sustainability of the proposals in each Development Plan Document', i.e. the effects of every component of the Core Strategy Review (the proposals of the Plan) and their reasonable alternatives should be set out clearly in the SA Report.

- A summary of changes in the Plan baseline, including updates to its evidence base since the full SA Report was prepared for consultation with the Proposed Submission Core Strategy Review in late 2019.
- A summary of the new plans, policies and programmes published of direct and indirect relevance to the Core Strategy Review since the full SA Report was prepared and consulted upon with the Proposed Submission Core Strategy Review in February 2020.
- A detailed schedule of all the proposed main modifications to the Proposed Submission Core Strategy Review (February 2020) and an SA of their likely effects.

1.4 **Appendix 2** contains a copy of the SA Framework used to appraise the effects of the Plan.

1.5 **Appendix 3** summaries notable updates to the baseline evidence and Plans, Programmes and Policies used as the baseline for the SA of the Core Strategy Review.

Core Strategy Review examination

1.6 Folkestone & Hythe District Council submitted the Proposed Submission Core Strategy Review to the Secretary of State for Housing, Communities and Local Government for formal examination on 10th March 2020. Hearing sessions for the examination were held between 15th December 2020 and 13th January 2021, followed by additional hearing sessions focussing on the proposed New Garden Settlement between the 29th June and the 1st July 2021.

1.7 Following completion of the Hearing sessions the Inspectors then published a letter⁸ stating that *'subject to main modifications concerning detailed policy wording, we consider that the District Spatial Strategy, the overall approach to the three character areas and settlements within them is sound.'*

Proposed main modifications to the Core Strategy Review

1.8 Following the examination hearings, the Council submitted a schedule of suggested main modifications to the Core Strategy Review⁹ to the Inspectors. The Inspectors promptly responded with an outline of suggested main modifications for the Plan to be found sound and instructing the Council to prepare a final schedule of proposed main modifications for publication for full consultation for at least six weeks¹⁰. The Inspectors' note highlights the need for a Sustainability Appraisal of the main modifications to be published alongside the main modifications schedule and the potential need for a Habitats Regulations Assessment of the main modifications also.

1.9 **Table 1** sets out all the proposed modifications to the Proposed Submission Core Strategy Review (February 2020) and their sustainability implications.

Reasonable alternatives to the proposed main modifications to the Core Strategy Review

1.10 The SEA Regulations require the consideration of reasonable alternatives to the published proposed modifications.

1.11 The main modifications to the proposed submission Plan provide further details relating to infrastructure in the new settlement and landscape-led masterplanning, in addition to factual updates in response to the revised National Planning Policy Framework (July 2021) and new Business Use Classes Order (September 2020). There have also been factual updates in response

⁸ Inspectors' Letter to Council regarding the Outline of Main Modifications, Planning Inspectorate, July 2021. Available [here](#).

⁹ Suggested Main Modifications Submitted to the Inspectors, Folkestone and Hythe District Council, July 2021. Available [here](#).

¹⁰ Inspectors' Letter to Council regarding the Outline of Main Modifications, Planning Inspectorate, July 2021. Available [here](#).

to updates to the evidence base. Given the reasons for the main modifications, there are not considered to be notable any reasonable alternatives.

Significant effects of the proposed modifications to the Core Strategy Review

- 1.12 The proposed modifications to the Plan have been appraised individually and as part of the Plan as a whole, taking into account the previously identified effects set out in the SA. The likely effects of each proposed modification are set out in the final column of **Table 1**. Where a main modification further contributes towards a positive effect already identified in the SA, the relevant text contributing to the positive change is highlighted in **green**. If the main modification is judged to change the positive effect, for example a main modification has resulted in a policy going from previously making a negligible effect to a minor positive effect, the green highlighted text is in **bold**. Where a main modification adversely influences a negligible, positive or minor negative effect of a policy towards an SA objective, the text is highlighted in **amber**. Where a main modification is judged to result in a negative change in a previously recorded effect on an SA objective, for example a main modification has resulted in a policy going from previously making a negligible effect to a minor negative effect, the amber highlighted text is in **bold**.
- 1.13 Most of the proposed main modifications will not alter the findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020) because they correct factual errors or represent minor updates to the wording of policies and supporting text for clarity rather than meaning.
- 1.14 Most of the main modifications at the very least enforce, strengthen or temper some of the effects already identified through the SA without changing the significance of the effects previously recorded, for example through clarifications on quantities or additional details with regards to measures designed to protect or enhance the environment.
- 1.15 Only three main modifications generated different or changes in the recorded significance of the effects identified previously through the SA:
- **Main modification 14 and 15** generate a new minor positive (+) effect for **Policies CSD3** (Rural and Tourism Development) and **CSD4** (Green Infrastructure of Natural Networks, Open Spaces and Recreation) against **SA objective 7 (Efficient Use of Land)**. This is due to the addition of Policy CSD3's encouragement for the re-use of redundant or disused buildings and Policy CSD4's requirement that development proposals demonstrate that they will protect soils commensurate to their status and quality.
 - **Main modification 19** generates a new minor positive (+) effect for **Policy CSD9** (Sellindge Strategy) against **SA objective 4 (Historic Environment)**, changing the overall effect of this policy to this SA objective from minor negative (-) to a mixed minor positive and minor negative (+/-) effect. This is due to the modified policy requiring the protection and conservation of the setting of non-designated heritage assets and where possible the enhancement of important historic natural heritage assets. Further to this, the supporting text to Policy CSD9 requires an evaluation of archaeological remains to the west of the broad location to inform an appropriate mitigation strategy.

Table 1: Detailed schedule of proposed main modifications and implications for SA findings

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
MM01	<p>Policy SS1: District Spatial Strategy</p>	<p>Policy SS1 District Spatial Strategy</p> <p>Housing will be delivered through a new sustainable, landscape-led settlement, with supporting town centre and community uses, based on garden town principles in the North Downs Area, in accordance with policies SS6-SS9. The garden town will maximise opportunities arising from the location, access to London and continental Europe and strategic infrastructure. Housing and supporting community uses will also be delivered through growth in Sellindge (policy CSD9).</p> <p>Elsewhere in the district, priority will continue to be given to previously developed land in the Urban Area in Folkestone, for main town centre uses and housing, to enhance the town's role as a sub-regional centre, with opportunity for increased densities within the town centre and maximisation of employment opportunities at key locations.</p> <p>Development in the Urban Area will be led through strategically allocated developments at Folkestone Seafront (policy SS10) and Shorncliffe Garrison, Folkestone (policy SS11), and the delivery of strategic mixed-use development at Hythe (policy CSD7).</p> <p>Remaining development needs should be focused on the most sustainable towns and villages as set out in policy SS3. Development outside the new settlement and identified centres in the open countryside and on the coast (defined as anywhere outside settlements within Table 4.3 4.4 Settlement Hierarchy) will only be allowed exceptionally, where a rural or coastal location is essential (policy CSD3).</p> <p>This is supported by the following strategic priorities for the three character areas of the district:</p>	<p>This change would further contribute towards the significant positive effect identified against SA objective 2 (Employment) because retaining Dungeness A for a mix of employment uses, and supporting small-scale operational development associated with the airport, would support the creation of new employment opportunities. It is also expected that this modification would further contribute towards the minor positive effects identified against SA objective 8 (Water quality) and minimise the negative effects recorded against SA objective 3 (Landscape) (as part of a mixed effect) and SA objective 5 (Biodiversity) (as part of a mixed effect) because development must avoid or minimise adverse impacts on the AONB, not result in adverse effects on biodiversity and the water quality of nationally and internationally designated sites of biodiversity value. However, there would be no change in the significance of these effects.</p>

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
		<ul style="list-style-type: none"> Urban Area - The future spatial priority for new development in the Urban Area (Folkestone and Hythe) is on promoting the development of vacant previously developed land, central Folkestone and the north of the town, and other locations within walking distance of Folkestone Central railway station; securing new accessible public green space, plus regenerating western Hythe. Romney Marsh Area - The future spatial priority for new development in the Romney Marsh Area is on accommodating development at the towns of New Romney and Lydd, and at sustainable villages; improving communications; protecting and enhancing the coast and the many special habitats and landscapes, especially at Dungeness; and avoiding further co-joining of settlements and localities at the most acute risk to life and property from tidal flooding. North Downs Area - The future spatial priority for new development in the North Downs area is on the creation of a landscape-led sustainable new settlement based on garden town principles outside the Kent Downs Area of Outstanding Natural Beauty (AONB) boundary, and without material impact <u>designed to avoid or minimise adverse impacts on the AONB</u>, and the expansion of Sellindge. Within the Kent Downs AONB development will be limited to consolidating Hawkinge's growth and sensitively meeting the needs of communities at better-served settlements. Major development will be refused with the AONB other than exceptional circumstances and where it can be demonstrated that the development is in the public interest, in accordance with the National Planning Policy Framework. <u>All proposed development in the North Downs area will have to satisfy the requirements of policy CSD5 d. in order to avoid any significant impact on the water quality of the Stodmarsh European designated sites.</u> <p>The strategic growth of New Romney is also supported through policy CSD8 to allow the market town to fulfill its potential to sustainably provide for the bulk of the housing,</p>	

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
		<p>community infrastructure and commercial needs of the Romney Marsh Area. Development will also be planned at other identified settlements in line with the Settlement Hierarchy sufficient to ensure the achievement of growth requirements. In particular, development which helps to maintain and support the local role of the market town of Lydd can meet priority needs.</p> <p><u>Dungeness A should be retained for: offices (within class E), general industrial (within class B2) and storage or distribution (within class B8) and research and development employment uses; employment-related training and educational purposes; and operations and uses associated with the decommissioning of the nuclear power station. Should redevelopment plans come forward for alternative uses unrelated to the function of the nuclear power station (including other energy generation sector uses), the council will work with the Nuclear Decommissioning Authority, local community and other stakeholders to prepare and adopt an Area Action Plan for part or the whole of the site.</u></p> <p>Should development proposals come forward for the further <u>material</u> expansion of London Ashford Airport at Lydd (<u>beyond the existing permissions and permitted development rights</u>), the council will work with the airport, local community and other stakeholders to prepare and adopt an Action-Area <u>Action</u> Plan for the site. <u>The council will support small-scale operational development integral to, and required to maintain, the airport use, subject to being satisfied that there would be no significant adverse impacts to the integrity of the nationally and internationally designated sites of biodiversity value.</u></p> <p><u>The preparation of Area Action Plan(s) for the Dungeness A, or London Ashford Airport sites will be accompanied by Habitats Regulations Assessment(s) (including Appropriate Assessment) to assess the potential effect of the Area Action Plan proposals on sites within the Natura 2000 network that are protected under the European Birds and Habitats Directives. The Habitats</u></p>	

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		<p><u>Regulation Assessment(s) must show that development would not result in significant adverse effects on these sites of biodiversity value, either alone or in combination with other projects and plans.</u></p> <p>Within identified settlements, development as agreed by the local community in neighbourhood plans will be encouraged where well-related in scale and location to the Settlement Hierarchy, and in line with the strategic policies of the Core Strategy Review and Places and Policies Local Plan.</p> <p>In all locations throughout the district, development should be designed to directly contribute to the sense of place and sustainable design as set out in policy SS3.</p>	
	<p>Supporting text: Insert new paragraphs to follow paragraph 4.36</p>	<p><u>Dungeness Power Station</u></p> <p><u>[New para.] For over 50 years, Dungeness Power Stations (A & B) have been a cornerstone of the Romney Marsh economy. Dungeness A ceased generation in 2006 and is currently undergoing decommissioning. Initially it was expected that from 2019 the site would enter a period of Care and Maintenance (C&M) lasting some 85 years pending final site clearance. The commencement of C&M would have had a serious impact on employment (in December 2019 approximately 220 people were employed on the site) as well as the local economy. It is now likely that the C&M phase will be replaced with decommissioning work continuing instead over the coming decades. This could mean that skilled staff are retained, employment is increased, and land is released for new economic uses, or for clearance, earlier than would happen through the C&M approach.</u></p> <p><u>[New para.] The Nuclear Decommissioning Authority is expected to announce its decision on whether this approach will be adopted for Dungeness A in the near term. EDF's Dungeness B station is expected to continue generating electricity until 2028, following which it will be decommissioned over a lengthy period. The EDF Director's Report Dungeness B June 2017 reported that the station employs over 550 employees, which is supplemented by over 200 contract partners, so</u></p>	<p>As modified text supporting policy, the changes referenced here are covered through the appraisal of main modifications to Policy SS1: District Spatial Strategy.</p>

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		<p><u>its closure would have major socio-economic impacts although, as with Dungeness A, these would be experienced gradually. It is important to recognise that there is likely to be a significant impact on jobs in the latter stages of the plan period. In the wider context of other current economic challenges and uncertainties, the decommissioning of the Dungeness Power Stations will create significant economic and social challenges for Romney Marsh. In addition to jobs being lost, businesses will find it increasingly difficult to operate successfully in an area which already has some pockets of significant deprivation and therefore the case for supporting local employment opportunities and the future of the Dungeness Power Stations site becomes an important consideration.</u></p> <p>4.37 Opportunities also exist for employment development at London Ashford Airport at Lydd, through the implementation of the existing planning permission. The council acknowledges the positive impact that Lydd Airport could deliver in supporting the regeneration of Romney Marsh and surrounding areas, accordingly should further material development proposals arise, beyond the existing permissions and permitted development rights, the council will seek to work with the airport, local community and other stakeholders to agree a framework by preparing an Action Area Action Plan for the site. The further development of the Mountfield Road Industrial Estate and investment within the nuclear and tourism industries also present opportunities for job creation.</p>	
MM02	<p>Section 4.2 Housing and the Economy Growth Strategy</p> <p>Supporting text: Paragraphs 4.42 – 4.56</p>	<p>Approach to housing provision</p> <p>4.42 Section 4.1 sets out the government’s methodology for assessing how many homes councils need to plan for. Using the latest household projections and affordability figures, the government methodology requires the provision of a minimum of:</p> <ul style="list-style-type: none"> • 738 new homes a year on average over the period 2019/20 to 2036/37 (18 years) or • 13,284 additional homes in total. 	<p>As modified text supporting policy, the changes referenced here are covered through the appraisal of main modifications to Policy SS2: Housing and the Economy Growth Strategy.</p>

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
		<p>4.43 This requirement will be delivered by development of the new garden settlement, other strategic sites, sites with planning permission and a number of small- and medium-sized site allocations in the Places and Policies Local Plan. An indicative housing trajectory is given in Appendix 3. All types of homes will be counted towards this requirement, including family homes and flats (C3 use class) and specialist accommodation for the elderly (C2 use class).</p> <p><u>[New para.] The National Planning Policy Framework states that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements. However, local authorities should make a realistic assessment of likely rates of delivery, given the lead-in times for large-scale sites (NPPF, paragraph 73). The delivery of large-scale developments may need to extend beyond an individual plan period and anticipated rates of delivery should be kept under review (NPPF, footnote 37).</u></p> <p><u>[New para.] National Planning Practice Guidance (PPG) recognises that a 'stepped' housing requirement (where the housing requirement is phased to reflect the level of housing expected to be delivered across the plan period) may be justified in certain circumstances. The PPG states that this approach may be appropriate where there is a significant change in the level of housing required and/or where strategic sites will have a phased delivery or are likely to be delivered later in the plan period. The Core Strategy Review will deliver a significant change in the numbers of new homes being built in the district, compared to the 2013 Core Strategy and allocates a major strategic site in the form of a new garden town as the focus for future growth. The council considers that a stepped housing requirement is justified and appropriate, and will ensure that the housing requirement is met fully within the plan period.</u></p> <p><u>[New para.] Policy SS2 puts forward four phases of delivery over the plan period:</u></p>	

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		<ul style="list-style-type: none"> • <u>Phase 1 – 2019/20 to 2023/24 (five years) – an average of 622 dwellings a year, or 3,110 dwellings in total;</u> • <u>Phase 2 – 2024/25 to 2028/29 (five years) – an average of 885 dwellings a year, or 4,425 dwellings in total;</u> • <u>Phase 3 – 2029/30 to 2033/34 (five years) – an average of 730 dwellings a year, or 3,650 dwellings in total; and</u> • <u>Phase 4 – 2034/35 to 2036/37 (three years) – an average of 700 dwellings a year, or 2,100 dwellings in total.</u> <p><u>This phased approach will deliver a minimum of 13,284 dwellings, an average of 738 homes a year over the 18 years of the Core Strategy Review plan period.</u></p> <p>...</p> <p>Approach to employment provision</p> <p>...</p> <p>As part of the <u>preparation of the</u> Core Strategy Review <u>Places and Policies Local Plan</u>, the Employment Land Review (ELR) (Lichfields, 2017) assessed the future requirements for office and industrial employment uses to 2026. The 2017-ELR considered three different scenarios for office and industrial uses (labour demand, past completion rates and labour supply).</p> <ul style="list-style-type: none"> • For office uses, the labour demand and supply scenarios indicated that there is <u>was</u> a need to plan for approximately 19,000 sqm of office space. The past completion scenario suggests <u>sed</u> a declining requirement which reflects <u>sed</u> recent losses in office space as a consequence of changes to permitted development rights allowing the conversion of office space to residential use; and • For industrial uses, the labour demand and supply scenarios indicated that there is <u>was</u> no requirement for further industrial space. However, 	

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		<p>notwithstanding the long-term decline of industrial jobs in the district, recent development activity indicateds that there remained a requirement for some industrial floorspace at a relatively modest level (around 15,500 sqm based on the past completion scenario).</p> <p>4.49 Regarding the existing supply, the ELR finds found that generally the district's employment sites showed ed good activity and low vacancy rates. In particular, a low level of vacancy was evident among industrial sites, demonstrating that much of the current industrial stock was is meeting a need in the market. This includes d good occupancy at lower quality sites, with high demand at the lower end of the rental market. Overall, occupancy levels in the office market appeared ed to be lower than the industrial market.</p> <p>4.50 The ELR concluded ds that, based on the current supply of employment space from planning permissions and allocated sites (some 50,825 sqm of office development and 97,745 sqm of industrial development), there is was a sufficient supply of space to meet the estimated office and industrial requirements under all scenarios to at least 2031.</p> <p>4.51 Nevertheless, the ELR also stressed ds that the district's strategic employment allocations need to be well connected with key motorway junctions and/or transport hubs in order to maximise opportunities for their delivery. There are were also some concerns around:</p> <ul style="list-style-type: none"> • The balance between limited supply in Folkestone, which exhibits the strongest demand, and the rest of the district; and • The quality of available employment sites. <p>4.52 These considerations will be closely monitored to see if further intervention, beyond the protection and allocation of land through Places and Policies Local Plan policies E1 and E2 is necessary. The ELR particularly recommended eds the regular assessment of sites and</p>	

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
		<p>the preparation of an employment land trajectory through the council's Authority Monitoring Report (AMR).</p> <p>...</p> <p>4.54 An updated Employment Land Needs Assessment (ELNA) has been completed (2018) to supplement the conclusion and recommendations of the 2017 ELR and Otterpool Park Employment Opportunities Study and inform the preparation of the Core Strategy Review. The update sets out district-wide growth projections and employment land requirements over the period to 2037 by drawing on the latest population projections and economic forecasts. It also provides estimates of employment land needs for the district and the garden town specifically, based on different assumptions about where growth and demand could come from.</p> <p>4.55 In terms of new jobs growth, the update forecasts a much lower level of job growth on an 'average per annum basis' than the 2017 study, albeit covering different periods of time and an end year of 2037. The latest forecasts imply growth of 237 jobs a year (between 2018 and 2037) compared with 445 jobs a year (between 2006 and 2026) in the 2017 ELR. Translated into net floorspace requirements, baseline jobs growth forecasts district-wide indicate a total demand for all 'B class' employment uses non-retail employment uses (e.g. falling within use class E, B2 and B8 and sui generis categories) of 16,360 sqm net. This figure is based on a requirement for 24,750 sqm of office floorspace, offset by an 8,390 sqm reduction in manufacturing and distribution floorspace.</p> <p>[New para.] Given that recent development activity has indicated that there remains a requirement for some industrial floorspace, the council intends to plan positively for manufacturing and distribution uses within the district. Therefore, the Core Strategy Review will seek to meet non-retail employment uses of 40,250 sqm based on the 24,750 sqm of office floorspace identified by the ELNA (2018) and 15,500 sqm industrial floorspace identified by the ELR (2017)</p>	

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		<p><u>through the implementation of Policies E1 and E2 of the Places and Policies Local Plan.</u></p> <p>4.56 As outlined in the Employment Opportunities Study, however, the creation of a new garden settlement offers a clear opportunity to plan for a higher level of employment growth to accommodate wider growth and inward investment opportunities that exist across the wider district, elsewhere in Kent and beyond. Adopting a labour supply scenario for the new settlement indicates that 4,770 new jobs should be planned for by 2037, leading to a requirement for around 36,760 sqm <u>of the same types of</u> 'B-class' employment floorspace or 8.1ha of employment land.</p>	
	<p>Supporting text: Paragraph 4.57 – 4.61</p>	<p><u>Approach to retail provision</u></p> <p>4.57 <u>The Folkestone & Hythe Retail and Leisure Needs Assessment (Lichfields, 2018) undertook a partial update of the Town Centres Study (PBA, 2015). This took account of changing retail trends, particularly the increase in online shopping and other 'special forms of trading', and the growth of population to provide district-wide retail capacity projections and needs assessment for the Core Strategy Review plan period to 2036/37.</u> The council has completed an update to the recent Town Centre Retail Study (PBA, 2015) to take account of changing retail trends, particularly the increase in online shopping and other 'special forms of trading', and the growth of population over the Core Strategy Review plan period to 2037.</p> <p>4.58 New retail space needs to be planned for to meet the changing demands of the existing population and the needs of new households. This will ensure that the district's retail centres retain existing trade and generate new jobs and economic activity, so that this spending is not lost to competing centres elsewhere. It also helps to reduce journeys, so that local people can meet their needs close to where they live and are not forced to travel long distances for shopping.</p> <p>4.59 <u>The Retail and Leisure Needs Assessment (2018) was revised by the Retail and Leisure Needs Assessment (2019) which applied higher population growth</u></p>	<p>As modified text supporting policy, the changes referenced here are covered through the appraisal of main modifications to Policy SS2: Housing and the Economy Growth Strategy.</p>

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?																			
		<p>figures. The updated study indicates that there is a total need for around 31,200 35,700 sqm (gross) of retail floorspace within the district over the plan period, a reduction of the need this is broadly similar with the need identified by the 2013 Core Strategy (although over a different time period). The need for convenience floorspace (everyday items, including food), and comparison floorspace (occasional and special items) and food/beverage is set out in Table 4.1 below.</p> <p>4.60 Policy SS2 seeks to meet this employment and retail need over the plan period. Retail is, however, a highly volatile sector, as shown by the failures of many well-known highstreet names in recent years. The council will therefore review the retail capacity of the district every five years: future studies will be material considerations in determining planning applications and, if the studies indicate major changes in retail needs, they may trigger a partial review of policies within the plan.</p> <p>4.61 The retail need will be met by developments within existing centres in the district, particularly Folkestone town centre (identified as a strategic town in the district settlement hierarchy), and in the new garden settlement.</p> <table border="1" data-bbox="472 951 1256 1337"> <thead> <tr> <th rowspan="2">Floorspace (district-wide)</th> <th colspan="4">Cumulative totals</th> </tr> <tr> <th>2022</th> <th>2027</th> <th>2032</th> <th>2037</th> </tr> </thead> <tbody> <tr> <td>Convenience goods</td> <td>439 1,100</td> <td>1,784 2,700</td> <td>3,185 4,600</td> <td>4,620 6,500</td> </tr> <tr> <td>Comparison goods</td> <td>4,578 1,500</td> <td>11,105 6,900</td> <td>18,570 14,700</td> <td>26,585 23,300</td> </tr> </tbody> </table>	Floorspace (district-wide)	Cumulative totals				2022	2027	2032	2037	Convenience goods	439 1,100	1,784 2,700	3,185 4,600	4,620 6,500	Comparison goods	4,578 1,500	11,105 6,900	18,570 14,700	26,585 23,300	
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		<table border="1" data-bbox="472 347 1256 507"> <tr> <td>Food/beverage</td> <td>900</td> <td>2,500</td> <td>4,100</td> <td>5,900</td> </tr> <tr> <td>Totals</td> <td>5,017 3,500</td> <td>12,889 12,100</td> <td>21,755 23,400</td> <td>31,205 35,700</td> </tr> </table> <p data-bbox="450 555 1503 584">Table 4.1: Folkestone & Hythe District Retail Floorspace Capacity (sqm gross)</p>	Food/beverage	900	2,500	4,100	5,900	Totals	5,017 3,500	12,889 12,100	21,755 23,400	31,205 35,700	
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	<p data-bbox="237 619 394 810">Policy SS2: Housing and the Economy Growth Strategy</p>	<p data-bbox="450 603 1039 663">Policy SS2 Housing and the Economy Growth Strategy</p> <p data-bbox="450 695 1532 995">The core long-term requirement is to deliver 738 dwellings (Class C2/C3) a year on average from 2019/2020 to 2036/37, a total requirement of 13,285 13,284 new homes over the plan period. This will be achieved by major strategic growth in the district including the delivery of a new garden town, as well as a number of small- and medium-sized sites as allocated in the Places and Policies Local Plan. <u>In order to meet the total housing requirement over the plan period, a stepped approach to housing delivery will be implemented encompassing four phases, as set out in Table 4.2; this acknowledges the significant change in the level of housing requirement and the phased delivery of the new garden town.</u></p> <p data-bbox="450 1031 1532 1193">Allied to this rate of housing delivery, business activity and the provision of jobs will be facilitated through supporting employment opportunities in the garden settlement, existing town centres, the protection of sufficient employment land across the district, allocations and delivering rural regeneration (especially in the south and west of the district).</p> <table border="1" data-bbox="450 1230 1249 1391"> <tr> <td data-bbox="450 1230 719 1391">Use <u>Development Types</u></td> <td data-bbox="719 1230 981 1391">Target amount of additional development</td> <td data-bbox="981 1230 1249 1391">Delivery of plan period</td> </tr> </table>	Use <u>Development Types</u>	Target amount of additional development	Delivery of plan period	<p data-bbox="1574 619 2107 1161">This change would further contribute towards the significant positive effect identified against SA objectives 2 (Employment) and 14 (Community Vibrancy and Social Cohesion) because an increase in retail floorspace would further support the creation of employment opportunities and access to services and facilities for all members of the community, with beneficial effects on community vibrancy and social cohesion. It is not anticipated that the minor change to the housing requirement figure would affect the findings of the SA, but the provision of a more detailed phasing plan is likely only to serve to improve the deliverability of the growth strategy over the plan period.</p>							
Use <u>Development Types</u>	Target amount of additional development	Delivery of plan period											

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification			Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
			2019/20 – 2036/37		
	Housing (Classes C2/C3)		Minimum of 13,284 dwellings <u>delivered in four phases as set out in the right hand column.</u>	<p>A requirement is set to deliver land for an average of 738 dwellings a year over the plan period (18 years). <u>This is to be delivered in four phases as follows:</u></p> <ul style="list-style-type: none"> • <u>2019/20 to 2023/24 – 622 dwellings a year</u> • <u>2024/25 to 2028/29 – 885 dwellings a year</u> • <u>2029/30 to 2033/34 – 730 dwellings a year</u> • <u>2034/35 to 2036/37 – 700 dwellings a year</u> 	

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification			Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
		<p>Employment Uses (B-Classes) <u>(offices, research and development, light industry, Class B2 and Class B8)</u></p>	<ul style="list-style-type: none"> Approximately 8.1 ha strategic employment allocation at new garden settlement (36,760 sqm floorspace) Employment sites in Places and Policies Local Plan Policies E1 and E2 	<p>Targets to be monitored and employment / retail needs to be reviewed every five years. Any future studies will be a material planning consideration and may trigger a review of relevant plan policies.</p>	
		<p>Goods Retailing (Class A1-A5, excluding A2 services) <u>(retail and food/beverage uses excluding financial and professional services)</u></p>	<p>Approximately 31,205 <u>35,700</u> sqm gross, comprising:</p> <ul style="list-style-type: none"> 4,620 <u>6,500</u> sqm convenience goods floorspace; and 26,585 <u>23,300</u> sqm comparison floorspace; <u>and 5,900sqm food/beverage floorspace</u> 		

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?										
	Supporting text: Paragraphs 4.62 – 4.64	Table 4.2 Provisions to ensure the effective implementation of this policy are detailed in section 5.3.											
		4.62 SS2 primarily addresses Core Strategy Review aims under the following Strategic Needs: A, C and D.											
		4.63 The table below shows how the housing requirement to 2036/37 will be met. Due to the scale of strategic allocations (policies SS6-SS11) and need for phasing with infrastructure, they will play a medium- and long-term role in maintaining housing supply.	As modified text supporting policy, the changes referenced here are covered through the appraisal of main modifications to Policy SS2: Housing and the Economy Growth Strategy.										
		<table border="1"> <thead> <tr> <th data-bbox="456 679 1137 762">Source</th> <th data-bbox="1137 679 1541 762">Contribution (net dwellings)</th> </tr> </thead> <tbody> <tr> <td data-bbox="456 762 1137 919"> Delivery through the allocated garden settlement over the plan period 2018/19 2019/20 to 2036/37 ⁽¹⁾ </td> <td data-bbox="1137 762 1541 919"> 5,925 5,593 </td> </tr> <tr> <td data-bbox="456 919 1137 1037"> Delivery through the further expansion of Sellindge ⁽²⁾ </td> <td data-bbox="1137 919 1541 1037"> 188 350 </td> </tr> <tr> <td data-bbox="456 1037 1137 1225"> Delivery through allocated development sites (remaining Core Strategy Policies CSD8 and Places and Policies Local Plan allocations) without planning permission ⁽³⁾ </td> <td data-bbox="1137 1037 1541 1225"> 1,703 1,610 </td> </tr> <tr> <td data-bbox="456 1225 1137 1340"> 'Windfall' sites – allowance of 95 units per annum for 15 13 years ⁽²⁾ ⁽⁴⁾ </td> <td data-bbox="1137 1225 1541 1340"> 1,425 1,235 </td> </tr> </tbody> </table>	Source	Contribution (net dwellings)	Delivery through the allocated garden settlement over the plan period 2018/19 2019/20 to 2036/37 ⁽¹⁾	5,925 5,593	Delivery through the further expansion of Sellindge ⁽²⁾	188 350	Delivery through allocated development sites (remaining Core Strategy Policies CSD8 and Places and Policies Local Plan allocations) without planning permission ⁽³⁾	1,703 1,610	'Windfall' sites – allowance of 95 units per annum for 15 13 years ⁽²⁾ ⁽⁴⁾	1,425 1,235	
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		<table border="1" data-bbox="454 347 1541 555"> <tr> <td data-bbox="454 347 1137 467">Delivery (minimum) through extant planning permissions and sites under construction ⁽⁴⁾ (5)</td> <td data-bbox="1137 347 1541 467">4,274 4,619</td> </tr> <tr> <td data-bbox="454 467 1137 555">Total 2019/2020 – 2036/37 (minimum)</td> <td data-bbox="1137 467 1541 555">13,515 13,407</td> </tr> </table> <p data-bbox="454 571 1541 638">Table 4.3 How the housing minimum requirement will be delivered through the plan period</p> <p data-bbox="454 675 1541 703">(1) Core Strategy Review Policies SS6-SS9.</p> <p data-bbox="454 708 1541 770">(2) Core Strategy Review Policy CSD9. Remaining part of proposed allocation without planning permission (second phase).</p> <p data-bbox="454 775 1541 869">(3) 5 per cent deducted from Places and Policies allocations without planning full permission to take account of non-delivery (excludes Core Strategy Review Policy CSD8).</p> <p data-bbox="454 874 1541 1007">(3) (4) Windfall development accounts for the housing delivery arising from small and medium sites of one to nine dwellings. Evidence from the years 2012/13 to 2018/19 indicates an average of 97 dwellings from windfall development per annum. Early years have been discounted to avoid double counting with existing planning permissions.</p> <p data-bbox="454 1011 1541 1074">(4) (5) 5 per cent deducted from sites where construction has not started to take account of non-delivery (excludes strategic allocations).</p> <p data-bbox="454 1110 1541 1399">4.64 Table 4.3 shows the different components of the housing land supply over the Core Strategy Review plan period, including allocations in the Places and Policies Local Plan, existing planning permissions, 'windfall' delivery (small sites of 1 to 9 dwellings) and the strategic allocations in this plan. A cautious approach has been taken, with deductions made for the possible non-delivery of sites (where planning permissions lapse, sites are developed for fewer homes than anticipated or some homes are completed beyond the plan period) and a conservative estimate has been made for windfall development. It is estimated that a minimum 13,515 13,407 new homes will be delivered over the plan period, exceeding the requirement of 13,284 currently set by the Government's national formula for housing need.</p>	Delivery (minimum) through extant planning permissions and sites under construction ⁽⁴⁾ (5)	4,274 4,619	Total 2019/2020 – 2036/37 (minimum)	13,515 13,407	
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Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
MM03	Supporting text: Paragraph 4.78	<p>4.78 Close attention will be paid to minimising hazards and flood risks in line with national policy using the sequential approach. It is critical that, where possible, development is directed away from those areas identified as facing greatest hazards in the Strategic Flood Risk Assessment (SFRA) should a flooding event occur. A high priority will be placed on upgrading flood defence infrastructure (see SS5). <u>The sequential approach is to take into account all forms of flooding.</u></p>	<p>As modified text supporting policy, the changes referenced here are covered through the appraisal of main modifications to Policy SS3: Place-Shaping and Sustainable Settlements Strategy.</p>
	<p>Policy SS3: Place-Shaping and Sustainable Settlements Strategy</p>	<p>Policy SS3</p> <p>Place-Shaping and Sustainable Settlements Strategy</p> <p>Development within the district is directed towards existing sustainable settlements and a new sustainable garden settlement south of the M20 near Westenhanger to protect the open countryside and the coastline, in accordance with policy SS1. Change in settlements will be managed to contribute to their role within the settlement hierarchy (Table 4.43) and local place-shaping objectives, to promote the creation of sustainable, vibrant and distinct communities.</p> <p>The principle of development is likely to be acceptable on previously developed and within defined settlements, provided it is not of high environmental value. All development must also meet the following requirements:</p> <p>a. The proposed use, scale and impact of development should <u>not be of a size, scale and nature that is disproportionate to the level of services which the settlement is capable of providing and should preserve the character of the settlement and maintain its status in the settlement hierarchy</u> proportionate and consistent with the settlement's status and its identified strategic role (see Table 4.4) within the district.</p> <p>b. Consideration of alternative options within the appropriate area should be evident, with a sequential approach taken as required for applicable uses set out in national policy, for example to inform decisions against clause (c) below on flood risk. In</p>	<p>This change would minimise the negative effects recorded against SA objectives 3 (Landscape) and 4 (Historic Environment) (as part of mixed effects) because the policy has been amended to explicitly reference the need to preserve the character of the settlement and historic features.</p> <p>In line with the updated supporting text, the policy requires a site-specific flood risk assessment for other sources of flood risk as identified within EA surface water flood mapping. This serves to emphasise the importance of protecting against all sources of flood risk, in line with the NPPF. This is likely to contribute positively to the minor positive effect identified against SA objectives 9 (Flood Risk and Climate Change Adaptation), although it is not anticipated that the additional wording on flooding would affect the significance of the effect recorded in the SA.</p>

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
		<p>considering appropriate site options, proposals should identify locational alternatives with regard to addressing the need for sustainable growth applicable to the Romney Marsh Area, or Urban Area or North Downs Area.</p> <p>b. e. For development located within zones identified by the Environment Agency (EA) as being at risk from flooding, or at risk of wave over-topping in immediate proximity to the coastline (within 30 metres of the crest of the sea wall or equivalent), site-specific evidence will be required in the form of a detailed flood risk assessment. This will need to demonstrate that the proposal is safe and meets with the sequential approach within the applicable character area (Urban Area, Romney Marsh Area or North Downs Area), and where applicable, the (if required) exception tests set out in national policy. It will utilise utilising the current applicable Strategic Flood Risk Assessment (SFRA) and provide further information. A site-specific flood risk assessment may be required for other sources of flood risk as identified within EA surface water flood mapping.</p> <p>Development must also meet the following criteria as applicable:</p> <ul style="list-style-type: none"> i) no residential development, other than replacement dwellings, should take place within areas identified at "extreme risk" as shown on the SFRA 2115 climate change hazard maps; and ii) all applications for replacement dwellings, should, via detailed design and the incorporation of flood resilient construction measures, reduce the risk to life of occupants and seek provisions to improve flood risk management; and iii) strategic-scale development proposals should be sequentially justified against district-wide site alternatives. <p>c. d. A design-led and sustainable access approach should be taken to density and layout, ensuring development is suited to the locality and its needs, and transport</p>	

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?				
		<p>infrastructure (particularly walking/cycling). Efficient use should be made of central land in town centres or in easy walking distance of rail and bus stations, with appropriate redevelopment of complementary uses above ground floor retail, leisure or other active uses, to directly support the vitality of centres.</p> <p>d. e. Proposals should be designed to contribute to local place-shaping and sustainable development by:</p> <ul style="list-style-type: none"> i) <u>preserving and wherever possible</u> respecting and enhancing <u>statutory and non-statutory listed buildings, monuments and conservation areas and other</u> key historic features of conservation interest <u>and their setting</u>; and ii) <u>including</u> through appropriate sustainable construction measures, <u>measures to optimise</u> including water efficiency and <u>(in cases of new-build development), measures to optimise</u> a proportion of energy <u>usage</u> from renewable and low carbon sources on new build development. <p>e. f. Development must address social and economic needs in the neighbourhood and not result in the loss of community, cultural, voluntary or social facilities (unless it has been demonstrated that there is no longer a need or alternative social/community facilities are made available in a suitable location).</p>					
MM04	Table 4.5	<table border="1" data-bbox="454 1102 1252 1193"> <tr> <td data-bbox="454 1102 654 1193">Location and Development Purpose</td> <td data-bbox="654 1102 853 1193">Urban Area</td> <td data-bbox="853 1102 1052 1193">Romney Marsh Area</td> <td data-bbox="1052 1102 1252 1193">North Downs Area</td> </tr> </table>	Location and Development Purpose	Urban Area	Romney Marsh Area	North Downs Area	As modified text supporting policy, the changes referenced here are covered through the appraisal of main modifications to Policy SS4: Priority Centres of Activity Strategy.
Location and Development Purpose	Urban Area	Romney Marsh Area	North Downs Area				

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification				Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
		<p>Major Employment Sites: To protect existing and provide further industrial (B-class and similar sui generis uses) premises for light industrial, Class B2 and Class B8 type uses suitable to the needs of the district's businesses and inward investors.</p>	<p>Sites in Folkestone and Hythe</p>	<p>Site at New Romney, sites in Lydd</p>	<p>Site at Lympe, site at Hawkinge, sites within new garden settlement</p>	
		<p>Town Centres: To accommodate the majority of identified needs for retail, office and leisure uses in the district through new development</p>	<p>Folkestone (main town centre) and Hythe</p>	<p>New Romney</p>	<p>New garden settlement</p>	

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification				Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
		to improve their vitality, public realm, mix of uses, and daytime and evening economy.				
		District Centres: To accommodate appropriate development to maintain their mix of uses and improve their vitality, viability and public realm.	Cheriton	Lydd	Hawkinge	
		Local Centres: To protect crucial services and accommodate development that maintains their viability for residents and visitors.	Sandgate village, other neighbourhood parades	Dymchurch	Lyminge, Elham, Sellindge, sites within new garden settlement	

Table 4.5: Priority Centres of Activity Network

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
	<p>Policy SS4: Priority Centres of Activity Strategy</p>	<p>Policy SS4</p> <p>Priority Centres of Activity Strategy</p> <p>In focal points for maintaining and developing jobs and services, as represented by the Priority Centres of Activity, development will be encouraged where it complies with national policy and contributes to continued centre viability. Major commercial and employment development, including A and B class uses, should be located in accordance with the Priority Centres of Activity network as shown on the Policies Map and should reinforce the role of the centre. Development in Priority Centres of Activity will be allowed where it does not result in a net loss of on-site non-retail employment B-Class uses, and it does not jeopardise the identified commercial purpose of areas set out in the Priority Centres of Activity network (see Table 4.5).</p> <p>Strategic objectives will be delivered through the following principles:</p> <ul style="list-style-type: none"> a. A 'town centre first' policy will operate for applicable uses in line with national policy. Potential town centre activities or those creating significant transport demand, including retail, leisure and major office uses, should be located: <ul style="list-style-type: none"> i) Sequentially, looking firstly at locations within town centres, then on the edge of centres, and only then out of centre with a preference given to accessible sites which are well connected to the town centre; and ii) With regard to their impact on the vitality and viability of, and existing, committed and planned investment in, the defined town, district and local centres. b. For other employment-generating (non-town centre) activities, investment should alternatively be directed to designated Major Employment Sites. If suitable sites are shown to be unavailable and unfeasible within any Priority Centre of Activity, 	<p>It is not considered that these changes will alter the findings of the SA because they represent minor wording changes to aid understanding and future-proofing of Policy SS4: Priority Centres of Activity Strategy.</p>

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
		<p>development for employment-generating uses will only be acceptable <u>where it accords with Policies SS1, SS3 and CSD3.</u></p> <ul style="list-style-type: none"> • In accordance with policies SS1, SS3 and CSD3; and • Where demonstrated to be in locations suffering longstanding deprivation (and subject to directly contributing to local workforce up-skilling, sustainable transport provisions and an acceptable environmental impact on the locality). <p><u>c. Sustainable employment development proposals will be encouraged in appropriate locations in areas suffering longstanding deprivation where they increase employment opportunities in the area and contribute to local workforce up-skilling.</u></p> <p><u>d.</u> To deliver commercial regeneration objectives, mixed-use development on employment land may be acceptable in line with the above principles where appropriate new <u>non-retail employment B-class</u> premises are provided, <u>and</u> the proposals provide a net gain of suitable local job opportunities, and where it can also be demonstrated that a following criterion is also satisfied (<u>subject to the satisfaction of</u> unless other site specific policies) <u>apply</u>:</p> <ul style="list-style-type: none"> <u>i)</u> At appropriate older Major Employment Sites, it directly delivers a range of small new and replacement industrial premises more appropriate to local needs; or <u>ii)</u> In and on the edge of Town Centres, it provides a significant quantum of small incubation premises/offices designed to meet the needs of indigenous start-up businesses. <p>All development in Town and District Centres should contribute to a mix of active ground floor uses, with predominantly retail goods (A1) frontage shopping retained at the core of</p>	

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
		centres. Elsewhere in Town Centres an appropriate mix of offices (A2/B1), cultural, community and voluntary facilities, and other shop uses will be permitted; with a limited increase in the proportion of restaurants (A3) where they add to the shown to be adding to the choice, vitality, tourist appeal and evening economy of Town Centres.	
MM05	Policy SS5: District Infrastructure Planning	<p>Policy SS5 District Infrastructure Planning</p> <p>Development should provide, contribute to or otherwise address the district’s current and future infrastructure needs. Infrastructure that is necessary to support development must exist already, or a reliable mechanism must be available to ensure that it will be provided at the time it is needed.</p> <p>The Community Infrastructure Levy (CIL) has been introduced to ensure that, alongside Section 106 contributions, resources are in place sufficient to meet the infrastructure needs of the district in line with the growth provisions of this strategy. CIL applies to all qualifying forms of development across the district, and a meaningful proportion of levy revenues raised in each neighbourhood will be used to deliver infrastructure within that neighbourhood. Developer contributions through specific legal requirements will continue to be negotiated taking appropriate account of the development’s viability for required local infrastructure (including facilities essential for development to take place or to mitigate the immediate impact of development).</p> <p>CIL and developer contributions will be used to secure resources contributing towards essential infrastructure needs. Potential infrastructure requirements of this Core Strategy Review are identified in the council’s Infrastructure Delivery Plan. Planning permissions will only be granted where suitable developer contributions are secured or are accompanied by a CIL liability notice, and where:</p> <p>a. The design of a development aims to reduce unnecessary or unsustainable demands on physical and social/community infrastructure, and environmental or utility</p>	<p>This change would further contribute towards the significant positive effect identified against SA objective 13 (Sustainable Transport and Congestion) because requiring tailored solutions and financial contributions (e.g. infrastructure provision) to limit car use generated by new developments would help to alleviate road congestion and encourage uptake of more active and sustainable travel modes.</p>

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
		<p>network capacity;</p> <p>b. Development does not jeopardise current or planned physical infrastructure; and</p> <p>c. The location, design or management of development provides a choice of means of transport and allows sustainable travel patterns, for pedestrians, cyclists and/or public transport. <u>The travel demand of new development proposals will be considered and managed and tailored solutions will be developed to limit car use generated by new developments.</u> All major trip-generating uses will provide Travel Plans.</p> <p><u>Where the provision of infrastructure is necessary to facilitate and/or mitigate the impacts of development (including the cumulative impacts of planned development), developers will be required, where necessary, to make a proportionate contribution on a retrospective basis towards such infrastructure as may have been forward-funded from other sources.</u></p>	
MM06	Policy SS6: New Garden Settlement Development Requirements	<p>Policy SS6</p> <p>New Garden Settlement Development Requirements</p> <p>Land in allocated within the North Downs are for a new garden settlement as shown on the Policies Map.</p> <p>The settlement will be developed on garden town principles and will have a distinctive townscape and outstanding accessible landscape, both of which will be informed by the historic character of the area. It will be planned to be sustainable, providing new homes with a broad mix of tenures, employment opportunities and community facilities within easy walking and cycling distance. It will be a landscape-led development that responds to its location within the setting within of the Kent Downs AONB landscape and the adjacent Lympne Escarpment with an emphasis on a network of green and blue spaces including woodland and other planting, open space and recreation that supports healthy living, encourages interaction between residents, enhances local biodiversity and</p>	<p>It is not considered that these changes will alter the findings of the SA of Policy SS6: New Garden Settlement Development Requirements. However, it is acknowledged that the additional wording on the Kent Downs AONB has greater potential to minimise the minor negative effect identified against SA objective 3 (Landscape) (as part of a mixed effect).</p>

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		<p>mitigates impacts on views from the scarp of the Kent Downs. Environmentally the settlement will be a beacon of best practice, making best use of new technologies, and will be designed to achieve a low carbon, low waste and highly water efficient development.</p> <p><u>Given the location of the proposed new settlement and its relationship with the Kent Downs AONB, it is essential that the landscape-led proposals include appropriate structural landscaping in order to avoid or minimise adverse impacts on the AONB and views in and out of the AONB in accordance with policy SS7.</u></p> <p>Outline planning permission will be granted for a comprehensive proposal that is supported by a masterplan prepared by the site promoters. The masterplan shall be prepared in partnership and in consultation with the local planning authority, stakeholders, partner organisations, local people and interest groups, <u>in accordance with the three-tier approval structure</u> and include a detailed phasing and delivery strategy.</p>	
	<p>Policy SS6: New Garden Settlement Development Requirements</p>	<p>(1) New Homes</p> <p>a. The settlement shall provide for a minimum of 5,925 <u>circa 5,600</u> new homes in a phased manner within this plan period (2019/20 to 2036/37) with potential for future growth to provide a total of 8,000-10,000 homes (subject to detailed masterplanning) within the site allocation area beyond the plan period <u>(subject to detailed masterplanning and an assessment of potential impacts on the Kent Downs AONB in line with Policy SS7);</u></p> <p>b. The mix of tenure and size if new homes shall be in accordance with Policies CSD1 and CSD2 and evidence in the Strategic Housing Market Assessment, Parts 1 and 2 (PBA, 2016/2017) (or subsequent revision to the evidence base) and shall include build for rent provision to meet identified need. A minimum of 22 per cent of all dwellings should be provided as affordable homes, subject to viability;</p>	<p>There has been a reduction in the number of homes to be delivered at the garden settlement to reflect revised trajectories in the planning applications for Otterpool Park. However, this change would not alter the significant positive effect identified against SA objective 1 (Housing) as a significant number of new homes would still be provided. The modification offers the possibility of delivering planned phases of the new garden settlement early where sustainable to do so.</p> <p>It is expected that the additional wording on achieving low carbon and high water efficiency standards in self-build and custom-build homes would further</p>

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		<p>c. All homes shall meet the adopted Nationally Described Space Standards in accordance with Policy HB3 of the Places and Policies Local Plan (or any revision to that policy);</p> <p>d. Within the early phases, development shall provide homes in neighbourhoods in and around the new town centre (Policy SS7 (2)), well connected to the centre by a walking, cycling and public transport network. Close to the town centre there shall be a higher proportion of smaller residential units serving all age groups. <u>Other phases of development may come forward in tandem if they are well-connected to an existing rural centre or primary village with capacity to provide for the day-to-day needs of new residents, are in accordance with the masterplan for the garden town, maintain its quality and do not prejudice its overall delivery;</u></p> <p>...</p> <p>(2) Self-build and custom-build homes</p> <p>a. A proportion of proposed dwellings shall be provided as self-build or custom-build plots, having regard to the need identified by the council, with each substantial phase contributing a proportion of self-build and custom-build housing;</p> <p>b. Innovative self-build and custom-build designs will be encouraged that are flexible and incorporate new technologies, particularly those that achieve carbon and water neutrality. <u>In small or single unit schemes the objective will be to achieve low carbon and high water efficiency;</u> and</p> <p>...</p> <p>(3) Employment development</p>	<p>contribute towards the significant positive effects identified against SA objectives 10 (Energy Efficiency) and 11 (Water Efficiency) in the SA.</p>

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		<p>a. The settlement shall provide approximately 36,770 36,760 sqm net of employment floorspace (B-use classes <u>which may include office, research and development and light industrial uses within Class E, and uses falling within Class B2 and B8</u>) by 2037. Development beyond the plan period has the potential to provide for approximately 57,600 sqm of employment floorspace in total within the site allocation area. A different delivery rate or quantum of employment development will need to demonstrate that employment provision aligns with population growth to ensure that the town grows in a sustainable way following garden town principles. Other employment opportunities will be created by the retail and other town centre development set out in Policy SS7(2)(b) as well as community uses. The settlement's location near the gateway to Europe (Channel Tunnel) provides the opportunity to deliver employment and town centre development that complements other centres including Folkestone town centre, Hythe and other growth areas across East Kent;</p> <p>...</p>	
MM07	<p>Supporting text: Paragraphs 4.178 – 4.180</p>	<p>New Garden Settlement – Place Shaping Principles</p> <p>4.178 Landscape-led masterplanning and the high quality design and layout of the town (its 'townscape') will be key to the success of the settlement, with particular regard to the impact on views from the AONB. Each neighbourhood should have a distinctive character with different densities of development. The masterplan should show the relationship of different land uses, the height and massing of buildings, the legibility of streets and how the development will make use of high quality materials that are sensitive to, and sit comfortably alongside, the local environment. There is existing design guidance that can be drawn on, including the Kent Design Guide (Kent Design Initiative) and the Kent Downs Area of Outstanding Natural Beauty Landscape Design Handbook (Kent Downs AONB Unit), but the development will need to be informed by detailed design codes drawn up with the participation of the local community. The area's heritage assets, in particular Westenhanger Castle and its setting, together with other non-designated</p>	<p>As modified text supporting policy, the changes referenced here are covered through the appraisal of main modifications to Policy SS7: New Garden Settlement – Place Shaping Principles.</p>

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		<p>heritage assets, can make a significant contribution to the character of the new settlement, that can help attract future residents, businesses and visitors and create a strong sense of place from the outset. <u>Proposals must be accompanied by a comprehensive Landscape and Visual Impact Assessment prepared in accordance with the Landscape Institute’s and Institute of Environmental Management & Assessment’s ‘Guidelines for Landscape and Visual Impact Assessment’ (Third Edition) or updates to this guidance.</u></p> <p>4.179 At the heart of the development will be a vibrant town centre that will meet the needs of residents, workers and visitors with attractive cultural, community, shopping and leisure facilities, as well as spaces for events and meetings to foster community cohesion. The Retail and Leisure Need Assessment 2018 Update indicates that the new garden settlement can support approximately 12,900 sqm (gross) <u>(June 2019 update) projections suggest the new town and local centres within the new Otterpool Park settlement could provide between 10,800 and 16,700 sqm gross</u> of retail (convenience and comparison) and food and beverage floorspace by 2017. Service uses (class A1 non-retail and class A2 financial and professional services) could increase this requirement to 15,500 sqm (gross) <u>the garden settlement overall floorspace projection to 13,000 to 20,000 sqm gross</u> by 2037. This will need to be carefully planned and phased, particularly any proposals above these indicative requirements, to avoid any detrimental impacts on nearby town centres (such as Folkestone, Hythe, New Romney, Ashford and Dover) or shops and facilities in nearby villages, yet also meet the everyday needs of the settlement and nearby communities. Each neighbourhood in the garden settlement will also need to be supported by educational, recreational and community facilities. <u>It is expected that the retail provision will be provided as part of the new town centre, which should be located at the heart of the garden settlement, within easy walking distance of the station. Other small-scale retail development would be expected to be provided at ‘local centres’ in neighbourhoods through the separate phases of the development. It is expected that the individual units provided for comparison retail, will not exceed in the region of 500sqm, unless justified by a retail impact assessment, and that the</u></p>	

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		<p><u>majority of retail development will be provided as small local stores. Details of the retail development is proposed to be phased across the development, to align with residential development, should be submitted with the application.</u></p> <p>4.180 The settlement presents a major opportunity to secure a high speed rail service between Westenhanger and London St Pancras. The council is pursuing this with the train operating companies, which are bidding for the new South Eastern franchise, infrastructure providers and also with Network Rail and other stakeholders. A transport hub should be provided, located at Westenhanger station, allowing easy transfer between walking, cycling, bus and train journeys. The railway station upgrade and hub will potentially deliver:</p> <ul style="list-style-type: none"> • Lengthening of the existing platforms; • New and refurbished station buildings with improved customer facilities; • A new footbridge between platforms; and • Car parking to meet the needs of the new town and nearby villages. • Ways of integrating the station improvements with other land uses and facilities should also be explored. <p><u>[New para.] In order to meet the demand for increased rail patronage on the high speed rail service from the increasing population of the garden settlement, and other development in the Folkestone & Hythe District and the rest of East Kent, there will be a need to engage with the relevant rail stake holders including Network Rail, the rail franchise of concession operator, and the Department for Transport to encourage sufficient capacity to support the future population. Whilst the Council has limited direct control over this issue, it will work together with Ashford Borough Council, Kent County Council and other East Kent authorities to lobby the relevant stakeholders to increase the capacity on the high speed service,</u></p>	

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	<p>Policy SS7: New Garden Settlement – Place-Shaping Principles</p>	<p>Policy SS7</p> <p>New Garden Settlement – Place Shaping Principles</p> <p>(1) A landscape-led approach</p> <p>a. <u>The design and layout of the development shall be landscape-led and include within it structural landscaping in order to avoid or minimise adverse impacts on the Kent Downs AONB and views into and out of the AONB. Where required to mitigate any such impacts arising from the development, structural planting shall be carried out at an appropriate stage in relation to each phase in order to optimize its effectiveness, and include the provision of new habitats for priority nature conservation species. Applications shall be accompanied by a landscape and visual impact assessment that should inform the landscaping scheme at a structural and local level.</u> Proposals shall demonstrate a landscape-led approach that respects topography and views, particularly from the Kent Downs Area of Outstanding Natural Beauty and helps mitigate impact on views from the scarp of the Kent Downs, guided by a Landscape and Visual Impact Assessment. The assessment should consider the proposal itself and any cumulative impacts arising from developments in the vicinity of the proposal; and</p> <p>b. A green and blue infrastructure strategy shall be developed that enhances existing green and blue infrastructure assets in accordance with Policy CSD4. Additionally the strategy shall deliver:</p> <p>i. Advanced woodland planting and habitat creation using native species to benefit later phases of development, particularly from prominent locations visible from the Kent Downs Area of Outstanding Natural Beauty, and to</p>	<p>This change increases the likelihood that any adverse effects of the new garden settlement on SA objectives 3 (Landscape) would be minimised because the policy and its supporting text have been amended to explicitly reference the requirement for a Landscape and Visual Impact Assessment as part of a landscape-led approach to new garden settlements.</p> <p>This change would further contribute towards the minor positive effects identified against and 5 (Biodiversity and Geodiversity) (as part of mixed effects) because the policy now requires the provision of new habitats for priority nature conservation species. However, there would be no change in the significance of these effects.</p> <p>It is also expected that this modification would further contribute towards the significant positive effects identified against SA objectives 2 (Employment) and 14 (Community Vibrancy and Social Cohesion) because retail provision within new garden settlements would support the creation of employment opportunities and access to services and facilities for all members of the community, with beneficial effects on community vibrancy and social cohesion.</p>

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		<p>avoid as far as possible temporary loss of biodiversity value when construction begins. Advanced woodland planting, habitat creation and community green space shall also be designed to relate to local landscape character and to prevent the coalescence of the new settlement with Lympne and to separate neighbourhoods within the settlement itself. Planting and habitat creation should also be used to provide distance buffers between the M20/High Speed transport corridor for noise and air quality mitigation purposes;</p> <p>ii. Clear net biodiversity gains over and above residual losses through the planting of native species and the creation of green ecological corridors to improve species' ability to move through the environment in response to predicted climate change, and to prevent isolation of significant populations of species. The strategy shall enhance nearby Harringe Brooks ancient woodlands, (including ecological connections, future management and community access) Local Wildlife Sites, Otterpool Quarry Site of Special Scientific Interest and other sensitive ecological features, including the existing pond at the former Folkestone Racecourse. <u>Enhancements may include improvements to ecological connections both within and outside the allocation boundary, their future management and community access, where appropriate. Proposals must demonstrate that there will be no impact on the Lympne Escarpment Site of Special Scientific Interest, unless exceptional circumstances can be demonstrated, in line with Places and Policies Local Plan Policy NE2;</u></p> <p>iii. <u>A pollinator network throughout the settlement with connection to the wider countryside, with the aim of providing all-year round support for pollinators, through the use of native species;</u></p>	<p>The supporting text to the policy requires this to be delivered at the heart of the settlement within easy walking distance of the station as well as appropriately distributed local centres elsewhere.</p> <p>It is expected that the additional wording on sustainable drainage systems (SuDS) would further contribute towards the minor positive effect identified against SA objective 9 (Flood Risk) (as part of a mixed effect) because avoiding any increase in, and reducing flooding downstream, would help minimise flood risk.</p> <p>Although there are other modifications to Policy SS7, they are not considered to have a notable effect on the likelihood or significance of the effects identified for Policy SS7 in the SA.</p>

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		<p>iii-iv. A new country park, easily accessible from the town centre and beyond and supported by and linked to other areas of strategic open space, that enhances the historic landscape setting of Westenhanger Castle;</p> <p>iv-v. Playing fields and sports provision, play areas, informal open spaces, allotments and woodland located to maximise use and meet the sporting, leisure and recreational needs of the garden settlement as informed by the council's Playing Pitch and Sports Facilities Strategies;</p> <p>v-vi. Publicly accessible, well-managed and high quality open spaces, which are linked to the open countryside and adjoining settlements. This shall be informed by an access strategy that seeks to protect and enhance existing public rights of way, and create new public rights of way. The strategy shall balance demands for public access with ecological and landscape protection, taking into account the impacts of increased access on the Kent Downs AONB and Folkestone to Etchinghill Escarpment Special Area of Conservation and other protected areas, which might necessitate the need for mitigation to be secured;</p> <p>vi-vii. Sustainable drainage systems (SuDS) to maximise landscape and biodiversity values and to prevent avoid any increase in, and where possible reduce, downstream flooding of the East Stour River, developed as part of an integrated water management solution; and</p> <p>vii-viii A long-term security and management plan of the Green Infrastructure estate which ensures community involvement and custodianship.</p> <p>(2) A vibrant town centre</p> <p>...</p>	

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		<p>b. Food shopping (convenience retail) shall be provided within the town centre to allow choice and variety as well as reducing the need to travel for day-to-day needs. The Retail and Leisure Need Assessment 2018 Update <u>(June 2019 update)</u> indicates that the new garden settlement can support approximately 3,150sqm <u>up to 4,284sqm</u> (gross) of convenience retail floorspace within the plan period <u>to 2037</u>. A range of other shopping floorspace (comparison retail) shall also be provided to create a vibrant town centre. The 2018 Update <u>Retail and Leisure Need Assessment (June 2019 update)</u> indicates that the new garden settlement can support approximately 7,300sqm <u>up to 9,108sqm</u> (gross) of comparison retail floorspace within the plan period. A mix of other town centre uses should be provided, including food and beverage space (approximately 2,450sqm gross) <u>(up to 3,305sqm gross)</u> and non-retail and financial and professional services (approximately 2,600 sqm gross) <u>3,300sqm gross</u>. An impact assessment shall be undertaken <u>The stated floorspace projections by use class type (baseline values) as drawn from the Retail and Leisure Need Assessment (June 2019 update) are to represent the upper limit of floorspace provision within the garden settlement across the plan period, so that it only meets the needs generated by the development itself. Should any phase of development propose a provision of floorspace that, when considered cumulatively to take account of the total floorspace provision across the garden settlement, would lead to the exceedance of one or more of the floorspace values stated within this policy, or if any individual comparison retail unit were to exceed 500sqm gross floorspace, then the promoter shall have to submit an impact assessment</u> to demonstrate that there would be no detrimental <u>significant</u> impacts on the vitality and viability <u>(including local consumer choice and trade)</u> of nearby local village centres and other town centres including Folkestone, Hythe, New Romney, Dover and Ashford, by the scale and/or phasing of town centre</p>	

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		<p>development particularly where provision above these indicative thresholds is proposed; and</p> <p>...</p> <p>(6) Sustainable access and movement</p> <p>...</p> <p>c. The capacity of M20 junction 11 shall be upgraded and other key junctions on the road network will be redesigned and improved in partnership with Highways England and Kent County Council. <u>Where improvements are required to junctions or links outside of Folkestone and Hythe District, consultation shall take place with the relevant local authority prior to the proposals being agreed;</u></p> <p>...</p>	
MM08	<p>Policy SS8: New Garden Settlement – Sustainability and Healthy New Town Principles</p>	<p>Policy SS8</p> <p>New Garden Settlement – Sustainability and Healthy New Town Principles</p> <p>(1) A sustainable new town</p> <p>...</p> <p>b. All new build housing shall be built to water efficiency standards that exceed the current building regulations so as to achieve a maximum use of 90 110 litres per person per day of potable water (including external water use). The development shall be informed by a Water Cycle Strategy which includes detail of:</p> <p>i. Water efficiency, and demand management measures to be implemented to minimise water use and maximise the recycling and reuse of water resources</p>	<p>The modification weakens the water efficiency standard from a new dwelling maximum of 90 litres per person per day to 110 litres per person per day. Although this reduces the positive contribution of the Policy to SA objective 11 (Water Efficiency), the effect of achieving a 110 litre standard is still considered to generate significant positive effect, given it delivers efficiencies over and above the Building Regulations Standards in a water stressed area.</p> <p>It is also expected that this modification would make a lower contribution towards</p>

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		<p>(i.e. through the use of 'grey' water) across the settlement, utilising integrated water management solutions;</p> <p>ii. The need to maintain the integrity of water quality, how it will be protected and improved, and how the development complies with the Water Framework Directive;</p> <p>iii. Surface water management measures to avoid increasing, and where possible to reduce, flood risk through the use of Sustainable Drainage Systems (SuDS); and</p> <p>iv. Water services infrastructure requirements and their delivery having regard to Policy CSD5, and as agreed with the relevant statutory providers, and the Environment Agency's guidance on Water Cycle Studies;</p> <p><u>c. All proposed development will have to satisfy the requirements of policy CSD5 (d). in order to avoid any significant impact on the water quality of the Stodmarsh European designated sites.</u></p> <p><u>e.d.</u> For non-residential development, development shall achieve BREEAM 'excellent Outstanding' standard including addressing maximum water efficiencies under the mandatory water credits;</p> <p>...</p>	<p>the significant positive effect identified against SA objective 10 (Energy Efficiency) because the policy now seeks to achieve BREEAM 'excellent' instead of 'outstanding', which is a high standard but lower than the original standard and therefore not as efficient. The collective benefits of other forms of energy efficiency combine to result in no change to the overall significance of the positive effect originally recorded against this SA objective.</p> <p>The additional wording on reducing surface water flood risk through the use of SuDS would further contribute towards the minor positive effect identified against SA objective 9 (Flood Risk) (as part of a mixed effect).</p> <p>Lastly, development proposals now have to satisfy the requirements of Policy CSD5: Water and Coastal Environmental Management.</p> <p>The modifications to Policy CSD5(d) have been appraised separately.</p>
MM09	Supporting text: New paragraphs following existing	<p>New Garden Settlement – Infrastructure, Delivery and Management</p> <p><u>Delivery of critical and necessary infrastructure</u></p>	<p>As modified text supporting policy, the changes referenced here are covered through the appraisal of main modifications to Policy SS9: New Garden Settlement –</p>

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
	<p>paragraph 4.190</p>	<p>4.189 The creation of a new garden settlement will be a long-term initiative, lasting 20 to 30 years and delivered through a phased approach. Initial development will focus on new housing in and around a town centre (Policy SS7(2)) and additional village neighbourhoods will grow around this core.</p> <p>4.190 The creation of a new settlement generates economies of scale that can be used to deliver critical and necessary infrastructure at the earliest opportunity and throughout the town’s development. The uplift in land value that will be created by the granting of planning permission will be captured to provide:</p> <ul style="list-style-type: none"> • The highest quality townscape and landscape; • High standards of energy and water efficiency; • Early investment in infrastructure; and <p>A sustainable funding stream for the management and maintenance of the community facilities and public realm over the long-term.</p> <p><u>[New para.] Policies for the new garden settlement are supported by the infrastructure delivery schedule set out in Appendix 5. This is intended to give adequate certainty to guide a development of this scale, given that will be built out over several decades with some development beyond the plan period, while recognising that it is not possible to fix every element of the scheme before the development commences. Some elements of infrastructure provision will be affected by new technologies, for example, or wider changes in society such as the ability to work from home, that cannot be predicted with certainty looking several decades ahead.</u></p> <p><u>[New para.] The National Planning Policy Framework recognises this issue. Paragraph 72 states that the supply of large numbers of new homes can often be best achieved through planning for larger scale development such as new</u></p>	<p>Infrastructure, Delivery, Phasing and Management below.</p>

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		<p><u>settlements or significant extensions to existing towns and villages. However, the NPPF add that the delivery of large-scale developments may need to extend beyond an individual plan period, and the associated infrastructure requirements may not be capable of being identified fully at the outset (footnote 35). Anticipated rates of development and infrastructure requirements should, therefore, be kept under review and amended as policies are updated.</u></p> <p><u>[New para.] There will therefore need to be some flexibility regarding phasing and this will be kept under through detailed monitoring. A three-tiered approach to approval and delivery has been agreed to allow for this, building on the national best practice for large scale developments. Each phase of development will be supported by a sequence of submissions to the local planning authority to provide a progressive layering of increasingly detailed information from the over-arching and site-wide strategy (Tier 1), through substantive key phases (Tier 2) to detailed reserved matters application for sub-phases within a specific phase and on individual development sites (Tier 3). The precise extent, components and location of each key phase must be agreed with the local planning authority as delivery of the scheme progresses. Reserved matters applications can only be submitted for approval for any part of the site where the relevant key phase has been defined and all of the key phase framework documents have been approved. Limited exceptions may be allowed where necessary to provide critical or enabling infrastructure.</u></p> <p><u>Waste-water infrastructure</u></p> <p><u>[New para.] Southern Water has indicated that there is some, but limited, capacity within the existing system, which could accommodate the very early phase of development. However there is a need to develop a more holistic solution for the phasing and development of wastewater infrastructure.</u></p>	

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		<p><u>[New para.] In this regard there are currently three potential options for the provision of waste water infrastructure to support the needs of the development. The off-site option (upgrading Sellindge WWTW, option 1) and on-site option (on-site WWTW, option 2) are both viable options and these should be developed further to establish a preferred solution. Southern Water has confirmed that a second off-site option, to connect via Range Road Pumping Station, Hythe to the West Hythe Wastewater Treatment Works located approximately 7km to the south-east of the garden settlement, is not viable and should not be taken further. To ensure that there will be no negative impacts upon the surrounding communities, water quality or flood risk as a result of the development, including upon the neighbouring authority of Ashford Borough, the provision of wastewater infrastructure will be controlled through appropriate trigger point(s) relating to the occupation of development, to reflect the required timing of the wastewater infrastructure, and secured through the Section 106 agreement. Proposals for wastewater treatment should meet the requirements of Policy CSD5 regarding nutrient neutrality.</u></p> <p><u>'Monitor and manage' approach to highways infrastructure – Strategic Road Network</u></p> <p><u>[New para.] A traffic monitoring and management strategy is to be prepared by the applicant(s) for development within the site allocation for the new garden settlement for submission to (and consideration by) the local planning authority in consultation with Highways England, taking account of wider transport changes that may come forward throughout the plan period and reflecting traffic levels at the point of delivery.</u></p> <p><u>[New para] The purpose of the strategy is to:</u></p>	

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		<ul style="list-style-type: none"> • <u>Enable the benefits of the anticipated modal shift to determine the requirement for, and most appropriate form of, highway mitigation; and</u> • <u>Ensure that there is an appropriate safeguard in place to monitor whether the distribution and volume of traffic generated by occupied development is as predicted by modelling work carried out to inform the position agreed by Highways England and the district council in the signed Statement of Common Ground dated June 2021 (or updates to this statement).</u> <p><u>In this manner, any mitigation scheme is subject to a 'monitor and manage' approach to implementation.</u></p> <p>[New para.] <u>Traffic volumes are to be monitored throughout the plan period to inform when, or if, the mitigation to be implemented in relation to the Strategic Road Network, and specifically M20 Junction 11, M20 Junction 12 to 13 proposals and the Alkham Valley interchange (A20/A260) is required.</u></p> <p>[New para.] <u>The schemes of mitigation agreed with Highway England to appropriately mitigate planned growth to 2037 represents a 'worst-case' scenario, and it is entirely possible that, under the monitor and manage framework, the mitigation that is required will be the subject of refinement and revision. In addition, the timing as to when a specific scheme of highway mitigation is required relative to housing completions at the new garden settlement could be subject to change. The mitigation solutions will be kept under review, through the monitor and manage approach, on the basis that the transport modelling that supports the Core Strategy Review has demonstrated that the majority</u></p>	

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		<p><u>of interventions to the Strategic Road Network will not be required until towards the end of the plan period, or beyond.</u></p> <p>[New para.] <u>The approach is appropriately robust to provide certainty about what transport infrastructure is needed, and by when, to ensure that development does not proceed until the impacts are understood and accounted for.</u></p> <p><u>'Monitor and manage' approach to highways infrastructure – Local Road Network</u></p> <p>[New para.] <u>The traffic monitoring and management strategy will also consider the local road network, as a means of controlling off-site traffic movements such that they do not bring about unacceptable impacts on nearby communities. A key requirement of the monitoring strategy, therefore, is that it will need to include actions for intervention should the monitoring show that traffic levels from the new garden settlement exceed what was predicted from the transport modelling and shown in the Transport Assessment.</u></p> <p>[New para.] <u>If the need for intervention is triggered, it will be contingent on the associated developer(s) to implement traffic calming and other sustainable transport measures as a means to encourage modal shift and act as a deterrent to seek to reduce traffic to the distribution shown within the modelling.</u></p> <p>[New para.] <u>The legal agreement will need to secure a sustainable transport funding agreement with the applicant for sustainable transport and off-site traffic calming measures, subject to the appropriate legislative tests relating to planning obligations, which can be drawn down in the event that such measures are required to be implemented. The</u></p>	

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
		<p><u>applicant will need to provide costed examples of the type of traffic calming or other sustainable transport measures that could be implemented as part of a monitoring strategy from which the secured capital sum is to be calculated. Where impacts relate to the road network outside Folkestone & Hythe district, consultation shall take place with the relevant local authority on the proposals.</u></p> <p>[New para.] Policy SS9 requires that highways mitigation measures are provided through planning obligations. Section 278 is part of the Highways Act 1980 that enables a highway authority to enter into an agreement with a third party to deliver improvements on the existing public highway. Works on the local highway network will require an agreement between the developer and Kent County Council. Improvements to the strategic road network require approval from Highways England, acting on behalf of the Secretary of State for Transport. Section 278 is a mechanism that allows highways improvements required as a result of a development to be implemented directly by either the developer or the highway authority, or through a developer contribution for future works on the wider highway network.</p>	
	<p>Policy SS9: New Garden Settlement – Infrastructure, Delivery and Management</p>	<p>Policy SS9 New Garden Settlement – Infrastructure, Delivery, <u>Phasing</u> and Management</p> <p>(1) Delivery of infrastructure <u>and phasing</u></p>	<p>It is also expected that this main modification would further contribute towards the significant positive effect identified against SA objective 13 (Sustainable Transport and Congestion) because the policy and supporting text to the policy have been amended to explicitly reference the requirement for a Traffic Monitoring and Management Strategy and for proposals to demonstrate that</p>

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
		<p>a. The settlement should be self-sufficient regarding education, health, community, transport and other infrastructure, where necessary allowing for the expansion and improvement of nearby facilities such as secondary education and waste;</p> <p>b. Critical <u>and necessary</u> infrastructure, such as <u>including</u> primary education, <u>highways mitigation and wastewater infrastructure</u> should be provided in the first phase of development to support investment and community development <u>in accordance with the indicative infrastructure delivery schedule at Appendix 5 and a delivery strategy which sets out broadly how the development is to be phased and delivered, unless it can be demonstrated that:</u></p> <p style="padding-left: 40px;">i) <u>Relevant infrastructure capacity is readily available to service the quantum of development proposed;</u></p> <p style="padding-left: 40px;">ii) <u>The relevant infrastructure will be provided in advance of the proposed development; or</u></p> <p style="padding-left: 40px;">iii) <u>Alternative provision can be secured and agreed with the relevant provider and the local planning authority to meet the relevant requirement.</u></p> <p><u>Proposals will be required to accord with the three-tier approval structure. Proposals which would deliver unsustainable, disconnected and isolated development will be refused.</u></p> <p>c. <u>A traffic monitoring and management strategy shall be submitted for approval by the local planning authority in consultation with the local highway authority, Highways England and other relevant authorities in</u></p>	<p>necessary highways capacity is available at each stage of development. Traffic volumes are to be monitored throughout the Plan period to establish whether mitigation is required, with development proposals required to contribute towards highway mitigation works and improvements. These measures will help reduce traffic congestion, in line with SA objective 13. The policy now makes reference to the indicative infrastructure delivery schedule at Appendix 5 and will therefore help ensure the successful delivery of infrastructure at each stage of development.</p> <p>This change contribute towards minimising the potential for negative effects identified against SA objective 8 (Water Quality) (as part of a mixed effect) because reference is now made in the policy to the provision of wastewater infrastructure. The supporting text to Policy SS9: New Garden Settlement – Infrastructure, Delivery and Management (see previous row) also explores three potential options for the provision of waste water infrastructure to support the needs of development.</p> <p>The supporting text also states that water quality or flood risk as a result of development, in addition to the provision of wastewater infrastructure, will be controlled through appropriate trigger</p>

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
		<p><u>relation to traffic movement and impact on the surrounding road network;</u></p> <p><u>d. Proposals will be required to demonstrate that necessary highways capacity is available for each quantum of development, taking into account cumulative development of the garden settlement, set within the monitor and manage framework relating to both the Strategic Road Network and Local Highways Network.</u></p> <p><u>e. Traffic volumes shall be monitored through the plan period to inform when, or if, mitigation shall be required and implemented in relation to the Strategic Road Network, and specifically M20 Junction 11, M20 Junction 12 to Junction 13 and the Alkham Valley Interchange (A20/A260) Mitigation will be delivered in accordance with schemes approved by Highways England and the relevant local highway authority, and the mitigation frameworks for the Strategic and Local Highway Networks set out in Appendix 5, as appropriate in order to achieve net zero harm in terms of highway capacity and highway safety;</u></p> <p><u>f. Development proposals will be required to be supported by planning obligations that provide for the payment of proportionate contributions towards the carrying out and/or implementation of strategic and other necessary highway mitigation works and improvements, or by direct delivery of the works and improvements, where monitoring identifies the need for such works at any stage during the lifetime of the development and which cannot otherwise be managed. Where necessary and appropriate, the occupation of the development shall be regulated by reference to the completion of any such works;</u></p>	<p>point(s) relating to the occupation of development. This is expected to help avoid adverse effects upon surrounding communities but will not alter any of the existing effects identified in the SA.</p> <p>Although there are other modifications to Policy SS9, they are not considered to have a notable effect on the likelihood or significance of the effects identified for Policy SS9 in the SA.</p>

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
		<p>g. <u>Where highway improvements are required to other junctions or links outside the Folkestone & Hythe District, consultation shall take place with the relevant local authority prior to the proposals being agreed;</u></p> <p>h. <u>A degree of overlap between one phase and another one may be acceptable, providing it can be demonstrated that this</u> The provision of infrastructure should be phased in a way that does not disadvantage early residents or neighbouring communities through placing pressure on existing infrastructure in the local area. The creation of a post of community development worker should be explored, to serve the early phases until the town is established, secured through the Section 106 agreement;</p> <p>e.i. The nearby communities of Lympne, Barrow Hill, Sellindge, Westenhanger, Saltwood, Stanford and Postling should have appropriate access to and benefit from the infrastructure provided. If it is appropriate for infrastructure to be shared with existing communities then this shall be decided through local consultation as part of the masterplanning process; and</p> <p>d.i. Infrastructure provision will be secured and/or funded through Section 106 and Section 278 legal agreements, <u>or secured by conditions,</u> to ensure it is delivered at the appropriate phase of the development.</p> <p>(2) A smart town</p> <p>...</p> <p>d. Ducting for the fibre-optic and other cabling, energy and other service infrastructure shall be provided in multi-service corridors outside the public highway <u>(where this is defined to be trafficked surface, i.e. not inclusive</u></p>	

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		<p>of pavement) that are easily accessible to statutory undertakers to avoid unnecessary highway works and surface repairs.</p> <p>e. ...</p>	
MM10	<p>Policy SS10: Spatial Strategy for Folkestone Seafont</p>	<p>Policy SS10</p> <p>Spatial Strategy for Folkestone Seafont</p> <p>Folkestone Seafont is allocated for mixed-use development, providing up to 1,000 homes, in the region of 10,000 sqm of floorspace comprising small shops and retail services (A use classes), offices (within class E B1) and other community and leisure (C1, D1, D2 and sui generis) uses: together with beach sports and sea sports facilities and with associated and improved on-site and off-site community and physical infrastructure.</p> <p>Planning permission will only be granted where:</p> <p>...</p> <p>h. Development delivers 22% 30% affordable housing dwellings for central Folkestone, subject to viability (or if total residential quantum is less than 1,000 units, a 30 per cent contribution).</p> <p>i. Residential buildings achieve a minimum water efficiency of 110 90 litres per/person/day. All development must be designed and constructed to achieve high standards of environmental performance, and buildings should be designed to allow convenient waste recycling.</p> <p>...</p>	<p>The modification weakens the water efficiency standard from a new dwelling maximum of 90 litres per person per day to 110 litres per person per day. Although this reduces the positive contribution of the Policy to SA objective 11 (Water Efficiency), the effect of achieving a 110 litre standard is still considered to generate significant positive effect, given it delivers efficiencies over and above the Building Regulations Standards in a water stressed area.</p> <p>It is also expected that the proposed modifications to Policy SS10 would make a lower contribution towards the significant positive effect identified against SA objective 1 (Housing) because the minimum affordable housing figure has been replaced by a percentage that would result in a lower number of affordable homes being delivered. The significant positive effect has not been downgraded to a minor positive effect because a significant number of affordable homes would still be delivered.</p>

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
			Although there are other modifications to Policy SS10, they are not considered to have a notable effect on the likelihood or significance of the effects identified for Policy SS10 in the SA.
MM11	Green box before paragraph 4.207	<p>Shorncliffe Garrison, Folkestone</p> <div style="border: 1px solid black; padding: 5px;"> <p>A hybrid permission, including full planning permission for phases 1A and 1B at Shorncliffe Garrison, Folkestone (14/0300/SH) was granted in 17 December 2015, totalling 1,200 homes. Development started on site in 2016 and 233 homes had been completed by the start of the Core Strategy Review plan period in 2019/20. is progressing on site, with subsequent Reserved Matters approval in place for phases 1D and 2B of the development. Construction is continuing on site and, with further reserved matters applications being approved, around three quarters of the strategic site is now complete, under construction or has detailed planning permission awaiting start on site. A further 967 homes are expected to be completed by the end of the plan period in 2036/37, completing the development of the strategic site. Policy SS11: Spatial Strategy for Shorncliffe Garrison, Folkestone is retained from the 2013 Core Strategy to guide the remaining phases of development.</p> </div>	As modified text supporting policy, the changes referenced here are covered through the appraisal of main modifications to Policy Policy SS11: Spatial Strategy for Shorncliffe Garrison, Folkestone.
	Policy SS11: Spatial Strategy for Shorncliffe	<p>Policy SS11</p> <p>Spatial Strategy for Shorncliffe Garrison, Folkestone</p> <p>The Shorncliffe Garrison complex is allocated for a predominantly residential development of around 1,000 dwellings to 2026 (up to 1,200 dwellings by 2031) and an improved military establishment, together with a hub of new community facilities, associated</p>	The modification weakens the water efficiency standard from a new dwelling maximum of 90 litres per person per day to 110 litres per person per day. Although this reduces the positive contribution of the Policy to SA objective 11 (Water

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
	Garrison, Folkestone	<p>enhancements to sports and green infrastructure, and on-site and off-site travel infrastructure upgrades.</p> <p>Planning permission will also only be granted where:</p> <p>...</p> <ul style="list-style-type: none"> i. Development delivers 360 22% affordable housing dwellings for the Urban Area subject to viability (or if the total residential quantum is less than 1,200 units, 30 per cent). j. Residential buildings achieve a minimum water efficiency of 110 90 litres/person/day. All development must be designed and constructed to achieve high standards of environmental performance, and buildings should be designed to allow convenient waste recycling. <p>...</p>	<p>Efficiency), the effect of achieving a 110 litre standard is still considered to generate significant positive effect, given it delivers efficiencies over and above the Building Regulations Standards in a water stressed area.</p> <p>It is also expected that this modification would make a lower contribution towards the significant positive effect identified against SA objective 1 (Housing) because the minimum affordable housing figure has been replaced by a percentage that would result in a lower number of affordable homes being delivered. The significant positive effect has not been downgraded to a minor positive effect because a significant number of affordable homes would still be delivered.</p> <p>Although there are other modifications to Policy SS11, they are not considered to have a notable effect on the likelihood or significance of the effects identified for Policy SS11 in the SA.</p>
MM12	Policy CSD1: Balanced Neighbourhoods	<p>Policy CSD1</p> <p>Balanced Neighbourhoods</p> <p>Development resulting in new housing (class C3) will be allowed in line with policy SS3 (optimising distinctiveness, appeal, sustainability, and accessibility of places) where it</p>	<p>It is expected that this modification would make a lower contribution towards the significant positive effect identified against SA objective 1 (Housing) because where it can be demonstrated by an applicant that it is not viable to meet the full affordable housing requirement, the Council will give consideration to allowing an appropriate</p>

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
		<p>contributes to the creation of balanced neighbourhoods through high-quality design proposals which address identified affordable housing needs.</p> <p>All housing development should include a broad range of tenures incorporating market housing for sale and affordable housing (affordable housing for rent, starter homes, discounted market sales housing and other affordable routes to home ownership <u>including rent to buy and shared ownership</u>), where practicable and subject to viability as follows:</p> <ul style="list-style-type: none"> • Development proposing (or land capable of accommodating) 6 to 10 dwellings (net gain) within the Kent Downs Area of Outstanding Natural Beauty should provide financial contributions towards the provision of affordable housing equivalent to one affordable dwelling on-site; • Development proposing (or land capable of accommodating) 11 to 14 dwellings (net gain) at any location within the district should provide a minimum of two affordable dwellings on-site; and • Development proposing (or land of 0.5ha or more in size) 15 or more dwellings (net gain) at any location within the district should provide a minimum of 22 per cent affordable dwellings on-site. <p>For development proposing of 15 or more dwellings, as a starting point approximately 30 per cent of the affordable housing provision shall be shared equity and 70 per cent <u>of the affordable housing to be provided shall be affordable housing for rent/social rent</u>. For sites under this threshold, the proportion of affordable housing tenures will be negotiated on a site-by-site basis.</p> <p>Provision should be made on-site unless off-site provision through a financial contribution of broadly equivalent value can be robustly justified. <u>Where a site-specific viability assessment is provided with an individual planning application and it can be</u></p>	<p>level of relaxation of the requirements. The significant positive effect has not been downgraded because a significant number of affordable homes are still likely to be delivered and the amendment will help preserve the viability of allocations, most likely contributing to the delivering of more homes over the Plan period.</p> <p>Although there are other modifications to Policy CSD1, they are not considered to have a notable effect on the likelihood or significance of the effects identified for Policy CSD1 in the SA.</p>

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		<p><u>demonstrated to the reasonable satisfaction of the Council that the proposed development would not be viable with the full affordable housing requirement, the Council will give consideration to allowing an appropriate level of relaxation of the requirements.</u></p> <p>Affordable housing developments will be allowed at sustainable rural settlements as an exception to policies of rural development restraint where it <u>can be</u> has been demonstrated that there is a requirement in terms of local need and <u>the proposed site is suitable for this purpose.</u> a suitable site.</p> <p>Provision of affordable housing within individual sites and settlements should <u>so far as possible be dispersed</u> not be concentrated in one location, and must be designed to integrate in <u>terms of</u> function and appearance with <u>the market housing.</u> private housing and existing properties.</p>	
	<p>Supporting text: Paragraph 5.8</p>	<p>5.8 Full account will be taken of viability in achieving these targets where a site specific viability assessment is provided with individual planning applications.</p>	<p>As modified text supporting policy, the changes referenced here are covered through the appraisal of main modifications to Policy CSD1: Balanced Neighbourhoods.</p>
<p>MM13</p>	<p>Policy CSD2: District Residential Needs</p>	<p>Policy CSD2 District Residential Needs</p> <p>Residential development and new accommodation should be designed and located in line with the spatial strategy's approach to managing demographic and labour market changes and meeting the specific requirement of vulnerable or excluded groups.</p> <p>Within developments of 15 or more dwellings (net gain), where viable and practical:</p> <ul style="list-style-type: none"> A range of housing tenures should be provided including owner-occupied and private rented and affordable housing in accordance with CSD1. The council's Strategic 	<p>It is not considered that these changes will alter the findings of the SA because they represent minor wording changes to aid understanding and future-proofing of Policy CSD2: District Residential Needs.</p>

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?												
		<p>Housing Market Assessment (SHMA) will be used as a starting point for determining the mix of tenures; and</p> <ul style="list-style-type: none"> A range of size of new dwellings should be provided. As a starting point, this range should reflect the mix identified in the SHMA as follows: <table border="1" data-bbox="486 547 1541 914"> <thead> <tr> <th>Tenure</th> <th>One bed (per cent)</th> <th>Two to three bed (per cent)</th> <th>Four bed + (per cent)</th> </tr> </thead> <tbody> <tr> <td>Owner-occupied / private rent</td> <td>5 – 20</td> <td>65 - 70</td> <td>15 - 30</td> </tr> <tr> <td>Affordable tenures (shared ownership / affordable rent / social rent as defined in the National Planning Policy Framework)</td> <td>20 – 25</td> <td>50 – 60</td> <td>20 - 25</td> </tr> </tbody> </table> <p>Specialist units for older people (Class C3(b)) will be delivered primarily through strategic allocations as part of a new garden settlement in the North Downs Area (Policies SS6-SS9) and expansion at Sellindge (Policy CSD9).</p> <p>Elsewhere, residential accommodation providing an element of care for, or supervision of, elderly or other individuals in need of supervised care will be permitted in line with the above and where:</p> <ol style="list-style-type: none"> It does not lead to an over-concentration of socially vulnerable people in a any neighbourhood, and 	Tenure	One bed (per cent)	Two to three bed (per cent)	Four bed + (per cent)	Owner-occupied / private rent	5 – 20	65 - 70	15 - 30	Affordable tenures (shared ownership / affordable rent / social rent as defined in the National Planning Policy Framework)	20 – 25	50 – 60	20 - 25	
Tenure	One bed (per cent)	Two to three bed (per cent)	Four bed + (per cent)												
Owner-occupied / private rent	5 – 20	65 - 70	15 - 30												
Affordable tenures (shared ownership / affordable rent / social rent as defined in the National Planning Policy Framework)	20 – 25	50 – 60	20 - 25												

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		<p>b. It makes a suitable contribution as necessary to the community and sustainable transport infrastructure needs associated with residents, and</p> <p>c. It is shown to be designed to provide facilitate the provision of a high quality of care.</p> <p>The accommodation needs of specific groups will be addressed on suitable sites based on evidence of local need, including appropriate provision for Gypsies, Travellers and Travelling Showpeople.</p>	
MM14	Policy CSD3: Rural and Tourism Development	<p>Policy CSD3</p> <p>Rural and Tourism Development</p> <p>Proposals for new development in locations outside the settlements identified in the settlement hierarchy may only be allowed if a rural or coastal location is essential, and or to protect or enhance meet green infrastructure assets in line with Policy CSD4 requirements. Development in these locations will only be acceptable in principle if forming a site for:</p> <p>a. a Affordable housing (rural exceptions in accordance with CSD1, or allocated sites);</p> <p>b. <u>Accommodation to provide for an essential need for a rural worker (including a person who is in majority control of a farm business) to live permanently at or near their place of work in the countryside;</u></p> <p>b.c. a Agriculture, forestry or equine development;</p> <p>c.d. s Sustainable rural diversification, and tourism enterprises as set out below;</p> <p>d.e. t Local public or essential services and community facilities in line with policies SS3/4;</p>	<p>Yes. A minor positive effect is now expected against SA objective 7 (Efficient Use of Land) because the policy supports the re-use of redundant or disused buildings.</p> <p>It is expected that this modification would further contribute towards the minor positive effects identified against SA objectives 4 (Historic Environment) and 6 (Green Infrastructure) because the policy supports development that makes optimal viable use of a heritage asset or enables development to secure the future of a heritage asset, in addition to supporting the protection and enhancement of green infrastructure assets. However, there would be no change in the significance of these effects.</p> <p>Although the modification removes reference to rural diversification and strengthens the wording relating to the preventative loss of community facilities,</p>

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
		<p>e.f. RReplacement buildings (on a like-for-like basis) <u>and the subdivision of existing residential dwellings;</u></p> <p><u>g. The re-use of a redundant or disused building and the enhancement of its immediate setting;</u></p> <p>f.h. <u>Building</u> conversions of buildings that contribute to the character of their location;</p> <p>g.i. sSustainable rural transport improvements;</p> <p>h.j. eEssential flood defences or strategic coastal recreation; ; <u>or</u></p> <p><u>k. Development that makes optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of a heritage asset.</u></p> <p>To underpin <u>maintain</u> the sustainable development <u>sustainability of rural communities</u> of the countryside, the loss of <u>community</u> facilities <u>(including local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship)</u> in the centre of any village will be resisted unless appropriately demonstrated to be unviable <u>in line with Places and Policies Plan C2.</u> and rural economic diversification will be supported, especially through the re-use or refurbishment of redundant rural buildings.</p> <p>Tourist, recreation and rural economic uses will be appropriately protected and new development allowed within defined settlements in the settlement hierarchy. Where sites are unavailable within settlements – and development is proportionate in scale/impact and also accessible by a choice of means of transport – it may also be acceptable on the</p>	<p>this change is not anticipated to affect the findings recorded in the SA. This is because the policy still outlines a number of ways in which to diversify development in rural locations.</p> <p>Although there are other modifications to Policy CSD3, they are not considered to have a notable effect on the likelihood or significance of the effects identified for Policy CSD3 in the SA.</p>

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		<p>edge of Strategic Towns and Service Centres, and failing that, Rural Centres and Primary Villages.</p> <p>Rural economic development must be consistent with the green infrastructure (GI) and coastal and water environmental principles set out in Policies CSD4 and CSD5.</p>	
	<p>Supporting text: Paragraphs 5.32 and 5.33</p>	<p>5.32 As a rural district with places of particular interest to visitors specifically because of their unique environments (for example, Dungeness), rural and coastal development must be appropriately managed. Planning for rural areas should therefore sympathetically utilise and enrich the beauty and character of the countryside. Therefore this policy should be read in parallel with national policy and environmental and coastal policy, particularly with green infrastructure provisions (CSD4) and Habitats Regulations Assessment findings on recreational uses and impact. Given the characteristics of the district, the scope of this policy is wide.</p> <p>[New paragraph break]</p> <p>5.33 In the countryside, rural services and infrastructure for residents and visitors alike may be found in a range of locations and serve far afield. It is an important principle that the stock of rural economic or social uses should be managed for the benefit of the countryside as a whole. National policy requires that services and facilities found within settlements should be retained and protected. <u>In applying Policy CSD3 the council will have regard to the National Planning Policy Framework which states that planning policies should enable “the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.”</u></p>	<p>As modified text supporting policy, the changes referenced here are covered through the appraisal of main modifications to Policy CSD3: Rural and Tourism Development.</p>
<p>MM15</p>	<p>Supporting text: Green Infrastructure of Natural Networks,</p>	<p>Green Infrastructure of Natural Networks, Open Spaces and Recreation</p> <ul style="list-style-type: none"> • Primary aims: B1, B3, B4, B6, B7 C4, D4, D5, D8 (see section 3.1). • Main local evidence base studies: Sustainability Appraisal, Habitats Regulations Assessment (sites other than Dungeness complex), Habitats Regulations Assessment (Dungeness SAC, Dungeness to Pett Level SPA), Green 	<p>As modified text supporting policy, the changes referenced here are covered through the appraisal of main modifications to Policy CSD4: Green Infrastructure of</p>

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
	<p>Open Spaces and Recreation</p> <p>Primary Aims 'green box'</p>	<p>Infrastructure Report, Open Space Strategy (2017), Play Area Review (2017)., <u>Dungeness Complex Sustainable Access and Recreation Management Strategy (SARMS) (2017).</u></p>	<p>Natural Networks, Open Spaces and Recreation.</p>
	<p>Supporting text: Paragraph 5.42</p>	<p>5.42 As a funder of the Romney Marsh Countryside Partnership, the council has long supported work to sustainably manage tourism and recreation at Dungeness and will continue to do so. By working with stakeholders including Natural England, the Royal Society for the Protection of Birds (RSPB), the Environment Agency, landowners and neighbouring authorities, <u>including Rother District Council,</u> the council is developing <u>has developed</u> a sustainable <u>Access and Recreation Management Strategy (SARMS)</u> for the area. <u>This includes</u> which may include proposals to support sustainable visiting to monitor impacts on the Dungeness Natura 2000 series sites. Given the breadth of its membership and its cross-boundary scope, the Romney Marshes Living Landscape project, <u>the Dungeness National Nature Reserve partner group</u> or a similar grouping would appear to offer a good vehicle to achieve such a strategy.</p>	<p>As modified text supporting policy, the changes referenced here are covered through the appraisal of main modifications to PolicyCSD4: Green Infrastructure of Natural Networks, Open Spaces and Recreation.</p>
	<p>Policy CSD4: Green Infrastructure of Natural Networks, Open Spaces and Recreation</p>	<p>Policy CSD4</p> <p>Green Infrastructure of Natural Networks, Open Spaces and Recreation</p> <p>Improvements in green infrastructure (GI) assets in the district will be actively encouraged as will increase in the quantity of GI delivered by the council working with partners and developers in and around the sub-region, including through pursuing opportunities to secure net gain in biodiversity, and positive management of areas of high landscape quality or high coastal/recreational potential.</p> <p><u>1. The council will require development proposals over their lifetime:</u></p>	<p>Yes. A minor positive effect is now expected against SA objective 7 (Efficient Use of Land) because the policy requires development proposals to demonstrate that they will protect soils commensurate to their status and quality.</p> <p>It is expected that this modification would further contribute towards the significant positive effects identified against SA objectives 3 (Landscape), 5 (biodiversity and geodiversity) and 6 (Green infrastructure) because development proposals must conserve and enhance the natural environment, with planning</p>

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		<ul style="list-style-type: none"> i. <u>To provide net gains in biodiversity at least to comply with statutory and/or national policy requirements (assuming no residual loss);</u> ii. <u>To demonstrate that they protect and enhance valued landscapes, sites of biodiversity or geological value and soils, commensurate to their status and quality;</u> iii. <u>So far as possible, to deliver improvements in green infrastructure (GI) assets in the district and ensure positive management of areas of high landscape quality or high costal/recreational potential identified in the Green Infrastructure Report (2011) (or any updates to this report).</u> <p><u>2.</u> Green infrastructure will be protected and enhanced and the loss of GI uses will not be allowed, other than where demonstrated to be in full accordance with national policy, or a significant quantitative or qualitative net GI benefit is realised or it is clearly demonstrated that the aims of this strategy are furthered and outweigh its impact on GI. Moreover:</p> <ul style="list-style-type: none"> a. Development must avoid a net loss of biodiversity, achieve net gain over and above residual loss. b. <u>i.</u> The highest level of protection in accordance with statutory requirements will be given to protecting the integrity of sites of international nature conservation importance; c. <u>ii.</u> A high level of protection will be given to nationally designated sites (Sites of Special Scientific Interest and Ancient Woodland) where development will avoid any significant impact; 	<p>applications supported by ecological surveys, mitigation strategies and enhancement plans, in addition to delivering improvements in Green Infrastructure. Development proposals must also now demonstrate that they protect and enhance valued landscapes and sites of biodiversity or geological value, in addition to ensuring the positive management of areas of high landscape quality. The AONB will be given the highest status of protection in relation to landscape and scenic beauty and therefore development within the setting of the AONB must be sensitively located to avoid adverse impacts on the AONB.</p>

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		<p>d.iii. Appropriate and proportionate protection will be given to habitats that support higher-level designations and sub-national and locally designated wildlife/geological sites, to include Local Wildlife Sites (LWS), (including Kent Biodiversity Action Plan habitats, and other sites of nature conservation interest);</p> <p>e.iv. Planning decisions will have close regard to the need for conservation and enhancement of landscape and scenic beauty natural beauty in the Kent Downs Area of Outstanding Natural Beauty (AONB) and its setting, <u>which will be given the highest status of protection in relation to these issues.</u> take priority over other planning considerations. <u>Development within the setting of the AONB should be sensitively located and avoid or minimise adverse impacts on the AONB.</u> Elsewhere development must not jeopardise the protection and enhancement of the district's distinctive and diverse local landscapes (especially where these support the setting of the AONB), and must reflect the need for attractive and high-quality open spaces throughout the district; <u>and</u></p> <p><u>v. Planning applications will need to be supported by ecological surveys, mitigation strategies (when required) and enhancement plans, in order to follow and apply the mitigation hierarchy, as appropriate.</u></p> <p>3. The GI network shown in Figure 5.2 and identified in supporting evidence, and other strategic open space, will be managed with a focus on:</p> <ul style="list-style-type: none"> i. Adapting to and managing climate change effects; ii. Protecting and enhancing biodiversity and access to nature, particularly in green corridors and other GI strategic opportunities in Figure 5.2, with appropriate 	

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		<p>management of public access (including the Sustainable Access and Recreation Management Strategy for Dungeness and together with a strategic approach to the international sites as detailed above); and also avoiding development which results in significant fragmentation or isolation of natural habitats;</p> <p>iii. Identifying opportunities to expand the GI functions of greenspaces and their contribution to a positive sense of place (including enhancements to public open spaces and outdoor sports facilities); and</p> <p>iv. Tackling network and qualitative deficiencies in the most accessible, or ecologically or visually important GI elements, including improving the GI strategic fringe zones in Figure 5.2 through landscape improvements or developing corridors with the potential to better link greenspaces and settlements.</p>	
MM16	Supporting text: New paragraphs following paragraph 5.48	<p>5.48 It is particularly important for green infrastructure that development is consistent with coastal management plans. Proposals must not adversely affect dynamic coastal processes and should avoid unnecessarily exacerbating 'coastal squeeze' impacts as recognised in the Habitats Regulations Assessment and elsewhere.</p> <p><u>[New para.] In coastal areas local planning authorities are required by National Planning Policy Framework paragraph 166 to take account of the UK Marine Policy Statement and marine plans in planning for coastal areas. The district council has worked with the Marine Management Organisation (MMO) in developing this Core Strategy Review and will liaise with the MMO in assessing development proposals that could affect marine interests.</u></p> <p><u>[New para.] Developers putting forward proposals in the coastal area of the district should have regard to the Marine Policy Statement, the South Inshore and Offshore Marine Plan (Department for Environment, Food and Rural Affairs, July 2018) and the district's Places and Policies Local Plan, particularly policies NE8: Integrated Coastal Zone Management and NE9: Development Around the Coast.</u></p>	As modified text supporting policy, the changes referenced here are covered through the appraisal of main modifications to Policy CSD4: Green Infrastructure of Natural Networks, Open Spaces and Recreation.

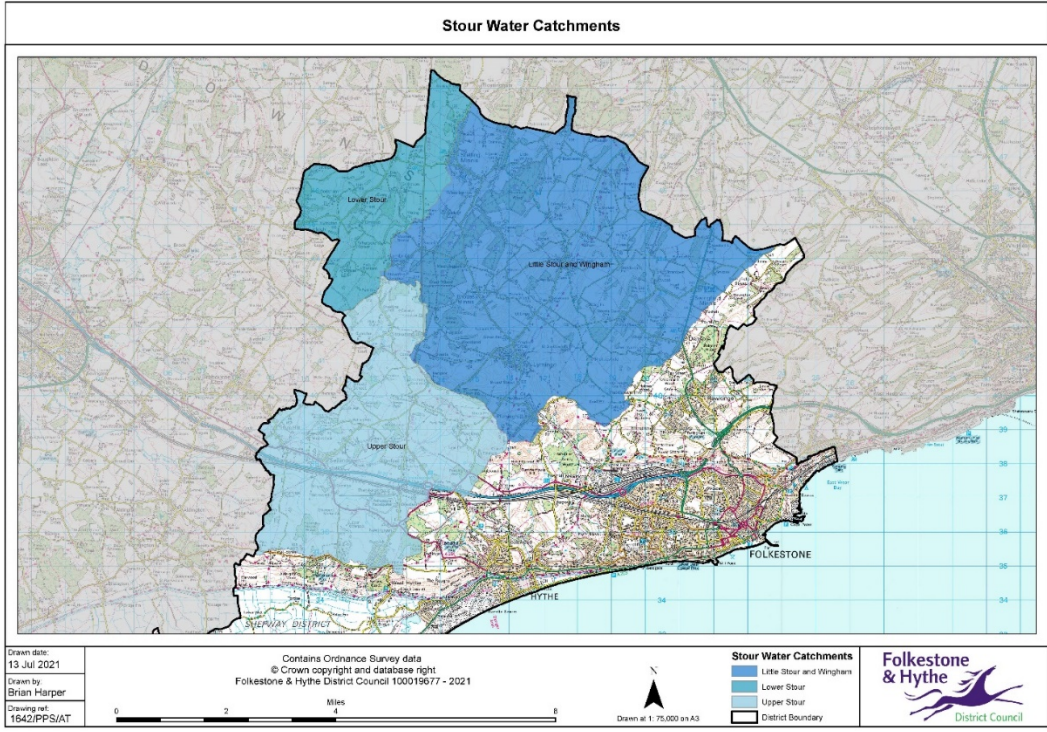
Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
	<p>Supporting text: Green box 'Appropriate Assessment Key Findings: Dungeness' before paragraph 5.51</p>	<p>Appropriate Assessment Key Findings: Dungeness</p> <p>...</p> <p>The Sustainable Access and Recreation Management Strategy for Dungeness (2017) will be used to identify resources, oversee the update of surveys of visitor usage and activity, and decide on appropriate management interventions (which may include increased stewardship, surveillance, education and further targeted controls on public access).</p>	<p>It is not considered that these changes will alter the findings of the SA because they represent minor wording changes to aid understanding and future-proofing of Policy CSD4: Green Infrastructure of Natural Networks, Open Spaces and Recreation.</p>
	<p>Supporting text: Paragraphs 5.65 and 5.66</p> <p>Water and Coastal Environmental Management</p>	<p>5.65 <u>All new homes already have to meet the mandatory national standard for water usage set out in Building Regulations of 125 litres per person per day. As set out in national planning practice guidance, where there is a clear local need, local planning authorities can set out local plan policies requiring new dwellings to meet tighter standards set out in Building Regulations of 110 litres per person per day.</u> Most of the district's recent residential planning permissions have required Code for Sustainable Homes standards, predominately at what was level 3. This level (and Code level 4) required design features to enable a maximum consumption of 105 litres per person per day. Since the adoption of the 2013 Core Strategy there have been significant changes to the planning and building regulations systems relating to energy efficiency and low carbon development. Following the Housing Standards Review, the Code for Sustainable Homes was withdrawn (effective from 26 March 2015). As a result of this, local planning authorities can no longer stipulate compliance with Code levels or require Code assessments in planning policy. In place of this, the government introduced a number of changes to building regulations standards, along with some new standards. These included for water (Part G), a new optional standard (110 litres per person per day) for water</p>	<p>As modified text supporting policy, the changes referenced here are covered through the appraisal of main modifications to Policy CSD5: Water and Coastal Environmental Management. Proposed changes to Policy CSD5 are appraised separately below.</p>

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		<p>stressed areas that has been added to the baseline standard of Part G (125 litres per person per day).</p> <p>5.66 Given the area's Water Scarcity Status, the council requires that all new homes development meets the new optional standard of water use of 110 litres per person per day. Proposals that achieve the water-related elements of good design standards and exceed the optional standard will be encouraged, and will be required for the new garden town to ensure it fully meets the principles at the heart of the garden settlement movement. For non-residential developments, the Building Research Establishment's Environmental Assessment Method (BREEAM) is the most commonly accepted assessment tool by which to judge and require increased sustainability standards. In relation to water, non-residential developments will be expected to reach a minimum of the BREEAM 'Outstanding Excellent' standard, with the aspiration to reach 'Outstanding' where meeting this standard would be feasible and viable.</p>	
	<p>Policy CSD5: Water and Coastal Environmental Management</p>	<p>Policy CSD5</p> <p>Water and Coastal Environmental Management</p> <p>...</p> <p>Development will be permitted where the following criteria are met:</p> <p>...</p> <p>b. For non-residential development, the development achieves BREEAM 'excellent outstanding' standard addressing maximum water efficiencies under the mandatory water credit, where technically feasible and viable; and</p> <p>c. New buildings and dwellings must be delivered in line with wastewater capacity, and designed so as to ensure that, in relation to greenfield development, peak rate of surface water runoff from the site is not increased above the existing greenfield surface water runoff rate, incorporating appropriate sustainable drainage systems (SuDS) where feasible and water management features, with full consideration given to integration of water management. The quality of water passed on to watercourses and the sea must</p>	<p>The modification weakens the water efficiency standard from a new dwelling maximum of 90 litres per person per day to 110 litres per person per day. Although this reduces the positive contribution of the Policy to SA objective 11 (Water Efficiency), the effect of achieving a 110 litre standard is still considered to generate significant positive effect, given it delivers efficiencies over and above the Building Regulations Standards in a water stressed area.</p> <p>It is expected that this modification would contribute towards minimising adverse effects against the minor positive effect recorded against SA objective 5 (Biodiversity) and contribute to the significant positive effects identified against</p>

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		<p>be maintained or improved, and flood risk must not be increased by developments within the district; and</p> <p><u>d. Development which could have an impact on water quality in the Stodmarsh European-designated sites through increased nutrient levels from wastewater discharges will be required to provide evidence of nutrient impacts through a nutrient budget approach. This will apply to development within the Stour Operational Catchment, or within the catchment areas of Wastewater Treatment Works discharging into the Stour Operational Catchment, as identified on the Policies Map. Planning permission will only be granted if:</u></p> <p><u>i. The applicant can demonstrate, subject to meeting the tests of the Habitat Regulations, that the development would not have a significant effect on the Stodmarsh European sites either alone or in combination with other plans and projects; and</u></p> <p><u>ii. The applicant can demonstrate that the development will provide all requisite mitigation measures to avoid any likely significant effect on the Stodmarsh European sites as may be necessary for the life of the development through a design and implementation plan to be submitted to and approved by the Council.</u></p>	<p>SA objective 8 (Water Quality) because development which could have an impact on water quality in the Stodmarsh European-designated sites through increased nutrient levels from wastewater discharges must submit evidence of nutrient impacts through a nutrient budget approach. Further to this, planning permission will only be granted if development does not have a significant effect on the Stodmarsh European sites and mitigation measures are provided so as to avoid any likely significant effect on the Stodmarsh European sites.</p> <p>The policy now seeks to achieve BREEAM 'excellent' instead of 'outstanding' but this is unlikely to affect the findings of the SA because the policy specifically focuses on the water aspect of BREEAM standards, rather than building efficiency.</p>
	<p>Supporting text: Paragraph 5.72</p>	<p>5.72 Most of district's water supply comes from groundwater sources. Water resources must be maintained, <u>and proposed developments must not have a negative impact to public water supplies or their associated Source Protection Zones</u> and ground source protection zones must be effective. Pollution prevention measures are required in areas of high groundwater (in consultation with the Environment Agency and Natural England). A key target of the Water Framework Directive is to aim for a 'good' status for all water bodies by 2015, where this is not possible the aim is to achieve 'good' status by 2021 or 2027. The</p>	<p>As modifications to text supporting policy, the changes referenced here are covered through the appraisal of main modifications to Policy CSD5: Water and Coastal Environmental Management.</p>

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
	<p>Supporting text: New paragraphs to follow paragraph 5.73</p>	<p>aim is also to achieve 'good' ecological potential and 'good' surface water chemical status for heavily modified water bodies and artificial water bodies.</p> <p>5.73 New developments should explore options other than a reliance on tank storage; for example the incorporation of open water storage and conveyance (including swales and wetlands) as a positive design feature of developments.</p> <p><u>Nutrient Neutrality</u></p> <p><u>[New para.] New development in the North Downs area of the district has the potential to increase nutrient flows into the River Stour, flowing into the Stodmarsh system of European designated sites (Social Area of Conservation, Special Protection Area and Ramsar site), north east of Canterbury. Damage to the water quality of these sites (eutrophication) has been caused by high nutrient levels, particularly phosphorus but also nitrogen. The likely extent of the affected catchments and the administrative boundary of the Folkestone and Hythe district is shown in Figure 5.4 and on the Policies Map.</u></p> <p><u>[New para.] The council will work with Natural England to assess the likely impacts of development proposals, in line with the Conservation of Habitats and Species Regulations 2017. In assessing proposals, the council will have regard to Natural England's 'Advice on Nutrient Neutrality for New Development in the Stour Catchment in Relation to Stodmarsh Designated Sites' (July 2020, or subsequent updates) and applicants should follow this advice in developing their proposals.</u></p> <p><u>[New para.] In operating Policy CSD5 d. the council will have regard to Natural England's advice note which stated (paragraphs 4.9-4.12):</u></p> <ul style="list-style-type: none"> <u>All types of development that would result in a net increase in population served by wastewater system, including new homes, student accommodation and residential institutions will have inevitable wastewater implications;</u> 	<p>As modified text supporting policy, the changes referenced here are covered through the appraisal of main modifications to Policy CSD5: Water and Coastal Environmental Management. Proposed changes to Policy CSD5 are appraised separately above.</p>

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		<ul style="list-style-type: none"> • <u>Tourism attraction and tourism accommodation attract people into the catchment and are likely to generate additional wastewater and consequential nutrient loading on the designated sites. This includes self-service and serviced tourist accommodation such as hotels, guest houses, bed and breakfast and self-catering holiday chalets and static caravan sites. Other developments that generate overnight stays, such conference facilities would need to be considered on their merits; and</u> • <u>Commercial development not involving overnight accommodation is not likely to have wastewater implications, as it is generally assumed that anyone working in, or making use of, the commercial development also lives in the catchment, and therefore wastewater generated by that person can be calculated using the population increase from new homes and other accommodation. This removes the potential for double-counting of wastewater arising from different planning uses.</u> <p><u>[New para.] Developers will need to demonstrate, either that their proposals will not have a significant effect on the Stodmarsh sites, or that mitigation measures can be delivered on-site, or secured off-site, to avoid any impact. Developers are encouraged to have early discussions with Natural England and the district council when preparing their proposals.</u></p>	
	<p>New Figure to show extent of Stour Operational Catchments</p> <p>Extend also to be shown on</p>	<p><u>Figure 5.4: Stour Operational Catchments</u></p>	<p>It is not considered that this new figure will alter the findings of the SA because its purpose is to aid understanding of policy by clearly showing the extent of Stour Operational Catchments.</p>

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	<p>Policies Map</p>		
	<p>Supporting text: New sub-heading before paragraph 5.74</p>	<p><u>Coastal management</u></p> <p>5.74 Coastal areas face issues of specific economic development pressures and opportunities, and risks from changing physical conditions. Beaches along the district's central and eastern coastline are important for leisure and fishing. Elsewhere, there are a number of prominent coastal areas in addition to Dungeness, for example the Dover-Folkestone Heritage Coast, requiring flexible management that balances conservation and public access.</p>	<p>It is not considered that this new sub-heading will alter the findings of the SA.</p>

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MM17	Policy CSD7: Hythe Strategy	<p>Policy CSD7 Hythe Strategy</p> <p>Hythe should develop as the high-quality residential, business, service, retail and tourist centre for the central district in line with the vision in paragraph 3.15. New development All new development, including that on the former Nickolls Quarry site (identified in Figure 5.5) should respect the historic character of the town and the established grain of the settlement in line with the place-shaping principles set out in policy SS3.</p> <p>....</p>	It is not considered that this change will alter the findings of the SA because it represents a minor wording clarification to aid understanding and future-proofing of Policy CSD7: Hythe Strategy.
	Paragraph 5.107	<p>5.107 Strategic development at Hythe is consistent with its demographic characteristics, housing need and good accessibility and range of services (policies SS3 and SS4). The primary area of change is to the west of the town, at the former Nickolls Quarry, where which has planning permission for a mixed-use development is underway including 1,050 dwellings, employment and a new halt on the light railway, at the former Nickolls Quarry. Construction is underway with 124 dwellings completed prior to the start of the Core Strategy Review plan period in 2019/20. The remaining 926 homes are anticipated to be completed by the end of the plan period. There is also the potential for significant green infrastructure facilities, including water-based recreation.</p>	As modified text supporting policy, the changes referenced here are covered through the appraisal of main modifications to Policy CSD7: Hythe Strategy.
MM18	Policy CSD8: New Romney Strategy	<p>Policy CSD8 New Romney Strategy</p> <p>...</p> <p>Development of the broad location should meet the following criteria:</p> <p>a. The development as a whole should provide around 300 dwellings (Class C3) and a range and size of residential accommodation, including 22% 30% affordable housing, subject to viability.</p>	This change would make a lower contribution towards the significant positive effect identified against SA objective 1 (Housing) because the minimum affordable housing figure has been replaced by a percentage that would result in a lower number of affordable homes being delivered. The significant positive effect has not been downgraded to a minor positive effect because a significant

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		...	number of affordable homes would still be delivered.
MM19	Supporting text: Paragraphs 5.156 and 5.157	<p>5.156 As of early 2017, there is no spare capacity for further development at either the doctor's surgery or school, and land with potential for the future expansion of the school is in separate ownership. The existing permission granted for 250 homes includes a requirement for land and funding to increase the primary school from 0.5 to 1 form of entry, however further capacity will be required to accommodate the additional growth proposed. Given this, any proposals will have to land and funding for the expansion of the primary school to ≥ 1.5 forms of entry (≥ 1.5 FE). Additionally, new or expanded health care will be required; however it may be that this can be delivered as part of a new facility within the nearby garden town.</p> <p>5.157 With regard to infrastructure, the Growth Options Study highlights that there will be impacts on the B2068 and A20 and these should be considered as part of the development proposal and policy formation process. <u>Any further improvements to the A20 or other roads should consider the findings of the Sellindge Rural Masterplan and applicants are encouraged to discuss their proposals with the Parish Council and highways authority at an early stage.</u> Furthermore, there are no cycleways in this area, especially to Westenhanger Station to the east of Sellindge, with opportunity for footpath upgrades to be delivered to allow safe access to rail services from the village. <u>Improvements to the Public Rights of Way (PROW) network adjacent to, or crossing, the broad locations will also be sought to improve connectivity. The key PROW are HE273, HE271A, HE274, HE310 and HE301.</u></p>	As modified text supporting policy, the changes referenced here are covered through the appraisal of main modifications to Policy CSD9: Sellindge Strategy.
	Supporting text: Paragraph 5.159	<p>5.159 There are a number of listed buildings within Sellindge such as Rhodes House and Little Rhodes and buildings of local interest such as Grove House and Potten Farm, the setting of which will need to be considered in any proposals. The retention of mature trees will also be sought where possible, to soften the built environment and to mitigate the impact on the wider views from the Kent Down AONB. <u>The broad location to the west may contain a protected crash site and an area of medieval archaeology, and evaluation and mitigation of archaeological remains will need to be undertaken in accordance with a specification and programme of work submitted and approved</u></p>	As modified text supporting policy, the changes referenced here are covered through the appraisal of main modifications to Policy CSD9: Sellindge Strategy.

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	<p>Policy CSD9: Sellindge Strategy</p>	<p>Policy CSD9</p> <p>Sellindge Strategy</p> <p>Land to the south and north east of Ashford Road in Sellindge forms a broad location for development to create an improved village centre with a mix of uses, a village green/common, pedestrian and cycle enhancements to Ashford Road and other community facilities together with new residential development of up to circa 600 dwellings.</p> <p><u>The first phase has planning permission for approximately 250 dwellings. The second phase for the remaining dwellings hereby allocated comprising Site A (land to the west of Phase 1) and Site B (land to the east of phase 1) as identified in Figure 5.7 is the subject of this policy. Planning permission will not be granted for any development pursuant of this policy unless and until the Council is satisfied that the requirements of Policy CSD5 d. are met.</u></p> <p>1. The first phase (land located in the centre of Sellindge) of any major residential led development in Sellindge parish should meet all of the following criteria;</p> <p>a. Proposals must be properly masterplanned (following extensive community engagement) and the full area included in a single outline application;</p> <p>b. Development must ensure the 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;</p>	<p>The modification weakens the water efficiency standard from a new dwelling maximum of 90 litres per person per day to 110 litres per person per day. Although this reduces the positive contribution of the Policy to SA objective 11 (Water Efficiency), the effect of achieving a 110 litre standard is still considered to generate significant positive effect, given it delivers efficiencies over and above the Building Regulations Standards in a water stressed area.</p> <p>The minor negative effect recorded against SA objective 4 (Historic Environment) has been changed to a mixed minor positive and minor negative effect because the amended policy requires the protection and conservation of the setting of non-designated heritage assets and where possible enhance important historic natural heritage assets, which will help protect and enhance the historic environment. Further to this, the supporting text to Policy CSD9: Sellindge Strategy (see previous row) requires an evaluation of archaeological remains to the west of the broad location so as to identify any necessary mitigation.</p>

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
		<p>c. Total residential development will not exceed approximately 250 dwellings (Class C3), with around 30% affordable housing subject to viability.</p> <p>d. Development should provide timely delivery of a village green/common south of the A20 that:</p> <ul style="list-style-type: none"> i. Is of at least 1.5-2ha in size, or greater; ii. Provides a range of facilities (including allotments) and type of landscaping identified through consultation with local residents and complementing the existing facilities located at the sports club; iii. Is of the highest quality and incorporates robust and durable lighting and furniture; and iv. Provides new habitats for priority nature conservation species; <p>e. Proposals must include satisfactory arrangements for the timely delivery of necessary local community facilities including:</p> <ul style="list-style-type: none"> i. A primary school extension to 1 form entry (IFE); ii. The expansion of the Doctor's surgery; and iii. Administrative accommodation for the Parish Council. <p>2. Proposals for the the second phase (Site A land to the west of phase 1 and Site B land east of phase 1) for any the residential-led development should be accompanied by a masterplan for Sites A and B which shows how the sites will be integrated with Phase 1 and the existing settlement. Development shall meet all the following criteria:</p>	<p>It is expected that the proposed modifications to this policy would further contribute towards the minor positive effects identified against SA objectives 3 (Landscape) and 5 (Biodiversity and Geodiversity) (as part of mixed effects) because the policy has been amended to explicitly reference the landscape-led approach that is being taken to the development of Sellindge, in addition to supporting the protection and enhancement of historic natural heritage assets, such as hedgerows.</p> <p>It is also expected that the proposed modifications to this policy would make a lower contribution towards the significant positive effects identified against SA objectives 1 (Housing) and 10 (Energy efficiency) because there is no longer a requirement for 10 per cent of the dwellings to be self-build and custom-built which would otherwise have enabled people to design their home in a way that suits their needs. The policy also now seeks to achieve BREEAM 'excellent' instead of 'outstanding'. These effects have not been downgraded in acknowledgement of the other positive contributions other elements of the policy make to both the provision of needed homes and energy efficiency and carbon reduction.</p>

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		<p>a. The residential development element shall not commence until the primary school extension (to 1 FE), doctors surgery and the Parish Council administrative accommodation to be provided by in phase 1 are under construction with a programmed completion date;</p> <p>b. Total residential development within phase 2 of approximately circa 350 dwellings (including Classes C2 and C3) with 22 per cent affordable housing subject to viability and a minimum of 10 per cent of dwellings designed to meet the needs of the ageing population;</p> <p>e. A minimum of 10 per cent of dwellings to be self-build or custom-build;</p> <p>d.c. Development shall be designed to minimise water usage, as required by the Water Cycle Study. Total water use per dwelling shall not exceed 90 110 litres per person per day of potable water (including external water);</p> <p>e. Energy efficiency standards are agreed with the local planning authority that meet or exceed prevailing best practice;</p> <p>f.d. Proposals must include provide: satisfactory arrangements for the timely delivery of necessary local community facilities including:</p> <p>i. Provision of Prior to the commencement of development, land and an appropriate level of funding to upgrade enable the upgrading of Sellindge Primary school to 2 1.5 forms of entry (2 1.5 FE);</p> <p>ii. Provision of new or upgraded sports grounds, open and play space or upgraded facilities in the village;</p>	<p>With regard to the supporting text to Policy CSD9: Sellindge Strategy (see previous two rows), improvements to the PROW network are sought, which will improve connectivity and support more sustainable and active travel choices. This will further contribute towards the significant positive effect against SA objective 13 (Sustainable Transport) (as part of a mixed effect).</p> <p>The first phase of development at Sellindge has been delivered and therefore the effects generated by this phase and recorded in the original SA of Policy CSD9 have also been delivered.</p> <p>There are other modifications to Policy CSD9, including clarity of key points and the deliver and phasing of development, which increase the certainty of the positive effects already acknowledged in the SA.</p>

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
		<p>iii-ii. Provision of <u>Prior to first occupation</u>, new nursery facilities of <u>sufficient size to meet the needs of the residents</u>;</p> <p>iv-iii. Provision of <u>Prior to the completion of the second phase</u>, a replacement village hall to a specification <u>that to meets the prospective local needs of future residents; and</u>;</p> <p>v. Provision of new allotment facilities; and</p> <p>vi-iv. <u>Prior to the commencement of development, a proportionate</u> Contributions towards the upgrading <u>and/or expansion</u> of <u>existing</u> local medical facilities <u>or otherwise towards a new healthcare facility</u> to meet the needs of the <u>residents</u> development;</p> <p>g-e. <u>The design and layout of the development shall be landscape-led and include within it structural</u> Appropriate landscaping, including <u>with</u> woodland planting, shall <u>to</u> be provided on the rural edge of the development, particularly around the western boundary of Site A, to retain the rural character, and on the eastern boundary of Site B, <u>to avoid or minimise adverse impacts due to the possible visual impact on the setting of the Kent Downs AONB and views into and out of the AONB.</u> All landscaping shall be planted at an early stage of the development and provide new habitats for priority nature conservation species. <u>Applications shall be accompanied by a landscape and visual impact assessment that should inform the landscaping scheme and address structural and local landscape matters;</u></p> <p>h. The eastern development area will provide improved pedestrian and cycle access along the northern boundary (Public Right of Way HE273);</p> <p>i-f. Approximately 1,000sqm of business (B1 Class) floorspace shall be provided achieving BREEAM 'outstanding <u>excellent</u>' rating;</p>	

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
		<p>j.g Site A land to the west of Sellindge in Phase 2 must be masterplanned and the full area included in a single outline application. The masterplan must include <u>Proposals should protect and conserve</u> consideration for the setting of non-designated built and natural heritage assets such as Grove House and Potten Farm, <u>protect and where possible enhance important historic natural heritage assets, such as hedgerows, in accordance with their particular significance</u>; and</p> <p>k.h. Any archaeological remains should be evaluated and potential impact mitigated in accordance with Places and policies Local Plan Policy HE2-;</p> <p>3. Both phases of the development shall:</p> <p style="padding-left: 40px;">a.i. Provide, <u>or contribute to, convenient and safe</u> wherever possible internal links within the sites itself and externally links to neighbouring sites to ensure there is ease of access by a range of transport modes to new and existing development <u>and facilities within the village and cycle and pedestrian access to Westenhanger Station</u>;</p> <p style="padding-left: 40px;">b.i Deliver pedestrian and cycle enhancements to the A20 through (as a minimum) informal traffic-calming features at key locations, and perceived narrowing of the carriageway outside Sellindge primary school and associated highways improvement. Phase 2 shall extend the highways improvement area to be delivered by phase 1 <u>extending the principles of the Rural Masterplan</u>;</p> <p style="padding-left: 40px;">c. Contribute to the provision of a safe, lit, surfaced cycle and pedestrian access to Westenhanger Station from Sellindge through the upgrade of existing bridleways and public rights of way (HE217A and HE2774);</p>	

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
		<p>d.k. Provide noise and air pollution mitigation measures such as distance buffers between the M20/High Speed 1 transport corridor and the built development, as well as landscaping within the buffers designed to integrate with other structural planting and habitat creation delivered through the comprehensive masterplan; and</p> <p>e.l. Contribute to improvements in the local wastewater infrastructure and other utilities as required to meet the needs of the development including;</p> <p>f.i. Ensure occupation of the development is phased to align with the delivery of sewage infrastructure, in liaison with the service provider, aligned with occupation of the development; and</p> <p>g.ii. Plan layout to ensure future access to existing sewage infrastructure for maintenance and upsizing purposes; and</p> <p>h. Provide a high standard of design, siting and layout of development to reflect the sites' proximity to the Kent Downs AONB</p>	
	<p>Supporting text: New paragraph following paragraph 5.163</p>	<p>5.163 An indicative strategy for Sellindge is set out below to show how residential development can meet needs for central facilities in a location near the junction with Swan Lane. Figure 5.7 is indicative only; proposals should be developed collectively by landowners with further community input to accord with the criteria of CSD9.</p> <p>[New para.] Policy CSD9 should be read in conjunction with the other policies in the development plan, in particular Places and Polices Local Plan Policy HB4: Self-build and Custom Housebuilding Development; Policy C3: Provision of Open Space, regarding allotments and sports facilities; Policy C4, regarding play space provision; and Policy CC1, regarding energy efficiency.</p>	<p>As modified text supporting policy, the changes referenced here are covered through the appraisal of main modifications to Policy CSD9: Sellindge Strategy.</p>

Ref No.	Section/ Policy/ Paragraph/ Table/ Diagram	Proposed main modification	Will the Proposed Main Modification alter the SA findings set out in the full SA Report (2019) and associated Addenda (2019 and 2020)?
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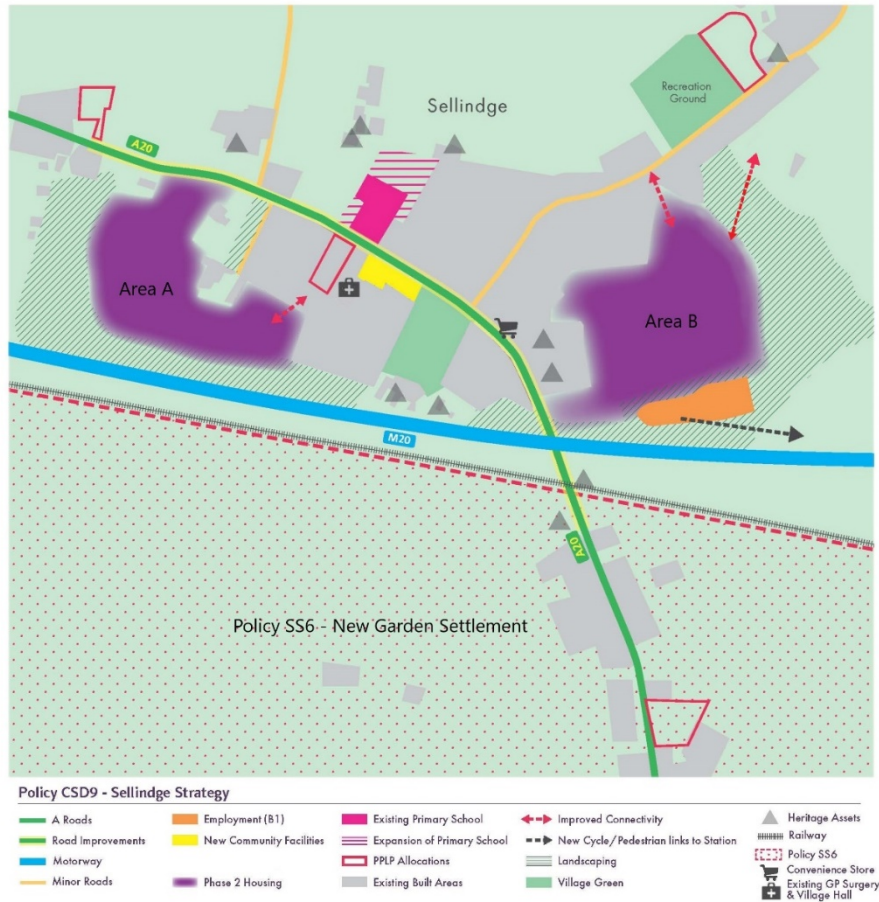


Figure 5.7: Sellindge Strategy

Cumulative effects of the proposed modifications to the Core Strategy Review

- 1.16 The effects recorded in the SA of the Core Strategy Review broadly identified significant positive effects against the majority of the SA objectives. The SA of the main modifications to the Core Strategy Review set out in **Table 1** broadly identifies **additional positive effects** that contribute to the significant positive effects previously identified. Although **some main modifications lessen the contribution of certain policies in delivering positive effects on certain SA objectives** (for example, the weakening of affordable housing, water efficiency and energy efficiency standards), the modified policies still deliver significant benefits over and above equivalent national standards. Therefore, these negative changes are not considered to result in changes to the significance of effects previously recorded, including the cumulative effects of the Core Strategy Review as a whole.

Habitats Regulations Assessment (HRA)

- 1.17 The HRA Report of the Proposed Submission Core Strategy Review (2019) concluded that, subject to implementation of safeguards, the Folkestone & Hythe Proposed Submission Core Strategy Review would not result in adverse effects on European sites, either alone or in-combination with other plans and projects.
- 1.18 The two HRA Addenda published in February and December 2020 concluded that the findings of the HRA report remained the same subject to the provisions listed in the HRA Report and Addenda.
- 1.19 The latest HRA Addendum has assessed whether the main modifications to the Core Strategy Review. It has concluded that the main modifications would not result in adverse effects on European sites, either alone or in-combination with other plans and projects.

Monitoring indicators

- 1.20 In light of the above, the proposed monitoring indicators for monitoring the effects of the Core Strategy Review in the SA Report which accompanied the Proposed Submission Core Strategy Review consultation remain unchanged.

Appendix 1

Consultation Representations on Core Strategy Review SA Report 2019

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Table A1.1: Regulation 19 consultation comments received in relation to the SA for the Proposed Submission Folkestone & Hythe Core Strategy Local Plan Review (2019)

Consultee	Consultation comments – summarised where appropriate	Response and any action taken to address consultation comment in the updated SA Report
<p>Natural England</p>	<p>1. Introduction</p> <p>Following our previous advice to the Reg 18 consultation, the CSR now contains strengthened policy wording for the garden settlement policies, in particular to mitigate impacts on views from the AONB. In light of this, Natural England concurs with the conclusions drawn in the SA.</p>	<p>Support noted.</p>
<p>Bilsington Parish Council</p>	<p>4. Baseline information</p> <p>The appraisal states "the review offers an opportunity to tailor policies that would address private vehicle use within the District, and encourage the use of more sustainable modes of transport in specific areas".</p> <p>Policy SS5 only calls for travel plans for trip generating uses it fails to address the fact that paragraph 4.123 quotes the aim of delivering 8,000 dwellings. This increase will generate additional traffic movements which need the infrastructure to support it.</p> <p>Policy SS5 needs to be strengthened to ensure that the transport infrastructure is in place before development commences. Otherwise there will be a significant increase in private car movement which is unlikely to decrease when alternative transport becomes available.</p>	<p>Noted.</p>

Consultee	Consultation comments – summarised where appropriate	Response and any action taken to address consultation comment in the updated SA Report
Aldington & Bonnington Parish Council	<p>1. Introduction, Paragraph 1.13</p> <p>Whilst the sustainability Appraisal has been undertaken in accordance with the National Planning Policy Framework there is no evidence included to suggest that there has been compliance with a Duty to Co-operate. Throughout the document, reference is made only (but multiple times) to even the smallest neighbouring villages and towns within the Folkestone and Hythe District, whilst, in contrast, there is not a single mention of the immediately neighbouring parish of Aldington, which, while located within the Parliamentary constituency of Folkestone & Hythe, for administrative purposes is located within the neighbouring Borough of Ashford. Similarly, the other two Ashford Borough parishes that border Folkestone & Hythe District are not mentioned in the Sustainability Appraisal.</p> <p>A full appraisal needs to be carried out on the effects of the core strategy on all the parishes adjoining the District, including those in the neighbouring administrative area, as they too are enduring growth and they too will be impacted by the proposed developments in Sellindge and at the new garden town.</p>	<p>The SA of the CSR has considered effects on neighbouring plan areas throughout the appraisal of CSR policies and site allocations and their reasonable alternatives and consideration of the cumulative effects of the Plan.</p> <p>Chapter 8 considers the effects of the Proposed Submission Core Strategy Review in combination with the other policies within the Core Strategy in 2013, the District Council’s Proposed Submission Places and Policies Local Plan (PPLP) and finally the wider regional cumulative effects of delivering the growth set out in the Core Strategy Review and Proposed Submission PPLP in combination with the planned growth in the neighbouring authorities of Ashford Borough, Canterbury City, Dover District and Rother District. This assessment acknowledges the potential for significant negative effects against the following SA objectives in the SA framework: 2 (employment), 3 (Landscape), 5 (Biodiversity), 7 (Efficient Use of Land), 9 (Flood Risk) and 14 (Community Cohesion, Services and Facilities), and significant positive effects against SA objectives 2 (Employment), 14 (Community Cohesion, Services and Facilities) and 13 (Sustainable Transport).</p> <p>Furthermore, the SA has been consulted on at each stage of its development, including</p>
	<p>1. Introduction, Paragraph 1.12</p> <p>The growth options used to inform the Core Strategy Review are flawed in that the high level options tested, whilst relevant, are based on assumptions that are open to interpretation and not necessarily reliable. In terms of the major developments proposed for Sellindge and the new Garden Town the commuting patterns and travel to work areas have not been adequately publicised to enable a true aspect to be seen.</p> <p>Neither of these major developments show large-scale employment opportunities, it could be assumed that at Sellindge a development of 600 dwellings could lead to employment needs for at least 1,200 and the Garden Town of 6,375 dwellings an employment need of upwards of 12,750. This will result in commuting patterns outside of the development and potentially outside of the area.</p>	

Consultee	Consultation comments – summarised where appropriate	Response and any action taken to address consultation comment in the updated SA Report
	<p>The increased commuting patterns will lead to traffic congestion and other transport infrastructure issues, not just on main roads but also on rural roads, including those in neighbouring parishes within Ashford Borough.</p> <p>There is no evidence of the duty to cooperate with neighbouring authorities having been effectively applied.</p> <p>To be fully effective, the Sustainability Appraisal should be more detailed in terms of numbers so as to highlight potential conflicts with other policies and show collaboration with adjoining local planning authorities who are also under pressure to deliver new homes.</p>	<p>statutory consultees and neighbouring planning authorities and organisations.</p>
	<p>4. Baseline Information, Paragraph 4.137</p> <p>The commentary of this paragraph on deprivation and social inclusion is inappropriate in that the area of the North Downs where the majority of the development for Folkestone and Hythe District is planned is currently an area of low deprivation. Given the large number of residents likely to be moving into this area, no evidence is provided to suggest that a similar or larger number of jobs is likely to be created for them, particularly within the North Downs area itself.</p> <p>With the strategy as prepared, the levels of deprivation could potentially increase as the number of potential workers moving into the area and the neighbouring planning authority is far in excess of any likely increases in the employment market.</p> <p>Greater emphasis needs to be placed on the provision of employment in the locality rather than reliance upon commuting, which places additional burdens on the road infrastructure and the already stretched public transport services. No clear evidence has been provided within the Core Strategy to show that the provision of a high-speed service from Westenhanger can become a reality.</p>	<p>The baseline information relating to deprivation and social inclusion was collected from the 2015 English Index of Multiple Deprivation.</p> <p>According to Paragraph 4.131 (fifth bullet point), the majority of least deprived SOAs in Folkestone & Hythe 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.</p> <p>The Proposed Submission Core Strategy Review states a significant number of jobs will be created within the garden town, which will provide employment opportunities for nearby towns and the wider area. Policy SS2 states that the CSR will deliver approximately 20 ha industrial warehousing and office space and 35,000 sqm of retail space. Policy SS6 states that the new garden settlement must aspire to deliver at least 1 job per dwelling, resulting</p>

Consultee	Consultation comments – summarised where appropriate	Response and any action taken to address consultation comment in the updated SA Report
	<p>5. Sustainability Appraisal Framework, Table 5.1 SA Objective 13</p> <p>The SA 13 objective to “reduce the need to travel, increase opportunities to choose sustainable transport modes and avoid development that will result in significant traffic congestion and poor air quality” has only partly been considered, especially in respect of the proposals for Sellindge and Otterpool Park Garden Town, both of which border onto Aldington. With regard to the traffic-modelling exercise, there is no mention of the A20 exit from Sellindge towards Ashford, the neighbouring borough. All statistics have been calculated on the assumption that all traffic will head towards Folkestone to join the M20 when heading towards Ashford. This is disingenuous: Ashford-bound traffic will likely flow west along the A20; and London-bound traffic, likewise west to J10/10A of the M20, rather than going east to J11. Local residents all know of the significant delays that already occur at J10, which are supposedly being reduced with the construction of J10A; this has taken years from initial planning to construction, and it is as yet unknown as to whether it will have the desired effect.</p> <p>When bus travel is mentioned, again this is focused in the opposite direction, away from Ashford. The Core Strategy and its associated Appraisals are written as though the District’s western border is at the edge of the world, and not adjoining several rural villages which happen to be located in another administrative district.</p> <p>In summary, the Sustainability Appraisal is unsound as it has been completely blind to parishes in the neighbouring borough of Ashford and the growth options considered appear only to relate to the Folkestone and Hythe District. To support this contention: Sellindge is referenced in the document 520 times; Lympne 140 times; while the parish of Aldington, which adjoins both, is not mentioned once.</p> <p>A full appraisal needs to be carried out on the effects of the core strategy on all the parishes adjoining the District, including those in the neighbouring administrative area, as they too are enduring growth and they too will be impacted by the proposed developments in Sellindge and at the new garden town.</p>	<p>in the creation of a minimum of 6,375 new jobs in the new garden settlement.</p> <p>The SA of the CSR has considered effects on neighbouring plan areas throughout the appraisal of CSR policies and site allocations and their reasonable alternatives and consideration of the cumulative effects of the Plan.</p> <p>Chapter 8 considers the effects of the Proposed Submission Core Strategy Review in combination with the other policies within the Core Strategy in 2013, the District Council’s Proposed Submission Places and Policies Local Plan (PPLP) and finally the wider regional cumulative effects of delivering the growth set out in the Core Strategy Review and Proposed Submission PPLP in combination with the planned growth in the neighbouring authorities of Ashford Borough, Canterbury City, Dover District and Rother District. This assessment acknowledges the potential for significant negative effects against the following SA objectives in the SA framework: 2 (employment), 3 (Landscape), 5 (Biodiversity), 7 (Efficient Use of Land), 9 (Flood Risk) and 14 (Community Cohesion, Services and Facilities), and significant positive effects against SA objectives 2 (Employment), 14</p>

Consultee	Consultation comments – summarised where appropriate	Response and any action taken to address consultation comment in the updated SA Report
		<p>(Community Cohesion, Services and Facilities) and 13 (Sustainable Transport).</p> <p>Furthermore, the SA has been consulted on at each stage of its development, including statutory consultees and neighbouring planning authorities and organisations.</p>
<p>Highways England</p>	<p>6. Appraisal of High Level Growth Options</p> <p>The accompanying Sustainability Appraisal (SA) of the Review of the Core Strategy sets out the context and framework for the SA of the Core Strategy Review and reports the appraisal findings of growth options tested to inform the preferred Core Strategy Review policies, as well as the appraisal findings of the policies in the Proposed Submission Core Strategy Review.</p> <p>We have reviewed the Sustainability Appraisal (SA) and have the following comments. Our comments are related only to issues that we consider will affect the SRN.</p> <ul style="list-style-type: none"> • The SA Review of the Core Strategy uses a framework of 15 SA objectives; of these, SA13 is most relevant to Highways England’s interests. The SA13 objective is <i>“Reduce the need to travel, increase opportunities to choose sustainable transport modes and avoid development that will result in significant traffic congestion and poor air quality”</i>. • SA2 is also relevant to our interests due to the way locations have been considered against it. SA2 is <i>“Support the creation of high quality and diverse employment opportunities”</i>. As detailed below, this has some implications for the SRN in the way it has been applied. • The findings against these SA objectives are summarised for six “character areas”: <ul style="list-style-type: none"> ○ Character area 1: Kent Downs. ○ Character area 2: Folkestone and Surrounding Area. 	<p>Noted.</p> <p>The SA Framework was developed and consulted on at the scoping stage in December 2016 and subsequently during consultation on the draft and proposed submission CSR and associated SA Reports.</p>

Consultee	Consultation comments – summarised where appropriate	Response and any action taken to address consultation comment in the updated SA Report
	<ul style="list-style-type: none"> ○ Character area 3: Hythe and Surrounding Area. ○ Character area 4: Sellindge and Surrounding Area (which is further divided into four sub-areas). ○ Character area 5: Romney Marsh and Walland Marsh. ○ Character area 6: Lydd, New Romney and Dungeness ● The character area findings for the SA objectives are given in Section 6. These are limited in detail at this stage, but appear to have a reasonable overall approach. However, a few areas for improvement are noted: <ul style="list-style-type: none"> ○ Paragraph 6.48, regarding SA2, suggests that access to existing strategic road infrastructure is expected to have a positive effect on this objective (the creation of high quality and diverse employment opportunities). While it is accepted that SRN access can reduce congestion on lower-order roads which are less able to accommodate heavy traffic, Highways England aims to encourage development in locations that are or can be made sustainable, that allow for uptake of sustainable transport modes and support wider social and health objectives. As such, while limiting congestion is important, this should not be achieved in a way that could potentially encourage an increase in overall car use, even if the road network could accommodate such traffic in that location. ○ Similarly, Paragraphs 6.65 and 6.66, regarding SA13, attribute a similarly positive effect to proximity to the SRN (notwithstanding that these paragraphs also attribute a positive effect to access to sustainable modes also, which is welcomed). ○ These comments also apply to the SA scoring of locations in Appendices 3 and 4. 	
Kent Downs AONB Unit	<p>6. Appraisal of High Level Growth Options, Table 6.2 and Paragraph 6.37</p> <p>The Kent Downs AONB Unit disagrees with many of the scores assigned in relation to the North Downs Character Area, and it is considered that the impacts of</p>	<p>The effects recorded against SA objective 3 during the appraisal of the six Character Areas and associated Character Area 4 sub areas (see Appendix 2) drew on the findings</p>

Consultee	Consultation comments – summarised where appropriate	Response and any action taken to address consultation comment in the updated SA Report
	<p>strategic scale development on SA Objective 3b, Landscape is significantly underestimated in respect of potential impacts on the Kent Downs AONB.</p> <p>Table 6.2 – The Kent Downs AONB Unit disagrees with the SA Score for Area B of Character Area in respect of SA Objective 3: landscape, where proximity to and visibility from the AONB means that much of this sub area would be highly visible from the nationally protected landscape of the Kent Downs AONB.</p> <p>6.37 – We would contend that the majority of Area B forms the setting for the AONB, rather than ‘some’ of Area B as stated. It forms the setting not just because it borders the AONB (as stated), but because of the inter visibility between this area and the AONB, principally from the escarpment of the Kent Downs to the north. We also query the contention that ‘portions of Area B have been identified as capable of accommodating strategic development without the need for extensive landscape mitigation’. The AONB Unit does not consider that this is the case, with the majority of area B being visible from large swathes of the AONB. It is considered an LVIA is required at this stage to justify such a contention. In view of this we consider a significant negative effects would be more appropriate than the minor negative effect that has been assigned to Area B.</p> <p>7. Appraisal of Special Options at Otterpool & Sellindge, Table 7.1 and Paragraph 7.20</p> <p>The AONB Unit disagrees with findings for Otterpool A site in respect of SA3 and consider both sites A and B would have significant negative effects, in view of the visibility of the site from the highly sensitive Kent Downs landscape. The topography of the site means that the higher parts of the slope at the western end of the site, immediately north of Aldington Road would be particularly visible in views from the north.</p>	<p>of the District’s High Level Landscape Appraisal (2017).</p> <p>The subsequent appraisal of the draft policies set out in the Draft Core Strategy Review (March 2018), including Policy SS6, drew on the same evidence acknowledging that <i>“the development of the new settlement would occur on mostly undeveloped greenfield land and as such would have an adverse impact on the openness and rural character of the countryside”</i>.</p> <p>In response to concerns raised by the Kent Downs AONB Unit and Natural England at the Regulation 18 consultation stage in March 2018 regarding landscape, additional text was added to policies within the Proposed Submission version of the Core Strategy Review. Policy SS6 now requires that the new garden town’s distinctive townscape and outstanding accessible landscape must be informed by the historic character of the area, respond to its setting within the Kent Downs AONB landscape and mitigate impact in views from the scarp of the Kent Downs. Similar text was added to policies SS7, SS9 and CSD9 (Sellindge).</p>

Consultee	Consultation comments – summarised where appropriate	Response and any action taken to address consultation comment in the updated SA Report
	<p>8. Appraisal of Proposed Submission Core Strategy Review, Tables 8.2 and 8.3</p> <p>Table 8.2 – We disagree with the mixed minor effects assigned to SA Objective SA3 in respect of policies SS1, SS2, SS3 and SS4. Allocating strategic large scale development on land in the setting of the Kent Downs AONB is likely to result in significant detrimental effects on the landscape. It is acknowledged that the policy would have some benefits in restricting development in other sensitive areas, but a significant impact on the landscape would nevertheless occur.</p> <p>Table 8.3 – We disagree with the ‘mixed minor effects’ assigned in respect of SA3 for policies SS6, SS7, SS8 and SS9. Large areas of the strategic allocation are visible from the AONB without any landscape mitigation, but notwithstanding this, we do not consider a development of the scale and density proposed is capable of being satisfactorily mitigated in views from the AONB.</p>	<p>The effects recorded against SA objective 3 during the appraisal of Area B drew on findings of the District’s Growth Options Study Phase Two Report (2017) and High Level Landscape Appraisal (2017). In the appraisal matrix for Area B in Character Area 4, we state that Area B is bordered by the Kent Downs AONB. In line with the SA Framework, Area B scores a minor negative effect.</p> <p>The Growth Options Study Phase Two Report (2017) states that land within Area B located west of Barrowhill, between Barrowhill and Westenhangar on the site of the former racecourse, would be suitable strategic development without need for extensive mitigation.</p> <p>As stated in Paragraph 6.21, the effects against SA objective 3 are expected to be more significant where development would take place within or in close proximity to the AONB, including areas which make up its setting as well as in areas which have been identified as having high sensitivity in terms of landscape character in Folkestone & Hythe’s High Level Landscape Appraisal (2017). According to the High Level Landscape Appraisal, the Landscape Character Area in which Area B falls is described as having medium landscape sensitivity.</p>

Consultee	Consultation comments – summarised where appropriate	Response and any action taken to address consultation comment in the updated SA Report
Kent County Council – Growth, Environment and Transport	<p>Appendix 2</p> <p>Reference to the Energy White Paper: Our Energy Future (2003) echoes the policy to reduce carbon emissions by 60% by 2050. It should be noted that this policy is slightly outdated, and the current policy is to reduce carbon emissions by 80% by 2050. This target is being reviewed in light of current understanding and may lead to a zero carbon target by 2050.</p>	<p>Noted.</p>
Sellindge Parish Council	<p>Appendix 4</p> <p>Sellindge B should not be considered until well after 2050.</p> <p>Sellindge C is totally unacceptable as it includes the nature reserve provided by site B in policy CSD9 plus blatant backfilling to Swan Lane.</p> <p>Sellindge D is also totally unacceptable due to the same reason for Sellindge C plus it will introduce a built environment to the east boundary to the village.</p>	<p>Sellindge site allocation options C and D both scored a significant negative effect against SA objective 5: biodiversity, due to the fact it contains areas of BAP priority habitat and falls within 40m of Gibbin’s Brook SSSI.</p> <p>The appraisal of CSD9 acknowledges that the development on land to the south and east of the exiting village will be located on greenfield land, resulting in the potential for habitat loss and fragmentation. Furthermore, development to the east of the village is located within 450m of Gibbins Brook SSSI, generating the potential for increased recreational pressures on the SSSI. However the SA also acknowledges that the supporting text of the policy requires that impacts on the SSSI should be minimised and funding provided for its enhancement and protection. Furthermore, the policy requires that the growth be incorporated within and bordered by appropriate landscape, including a new village green/common, substantial woodland planting at the rural edges of the village, all of which have the potential to</p>

Consultee	Consultation comments – summarised where appropriate	Response and any action taken to address consultation comment in the updated SA Report
		deliver new habitats for priority nature conservation species. Overall, a mixed effect (minor positive/minor negative) is therefore expected on this SA objective.

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Appendix 2

SA Framework for the Folkestone & Hythe Core Strategy Review

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SA Objective Reference	SA Objective	Appraisal questions: will the Plan/option lead to...?	Relationship with the SEA Topics / District's Health and Well Being
SA1	Improve the provision of homes, including affordable housing, having regard to the needs of all sections of society, including the elderly.	<p>Create strategic-scale developments that make significant contributions to local housing needs in the short, medium and long term?</p> <p>Provision of a high-quality mix of housing developments suitable for the full range of ages and abilities in need of affordable accommodation?</p> <p>The provision of the range of types and tenure of housing as identified in the housing market assessment?</p>	Population, Human Health and Material Assets
SA2	Support the creation of high quality and diverse employment opportunities.	<p>An adequate supply of land, skills and infrastructure (such as ICT and high speed broadband) to meet the requirements of sectors targeted for economic growth and diversification, including those set out in the District's Economic Strategy?</p> <p>New and improved education facilities which will support raising attainment and the development of skills, leading to a work ready population of school and college leavers?</p> <p>The promotion of the development of education services which retain young people through further and higher education in order to develop and diversify the skills needed to make Folkestone & Hythe prosper?</p> <p>Improved access to jobs for local people from all sectors of the community that will lift standards of living?</p> <p>Enhanced vitality and vibrancy of town centres?</p> <p>Expansion or upgrading of key visitor attractions to support the visitor economy?</p> <p>Employment opportunities which address the economic consequences of the de-commissioning of Dungeness nuclear power station?¹¹</p> <p>Provision of high quality employment sites and associated infrastructure suitable for the likely continuation in a shift from manufacturing to higher skill, service industries?</p>	Population, Human Health and Material Assets

¹¹ Power generation at Dungeness 'A' finished in 2006; that at Dungeness 'B' is currently scheduled for 2018 but EDF has applied to extend this to 2028; employment levels at the site are typically maintained for several years after operation ceases to carry out de-commissioning.

SA Objective Reference	SA Objective	Appraisal questions: will the Plan/option lead to...?	Relationship with the SEA Topics / District's Health and Well Being
SA3	Conserve, and where relevant enhance, the quality, character and local distinctiveness of the landscape and townscape.	<p>Areas of the highest landscape sensitivity (i.e. Kent Downs AONB) being protected from adverse impacts on character and setting?</p> <p>Development which considers the existing character, form and pattern of the District's landscapes, buildings and settlements?</p> <p>The protection and enhancement of local distinctiveness and contribution to a sense of place?</p>	Landscape, Biodiversity, Flora and Fauna
SA4	Conserve and enhance the fabric and setting of historic assets.	<p>Development that avoids negative effects on listed buildings, conservation areas, scheduled ancient monuments, registered historic parks and gardens, and registered battlefields and their settings?</p> <p>Provision of appropriately scaled, designed and landscaped developments that relate well to and enhance the historic character of the District and contribute positively to its distinctive sense of place?</p> <p>Promotes the enhancement of the District's archaeological resource and other aspects of heritage, such as, parks and open spaces, and areas with a particular historical or cultural association?</p> <p>Promotes access to as well as enjoyment and understanding of the local historic environment for people including the District's residents?</p> <p>Improves participation in local cultural activities?</p> <p>Helps to foster heritage-led regeneration and address heritage at risk?</p> <p>Improves existing and provides new leisure, recreational, or cultural activities related to the historic environment?</p>	Cultural Heritage, including architectural and archaeological heritage
SA5	Conserve and enhance biodiversity, taking into account the effects of climate change.	<p>Protect and where possible enhance internationally and nationally designated biodiversity sites and species?</p> <p>Avoidance of net loss, damage to, or fragmentation of locally designated and non-designated wildlife sites, habitats and species (including biodiverse brownfield sites)?</p>	Biodiversity, Flora and Fauna

SA Objective Reference	SA Objective	Appraisal questions: will the Plan/option lead to...?	Relationship with the SEA Topics / District's Health and Well Being
		<p>Opportunities to enhance and increase the extent of habitats for protected species and priority species identified in the Kent BAP or the England Biodiversity Strategy 2020?</p> <p>Opportunities for people to come into contact with resilient wildlife places whilst encouraging respect for and raising awareness of the sensitivity of these sites?</p> <p>Development which includes the integration of ecological habitats and contributes to improvements in ecological connectivity and ecological resilience to current and future pressures, both in rural and urban areas?</p> <p>Maintenance and enhancement of the ecological networks in the District?</p> <p>N.B. Climate change is likely to impact upon habitats and thereby biodiversity. Plan policies which achieve the goals listed above should all help to enhance the ability of wildlife to adapt to a changing climate.</p>	
SA6	Protect and enhance green infrastructure and ensure that it meets strategic needs.	<p>Provision, stewardship and maintenance of green infrastructure assets and networks (including green open space, river/canal corridors and the coastline), ensuring that this is linked into new and existing developments, to improve the connectivity of green spaces and green networks?</p> <p>N.B. The East Kent Green Infrastructure (GI) Working Group has identified an East Kent GI Typology which encompasses the following GI types:</p> <ul style="list-style-type: none"> - Biodiversity e.g. Natura 2000 sites, SSSIs, LNRs, Local Wildlife Sites. - Civic Amenity e.g. parks, allotments, cemeteries. - Linear features e.g. the Royal Military Canal, railway corridors. <p>The full list of GI components of this typology is available from the District's GI Report, 2011.</p>	Landscape, Biodiversity, Flora and Fauna
SA7	Use land efficiently and safeguard soils, geology and economic mineral reserves.	<p>Development that avoids high quality agricultural land?</p> <p>Remediation of contaminated sites?</p> <p>Re-use and re-development of brownfield sites?</p> <p>Efficient use of recycled/ secondary materials?</p>	Soil, Climatic Factors and Landscape

SA Objective Reference	SA Objective	Appraisal questions: will the Plan/option lead to...?	Relationship with the SEA Topics / District's Health and Well Being
		<p>Protection of mineral resources and infrastructure?</p> <p>Development that protects sites valued for their geological characteristics?</p> <p>Development that avoids sterilising local mineral reserves and can be accommodated by existing or planned local mineral reserves?</p>	
SA8	<p>Maintain and improve the quality of groundwater, surface waters and coastal waters and the hydromorphological (physical) quality of rivers and coastal waters.</p>	<p>Development that will not lead to the deterioration of groundwater, surface water, river or coastal water quality, i.e. their Water Framework Directive status?</p> <p>Development where adequate foul drainage, sewage treatment facilities and surface water drainage are, or can be made, available?</p> <p>Development which incorporates SuDS (including their long-term maintenance) to reduce the risk of combined sewer overflows and to trap and break down pollutants?</p>	<p>Water, Biodiversity, Fauna and Flora</p>
SA9	<p>Reduce the risk of flooding, taking into account the effects of climate change.</p>	<p>Avoid development in locations at risk from flooding or that could increase the risk of flooding elsewhere having regard to the District's Strategic Flood Risk Assessment, taking into account the impacts of climate change?</p> <p>Create development which incorporates SuDS (including their long-term maintenance) to reduce the rate of run-off and reduce the risk of surface water flooding and combined sewer overflows?</p>	<p>Water, Soil, Climatic Factors and Human Health</p>
SA10	<p>Increase energy efficiency in the built environment and the proportion of energy use from</p>	<p>Create strategic-scale developments that make significant and lasting contributions to the UK's national carbon target of reducing emissions by at least 80% from 1990 levels by 2050?</p> <p>Create connected energy networks that provide local low carbon and renewable electricity and heat?</p>	<p>Air, Climatic Factors, and Human Health</p>

SA Objective Reference	SA Objective	Appraisal questions: will the Plan/option lead to...?	Relationship with the SEA Topics / District's Health and Well Being
	renewable sources.		
SA11	Use water resources efficiently.	Development where adequate water supply is, or can be made, available? Water efficient design and reduction in water consumption (e.g. rainwater recycling/grey water reuse and BREEAM)?	Water and Climatic Factors
SA12	To reduce waste generation and disposal, and achieve the sustainable management of waste.	Will it promote sustainable waste management practices through a range of waste management facilities? Will it reduce hazardous waste? Will it increase waste recovery and recycling? Will it protect existing waste facilities and infrastructure or support the delivery of new facilities or infrastructure?	Soil, Climatic Factors and Material Assets
SA13	Reduce the need to travel, increase opportunities to choose sustainable transport modes and avoid development that will result in significant traffic congestion and poor air quality.	A complementary mix of land uses within compact communities that minimises the length of journeys to services and facilities and employment opportunities, increases the proportion of journeys made on foot or by cycle, and are of a sufficient density to support and enhance local services and public transport provision? Development in locations well served by public transport, cycle paths and walking routes? Development of new and improved sustainable transport networks, including cycle and walking routes, to encourage active travel and improve connectivity to local service centres, transport hubs, employment areas and open/green spaces?	Air, Climatic Factors, Population and Human Health
SA14	Promote community vibrancy and social cohesion; provide opportunities to	Create well-designed developments that contain compact communities with a sufficient critical mass or density to support local services and public transport provision?	Population, Human Health and Material Assets

SA Objective Reference	SA Objective	Appraisal questions: will the Plan/option lead to...?	Relationship with the SEA Topics / District's Health and Well Being
	access services, facilities and environmental assets for all ages and abilities and avoid creating inequalities of opportunity for access.	<p>Create new opportunities to improve educational attainment, qualification levels and participation in education and training through access to existing or the provision of new educational infrastructure?</p> <p>Provision of new or enhancement of existing leisure facilities for young people, where thresholds/standards require these?</p> <p>Create opportunities to lead healthier lifestyles, including development that enhances existing and /or makes provision for and maintenance towards open spaces, sports and recreational facilities e.g. publicly available pitches, allotments, swimming pools, courts, etc.?</p> <p>Provision of new or enhanced local health services to support new and growing communities?</p> <p>Improvements to strategic public transport infrastructure?</p> <p>Reintegration of physically divided or highly linear villages or neighbourhoods through, for example, provision of central social infrastructure?</p> <p>Provision for the specific needs of disabled and older people?</p>	
SA15	Reduce crime and the fear of crime.	Reduced levels of crime, anti-social behaviour and the fear of crime through high quality design and intervention, i.e. street layout, public space provision, passive surveillance, lighting etc.?	Population and Human Health

Appendix 3

Baseline and Plans, Programmes and Policies Updates

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Baseline and evidence updates

Since the publication of the full Proposed Submission Core Strategy Review SA Report and subsequent Proposed Changes SA Addendum in 2019, the following additional key evidence documents have been produced by the Council and have informed the proposed modifications to the Core Strategy Review. All evidence relating to the Core Strategy Review is available on the Council's website.

- **Folkestone & Hythe Retail and Leisure Need Assessment (June 2019)**¹²: Amended in June 2019, this document provides an update of the Shepway Town Centres Study¹³, incorporating emerging garden settlement development proposals at Otterpool Park. The report updates the District wide retail capacity projections and need assessments.

It concludes that the new town and local centres within Otterpool Park new settlement should support between 10,800 and 16,700sqm gross of retail and food/ beverage floorspace by 2037, excluding Class A1 non-retail services and Class A2 financial/ professional services, with the potential for service use to increase the new garden settlement's overall floorspace projection to between 13,000 and 20,000sqm gross (Class A1 to A5) by 2037. Furthermore, the emerging Otterpool Park Masterplan phasing was found to suggest that a total of 20,400sqm gross Class A1 to A5 floorspace will be delivered by 2037. This scale of retail and leisure provision was judged to be more than sufficient to meet the need generated by the new Garden Settlement, and could also accommodate residual growth from other parts of the District, if required.

It is noted that since this document was produced, changes have been made the Business Use Classes Order. A1-A3 and B1 are now treated as Class E.

- **Revised Housing Need and Supply Evidence Paper (November 2019)**¹⁴ Produced in response to the introduction of a national standard method for calculating housing need in July 2018. Using the national standard, the District's housing need was updated to 13,284 new homes over the plan period to 2036/37 (738 new dwellings per year).

Bringing together the different sources of housing supply across the District, the document identifies an anticipated supply of 13,515 new homes over the plan period and a list of specific sources to meet the needs of the first 5.17 years of the Plan period. The document concluded that there is no need to identify additional housing sites for allocation in the Core Strategy Review. The document was published alongside the Sustainability Appraisal Addendum of the Proposed Changes to the Proposed Submission Folkestone & Hythe Core Strategy Review in November 2019.

Authority Monitoring Report 2019 (2020)¹⁵: Published in 2020, this document reports on the monitoring year 1st April 2018 to 31st March 2019. The contents of this document highlight similar trends to those outlined in previous Authority Monitoring Reports, including population growth (100,300 in 2006 to 108,00 in 2011), falling rates of unemployment (3.6% which is down 0.8% from the previous monitoring year), a 10-year decline in carbon emissions and an increase in vacancy levels within Town and District Centres. Folkestone & Hythe has an ageing population with a median age of over 43 years, which is the oldest average age of residents in the Kent districts. There are 53,400 'economically active' people in the District aged 16 or over, either in employment or unemployed, and of this figure, 82% fall within the 16 to 64 'working age' group, which brings the District above the regional (81.6%) and national (78.9%) averages.

In the previous monitoring year there was a recorded decrease in average gross weekly pay for residents in full-time employment but this has now increased. However, average weekly pay in the District (£556.10) still remains below the Kent and UK averages of £636.00 and £587.00 respectfully. With regard to education, there has been a significant drop in residents

¹² Folkestone & Hythe Retail and Leisure Need Assessment, Lichfields, 2019. Available [here](#).

¹³ Shepway Town Centres Study, Peter Breet Associates, 2015. Available [here](#).

¹⁴ Revised Housing Need and Supply: Evidence Paper, Folkestone & Hythe District Council, 2020. Available [here](#).

¹⁵ Authority Monitoring Report 2019, Folkestone & Hythe District Council, 2020. Available [here](#).

with qualifications at NVQ Level 4 and above compared to the previous monitoring year where there had been an increase in residents with qualifications at NVQ Level 4 and above. This places Folkestone & Hythe in the bottom 5% of authorities for the proportion of people with NVQ4+.

- **Technical Note: Nutrient Budget (August 2020)**¹⁶: Produced in August 2020, this note contains a nutrient budget for the Folkestone & Hythe Local Plan, including all development conferred by the Plan which drains into the Stour catchment either directly via land use run off or indirectly via the effluent of a wastewater treatment works (WWTW). It reports a number of options which could be used to mitigate a nitrogen and phosphorus surplus in the District to demonstrate no adverse effect to the integrity of the Stodmarsh internationally designated sites. Direct measures include the creation of wetlands which act as interceptors and remove a proportion of the nitrogen/phosphorus in water through natural processes, in addition to WWTW upgrades to increase nutrient removal capacity and thereby reduce effluent nutrient loading. Indirect measures are the removal of land within the District from nitrogen/phosphorus intensive uses, such as crops or intensive livestock systems. The technical note informed the definition of new mitigation measures to be included as main modifications to the Core Strategy Review new settlement and Sellindge allocations, covering the provision of roughly 25ha of new interceptor wetland habitat, 35ha of new woodland planting in current high nutrient land use areas, the provision of a new WWTW and conversion of agricultural land uses to lower nutrient uses. Nutrient budget calculations generated by Arcadis demonstrate that these measures would deliver nutrient neutrality, resulting in the HRA concluding that a modified Core Strategy Review will not result in an adverse effect on the integrity of the Stodmarsh SAC, SPA and Ramsar either alone or in combination with other plans and projects.
- **Evidence to support deliverability and viability of Core Strategy Examination of Additional Sites (October 2020)**¹⁷: Published in October 2020, this report provides a review of the financial viability of development at various sites allocated within the Core Strategy Review. The report finds the majority of site allocations, notably those in New Romney, Sellindge and Shorncliffe Garrison to be financially viable, but raises questions with regards to the allocation at Folkestone Sea Front.

Statements of Common Ground

Statements of common ground have been agreed with the following consultees on strategic policy matters:

- Highways England
- Kent County Council
- Ashford Borough Council
- Dover District Council
- Canterbury City Council
- Rother District Council
- Affinity Water
- Environment Agency
- Marine Management Organisation
- Natural England
- London Ashford Airport

In order for Folkestone & Hythe District Council and Highways England to agree on a Statement of Common Ground, further work was undertaken and presented as appendices to the Statement

¹⁶ Technical Note: Nutrient Budget, Urban Edge, August 2020. See Appendix C, available [here](#).

¹⁷ Evidence to support deliverability and viability of: Core Strategy Examination of Additional Sites, Gerald Eve, 2020. Available [here](#).

of Common Ground between Folkestone & Hythe District Council and Highways England. Key documents include:

- **Otterpool Park Future Mobility: Monitoring & Evaluation Framework (September 2020)**¹⁸: Published in September 2020, this document sets out the monitoring and evaluation approach for the new garden settlement at Otterpool, focussing on the first phase of development (up to 2,500 homes). The Framework supplements a traditional travel plan, seeking to enable a continuously improving mobility offer at Otterpool Park that meets users' needs.
- **Otterpool Park Future Mobility: User-Centric Travel (September 2020)**¹⁹: Published in September 2020, this report outlines the people-centric assessment to support the future mobility strategy at the new garden settlement Otterpool Park. The report outlines the benefits and linkages between a traditional transport planning approach and future mobility thinking to ensure the full potential of a low carbon vision is achieved. The findings of the report will help influence Phase 1 of the development by influencing design relating to active travel, walking and cycling routes, micromobility, mobility hubs, freight consolidation centres and associated services, parking provision and layout, and interventions that reduce the need to travel.
- **Otterpool Park: Mobility Vision Report (September 2020)**²⁰: Published in September 2020, this report outlines the mobility vision that both Kent County Council and Folkestone & Hythe District Council would be willing to support at Otterpool Park. The vision is to make Otterpool Park a low-car and net zero destination.
- **Local Plan Traffic Analysis: Highways England Road Network (December 2020)**²¹: Published in December 2020, this document was produced to enable Folkestone & Hythe District Council and Highways England to agree on a Statement of Common Ground regarding mitigation of impacts related to the Core Strategy Review on the road network. According to the report, the weaving segments on the M20 between Junction 12 and Junction 13 (both directions) would require upgrading according to the design standard, but such a situation corresponds to a worst case scenario which is unlikely to occur in practice. The report concludes by stating that the M20 Junction 11, M20 Junction 13 and the A20/ Spitfire Way/ Alkham Valley Road interchange require physical upgrades by 2037.
- **M20 J12 to J13 Weaving Assessment: Highways England Road Network (April 2021)**²²: Published in April 2021, the purpose of this document is to present a revised traffic forecast and Design Manual for Roads and Bridges (DMRB) traffic analysis to support the identification of suitable road geometry. According to the report, the DMRB provides sufficient flexibility to adjust the existing road layout without the need for a link road or motorway mainline widening.
- **Monitor and Manage Framework to Provide Mitigation for the Strategic Road Network and Local Road Network (June 2021)**²³: Published in June 2021, this document sets out the roads and junctions requiring mitigation and what mitigation will be implemented. The roads and junctions requiring mitigation are as follows: (1) M20 J11; (2) Churchill Avenue; (3) A20 Castle Hill Bridge; and (4) A20/Spitfire Way/Alkham Road Interchange.

Together these documents have informed the proposed main modifications to the Core Strategy Review appraised in the main body of the addendum above.

¹⁸ Otterpool Park Future Mobility: Monitoring & Evaluation Framework, WSP, 2020. Available [here](#).

¹⁹ Otterpool Park Future Mobility: User-Centric Travel, WSP, 2020. Available [here](#).

²⁰ Otterpool Park: Mobility Vision Report, WSP, September 2020. Available [here](#).

²¹ Local Plan Traffic Analysis: Highways England Road Network, Arcadis, 2020. Available [here](#).

²² M20 J12 to J13 Weaving Assessment: Highways England Road Network, Arcadis, 2021. Available [here](#).

²³ Monitor and manage framework to provide mitigation for the Strategic Road Network and local road network, Folkestone & Hythe District Council, 2021. Available [here](#).

Review of the SA Report Baseline

A review has also been undertaken of the baseline set out in the 2019 full SA Report, which covers a range of topics including the landscape and historic environment of the District, biodiversity, soil and minerals, water quality and resources, transport, climate change and flood risk, population and health, housing, the economy and labour market, deprivation and education. Since the publication of the full SA Report in 2019, the following events have taken place which add greater uncertainty to the future environmental, social and economic baseline of the District:

- **Brexit** – The UK left the European Union (EU) on 31st January 2020 and entered a transition period up to 31st December 2020. From 1st January 2021, directly applicable EU law no longer applied to the UK and the UK is free to repeal EU law that has been transposed into UK law. The EU Directives listed in the 2019 full SA Report are no longer relevant but their corresponding national legislation (i.e. Acts and Regulations) remain relevant until such time as they are replaced.
- **COVID-19** – The COVID-19 pandemic has led to far-reaching changes to society in the UK and around the world. It is not clear at this point in time whether the full range and significance of these changes will continue in the long term. Much will depend on the effectiveness of worldwide vaccine programmes against future variants of the virus. Potential implications for planning and development include Government measures to re-start the economy via support for housebuilding and infrastructure development, changes to permitted development rights, increased remote working and reduced commuting and related congestion and air pollution, increased prioritisation of walking and cycling over public transport, and increasing pressure to ensure satisfactory living standards are set and enforced.

It is also possible that UK and sub-national climate change policy may change as public awareness and prioritisation of the threat of climate change grows, as illustrated by the increasing number of local authorities, including Folkestone & Hythe District Council, that have declared a climate emergency.

In light of the objectives of the Core Strategy Review and its contents, there are considered to be no clear significant changes to the key issues and opportunities reported in the 2019 full SA Report. The new evidence bases listed in this appendix have informed the main modifications to the Proposed Submission Core Strategy Review and their SA.

Review of plans, policies and programmes

Since the publication of the Proposed Submission Core Strategy Review SA Report and Proposed Changes SA Addendum in 2019, the following relevant national plans, policies and programmes have been updated/published. The Core Strategy Review was submitted for examination before the publication of these new national planning updates; however, they provide an important context for the future of relationship of the Core Strategy Review with plans, policies and programmes:

National

- **Planning for the Future White Paper (February 2021)**²⁴: Sets out a series of potential reforms to the English planning system, to deliver growth faster. The White Paper focuses on the following:
 - Simplifying the role of Local Plans and the process of producing them.
 - Digitising plan-making and development management processes.
 - Focus on design, sustainability and infrastructure delivery.
 - Nationally determined, binding housing requirements for local planning authorities to deliver through Local Plans.

²⁴ Planning for the Future White Paper, MHCLG, 2020. Available [here](#).

- **National Planning Practice Guidance (NPPG) (June 2021)**²⁵: The NPPG is an online resource that is continuously being updated. The latest updates include:
 - 24 May 2021 – new information on 'First Homes'.
 - 24 June 2021 – new information on 'Fire safety and high-rise residential buildings '(from 1 August 2021).
- **National Planning Policy Framework (July 2021)**²⁶: The NPPF sets out the government's planning policies for England and how these are expected to be applied. The original NPPF was published in March 2012, before being updated in July 2018, February 2019 and June 2019. The latest version of the NPPF was published in July 2021. Notable changes made since the publication of the second 2019 version include:
 - Pursuit of the UN's 17 Global Goals for Sustainable Development in the period to 2030, addressing social progress, economic well-being and environmental protection.
 - Measures to improve design quality, including a new requirement for councils to produce local design codes or guides, in response to the findings of the government's Building Better, Building Beautiful Commission.
 - Local plan policies are now required to set a vision that looks further ahead (at least 30 years) for larger scale developments such as new settlements or significant extensions to existing villages and towns.
 - The use of Article 4 directions to remove national permitted development rights should be limited to situations where an Article 4 direction is necessary to avoid wholly unacceptable adverse impacts.
 - Local authorities are required to work proactively and positively with promoters, delivery partners and statutory bodies in order to plan for required infrastructure facilities, including further education colleges, hospitals and criminal justice accommodation.
 - New streets must now be tree-lined, with opportunities also taken to incorporate trees elsewhere in developments (such as parks and community orchards).
 - Aspects of policy concerning planning and flood risk have been clarified, with the Flood Risk Vulnerability Classification previously set out in the national Planning Practice Guidance now included as an appendix in the NPPF.
 - 10% of all major housing schemes should comprise affordable home ownership properties.
 - Policies on improving biodiversity have been strengthened.
 - Neighbourhood Plans are now encouraged to allocate large sites, as well as small and medium-sized sites.
 - In considering applications to remove or alter a historic statue, plaque, memorial or monument, LPAs should have regard to the importance of their retention in situ and, where appropriate, of explaining their historic and social context rather than removal.
- **National Model Design Code (August 2021)**²⁷: Provides detailed guidance on the production of design codes, guides and policies for local authorities and communities, to promote successful design that is good quality. The National Model Design Code forms part of the government's Planning Practice Guidance and expands on the ten characteristics of good design set out in the National Design Guide, which reflects the government's priorities and provides a common overarching framework for design.

²⁵ National Planning Practice Guidance, MHCLG, 2021. Available [here](#).

²⁶ National Planning Policy Framework, MHCLG, 2021. Available [here](#).

²⁷ National Model Design Code, MHCLG, 2021. Available [here](#).

Neighbouring authorities' Local Plans

The Ashford Local Plan 2030 was adopted in February 2019. This Plan sets out the land that needs to be provided in Ashford Borough to accommodate new homes and jobs up to 2040. It contains a number of sites across the Borough proposed for development as well as establishing planning policies and guidance to ensure local development is built in accordance with the principles of sustainable development. There are no development sites within Ashford Borough that are close to Folkestone & Hythe District.

Canterbury City Council (CCC) adopted a new Local Plan in July 2017 which sets out policies and proposals for the development of land in the District until 2031. There are no development sites close to the boundary with Folkestone & Hythe district. The City Council has started a review of this plan and consulted on the future issues facing the District between July and September 2020 and a draft vision and high-level preferred options between May and August 2021. The vision for Canterbury is to provide 14,000 to 17,000 new homes by 2040, with most growth supported within Canterbury City.

Dover District Council (DDC) adopted its Core Strategy in February 2010 which allocates a number of strategic sites. The Land Allocations Local Plan was adopted in January 2015 and allocates specific sites for employment, retail and housing development to deliver the aims of the Core Strategy. DDC is currently producing a new Local Plan to cover the period 2020 to 2040. DDC consulted on the Regulation 18 draft Dover District Local Plan between January and March 2021 and is expected to consult on the Regulation 19 draft Local Plan in Winter 2021/22, with a view to adopt in February 2023. There are no development sites close to the boundary with Folkestone & Hythe District.

Rother District Council (RDC) adopted its Core Strategy in September 2014, which sets out the overall vision and objectives for development in the District to 2028. Part 2 of the Local Plan, the Development and Site Allocations Local Plan (DaSA), was adopted in December 2019 and allocates specific sites in line with the Core Strategy. There are no development sites close to the boundary with Folkestone & Hythe District. RDC is now undertaking a review of the Core Strategy Local Plan to produce a new Local Plan that covers the period 2019-2039. A Draft Local Plan will be consulted upon in late 2021 / early 2022.