



Canterbury City Council

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# Canterbury District Local Plan (2020-2045)

Draft Canterbury District Local Plan (2020 - 2045)  
(Regulation 18 consultation)

Sustainability Appraisal Report



This report was prepared by WSP Environment & Infrastructure Solutions UK Limited (formerly known as Wood Environment & Infrastructure Solutions UK Limited), company registration number 02190074, which is carrying out these services as a subcontractor and/or agent to Wood Group UK Limited

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## Document revisions

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| 1   | Draft   | October |
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# Non-Technical Summary

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This is the Non-Technical Summary (NTS) of the Sustainability Appraisal (SA) of the Draft Canterbury District Local Plan (2020 - 2045) (Regulation 18 consultation) (the Draft Local Plan from here on). It provides an overview of the SA process and describes the key sustainability effects anticipated as a result of the implementation of the development options and policies contained in the Draft Local Plan.

This Non-Technical Summary (NTS) provides an overview of the Sustainability Appraisal (SA) of the Draft Local Plan. Canterbury City Council (the Council), with support from WSP Environment and Infrastructure Solutions UK Ltd (WSP)<sup>1</sup>, has undertaken a Sustainability Appraisal (SA) of the Draft Local Plan.

The following sections of this NTS:

- Provide an overview of the Draft Local Plan;
- Describe the approach to undertaking the SA of the Draft Local Plan;
- Summarise the findings of the SA of the Draft Local Plan; and
- Set out the next steps in the SA of the Local Plan.

## What is the Canterbury District Local Plan

The Council is currently preparing a new Local Plan for the district that will, once adopted, replace the Canterbury Local Plan adopted in 2017. The new Local Plan will guide growth and development in the district for the period up to 2045. It is anticipated it will provide:

- The District Vision by 2045 and a set of strategic objectives;
- The overall spatial strategy and growth requirements;
- A set of strategic and development management policies to help shape development;
- A range of allocations for housing and employment to meet the identified requirements; and
- A Policies Map showing relevant allocations and designations.

Alongside any Neighbourhood Plans that come forward, it will form the Development Plan for the local authority area.

## The Draft Canterbury District Local Plan (2020 - 2045) (Regulation 18 consultation)

The Draft Local Plan comprises the following draft components:

- Vision and Strategic Objectives;
- The preferred options in terms of the quantum of growth (housing, employment and retail development requirements) and distribution of growth (Spatial Strategy);
- Proposed sites allocations to deliver the preferred options;

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<sup>1</sup> Formerly Wood Group UK Ltd (Wood)

- Proposed strategic and development management policies.

**Further information about the Draft Local Plan is set out in Section 1.3 and Section 1.4 of the SA Report**

## What is Sustainability Appraisal?

Under Section 19(5) of the Planning and Compulsory Purchase Act 2004, the Council is required to carry out a SA of the Local Plan to help guide the selection and development of policies and proposals in terms of their potential social, environmental and economic effects. In undertaking this requirement, local planning authorities must also incorporate the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004<sup>2</sup> (SEA Regulations). The SEA regulations seek to provide a high level of protection of the environment by integrating environmental considerations into the process of preparing certain plans and programmes.

## Stages in the Sustainability Appraisal process

There are five key stages in the SA process and these are highlighted in **Figure NTS.1** together with links to the development of the Local Plan. The first stage (**Stage A**) led to the production of a SA Scoping Report, which was informed by a review of other relevant policies, plans and programmes as well as baseline information and the identification of key sustainability issues affecting the District, the Scoping Report set out the proposed framework for the appraisal of the Local Plan (the SA Framework).

The Scoping Report was subject to a six week consultation between 28th October and 9th December 2019. 31 responses were received to the consultation from the statutory SEA consultation bodies (Environment Agency, Historic England, Natural England) as well as a range of other stakeholders. Responses related to all aspects of the Scoping Report and resulted in amendments to the baseline, plans and programmes review and SA Framework. **Appendix B** contains a schedule of the consultation responses received to the Scoping Report, the Council's response and the subsequent action taken and reflected in subsequent SA Reports, including this SA Report.

**Stage B** is an iterative process involving the appraisal and refinement of the Local Plan with the findings presented in a series of interim SA Reports. This SA Report and the appraisal contained therein forms part of Stage B of the SA process. This SA Report follows on from consultation on the Draft District Vision and Local Plan Options (June 2021) which was consulted on between 28 May and 30 July 2021. Responses received to the SA Report that accompanied the Draft District Vision and Local Plan Options are available in **Appendix B**. Through the appraisal of the draft policies and allocations this SA Report is intended to help further refine the emerging Canterbury District Local Plan (2020-2045).

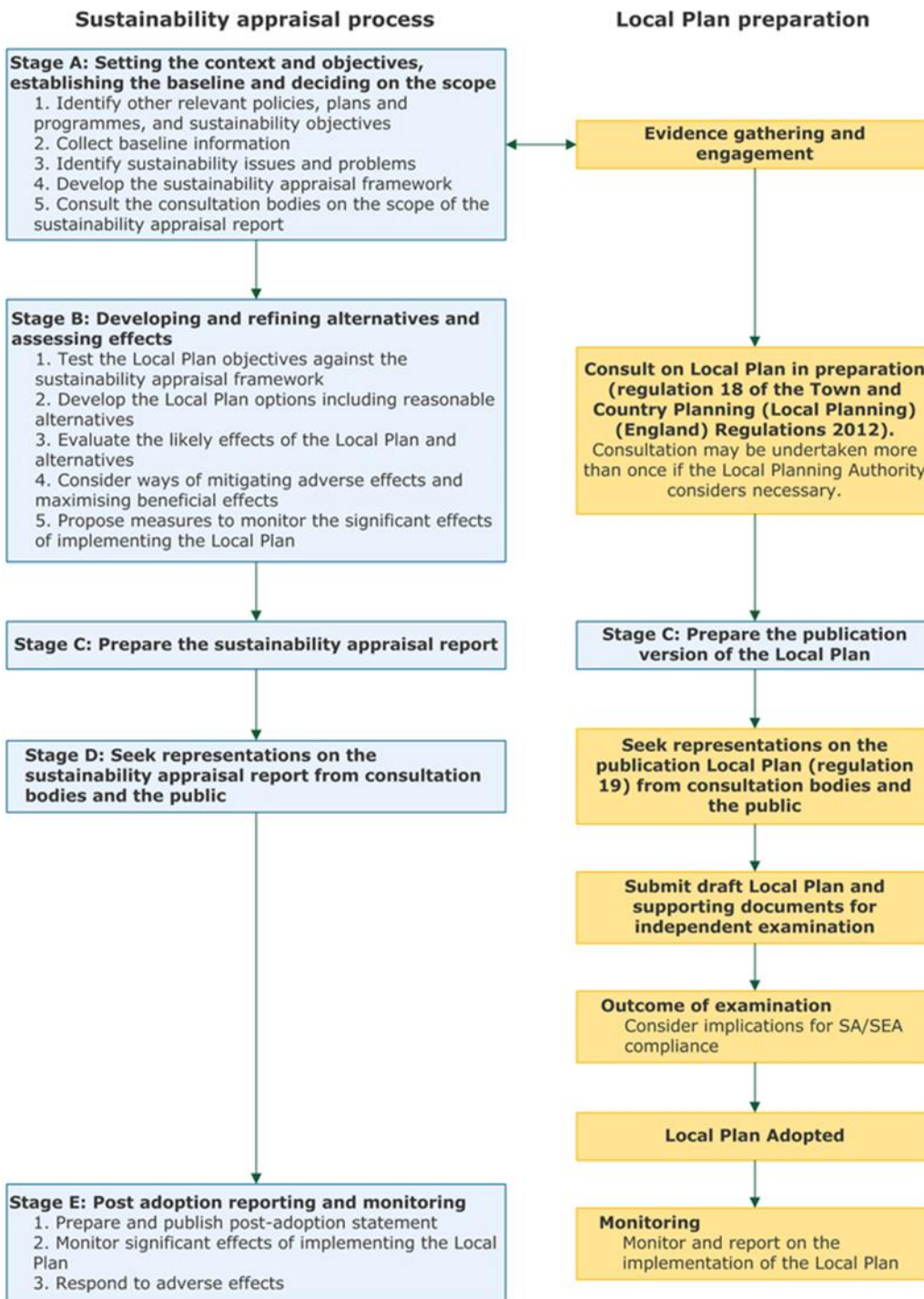
At **Stage C**, a final SA Report will be prepared to accompany the submission draft Local Plan and will be available for consultation alongside the draft Local Plan itself prior to consideration by an independent planning inspector (**Stage D**).

Following Examination in Public (EiP), and subject to any significant changes to the draft Local Plan that may require appraisal as a result of the EiP, the Council will issue a Post Adoption Statement as soon as reasonably practicable after the adoption of the Local Plan. This will set out the results of the consultation and SA process and the extent to which the findings of the SA have been accommodated in the adopted Local Plan. During the period of the Local Plan, the Council will monitor its implementation and any significant social, economic and environmental effects (**Stage E**).

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<sup>2</sup> Statutory Instrument 2004 No. 1633 *The Environmental Assessment of Plans and Programmes Regulations 2004*. Available from [SEA Regulations](#)

**Figure NTS.1 Stages in the SA Process**



## How has the Draft Local Plan been appraised?

To support the appraisal of the Local Plan, a SA Framework has been developed. This contains a series of sustainability objectives and guide questions that reflect both the current socio-economic and environmental issues which may affect (or be affected by) the Local Plan and the objectives contained within other plans and programmes reviewed for their relevance to the SA and Local Plan. The SA objectives are shown in **Table NTS.1**.

**Table NTS.1 SA Framework**

| <b>SA Objective</b>   | <b>Sub-objective</b>   |
|---|--|
| <b>1. To reduce air pollution and encourage improvements in air quality</b>   | 1.1 Minimise poor air quality and encourage improvements<br>1.2 Minimise and mitigate adverse effects of poor air quality<br>1.3 Support the achievement of air quality improvement objectives within the designated AQMAs   |
| <b>2. To minimise greenhouse gases that cause climate change and deliver a managed response to its effects</b>  | 2.1 Minimise greenhouse gas emissions<br>2.2 Deliver high standards of energy efficiency in new development<br>2.3 Support the use of renewable energies<br>2.4 Support increased resilience to climate change   |
| <b>3. To conserve, connect and enhance biodiversity across the District</b>   | 3.1 Support the achievement of biodiversity net gain<br>3.2 Conserve, protect and enhance protected sites in accordance with the protection hierarchy (i.e. international, national or locally designated)<br>3.3 Support improvements to biodiversity in non-designated areas of the District<br>3.4 Support improvements to ecological networks including connectivity of habitats<br>3.5 Support species adaptation and migration to reduce impacts of climate change and ensure resilience<br>3.6 Encourage carbon sequestration |
| <b>4. To conserve geological sites and safeguard mineral resources within the District</b>  | 4.1 Aim to protect and prevent damage to geologically important sites, such as RIGS<br>4.2 Balance the need for development with safeguarding mineral resources and infrastructure   |
| <b>5. To conserve and enhance the landscapes of the District for people and wildlife</b>  | 5.1 Conserve, protect and enhance protected sites in accordance with the protection hierarchy (i.e. international, national or locally designated)<br>5.2 Support improvements to existing non-designated landscapes   |
| <b>6. To protect water resources and ensure a high quality of inland and coastal waters</b>   | 6.1 Protect and enhance ground and surface water quality<br>6.2 Avoid adverse impacts on coastal waters, fisheries and bathing waters<br>6.3 Promote the sustainable and efficient use of water resources  |
| <b>7. To reduce the risk of flooding and where appropriate prevent coastal erosion</b>  | 7.1 Avoid inappropriate development in areas at risk from flooding and coastal erosion<br>7.2 Support priorities identified within the Isle of Grain to South Foreland Shoreline Management Plan (or subsequent updates or amendments)   |
| <b>8. To promote sustainable waste management</b>   | 8.1 Encourage a reduction in the amount of waste generated<br>8.2 Ensure the management of waste is consistent with the waste management hierarchy   |
| <b>9. To preserve, enhance, promote and capitalise on the significant qualities, fabric, setting and accessibility of the District's historic environment</b> | 9.1 Preserve and enhance designated heritage assets including their setting and contribution to local character and distinctiveness<br>9.2 Support improvements to existing non-designated heritage assets<br>9.3 Aim to promote sustainable access to the historic environment<br>9.4 Aim to capitalise on the potential of heritage assets to deliver sustainable benefits<br>9.5 Encourage new developments to contribute to the maintenance and enhancement of the historic character through design, layout and setting         |

|  |   |
|--|---|
| <b>10. To ensure the supply of high quality homes, which cater for identified needs</b>              | 10.1 Promote increased access to affordable housing<br>10.2 Support the timely delivery of market and affordable housing<br>10.3 Support the provision of homes which cater for existing and future residents' needs and the needs of different groups within the community by promoting a mix of new residential development, including, but not limited to, student, care home, gypsy & travellers and self build<br>10.4 Promote an appropriate mix of dwelling types, sizes and tenures<br>10.5 Promote the reduction in the amount of homelessness within the district<br>10.6 Promote high quality design in new housing developments |
| <b>11. To promote the sustainable use of land and conserve soil quality</b>                          | 11.1 Encourage the efficient use of previously developed land<br>11.2 Avoid the unnecessary loss of best and most versatile agricultural land<br>11.3 Encourage appropriate building densities within developments<br>11.4 Support the reduction in land contamination  |
| <b>12. To achieve a strong and sustainable economy, and revitalise town, local and rural centres</b> | 12.1 Support the provision of jobs in the right places to meet the identified employment needs<br>12.2 Encourage investment in businesses, people and infrastructure to improve productivity<br>12.3 Support the vitality and viability of town and city centres<br>12.4 Promote sustainable tourism<br>12.5 Support a safe and attractive night economy<br>12.6 Support a sustainable marine and coastal economy<br>12.7 Support a sustainable rural economy   |
| <b>13. To promote and encourage sustainable transport</b>  | 13.1 Promote consistency with the sustainable transport hierarchy and improvements to support increased use of sustainable transport methods<br>13.2 Support the reduction in the need to travel<br>13.3 Support the reduction of traffic congestion and improve road safety<br>13.4 Encourage investment to improve transport infrastructure   |
| <b>14. To promote safe, healthy, inclusive and sustainable communities</b>                           | 14.1 Support equal access and improvements to green and blue infrastructure, the countryside and open spaces including parks<br>14.2 Support equal access and improvements to community and health infrastructure, services and facilities to meet day-to-day needs<br>14.3 Support the delivery of connected communities which maximise social interaction including high quality public realm to create a sense of place<br>14.4 Minimise light and noise pollution<br>14.5 Promote healthy lifestyles including through sport and physical activity<br>14.6 Support the reduction of actual levels of crime                              |

The Draft Local Plan Vision and Strategic Objectives have been assessed for their compatibility with the SA objectives above. The preferred development requirements for housing, employment and retail (and alternatives identified), preferred Spatial Strategy and proposed plan policies have been appraised using matrices to identify likely significant effects on the SA objectives. A qualitative scoring system has been adopted which is set out in **Table NTS.2**.

**Table NTS.2 Scoring system used in the SA**

|                                    |            |   |
|------------------------------------|------------|---|
| <b>Significant Positive Effect</b> | <b>+ +</b> | Likely to have a significant positive effects |
| <b>Minor Positive Effect</b>       | <b>+</b>   | Likely to have a positive effects             |
| <b>Neutral</b>                     | <b>0</b>   | Neutral                                       |
| <b>Minor Negative Effect</b>       | <b>-</b>   | Likely to have negative effects               |
| <b>Significant Negative Effect</b> | <b>- -</b> | Likely to have significant negative effects   |

|                        |           |                                |
|------------------------|-----------|--------------------------------|
| <b>Uncertain</b>       | <b>?</b>  | Uncertain                      |
| <b>No Relationship</b> | <b>NA</b> | Not applicable/No relationship |

Proposed site allocations and reasonable alternatives have been appraised against the SA objectives that comprise the SA Framework using tailored appraisal criteria and associated thresholds of significance.

**Section 4 of the SA Report provides further information concerning the approach to the appraisal of the Draft Local Plan.**

## What are the findings of the appraisal of the Draft Local Plan?

### Vision and Strategic Objectives

The Vision seeks to ensure a range of good quality homes, a strong and resilient economy with quality jobs, higher educational attainment, low carbon design and good public transport links. Overall, the Vision performs well when assessed against the SA objectives although there are uncertainties and potential conflicts could arise between growth, resource use and environmental factors. The appraisal has found the Strategic Objectives to be broadly supportive of the SA objectives. Where conflicts or uncertainties have been identified, this generally relates to, on the one hand, the aspiration for growth of housing and employment, and on the other, the need to protect and enhance environmental assets and minimise resource use. However, incompatibility can be overcome by specific Local Plan policies focused on issues related environmental policy areas.

### Housing Growth Option

The Draft Local Plan sets out a preferred option of 1,252 dwellings per annum over the plan period based on the government's standard methodology for calculating housing need. The appraisal found positive effects against seven objectives. In relation to housing (SA Objective 10) the option was assessed as having a significant positive effect as it is considered to meet the identified housing need identified in the standard methodology and employment (SA Objective 12). This assessment is predicated on the basis that the level of housing growth will generate economic benefits and help meet the housing needs of the district's population.

Mixed positive and negative effects were identified regarding climate change, biodiversity, landscape, land use, and transport (SA Objectives 2, 3, 5, 11, 13). Effects on climate change, biodiversity, landscape, land use and transport were identified as being significant negative. This reflects the potential for positive benefits and negative aspects related to growth of this level. The assessment identified the potential for housing growth to have minor negative effects on a range of objectives including air quality (SA Objective 1), geology (SA Objective 4), water quality (SA Objective 6), flood risk (SA Objective 7) and health and communities (SA Objective 14). Significant negative effects with uncertainty were identified in respect of the historic environment (SA Objective 9) and waste (SA Objective 8).

### Employment Growth Option

The Draft Local Plan sets out a preferred option for a combined 172,220 sqm of employment land (comprising office, light industrial, general industrial and warehousing uses). Significant positive effects were assessed for employment and economy (SA Objective 12) as the figure would meet the evidenced figure for Labour Demand within the district. No further significant positive effects were identified during the appraisal of the preferred employment target. The preferred option was



assessed as having mixed positive and negative effects with regards to biodiversity (SA Objective 3), landscape (SA Objective 5) and health and sustainable communities (SA Objective 42), and positive and significant negative effects in relation to land use (SA Objective 11), transport (SA Objective 13) reflecting that it would lead to negative environmental effects during construction and potentially operation. This reflects the option would likely include the substantial release of greenfield land and a reduced ability to avoid the best and most versatile agricultural land (Grades 1 to 3).

The preferred option was considered likely to have a negative effect on air quality (SA Objective 1), climate (SA Objective 2), water (SA Objective 6), flood risk (SA Objective 7), waste (SA Objective 8) and heritage (SA Objective 9) due to impacts associated with the construction and operation of new development. However, there is uncertainty related to most of these effects.

## Retail Growth Option

The Draft Local Plan sets out a preferred option to meet the identified retail floorspace needs for the period up to 2035. Significant positive effects were assessed for employment and economy (SA Objective 12) as the figure would meet the evidenced need within the district and support the vibrancy and vitality of town centres. No further significant positive effects were identified during the appraisal of the preferred employment target. The preferred option was assessed as having mixed positive and negative effects with regards to biodiversity (SA Objective 3), landscape (SA Objective 5), heritage (SA Objective 9), land use (SA Objective 11), transport (SA Objective 13) and sustainable communities (SA Objective 14). The preferred option was considered likely to have a negative effect on air quality (SA Objective 1), climate change (SA Objective 2), water (SA Objective 6), flood risk (SA Objective 7) and waste (SA Objective 8) due to impacts associated with the construction and operation of new development. However, there is uncertainty related to most of these effects.

**A detailed matrix containing the appraisal of the preferred employment growth option and alternatives is presented in Appendix E to the SA Report. The findings of these appraisals are summarised in Section 5.3 – 5.5 of the SA Report.**

## Spatial Strategy

The Draft Local Plan sets out a spatial strategy with a principal focus within Canterbury Urban Area, with development in the Whitstable and Herne Bay Urban Areas as a secondary focus, a new freestanding community, with development in Rural Service Centres and at Local Service Centres to support the function of the settlements. The preferred option would have significant positive effects on housing (SA Objective 10). Significant positive employment and economic effects (SA Objective 12) were identified.

A mix of positive and negative effects were assessed for many of the remaining objectives. With regards to climate change (SA Objective 2), biodiversity (SA Objective 3), land use (SA Objective 11) the negative effects were assessed as potentially being significant. These findings reflect the substantial loss of greenfield around the main urban areas and within the new garden community location, with additional loss in other settlements. Minor positive effects are identified through the potential to provide biodiversity and green infrastructure enhancements. There is some uncertainty with regards to the type, duration and magnitude of effects. Significant positive and minor negative effects were assessed for health and sustainable communities (SA Objective 14) whilst for transport (SA Objective 13) the mix of effects assessed is significant in term of positive and negative effect.

**A detailed matrix containing the appraisal of the preferred spatial strategy is presented in Appendix F to the SA Report. The findings of these appraisals are summarised in Section 5.6 of the SA Report. Section 5.6 also reports on the assessment of the garden community location and reasonable alternative considered with detailed assessment in Appendix G.**

## Site allocations

Overall, the scale of housing and employment land to be delivered through proposed site allocations is considered to be significant and will help to meet the future needs of the district. Therefore, significant positive effects have been identified in respect of housing (SA Objective 10), employment and the economy (SA Objective 12) and health and sustainable communities (SA Objective 14), although cumulatively development could place pressure on key services and facilities (if unmitigated).

There is the potential for new development to result in adverse environmental effects (and in some cases, significant negative effects). However, in many cases (such as in respect of biodiversity, water, flood risk, cultural heritage and landscape) it is anticipated that the potential adverse effects could be mitigated or reduced at the project level. In this context, the site-specific development requirements contained in the area based policies, strategic policies, and the more general management policies will help minimise adverse effects and enhance positive effects associated with the delivery of the proposed site allocations. There are some residual uncertainties in relation to R12 due to the proximity of the associated site to Stodmarsh SAC/SPA/Ramsar although the HRA at regulation 18 stage assesses that there will be no adverse effects on integrity. Overall, some uncertainties are also identified about the in-combination effects of the allocations identified in the HRA.

Cumulatively, development will result in the loss of a substantial area of greenfield land including a number of sites that are classified as grades 1, 2 or 3 agricultural land (land in grades 1, 2 and 3a is classified as the best and most versatile agricultural land at Annex 2 of the National Planning Policy Framework). In consequence, there is the potential for significant negative effects on land use (SA Objective 11).

**The findings of the appraisal of both the proposed site allocations and reasonable alternatives are presented in Appendix G to the SA Report. A summary of the appraisal is provided in Section 5.7 of the SA Report.**

## Draft Local Plan policies

To support the overall strategy for development, the Draft Local Plan includes a range of policies across the following chapters:

- Spatial Strategy;
- Canterbury;
- Whitstable;
- Herne Bay;
- Rural Areas;
- District-wide Strategic Policies; and
- Development Management Policies.

The performance of these policies has been tested against the 14 SA objectives. Table **NTS 3** shows the anticipated cumulative effects of each plan chapter against the SA objectives. The cumulative effects on the SA objectives resulting from all chapters has also been assessed.

**Table NTS.3 Summary of cumulative effects**

| SA Objective  | Spatial Strategy Policies | Canterbury Policies | Whitstable Policies | Herne Bay Policies | Rural Area Policies | District Wide Strategic – Housing and New Communities | District Wide Strategic – Employment and the local economy | District Wide Strategic – Movement, transportation and air quality | District Wide Strategic – Open space, natural and historic environment | Development Management Policies | Cumulative |
|---|---------------------------|---------------------|---------------------|--------------------|---------------------|---|--|--|--|---------------------------------|------------|
| 1. To reduce air pollution and encourage improvements in air quality                                    | +<br>+/-                  | -/?                 | +/-                 | +/-                | -                   | +/-   | -  | ++   | +  | +/-                             | +/-        |
| 2. To minimise greenhouse gases that cause climate change and deliver a managed response to its effects | +<br>+/-                  | -                   | +/-                 | +/-                | -                   | ++/-  | -  | ++   | ++   | ++/-                            | ++/-       |
| 3. To conserve, connect and enhance biodiversity across the District                                    | +<br>+/-                  | ++/-<br>/?          | +/-/?               | +/-/?              | ++/-                | +/-   | -/?  | +  | ++   | ++                              | +/-/?      |
| 4. To conserve geological sites and safeguard mineral resources within the District                     | +/-                       | -                   | -/?                 | -/?                | -/?                 | 0   | -/?  | 0  | 0/?  | +                               | +/-        |
| 5. To conserve and enhance the landscapes of the District for people and wildlife                       | +<br>+/-                  | +/- -<br>/?         | +/- -               | +/- -<br>/?        | ++/- -<br>/?        | ++/-  | +/-  | +  | ++   | ++                              | +/-/?      |
| 6. To protect water resources and ensure a high quality of inland and coastal waters                    | +<br>+/-                  | ++/-<br>/?          | -                   | -                  | ++/-                | ++/-  | -  | +  | ++   | ++                              | ++/-       |
| 7. To reduce the risk of flooding and where appropriate   | +/-<br>/?                 | ++/- -<br>/?        | ++/-                | ++/- -             | ++/- -<br>/?        | 0   | 0  | 0  | ++   | ++                              | ++/-       |

| SA Objective   | Spatial Strategy Policies | Canterbury Policies | Whitstable Policies | Herne Bay Policies | Rural Area Policies | District Wide Strategic – Housing and New Communities | District Wide Strategic – Employment and the local economy | District Wide Strategic – Movement, transport-ation and air quality | District Wide Strategic – Open space, natural and historic environment | Development Management Policies | Cumulative |
|--|---------------------------|---------------------|---------------------|--------------------|---------------------|---|--|---|--|---------------------------------|------------|
| prevent coastal erosion  |                           |                     |                     |                    |                     |   |  |   |  |                                 |            |
| 8. To promote sustainable waste management   | +/- -                     | -                   | -                   | -                  | -                   | 0   | -  | +   | +/-/?  | ++                              | +/-        |
| 9. To preserve, enhance, promote and capitalise on the significant qualities, fabric, setting and accessibility of the District’s historic environment | + +/-                     | +/-/?               | +/-                 | +/-/?              | -/?                 | +/-   | +/-/?  | +   | ++   | +                               | +/-/?      |
| 10. To ensure the supply of high quality homes, which cater for identified needs   | ++                        | ++                  | ++                  | ++                 | ++                  | ++  | NA   | +   | NA   | ++                              | ++         |
| 11. To promote the sustainable use of land and conserve soil quality   | +/- -                     | + +/- -             | + +/- -             | + +/- -            | + +/- -             | + +/-   | +/-  | 0   | +  | ++                              | +/- -      |
| 12. To achieve a strong and sustainable economy, and revitalise town, local and rural centres  | ++                        | ++                  | ++                  | ++                 | ++                  | +   | ++   | ++  | +  | +                               | ++         |
| 13. To promote and encourage sustainable transport   | + +/-                     | + +/-/?             | +/-                 | +/-                | +/-                 | ++  | ++   | ++  | ++   | ++                              | + +/-      |
| 14. To promote safe, healthy, inclusive and sustainable communities  | + +/-                     | + +/-/?             | +/-                 | +/-                | + +/-               | ++  | ++   | ++  | ++   | ++                              | + +/-      |

The appraisal of cumulative effects highlights that the majority of the SA objectives will experience positive effects as a result of the implementation of the policies and proposals contained in the Draft Local Plan. Significant positive effects are expected in respect of the following SA objectives:

climate change; water; flood risk; housing; economy; transport; health and wellbeing. This reflects the likely socio-economic benefits associated with the delivery of housing, employment and related community facilities, services and infrastructure in the district over the plan period and the focus of the majority of this growth in and adjacent to the Canterbury Urban Area, Whitstable Urban Area, Herne Bay Urban Area, a single Garden Community location, and at a range of Rural and Local Service Centres within the rural area. It also reflects the strong framework provided by the plan policies that will help to conserve and enhance the district's natural and built environments.

Despite the overall positive cumulative effects associated with the implementation of the Draft Local Plan, cumulative negative effects have also been identified against many of the SA objectives including: air quality, climate change, biodiversity; geology; landscape; water; flood risk; waste; cultural heritage; transport; health and sustainable communities. This principally reflects impacts associated with the construction and operation of new development including land take, resource use, emissions and loss of landscape character and the location of proposed site allocations. However, the Draft Local Plan includes policies which seek to manage these effects (including through development requirements related to proposed site allocations) and in consequence, it is expected that significant adverse effects will be largely avoided, although some uncertainty remains. The Draft Local Plan has been assessed as having mixed positive and significant negative effects on land use. The Draft Local Plan policies and proposals seek to deliver a range of brownfield sites but would deliver the majority of new development on greenfield land. In consequence, a cumulative significant negative effect has also been identified in respect of land use.

**Detailed matrices containing the appraisal of the Draft Local Plan policies are presented in Appendix H – K to the SA Report. The findings of these appraisals are summarised in Section 5.8 of the SA Report. Cumulative effects are assessed in Section 5.9.**

## Mitigation and enhancement

The appraisal contained in the SA Report has identified a range of measures to help address potential negative effects and enhance positive effects associated with the implementation of the Draft Local Plan. These measures are highlighted within the detailed appraisal matrices to the SA Report and will be considered by the Council in refining the Local Plan.

## Consultation and next steps

This SA Report NTS and SA Report is being issued for consultation. We would welcome your views on any aspect of this SA Report. In particular, we would like to hear your views as to whether the effects which are predicted are likely and whether there are any significant effects which have not been considered.

**The consultation will run from: Monday 24 October 2022 to Monday 16 January 2023.**

The findings of this SA Report, together with consultation responses and further evidence base work, will be used to help refine the Draft Local Plan leading to consultation on the Local Plan Publication Draft (Regulation 19) version of the Local Plan.

# Contents

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|           |   |           |
|-----------|---|-----------|
| <b>1.</b> | <b>Introduction</b>   | <b>17</b> |
| 1.1       | Overview  | 17        |
| 1.2       | Purpose of the SA Report  | 17        |
| 1.3       | The Canterbury District Local Plan (2020-2045)                                  | 18        |
|           | Requirement to prepare a Local Plan   | 18        |
|           | Scope and content of the Canterbury District Local Plan (2020-2045)             | 18        |
|           | Preparation of the Local Plan Review  | 19        |
| 1.4       | Draft Canterbury District Local Plan (2020 - 2045) (Regulation 18 consultation) | 19        |
|           | Scope of the Draft Local Plan   | 19        |
| 1.5       | Sustainability Appraisal  | 21        |
|           | The requirement for Sustainability Appraisal                                    | 21        |
|           | Stages in the Sustainability Appraisal process                                  | 21        |
| 1.6       | Habitats Regulations Assessment   | 23        |
| 1.7       | Structure of this SA Report   | 24        |
| 1.8       | How to comment on this SA Report  | 24        |
| <b>2.</b> | <b>Review of Plans and Programmes</b>   | <b>25</b> |
| 2.1       | Introduction  | 25        |
| 2.2       | Review of Plans and Programmes  | 25        |
| 2.3       | Objectives and policies relevant to the Local Plan and SA                       | 25        |
| <b>3.</b> | <b>Baseline Analysis</b>  | <b>29</b> |
| 3.1       | Introduction  | 29        |
| <b>4.</b> | <b>SA Approach</b>  | <b>32</b> |
| 4.1       | Introduction  | 32        |
| 4.2       | SA Framework  | 32        |
| 4.3       | Methodology   | 35        |
|           | Draft District Vision and Strategic Objectives                                  | 35        |
|           | Strategic growth options  | 36        |
|           | Preferred Spatial Strategy  | 37        |
|           | Site allocations and reasonable alternatives                                    | 37        |
|           | Plan policies   | 37        |
|           | Secondary, Cumulative and Synergistic Effects                                   | 38        |
| 1.1       | When the SA was undertaken and by whom  | 38        |
| 1.2       | Difficulties encountered when undertaking the appraisal                         | 38        |
|           | Uncertainties   | 38        |
|           | Assumptions   | 39        |
| <b>5.</b> | <b>Appraisal of Effects</b>   | <b>40</b> |

|           |   |            |
|-----------|---|------------|
| 5.1       | Introduction  | 40         |
| 5.2       | Draft District Vision and Strategic Objectives – Compatibility Assessment with the SA Objectives                | 40         |
| 5.3       | Housing Growth Options  | 45         |
|           | Considered housing growth options   | 45         |
| 5.4       | Employment Growth Options   | 49         |
| 5.5       | Retail Growth Options   | 52         |
| 5.6       | Preferred Spatial Strategy  | 55         |
|           | Appraisal of Draft Local Plan spatial strategy  | 55         |
| 5.7       | Site allocations  | 63         |
|           | Housing Allocations   | 63         |
|           | Summary of findings   | 70         |
|           | Employment Allocations  | 71         |
|           | Country Park and Reservoirs Allocations   | 73         |
|           | Reasons for the selection of the preferred site allocations and for the rejection of Alternatives at this stage | 76         |
| 5.8       | Plan Policies   | 76         |
|           | Spatial Strategy Policies   | 76         |
|           | Canterbury Policies   | 78         |
|           | Whitstable Policies   | 80         |
|           | Herne Bay Policies  | 81         |
|           | Rural Area Policies   | 83         |
|           | District Wide Strategic Policies  | 84         |
|           | Development Management Policies   | 87         |
| 5.9       | Cumulative, Synergistic and Secondary Effects   | 89         |
|           | Cumulative Effects Arising from the Draft Local Plan  | 89         |
|           | Cumulative effects arising from other plans and programmes  | 99         |
| 5.10      | Mitigation and Enhancement  | 99         |
| <b>6.</b> | <b>Conclusions, Monitoring and Next Steps</b>   | <b>100</b> |
| 6.1       | Conclusions   | 100        |
|           | Vision and Strategic Objectives   | 100        |
|           | Housing Growth Option   | 100        |
|           | Employment Growth Option  | 100        |
|           | Retail Growth Option  | 101        |
|           | Spatial Strategy  | 101        |
|           | Site allocations  | 102        |
|           | Draft Local Plan policies   | 102        |
| 6.2       | Monitoring  | 103        |
| 6.3       | Consultation on this SA Report  | 103        |
| 6.4       | Next steps  | 103        |

---

|           |   |    |
|-----------|---|----|
| Table 2.1 | Key objectives and policies arising from the review of Plans and Programmes | 26 |
| Table 3.1 | Key Sustainability Issues   | 29 |
| Table 4.1 | SA Framework  | 32 |
| Table 4.2 | Coverage of the SEA Topics by the SA Objectives                             | 34 |
| Table 4.3 | SA scoring system   | 36 |
| Table 4.4 | Appraisal matrix example  | 37 |

|            |  |    |
|------------|--|----|
| Table 5.1  | Draft Vision and Strategic Objectives – Compatibility with the SA Objectives | 42 |
| Table 5.2  | Summary SA of strategic housing growth options                               | 45 |
| Table 5.3  | Employment growth options assessed   | 49 |
| Table 5.4  | Summary SA of strategic employment growth options                            | 50 |
| Table 5.5  | Retail growth options assessed   | 52 |
| Table 5.6  | Summary SA of retail growth options  | 53 |
| Table 5.7  | Summary SA of proposed Garden Community location                             | 57 |
| Table 5.8  | Summary SA of alternative Garden Community location                          | 57 |
| Table 5.9  | Appraisal of the Preferred Spatial Strategy                                  | 60 |
| Table 5.10 | Summary SA of proposed housing allocations – Canterbury area                 | 64 |
| Table 5.11 | Summary SA of proposed housing allocations – Whitstable area                 | 66 |
| Table 5.12 | Summary SA of proposed housing allocations – Herne Bay area                  | 67 |
| Table 5.13 | Summary SA of proposed housing allocations – Rural area                      | 68 |
| Table 5.14 | Summary SA of proposed employment allocations                                | 72 |
| Table 5.15 | Summary SA of proposed Country Park and reservoir                            | 75 |
| Table 5.16 | Results of the Cumulative Effects Appraisal                                  | 90 |

---

|            |                          |    |
|------------|--------------------------|----|
| Figure 1.1 | Stages in the SA Process | 23 |
|------------|--------------------------|----|

---

|             |  |
|-------------|--|
| Appendix A: | Quality Assurance Checklist  |
| Appendix B: | Consultation Responses   |
| Appendix C: | Review of Plans, Policies and Programmes                               |
| Appendix D: | Baseline   |
| Appendix E: | Appraisal of Housing, Employment and Retail Growth Options             |
| Appendix F: | Appraisal of Spatial Strategy  |
| Appendix G: | Appraisal of Site Allocations and Alternatives                         |
| Appendix H: | Appraisal of Spatial Strategy Policies                                 |
| Appendix I: | Appraisal of Canterbury, Whitstable, Herne Bay and Rural Area Policies |
| Appendix J: | Appraisal of District Wide Strategic Policies                          |
| Appendix K: | Appraisal of Development Management Policies                           |
| Appendix L: | Monitoring Indicators  |
| Appendix M: | Definitions of significance  |



# 1. Introduction

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## 1.1 Overview

- 1.1.1 Canterbury City Council (the Council) is currently preparing the Canterbury District Local Plan (2020 - 2045) (the Local Plan). The Local Plan will set out the vision, objectives, planning policies and site allocations that will guide development in the local authority area to 2045. The Council, with support from WSP Environment and Infrastructure Solutions UK Ltd (WSP)<sup>3</sup>, has undertaken a Sustainability Appraisal (SA) of the new Local Plan. The SA will appraise the environmental, social and economic performance of the Local Plan and any reasonable alternatives. In doing so, it will help to inform the selection of the options for the Local Plan concerning (in particular) the quantum, distribution and location of future development in the district. The SA process will also identify measures to avoid, minimise or mitigate any potential negative effects that may arise from the Plan's implementation as well as opportunities to improve the contribution of the Local Plan towards sustainability.
- 1.1.2 As part of the preparation of the Local Plan, the Council has prepared the Draft Canterbury District Local Plan (2020 - 2045) (Regulation 18 consultation) (Draft Local Plan from here on) for consultation. This document sets out the draft policies and land allocations to address the land use and planning issues facing district until 2045. It is being consulted on between Monday 24 October 2022 and Monday 16 January 2023.
- 1.1.3 This report presents the findings of the SA of the Draft Local Plan document.

## 1.2 Purpose of the SA Report

- 1.2.1 This SA Report supports the development and refinement of the Local Plan by appraising the sustainability strengths and weaknesses of the policies and allocations that comprise the Draft Local Plan. More specifically, this SA Report sets out:
- an overview of the Canterbury District Local Plan Review;
  - a review of relevant international, national, regional, sub-regional and local plans, policies and programmes;
  - baseline information for the Local Plan area across key sustainability topics;
  - key economic, social and environmental issues relevant to the appraisal of the Local Plan;
  - the approach to undertaking the appraisal of the Draft Local Plan;
  - the findings of the appraisal of the Draft Local Plan; and
  - conclusions and an overview of the next steps in the SA process.

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<sup>3</sup> Formerly Wood Group UK Ltd (Wood)

## 1.3 The Canterbury District Local Plan (2020-2045)

### Requirement to prepare a Local Plan

- 1.3.1 The National Planning Policy Framework (NPPF) (July 2021) sets out the government's planning policies for England and how these are expected to be applied. The NPPF (para. 15) states that *"The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings."*
- 1.3.2 The NPPF must be taken into account in the preparation of Local and Neighbourhood Plans, and is a material consideration in planning decisions. The NPPF states (paragraph 19) that *"the development plan for an area comprises the combination of strategic and non-strategic policies which are in force at a particular time"*.
- 1.3.3 Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for (para. 20):
- *"Housing (including affordable housing), employment, retail, leisure and other commercial development;*
  - *Infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);*
  - *Community facilities (such as health, education and cultural infrastructure); and*
  - *Conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation."*
- 1.3.4 The NPPF states (para. 28) that *"non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure and community facilities at a local level, establishing design principles, conserving and enhancing the natural and historic environment and setting out other development management policies."*

### Scope and content of the Canterbury District Local Plan (2020-2045)

- 1.3.5 In this context, the Council is currently preparing a new Local Plan for the district that will, once adopted, replace the Canterbury Local Plan adopted in 2017. The new Local Plan will guide growth and development in the district for the period up to 2045. It is anticipated it will provide:
- The District Vision by 2045 and a set of strategic objectives;
  - The overall spatial strategy and growth requirements;
  - A set of strategic and development management policies to help shape development;
  - A range of allocations for housing and employment to meet the identified requirements; and
  - A Policies Map showing relevant allocations and designations.
- 1.3.6 Alongside any Neighbourhood Plans that come forward, it will form the Development Plan for the local authority area.

## Preparation of the Local Plan Review

- 1.1.1 A Local Development Scheme (LDS) was adopted by the Council in May 2021. The LDS sets out the timetable for production of the Local Plan in accordance with the requirements for plan production set out in The Town and Country Planning (Local Planning) (England) Regulations 2012). The first stage in the preparation of the Local Plan, the Issues consultation, was consulted on in Summer 2020. The Draft District Vision and Local Plan Options (June 2021) was consulted on between 28 May and 30 July 2021. The LDS envisages Publication Plan (Regulation 19) preparation and publication from February to September 23; Submission (Regulation 22) and examination between Oct 2023 and August 2024; and Adoption September 2024

## 1.4 Draft Canterbury District Local Plan (2020 - 2045) (Regulation 18 consultation)

### Scope of the Draft Local Plan

- 1.4.1 The Draft Local Plan comprises the following draft components:
- Vision and Strategic Objectives;
  - The preferred options in terms of the quantum of growth (housing, employment and retail development requirements) and distribution of growth (Spatial Strategy);
  - Proposed sites allocations to deliver the preferred options;
  - Proposed strategic and development management policies.
- 1.4.2 Each plan component is discussed in turn below.

### Vision and Strategic Objectives

- 1.1.2 The Vision for the district to 2045 contained in the Draft Local Plan is reproduced below:

#### **Vision for the district to 2045**

##### **A strong and resilient economy**

The district will be stronger and more resilient by 2045, offering highly-skilled jobs in areas like science and technology thanks to the growth and development of universities and a strong medical sector. Business investors will continue to be attracted by the district's connection to London and the Continent, with new and diverse jobs for local people.

##### **Improved connectivity**

Growth and investment in the district will be centred on Canterbury, and complemented by an enhanced historic and natural environment that will create vibrant cultural and creative areas, and improved biodiversity. Investment in digital infrastructure and walking and cycling routes will have helped to improve air quality and to respond to the challenges of climate change, supporting good health and wellbeing in our communities. This will enhance quality of life for residents and improve the visitor experience.

##### **Healthy communities**

Existing communities will be enhanced and new healthy communities will be of high-quality low-carbon design with good public transport links to the city and beyond. There will also be high-quality attractive public spaces and good access to community facilities. A range of homes will meet the needs of the district, improve affordability and support growth.

##### **A thriving environment**

Significant new areas of accessible, high-quality open space will be created across the district and both new and existing valued open spaces enjoyed by the district's residents will be protected for future generations, ensuring continued access beyond the period of the plan. Our important habitats and landscapes will be restored and enhanced, supporting the recovery of nature and increasing biodiversity. Opportunities for nature-based responses to climate change and other environmental challenges will be maximised. Significant investment in our water environment and infrastructure will improve river and coastal water quality, provide a resilient water supply and minimise flood risk.

- 1.4.3 The vision is supported by 12 Strategic Objectives, linked to the themes of the economy, connectivity, healthy communities, and thriving environment. The Draft Local Plan sets out the objectives in full.

## Preferred Development Requirements and Spatial Strategy

- 1.4.4 The Draft Local Plan sets out development requirements:
- Housing – to deliver 1,252 houses per annum, equivalent to 31,300 dwellings between 2020 and 2045;
  - Employment – to provide 172,220 sqm of employment floorspace.
  - Retail – to provide 414 sqm floorspace for convenience retail use; and 5,290 sqm floorspace for comparison retail use.

## Proposed allocations

- 1.1.3 The Draft Local Plan sets out a range of allocations to help meet the identified needs of the district:
- A new garden community at Cooting Farm; and
  - A range of housing and employment allocations in the Canterbury, Whitstable, Herne Bay and Rural areas.

## Local Plan policies

- 1.1.4 To support the overall strategy for development, the Draft Local Plan sets out a range of policies to help guide new development across the following chapters:
- Spatial Strategy;
  - Canterbury;
  - Whitstable;
  - Herne Bay;
  - Rural areas;
  - District-wide Strategic Policies; and
  - Development Management Policies.
- 1.4.5 Following consultation on the Draft Local Plan the Council will consider all the comments received and intends to progress to formal publication of the plan (Regulation 19) in 2023.

## 1.5 Sustainability Appraisal

### The requirement for Sustainability Appraisal

- 1.5.1 Under Section 19(5) of the Planning and Compulsory Purchase Act 2004, the Council is required to carry out a SA of the Local Plan to help guide the selection and development of policies and proposals in terms of their potential social, environmental and economic effects. In undertaking this requirement, local planning authorities must also incorporate the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004<sup>4</sup> (SEA Regulations). The SEA regulations seek to provide a high level of protection of the environment by integrating environmental considerations into the process of preparing certain plans and programmes.
- 1.5.2 At paragraphs 15-16, the National Planning Policy Framework (NPPF)<sup>5</sup> sets out that local plans provide a framework for addressing housing needs and other economic, social and environmental priorities and that they must be prepared with the objective of contributing to the achievement of sustainable development. In this context, paragraph 32 reiterates the requirement for SA/SEA as it relates to local plan preparation:
- “Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered).”*
- 1.5.3 The Planning Practice Guidance<sup>6</sup> (PPG) also makes clear that SA plays an important role in demonstrating that a local plan reflects (and contributes to) sustainability objectives and has considered reasonable alternatives. In this regard, SA will help to ensure that a local plan is “justified”, a key test of soundness that concerns the extent to which the plan is an appropriate strategy, when considered against the reasonable alternatives and available and proportionate evidence.

### Stages in the Sustainability Appraisal process

- 1.5.4 There are five key stages in the SA process and these are highlighted in **Figure 1.1** together with links to the development of the Local Plan. The first stage (**Stage A**) led to the production of a SA Scoping Report, which was informed by a review of other relevant policies, plans and programmes as well as baseline information and the identification of key sustainability issues affecting the District, the Scoping Report set out the proposed framework for the appraisal of the Local Plan (the SA Framework).
- 1.5.5 The Scoping Report was subject to a six week consultation between 28th October and 9th December 2019. 31 responses were received to the consultation from the statutory SEA consultation bodies (Environment Agency, Historic England, Natural England) as well as a range of other stakeholders. Responses related to all aspects of the Scoping Report and resulted in amendments to the baseline, plans and programmes review and SA Framework. **Appendix B** contains a schedule of the consultation responses received to

<sup>4</sup> Statutory Instrument 2004 No. 1633 *The Environmental Assessment of Plans and Programmes Regulations 2004*. Available from [SEA Regulations](#)

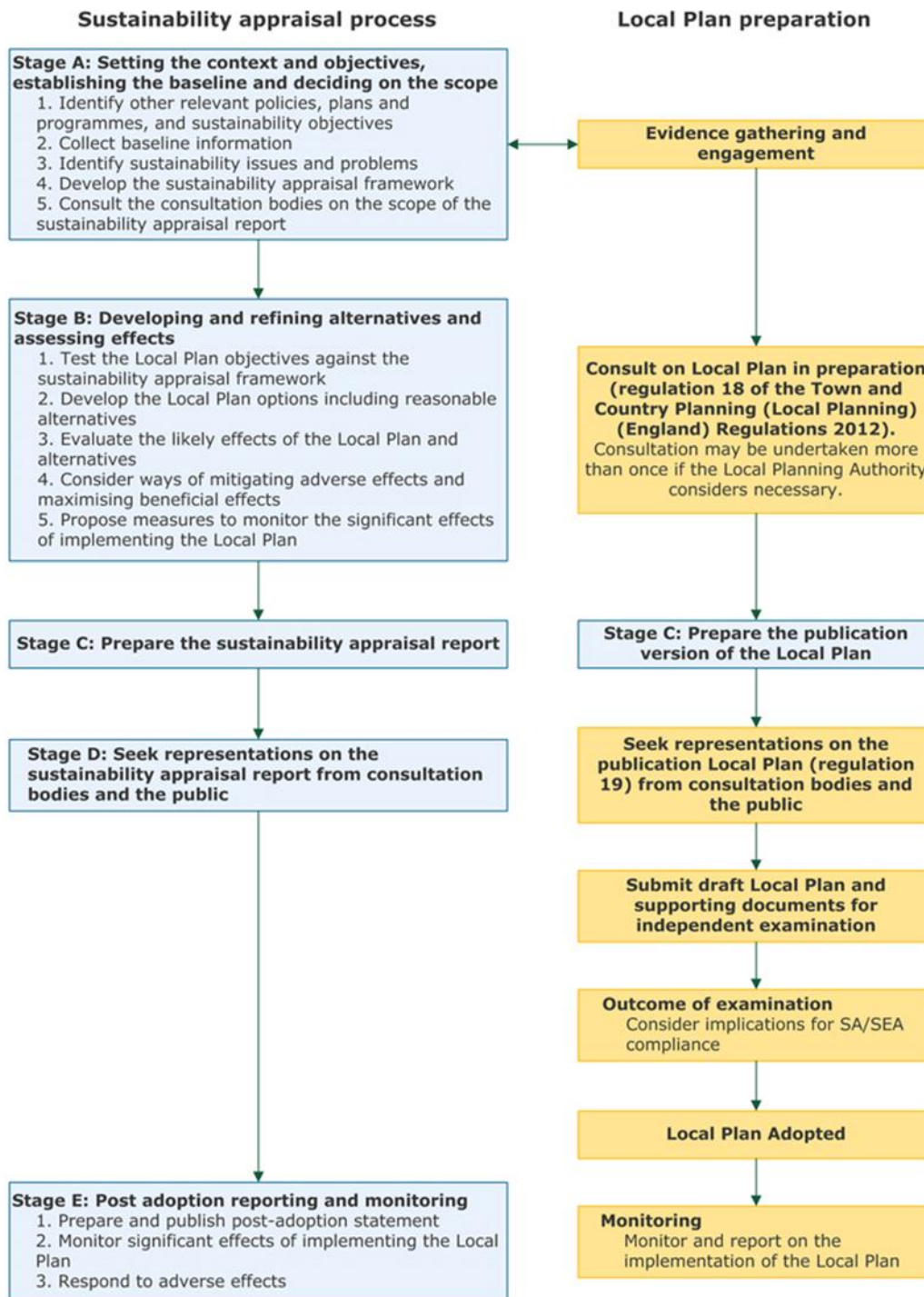
<sup>5</sup> MHCLG (2021) National Planning Policy Framework. Available from: [NPPF](#)

<sup>6</sup> MHCLG (2019), Planning Practice Guidance, Strategic environmental assessment and sustainability appraisal, Paragraph: 001 Reference ID: 11-001-20190722

the Scoping Report, the Council's response and the subsequent action taken and reflected in subsequent SA Reports, including this SA Report.

- 1.5.6 **Stage B** is an iterative process involving the appraisal and refinement of the Local Plan with the findings presented in a series of interim SA Reports. This SA Report and the appraisal contained therein forms part of Stage B of the SA process. This SA Report follows on from consultation on the Draft District Vision and Local Plan Options (June 2021) which was consulted on between 28 May and 30 July 2021. Responses received to the SA Report that accompanied the Draft District Vision and Local Plan Options are available in **Appendix B**. Through the appraisal of the draft policies and allocations this SA Report is intended to help further refine the emerging Canterbury District Local Plan (2020-2045).
- 1.5.7 At **Stage C**, a final SA Report will be prepared to accompany the submission draft Local Plan and will be available for consultation alongside the draft Local Plan itself prior to consideration by an independent planning inspector (**Stage D**).
- 1.5.8 Following Examination in Public (EiP), and subject to any significant changes to the draft Local Plan that may require appraisal as a result of the EiP, the Council will issue a Post Adoption Statement as soon as reasonably practicable after the adoption of the Local Plan. This will set out the results of the consultation and SA process and the extent to which the findings of the SA have been accommodated in the adopted Local Plan. During the period of the Local Plan, the Council will monitor its implementation and any significant social, economic and environmental effects (**Stage E**).

**Figure 1.1 Stages in the SA Process**



## 1.6 Habitats Regulations Assessment

1.6.1 Regulation 105 of the Conservation of Habitats and Species Regulations 2017 (the ‘Habitats Regulations’) states that if a land-use plan is “(a) is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects); and (b) is not directly connected with or necessary to the management of the site” then the plan-making authority must “...make

*an appropriate assessment of the implications for the site in view of that site's conservation objectives*" before the plan is given effect. The process by which Regulation 105 is met is known as Habitats Regulations Assessment (HRA). An HRA determines whether there will be any 'likely significant effects' (LSE) on any European site as a result of a plan's implementation (either on its own or 'in combination' with other plans or projects) and, if so, whether these effects will result in any adverse effects on site integrity. The Council has a statutory duty to prepare the Local Plan and is therefore the Competent Authority for an HRA.

- 1.6.2 In accordance with the Habitats Regulations, what is commonly referred to as a HRA screening exercise has been undertaken to identify the likely impacts of the Local Plan upon European sites, either alone or 'in combination' with other projects or plans, and to consider whether these effects are likely to be significant. Where there are likely significant effects, a more detailed Appropriate Assessment will be required.
- 1.6.3 The HRA screening exercise is reported separately from the SA of the Local Plan but has helped inform the appraisal process, particularly in respect of the potential effects of proposals on biodiversity.

## 1.7 Structure of this SA Report

1.7.1 This SA Report is structured as follows:

- **Non-Technical Summary** - Provides a summary of the SA Report including the findings of the appraisal of the Draft Local Plan;
- **Section 1: Introduction** - Includes a summary of the Draft Local Plan, an overview of SA, report contents and an outline of how to respond to the consultation;
- **Section 2: Review of Plans and Programmes** - Provides an overview of the review of those plans and programmes relevant to the Local Plan and SA that is contained at **Appendix C**;
- **Section 3: Baseline Analysis** - Presents the baseline analysis of the District's social, economic and environmental characteristics and identifies the key sustainability issues that have informed the SA Framework and appraisal;
- **Section 4: SA Approach** - Outlines the approach to the SA of the Draft Local Plan including the SA Framework;
- **Section 5: Appraisal of the Draft Local Plan** – Presents the findings of the appraisal of the Draft Local Plan;
- **Section 6: Conclusions, Monitoring and Next Steps** – Presents the conclusions of the SA of the Local Plan, an initial monitoring framework and details of the next steps in the appraisal process.

## 1.8 How to comment on this SA Report

1.8.1 This SA Report has been issued for consultation alongside the Draft Local Plan consultation from Monday 24 October 2022 to Monday 16 January 2023. We would welcome your views on any aspect of this SA Report. In particular, we would like to hear your views as to whether the effects which are predicted are likely and whether there are any significant effects which have not been considered.



## 2. Review of Plans and Programmes

---

### 2.1 Introduction

2.1.1 Stage A of the SA process requires that analysis is undertaken to 'Identify other relevant policies, plans and programmes, and sustainability objectives'. This is not only relevant to the SA, but the Local Plan Review in its entirety as it should reflect legislation, national policy objectives and relate to policy contexts and visions set by any relevant plans.

### 2.2 Review of Plans and Programmes

2.2.1 **Appendix C** contains a list of the most relevant plans at International, National, Regional (South East and Kent) and Local level. The plans and programmes are split into similar thematic headings as the evidence base, but each plan/policy/programme is assessed in its entirety once, so there are no duplicates within the list. The order within each level does not dictate a prioritisation of the plans and programmes.

2.2.2 Each plan, policy or programme has been reviewed and its content and/or key sustainability objectives has been described. Consideration has been given to the implications of each plan, policy or programme for the emerging Local Plan Review.

### 2.3 Objectives and policies relevant to the Local Plan and SA

2.3.1 The review of plans and programmes presented in **Appendix C** has identified a number of objectives and policies relevant to the Local Plan and the SA across the following topic areas:

- Air Quality;
- Climate Change, Adaptation and Mitigation;
- Biodiversity;
- Landscape, Land Use and Geology;
- Water: Flooding Quality and Resources;
- Waste;
- Population and Human Health;
- Historic Environment;
- Housing;
- Economy; and
- Transport.

2.3.2 These objectives and policies are summarised in **Table 2.1** together with the key sources and implications for the SA Framework. Only the key sources are identified; however, it is acknowledged that many other plans and programmes could also be included.

**Table 2.1 Key objectives and policies arising from the review of Plans and Programmes**

| Key Objectives and Policies  | Key Source(s)  | Implications for the SA Framework   |
|--|--|---|
| <b>Air Quality</b>   |  |   |
| Ensure that air quality is maintained or enhanced and that emissions of air pollutants are kept to a minimum.  | Air Quality Directive; NPPF; Clean Air Strategy; Air Quality Action Plan 2018-2023   | The SA Framework should include a specific objective and/or guide question relating to air quality.   |
| <b>Climate Change, Adaptation and Mitigation</b>   |  |   |
| <ul style="list-style-type: none"> <li>Minimise the effects of climate change.</li> <li>Reduce emissions of greenhouse gases that may cause climate change.</li> <li>Encourage the provision of renewable energy.</li> <li>Move towards a low carbon economy.</li> <li>Promote adaptation to the effects of climate change.</li> </ul>   | Paris Climate Change Agreement; IPCC reports; The Climate Change Act (2008) and Climate Change Act (2050 Target Amendment) Order 2019; UK Climate Projections  | The SA Framework should include a specific objective relating to climate change mitigation and adaptation.  |
| <b>Biodiversity</b>  |  |   |
| <ul style="list-style-type: none"> <li>Protect and enhance biodiversity, including designated sites, species of principal importance, habitats and ecological networks.</li> <li>Identify opportunities for green infrastructure provision.</li> </ul>   | EU Directives and Conventions; Wildlife and Countryside Act (1981); The Conservation of Habitats and Species Regulations (2017) (as amended); A Green Future: Our 25 Year Plan to Improve the Environment; Strategic Access Management and Monitoring Strategies; Green Infrastructure Strategy (2018-2031) & associated evidence document and action plan | The SA Framework should include a specific objective relating to the protection and enhancement of biodiversity including green infrastructure provision.   |
| <b>Landscape, Land Use and Geology</b>   |  |   |
| <ul style="list-style-type: none"> <li>Protect and enhance the quality and distinctiveness of natural landscapes and townscapes including the Kent Downs AONB.</li> <li>Promote access to the countryside.</li> <li>Promote high quality design that respects and enhances local character.</li> <li>Protect the undeveloped coast.</li> <li>Encourage the use of previously developed (brownfield) land.</li> </ul> | NPPF; Safeguarding our Soils – A Strategy for England; Canterbury Landscape Character and Biodiversity Appraisal); Green Infrastructure Strategy (2018-2031) & associated evidence document and action plan; Kent Downs Area of Outstanding Natural Beauty (AONB) Management Plan  | <p>The SA Framework should include a specific objective relating to the protection and enhancement of landscape and townscapes.</p> <p>The SA Framework should include an objective that helps to promote the effective use of land and protect geological resources.</p> |

- **Protect soil quality and minimise the loss of Best and Most Versatile agricultural land.**

### Water: Flooding Quality and Resources

- Protect and enhance surface and groundwater quality.
- Improve water efficiency.
- Avoid development in areas of river, surface, ground, and coastal flood risk.
- Reduce the risk of flooding arising from new development.
- Ensure timely investment in water management infrastructure to accommodate new development.
- Promote the use of Sustainable Urban Drainage Systems.

Water Framework Directive; Drinking Water Directive; Floods Directive; Flood and Water Management Act 2010; Flood and Water Management Act 2010; Water for Life, NPPF; Water Resources Management Plan (2020-2080); South East River Basin District: River Basin Management Plan; Water Resources South East Regional Plan

The SA Framework should include specific objectives relating to the protection and enhancement of water quality and quantity and minimising flood risk.

### Waste

- Promote the use of substitute or secondary and recycled materials and minerals waste.
- Ensure the timely provision of infrastructure to support new development.

National Planning Policy for Waste (NPPW); Resources and Waste Strategy for England; Joint Municipal Waste Management Strategy (2018/19 to 2020/21)

The SA Framework should support effective waste management and reuse of resources.

### Population and Human Health

- Address deprivation and reduce inequality through regeneration.
- Ensure social equality and prosperity for all.
- Provide high quality services, community facilities and social infrastructure that are accessible to all.
- Promote improvements to health and wellbeing.
- Promote healthier lifestyles.
- Minimise noise pollution.
- Reduce crime including the fear of crime.

NPPF; Fair Society, Healthy Lives; Sports England: Towards an active nation; NHS Long Term Plan; Joint Strategic Needs Assessment

The SA Framework should include objectives relating to:

- supporting access to community and health services;
- addressing deprivation and promoting equality and inclusion;
- the provision of high quality community facilities and services;
- supporting high quality public realm.
- promote healthy lifestyles.

### Historic Environment

- Conserve and enhance cultural heritage assets and their settings including the World Heritage Site.
- Maintain and enhance access to cultural heritage assets.
- Respect, maintain and strengthen local character and distinctiveness.

The World Heritage Convention (UNESCO); NPPF; A Heritage Strategy for Canterbury District; Conservation Area Appraisals.

The SA Framework should include a specific objective relating to the conservation and enhancement of cultural heritage.

- Improve the quality of the built environment.

**Housing**

- |   |   |  |
|---|---|--|
| <ul style="list-style-type: none"> <li>• Meet the full affordable and private market housing need for Canterbury within the administrative boundary where possible.</li> <li>• Make appropriate provision for Gypsies, Travellers and Travelling Showpeople.</li> <li>• Support opportunities for custom and self-build.</li> </ul> | <p>NPPF; Planning for the Future White Paper: Thames Estuary 2050 Growth Commission Report: 2050 Vision; Housing, Homelessness and Rough Sleeping Strategy (2018-23) &amp; associated Action Plan; Housing Needs Assessment 2021.</p> | <p>The SA Framework should include a specific objective relating to:</p> <ul style="list-style-type: none"> <li>• the provision of housing to meet current and future needs;</li> <li>• supporting development of a mix of type and tenures;</li> <li>• reducing homelessness</li> </ul> |
|---|---|--|

**Economy**

- |   |   |   |
|---|---|---|
| <ul style="list-style-type: none"> <li>• Ensure that there is an adequate supply of employment land to meet local needs and to attract inward investment.</li> <li>• Encourage economic diversification including growth in high value economic sectors.</li> <li>• Create local employment opportunities.</li> <li>• Enhance skills in the workforce to reduce unemployment and deprivation.</li> <li>• Improve educational attainment and ensure the appropriate supply of high-quality educational facilities.</li> <li>• Promote the vitality of retail and leisure sectors within town centres.</li> </ul> | <p>NPPF; Thames Estuary 2050 Growth Commission Report: 2050 Vision; South East LEP: Smarter, Faster, Together - Towards a Local Industrial Strategy; University of Kent Canterbury Campus Framework Masterplan, Final Draft; Kent and Medway Growth and Infrastructure Framework; Herne Bay Area Action Plan 2010 &amp; associated SPDs; Economic Development and Tourism Study (2020, 2022); Retail and Leisure Study Update (2020, 2022).</p> | <p>The SA Framework should include objectives relating to:</p> <ul style="list-style-type: none"> <li>• the enhancement of education and skills;</li> <li>• delivery of employment land that supports economic diversification and the creation of high quality, local jobs;</li> <li>• enhancing the area's town and other centres.</li> </ul> |
|---|---|---|

**Transport**

- |  |  |  |
|--|--|--|
| <ul style="list-style-type: none"> <li>• Encourage sustainable transport and reduce the need to travel.</li> <li>• Reduce traffic and congestion.</li> <li>• Improve public transport provision.</li> <li>• Encourage walking and cycling.</li> <li>• Enhance accessibility to key community facilities, services and jobs for all.</li> <li>• Ensure timely investment in transportation infrastructure to accommodate new development.</li> <li>• Locate new housing development in sustainable locations or in locations that can be made sustainable.</li> </ul> | <p>NPPF; Kent County Council Active Travel Strategy; Local Transport Plan 4: Delivering Growth without Gridlock 2016-2031; Canterbury District Transport Strategy (2014-2031).</p> | <p>The SA Framework should include objectives relating to:</p> <ul style="list-style-type: none"> <li>• reducing the need to travel, particularly by car;</li> <li>• the promotion of sustainable forms of transport such as walking and cycling;</li> <li>• maintaining and enhancing accessibility to key facilities, services and jobs;</li> <li>• reducing congestion and enhancing road safety;</li> <li>• investment in transportation infrastructure to meet future needs.</li> </ul> |
|--|--|--|

## 3. Baseline Analysis

### 3.1 Introduction

- 3.1.1 An essential part of the SA process is the identification of current baseline conditions and their likely evolution. It is only with a knowledge of existing conditions, and a consideration of their likely evolution, can the effects of the Draft Local Plan be identified and appraised and its subsequent success or otherwise be monitored. The SEA Regulations also require that the evolution of the baseline conditions of the plan area (that would take place without the plan or programme) is identified, described and taken into account.
- 3.1.2 The baseline evidence is set out in **Appendix D**. The baseline analysis is presented for the following topic areas:
- Air Quality;
  - Climate Change, Adaptation and Mitigation;
  - Biodiversity;
  - Landscape, Land Use and Geology;
  - Water: Flooding Quality and Resources;
  - Waste;
  - Population and Human Health;
  - Historic Environment;
  - Housing;
  - Economy; and
  - Transport.
- 3.1.3 To inform the analysis, data has been drawn from a variety of sources, including: the 2011 and 2021 Census; Nomis; Office for National Statistics Canterbury City Council's Authority Monitoring Reports; the emerging Local Plan evidence base; Environment Agency; Historic England; Kent County Council; Index of Multiple Deprivation 2019; and Department for Environment, Food and Rural Affairs (Defra).
- 3.1.4 The key sustainability issues arising from the review of baseline conditions are summarised in **Table 3.1**.

**Table 3.1 Key Sustainability Issues**

| Topic Area  | Key Sustainability Issues  |
|-------------|--|
| Air Quality | <ul style="list-style-type: none"> <li>● The main source of air pollution in the district is road traffic emissions from major roads, notably the A2, A28 and A299.</li> <li>● Background PM10 annual mean concentrations increased in 2018, levels will continue to be monitored to determine whether the trend is shifting upwards.</li> </ul> |

- Two AQMAs have been declared in relation to exceedances in nitrogen dioxide (NO<sub>2</sub>).

### **Climate Change, Adaptation and Mitigation**

- The urgent need to address climate change to reduce the current and future threat to Canterbury District's population, wildlife, natural resources, archaeological and cultural heritage and material assets (including flood risk).
- Ensuring CO<sub>2</sub> levels continue to decrease, especially by trying to reduce the amount of CO<sub>2</sub> from transport in particular on A roads.
- The need to promote sustainable forms of energy and encourage renewable energy projects in the appropriate location.
- To become as energy efficient as possible, while reducing the overall energy consumption.

### **Biodiversity**

- Ensure development does not negatively impact biodiversity, and conserve and enhance biodiversity and protected sites.
- Minimising or mitigating any adverse impacts of coastal squeeze, increased levels of public access/disturbance, increased development and any associated impacts on the District's rich biodiversity.
- To achieve biodiversity net gain to improve the environment including through the long-term enhancement and creation of well-connected, functional habitats.

### **Landscape, Land Use and Geology**

- To conserve and enhance landscape character and protected sites, by limiting damage to sites which are deemed important for their landscape.
- Ensuring limited damage to sites which are deemed important for their geological or mineral resources; including minimising developments which could prevent or hinder essential extractions.

### **Water: Flooding, Quality and Resources**

- Prepare against flooding and ensure development is appropriately placed. Where necessary, ensure the appropriate mitigation or development design is used.
- Protect groundwater especially within SPZ, NVZ and DWSZ.
- Ensure there is a sufficient supply of water and adequate capacity at wastewater treatment works.
- The need to manage and protect water resources in response to climate change, population growth and lifestyle choices.

### **Waste**

- Ensuring the waste hierarchy continues to be implemented meaning only a low proportion of waste continues to go to landfills, while reuse options (recycling, composting and electricity) continue to increase as the preferred option.
- The need to reduce the volume of construction, demolition and excavation wastes produced by new developments, change of uses or conversions.

### **Population and Human Health**

- Ensuring everyone in the District's growing, ageing population have their needs considered and where possible provided for.
- Improving the deprivation within the District, especially for the 6 LSOAs that are within the most deprived areas in Kent within the Index of Multiple Deprivation (2019).
- Ensuring community infrastructure and services (such as GPS), are available and accessible to all communities and residents, and improving those where necessary.
- Supporting those within the District who are 'limited a lot' in their day-to-day activities.
- Ensure that formal and informal opportunities for all to take part in sport and be physically active are protected, provided and enhanced.

**Historic Environment**

- Ensure the heritage of the District is protected, promoted and allowed to prosper.
- Minimise adverse impacts on all heritage assets caused by development. This includes conservation areas, as the quality of the historic environment is coming under increasing pressure from competing land uses.

**Housing**

- Encourage development towards previously developed land and minimise the impact of development on the District's sensitive environmental receptors.
- The need to maximise the supply of appropriate, well designed, located and affordable housing (in all tenures) to meet the needs of the District.
- Providing sufficient housing on the most appropriate land, which supports the needs of all of the District and meets housing targets (for example care homes; student; affordable; residential; self and custom build; and gypsies and travellers).
- Ensure developments are built at appropriate densities, maximising the land available without over developing, and with a high design quality.

**Economy**

- Loss of too much employment floorspace, such as B1a, D2 and B2.
- Ensuring rent is appropriately set.
- Encouraging a reduction in the number of individuals unemployed or economically inactive.
- Ensure jobs which are provided are in the right places to meet the identified employment needs.
- Ensure the District continues to be highly educated.
- Ensure tourism rates continue to grow in a sustainable manner.
- Supporting broader economic recovery after the COVID-19 pandemic.

**Transport**

- The need to reduce the amount of people using individual cars to get to work.
- Reduce the number of cars on the road in general to reduce congestion.
- Encourage sustainable transport in the order of the hierarchy: 1. Walking, 2. Cycling, 3. Public transport (buses and trains), 4. Park and ride; and 5. Private car.
- Ensure that the provision of sustainable transport is appropriate in location, quantity and standard, to encourage mode shift.
- Encourage investment in transport infrastructure, to increase transport choice and reduce congestion.
- Encourage the co-location of community facilities in walkable, well connected neighbourhoods, wherever possible.
- The need to reduce out-commuting.

## 4. SA Approach

### 4.1 Introduction

4.1.1 This section describes the approach to the SA. In particular, it sets out the appraisal framework (the SA Framework) and how this has been used to appraise the key components of the Draft Local Plan. It also documents the difficulties encountered during the appraisal process including key uncertainties and assumptions.

### 4.2 SA Framework

4.2.1 The SA Framework comprises sustainability objectives and guide questions to inform the appraisal. Establishing appropriate SA objectives and guide questions is central to appraising the sustainability effects of the new Local Plan. Broadly, the SA objectives define the long-term aspirations for the Canterbury area with regard to social, economic and environmental considerations and it is against these objectives that the performance of the Draft Local Plan has been appraised.

4.2.2 **Table 4.1** presents the SA Framework including SA objectives and associated guide questions. The SA objectives and guide questions reflect the analysis of the key objectives and policies arising from the review of plans and programmes (**Section 2**), the key sustainability issues identified through the analysis of the socio-economic and environmental baseline conditions (**Section 3**) and comments received during consultation on the Scoping Report (see **Appendix B**). The SEA topic(s) to which each of the SA objectives relates is included in the third column.

**Table 4.1 SA Framework**

| SA Objective   | Sub-objective  | Relevant SEA Topic  |
|--|--|---|
| <b>1. To reduce air pollution and encourage improvements in air quality</b>                                    | 1.1 Minimise poor air quality and encourage improvements<br>1.2 Minimise and mitigate adverse effects of poor air quality<br>1.3 Support the achievement of air quality improvement objectives within the designated AQMAs   | Air, climatic factors, human health                                   |
| <b>2. To minimise greenhouse gases that cause climate change and deliver a managed response to its effects</b> | 2.1 Minimise greenhouse gas emissions<br>2.2 Deliver high standards of energy efficiency in new development<br>2.3 Support the use of renewable energies<br>2.4 Support increased resilience to climate change   | Climatic factors  |
| <b>3. To conserve, connect and enhance biodiversity across the District</b>                                    | 3.1 Support the achievement of biodiversity net gain<br>3.2 Conserve, protect and enhance protected sites in accordance with the protection hierarchy (i.e. international, national or locally designated)<br>3.3 Support improvements to biodiversity in non-designated areas of the District<br>3.4 Support improvements to ecological networks including connectivity of habitats | Biodiversity, flora, fauna, landscape, human health, climatic factors |



|  |   |  |
|--|---|--|
|  | <p>3.5 Support species adaptation and migration to reduce impacts of climate change and ensure resilience</p> <p>3.6 Encourage carbon sequestration</p>   |  |
| <p><b>4. To conserve geological sites and safeguard mineral resources within the District</b></p>  | <p>4.1 Aim to protect and prevent damage to geologically important sites, such as RIGS</p> <p>4.2 Balance the need for development with safeguarding mineral resources and infrastructure</p>   | <p>Material assets</p>                           |
| <p><b>5. To conserve and enhance the landscapes of the District for people and wildlife</b></p>  | <p>5.1 Conserve, protect and enhance protected sites in accordance with the protection hierarchy (i.e. international, national or locally designated)</p> <p>5.2 Support improvements to existing non-designated landscapes</p>   | <p>Landscape, fauna, flora, water</p>            |
| <p><b>6. To protect water resources and ensure a high quality of inland and coastal waters</b></p>   | <p>6.1 Protect and enhance ground and surface water quality</p> <p>6.2 Avoid adverse impacts on coastal waters, fisheries and bathing waters</p> <p>6.3 Promote the sustainable and efficient use of water resources</p>  | <p>Water, climatic factors, human health</p>     |
| <p><b>7. To reduce the risk of flooding and where appropriate prevent coastal erosion</b></p>  | <p>7.1 Avoid inappropriate development in areas at risk from flooding and coastal erosion</p> <p>7.2 Support priorities identified within the Isle of Grain to South Foreland Shoreline Management Plan (or subsequent updates or amendments)</p>   | <p>Water, human health</p>                       |
| <p><b>8. To promote sustainable waste management</b></p>   | <p>8.1 Encourage a reduction in the amount of waste generated</p> <p>8.2 Ensure the management of waste is consistent with the waste management hierarchy</p>   | <p>Material assets</p>                           |
| <p><b>9. To preserve, enhance, promote and capitalise on the significant qualities, fabric, setting and accessibility of the District's historic environment</b></p> | <p>9.1 Preserve and enhance designated heritage assets including their setting and contribution to local character and distinctiveness</p> <p>9.2 Support improvements to existing non-designated heritage assets</p> <p>9.3 Aim to promote sustainable access to the historic environment</p> <p>9.4 Aim to capitalise on the potential of heritage assets to deliver sustainable benefits</p> <p>9.5 Encourage new developments to contribute to the maintenance and enhancement of the historic character through design, layout and setting</p> | <p>Cultural heritage, landscape</p>              |
| <p><b>10. To ensure the supply of high quality homes, which cater for identified needs</b></p>   | <p>10.1 Promote increased access to affordable housing</p> <p>10.2 Support the timely delivery of market and affordable housing</p> <p>10.3 Support the provision of homes which cater for existing and future residents' needs and the needs of different groups within the community by promoting a mix of new residential development, including, but not limited to, student, care home, gypsy &amp; travellers and self build</p>  | <p>Population, human health, material assets</p> |

- 10.4 Promote an appropriate mix of dwelling types, sizes and tenures
- 10.5 Promote the reduction in the amount of homelessness within the district
- 10.6 Promote high quality design in new housing developments

|   |   |  |
|---|---|--|
| <p><b>11. To promote the sustainable use of land and conserve soil quality</b></p>                          | <p>11.1 Encourage the efficient use of previously developed land<br/>                     11.2 Avoid the unnecessary loss of best and most versatile agricultural land<br/>                     11.3 Encourage appropriate building densities within developments<br/>                     11.4 Support the reduction in land contamination</p>   | <p>Soil, human health</p>                              |
| <p><b>12. To achieve a strong and sustainable economy, and revitalise town, local and rural centres</b></p> | <p>12.1 Support the provision of jobs in the right places to meet the identified employment needs<br/>                     12.2 Encourage investment in businesses, people and infrastructure to improve productivity<br/>                     12.3 Support the vitality and viability of town and city centres<br/>                     12.4 Promote sustainable tourism<br/>                     12.5 Support a safe and attractive night economy<br/>                     12.6 Support a sustainable marine and coastal economy<br/>                     12.7 Support a sustainable rural economy</p>  | <p>Material assets, human health, population</p>       |
| <p><b>13. To promote and encourage sustainable transport</b></p>  | <p>13.1 Promote consistency with the sustainable transport hierarchy and improvements to support increased use of sustainable transport methods<br/>                     13.2 Support the reduction in the need to travel<br/>                     13.3 Support the reduction of traffic congestion and improve road safety<br/>                     13.4 Encourage investment to improve transport infrastructure</p>  | <p>Air, human health, population, climatic factors</p> |
| <p><b>14. To promote safe, healthy, inclusive and sustainable communities</b></p>                           | <p>14.1 Support equal access and improvements to green and blue infrastructure, the countryside and open spaces including parks<br/>                     14.2 Support equal access and improvements to community and health infrastructure, services and facilities to meet day-to-day needs<br/>                     14.3 Support the delivery of connected communities which maximise social interaction including high quality public realm to create a sense of place<br/>                     14.4 Minimise light and noise pollution<br/>                     14.5 Promote healthy lifestyles including through sport and physical activity<br/>                     14.6 Support the reduction of actual levels of crime</p> | <p>Human health, population</p>                        |

4.2.3 **Table 4.2** shows the extent to which the SA objectives encompass the range of issues identified in the SEA Directive.

**Table 4.2 Coverage of the SEA Topics by the SA Objectives**

| SEA Directive Topic   | SA Objective(s)                |
|---|--------------------------------|
| Biodiversity  | 3                              |
| Population *  | 10, 12, 13, 14                 |
| Human Health  | 1, 3, 6, 7, 10, 11, 12, 13, 14 |
| Fauna   | 3, 5                           |
| Flora   | 3, 5                           |
| Soil  | 11                             |
| Water   | 5, 6, 7                        |
| Air   | 1, 13                          |
| Climatic Factors  | 1, 2, 3, 6, 13                 |
| Material Assets *   | 4, 8, 10, 12                   |
| Cultural Heritage including architectural and archaeological heritage | 9                              |
| Landscape   | 3, 5, 9                        |

## 4.3 Methodology

4.3.1 Based on the contents of the Local Plan Options document detailed in **Section 1.4**, the SA Framework has been used to appraise the following key components of the document:

- Vision and Strategic Objectives;
- Strategic housing, employment and retail growth options;
- Spatial strategy;
- Draft allocations; and
- Draft plan policies.

4.3.2 The approach to the appraisal of each of the elements listed above is set out in the sections that follow.

### Draft District Vision and Strategic Objectives

4.3.3 The Vision and Strategic Objectives set out the draft vision for Canterbury District in 2045 and how this will be achieved. It is important that the vision and objectives are aligned with the SA objectives (see ODPM guidance<sup>7</sup> Task B1). The Vision and Strategic Objectives

<sup>7</sup> ODPM (November 2005) *Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents: Guidance for Regional Planning Bodies and Local Planning Authorities*.

have therefore been assessed for their compatibility against each of the 14 SA objectives (presented in **Table 4.1**). The following scoring system has been used to determine their compatibility:

|   |                   |     |                     |
|---|-------------------|-----|---------------------|
| +   | <b>Compatible</b> | ?   | <b>Uncertain</b>    |
| 0   | <b>Neutral</b>    | -   | <b>Incompatible</b> |
| <b>Mixed scores are presented as e.g.</b> |                   | +/- |                     |

4.3.4 The findings of the compatibility assessment of the vision and plan outcomes and SA objectives are shown in **Table 5.1**. The findings are summarised in **Section 5.2**.

### Strategic growth options

4.3.5 Three options have been considered for housing, employment and retail growth required to meet the needs of the district up to 2045, including the identification of a preferred option. These growth options have been appraised against each of the 14 SA objectives using an appraisal matrix that enables a comparison of their sustainability performance. The matrix includes:

- the SA objectives;
- a score indicating the nature of the effect for each option on each SA objective;
- a commentary on significant effects (including consideration of the cumulative, synergistic and indirect effects as well as the geography, duration, temporary/permanence and likelihood of any effects) and on any assumptions or uncertainties; and
- recommendations, including any mitigation or enhancements measures.

4.3.6 A qualitative scoring system has been adopted which is set out in **Table 4.3** and to guide the appraisal, specific definitions have been developed for what constitutes a significant effect, a minor effect or a neutral effect for each of the 14 SA objectives; these can be found in **Appendix M**. The completed appraisal matrices are contained at **Appendix E**. The findings of the appraisal of the growth options are summarised in **Section 5.4** of this report. An example matrix is set out in **Table 4.4**.

**Table 4.3 SA scoring system**

|                                    |     |   |
|------------------------------------|-----|---|
| <b>Significant Positive Effect</b> | + + | Likely to have a significant positive effects |
| <b>Minor Positive Effect</b>       | +   | Likely to have a positive effects             |
| <b>Neutral</b>                     | 0   | Neutral                                       |
| <b>Minor Negative Effect</b>       | -   | Likely to have negative effects               |
| <b>Significant Negative Effect</b> | - - | Likely to have significant negative effects   |
| <b>Uncertain</b>                   | ?   | Uncertain                                     |
| <b>No Relationship</b>             | NA  | Not applicable/No relationship                |

NB: where more than one symbol is presented in a box it indicates that the appraisal has identified both positive and negative effects. Where this is no colour is included. Where a box is coloured but also contains a '?', this indicates uncertainty over whether the effect could be a minor or significant effect although a professional judgement is expressed in the colour used. A conclusion of uncertainty arises where there is insufficient evidence for expert judgement to conclude an effect.

**Table 4.4 Appraisal matrix example**

| SA Objective  | Score | Commentary   |
|---|-------|--|
| <b>10. To ensure the supply of high quality homes, which cater for identified needs</b> | ++    | <p><b>Likely Significant Effects</b></p> <p>A description of the likely significant effects of the preferred option on the SA objective has been provided here, drawing on baseline information as appropriate.</p> <p><b>Mitigation</b></p> <ul style="list-style-type: none"> <li>• Mitigation and enhancement measures are outlined here.</li> </ul> <p><b>Assumptions</b></p> <ul style="list-style-type: none"> <li>• Any assumptions made in undertaking the appraisal are listed here.</li> </ul> <p><b>Uncertainties</b></p> <ul style="list-style-type: none"> <li>• Any uncertainties encountered during the appraisal are listed here.</li> </ul> |

## Preferred Spatial Strategy

4.3.7 The preferred strategic, spatial option for the distribution of growth to be accommodated in the district over the plan period has been appraised against each of the SA objectives that comprise the SA Framework using an appraisal matrix. The spatial strategy has been assessed using the matrix as set out in **Table 4.4** and the scoring system set out in **Table 4.3**. The detailed appraisal matrix is contained at **Appendix F**. Definitions of significance used to inform the appraisal are set out in **Appendix M**.

## Site allocations and reasonable alternatives

4.3.8 The draft site allocations have been appraised against the SA objectives that comprise the SA Framework using tailored appraisal criteria and associated thresholds of significance (see **Appendix G**). Additionally, all sites that are considered by the Council to be reasonable alternative options to date have been subject to SA using the SA objectives and tailored thresholds. It should be noted that the site appraisal does not take into account the provisions of the mitigation provided by Draft Local Plan policies contained in the document. This is to ensure that all sites are considered equally.

4.3.9 See **Appendix G** for the sites assessment framework used to appraise the sites and reasonable alternatives. The site appraisal is also set out in **Appendix G**. The sites assessment has been undertaken by Council officers.

## Plan policies

4.3.10 The appraisal of policies contained in each of the Draft Local Plan policy chapters has used the same approach as that used to appraise the strategic options. A score has been awarded for each constituent policy and for the cumulative effect of all policies on a chapter-by-chapter basis. A summary of the results of the appraisal of the draft policies is

presented in **Section 5.8** of this report. The detailed appraisal matrices are contained at **Appendices H to K**. Definitions of significance used to inform the appraisal are set out in **Appendix M**.

## Secondary, Cumulative and Synergistic Effects

- 4.3.11 The policies of the Draft Local Plan do not sit in isolation from each other. The policies will work together to achieve the objectives of the Plan. For this reason, it is important to understand what the combined sustainability effects of the policies will be.
- 4.3.12 As noted above, the appraisal of the policies has been undertaken by draft Local Plan chapters in order to determine the cumulative effects of each policy area. Throughout the policy appraisal matrices, reference is made to where cumulative effects could occur between the policy themes. In addition to the inclusion of cross reference between the policy themes, a cumulative effect assessment has been undertaken in order to clearly identify areas where policies work together. The cumulative assessment matrix is presented in **Section 5.9**. Additional commentary is also provided where the Draft Local Plan may have effects in-combination with other plans and programmes.

### 1.1 When the SA was undertaken and by whom

- 4.3.13 The SA of the Draft Local Plan was undertaken by WSP from August to October 2022 with the exception of the appraisal of the site allocations and reasonable alternatives. This was undertaken by Council officers. WSP provided a 'critical friend' review of the assessment undertaken by the Council.

### 1.2 Difficulties encountered when undertaking the appraisal

- 4.3.14 The SEA Regulations require the identification of any difficulties (such as technical deficiencies or lack of knowledge) encountered during the appraisal process. These uncertainties and assumptions are detailed in the appraisal matrices. Those uncertainties and assumptions common across the appraisal are outlined below.

## Uncertainties

- The exact composition of future development is uncertain at this stage.
- The extent to which new housing development meets local needs will be dependent on the mix of housing delivered (in terms of size, type and tenure) which is currently unknown.
- The extent to which job creation is locally significant will depend on the type of jobs created (in the context of the local labour market) and the recruitment policies of prospective employers.
- The level of investment in community facilities and services that may be stimulated by new development is uncertain at this stage and will in part be dependent on the policies of the Local Plan, site specific proposals and viability.
- The exact scale of waste associated with the Local Plan will be dependent on a number of factors including: the design of new development; waste collection and disposal regimes; and individual behaviour with regard to recycling and reuse.
- The form and function of any development will have the potential to enhance or detract from designated heritage and cultural assets and/or their settings.

- The exact characteristics of sites (in terms of, for example, the presence of buried archaeological remains or protected species) is uncertain and will be subject to further, detailed analysis at the project stage.

## Assumptions

- It is assumed that over the plan period there will be a decarbonisation of the electricity generation mix with renewable energy sources displacing fossil fuels.
- It is assumed over the lifetime of the plan that the vehicle fleet will be on the way to decarbonisation with the ban on new combustion engine vehicles due to come in to effect in 2030.
- It is assumed that a higher proportion of suitable greenfield land will be required to meet the development needs associated with higher growth figures.
- It is assumed that new development would not be located on land designated for its nature conservation value.
- It is assumed that, on balance, the biodiversity value of brownfield sites is less than that of greenfield land.
- It is assumed that site specific Flood Risk Assessments (FRA) will accompany development proposals where appropriate and that new development will achieve greenfield run off rates.
- It is assumed that the Kent County Council Joint Minerals and Waste Plan will make sufficient household waste recycling infrastructure provision available.
- It is assumed that there will be consistent policy implementation.

## 5. Appraisal of Effects

### 5.1 Introduction

5.1.1 This section presents the findings of the appraisal of effects of the Draft Local Plan against the SA objectives. It includes:

- An assessment of the compatibility of the Vision and Strategic Objectives with the SA Objectives (**Section 5.2**);
- An appraisal of the housing, employment and retail growth options (**Section 5.3 – 5.5**);
- An appraisal of the preferred spatial strategy (**Section 5.6**);
- An appraisal of the site allocations (**Section 5.7**);
- An appraisal of the plan policies (**Section 5.8**); and
- An appraisal of the cumulative effects of the plan policies and mitigation and/or enhancements (**Section 5.9**).

### 5.2 Draft District Vision and Strategic Objectives – Compatibility Assessment with the SA Objectives

5.2.1 The Council has prepared a draft Vision for district. This has been revised and updated from the Vision presented in the Options Report (2021). The Vision is set out below.

#### Vision for the district to 2045

##### **A strong and resilient economy**

The district will be stronger and more resilient by 2045, offering highly-skilled jobs in areas like science and technology thanks to the growth and development of universities and a strong medical sector. Business investors will continue to be attracted by the district's connection to London and the Continent, with new and diverse jobs for local people.

##### **Improved connectivity**

Growth and investment in the district will be centred on Canterbury, and complemented by an enhanced historic and natural environment that will create vibrant cultural and creative areas, and improved biodiversity. Investment in digital infrastructure and walking and cycling routes will have helped to improve air quality and to respond to the challenges of climate change, supporting good health and wellbeing in our communities. This will enhance quality of life for residents and improve the visitor experience.

##### **Healthy communities**

Existing communities will be enhanced and new healthy communities will be of high-quality low-carbon design with good public transport links to the city and beyond. There will also be high-quality attractive public spaces and good access to community facilities. A range of homes will meet the needs of the district, improve affordability and support growth.

##### **A thriving environment**

Significant new areas of accessible, high-quality open space will be created across the district and both new and existing valued open spaces enjoyed by the district's residents will be protected for future generations, ensuring continued access beyond the period of the plan. Our important habitats and landscapes will be restored and enhanced, supporting the recovery of nature and increasing biodiversity. Opportunities for nature-based responses to climate change and other environmental challenges will be maximised. Significant investment in our water environment and infrastructure will improve river and coastal water quality, provide a resilient water supply and minimise flood risk.



5.2.2 The Vision is supported by 12 strategic objectives which set out how the district will be developed in the period to 2045:

- Provide high-quality housing for everyone, including affordable housing, as part of mixed, sustainable communities.
- Ensure housing is of high-quality design, is low carbon and energy and water efficient as part of healthy communities with access to community facilities and open space.
- Create a thriving economy with a wide range of jobs, including more highly-paid roles, to support increased prosperity for all throughout the district.
- Support the growth and development of our universities as a centre of innovation and learning excellence, which stimulates business start-ups and generates skilled jobs.
- Create a transport network with a focus on low-carbon travel to improve air quality and people's health while ensuring excellent access to city and town centres on foot, cycle and by public transport including through intelligent transport systems.
- Take advantage of and improve our links to/from London and the Continent, while creating a local transport network which enables most residents, particularly those in the urban areas, to access their day to day needs within 15 minutes through healthy, environmentally friendly journeys.
- Support the sustainable growth of our rural communities through the provision of affordable housing, community facilities and transport infrastructure while taking advantage of opportunities to grow the rural economy.
- Capitalise on our rich and distinctive heritage and culture, enhancing character, sense of place and quality of life, supporting tourism and the local economy for our residents, visitors and businesses.
- Positively exploit the delivery of infrastructure needed to support growth to maximise the benefits for existing residents and businesses while ensuring critical infrastructure is delivered at the right time to support development.
- Create accessible vibrant town centres, maximising digital connectivity for residents, visitors and businesses to shop, stay and enjoy their leisure time.
- Protect and enhance our rich environment and valued landscapes, creating a network of spaces, supporting wildlife and biodiversity and improving the health and wellbeing of our communities.
- Reduce the causes of climate change and adapt to ensuring that all district developments enable the carbon emissions reduction and increased resilience as quickly as possible.

5.2.3 A matrix has been completed to assess the compatibility of the Draft Vision and Strategic Objectives contained in the Draft Local Plan document and the SA objectives. **Table 5.1** presents the results of this compatibility assessment.

**Table 5.1 Draft Vision and Strategic Objectives – Compatibility with the SA Objectives**

| SA Objective   | 1. Air Quality | 2. Climate change | 3. Biodiversity | 4. Geology | 5. Landscape | 6. Water | 7. Flood Risk | 8. Waste | 9. Historic environment | 10. Housing | 11. Land use | 12. Economy | 13. Sustainable transport | 14. Health |
|--|----------------|-------------------|-----------------|------------|--------------|----------|---------------|----------|-------------------------|-------------|--------------|-------------|---------------------------|------------|
| Draft District Vision  | +/?            | +/?               | +/?             | ?          | +            | +        | ?             | ?        | +                       | +           | ?            | +           | +                         | +          |
| Provide high-quality housing for everyone, including affordable housing, as part of mixed, sustainable communities.  | +/?            | +/?               | +/?             | 0          | ?            | ?        | ?             | ?        | ?                       | +           | ?            | +           | +                         | +          |
| Ensure housing is of high-quality design, is low carbon and energy and water efficient as part of healthy communities with access to community facilities and open space.  | +/?            | +/?               | +/?             | 0          | ?            | +        | ?             | ?        | ?                       | +           | ?            | +           | +                         | +          |
| Create a thriving economy with a wide range of jobs, including more highly-paid roles, to support increased prosperity for all throughout the district.  | +/?            | +/?               | +/?             | 0          | ?            | ?        | ?             | ?        | ?                       | +           | ?            | +           | ?                         | +          |
| Support the growth and development of our universities as a centre of innovation and learning excellence, which stimulates business start-ups and generates skilled jobs.  | +/?            | +/?               | +/?             | 0          | ?            | ?        | ?             | ?        | ?                       | +           | ?            | +           | ?                         | +          |
| Create a transport network with a focus on low-carbon travel to improve air quality and people's health while ensuring excellent access to city and town centres on foot, cycle and by public transport including through intelligent transport systems.                                       | +              | +                 | ?               | ?          | ?            | ?        | ?             | 0        | ?                       | +           | ?            | +           | +                         | +          |
| Take advantage of and improve our links to/from London and the Continent, while creating a local transport network which enables most residents, particularly those in the urban areas, to access their day to day needs within 15 minutes through healthy, environmentally friendly journeys. | +              | +/-               | 0               | ?          | ?            | ?        | +             | 0        | ?                       | +           | ?            | +           | +                         | +          |
| Support the sustainable growth of our rural communities through the provision of affordable housing, community facilities and transport infrastructure while taking advantage of opportunities to grow the rural economy.  | +/?            | +/?               | +/?             | 0          | ?            | ?        | ?             | ?        | ?                       | +           | ?            | +           | +                         | +          |

| SA Objective  | 1. Air Quality | 2. Climate change | 3. Biodiversity | 4. Geology | 5. Landscape | 6. Water | 7. Flood Risk | 8. Waste | 9. Historic environment | 10. Housing | 11. Land use | 12. Economy | 13. Sustainable transport | 14. Health |
|---|----------------|-------------------|-----------------|------------|--------------|----------|---------------|----------|-------------------------|-------------|--------------|-------------|---------------------------|------------|
| Capitalise on our rich and distinctive heritage and culture, enhancing character, sense of place and quality of life, supporting tourism and the local economy for our residents, visitors and businesses.                              | +/?            | +/?               | +/?             | 0          | 0            | 0        | +             | ?        | +                       | +           | +            | +           | +/?                       | +          |
| Positively exploit the delivery of infrastructure needed to support growth to maximise the benefits for existing residents and businesses while ensuring critical infrastructure is delivered at the right time to support development. | +/?            | +/?               | +/?             | ?          | ?            | ?        | +             | ?        | ?                       | +           | ?            | +           | +                         | +          |
| Create accessible vibrant town centres, maximising digital connectivity for residents, visitors and businesses to shop, stay and enjoy their leisure time.  | +/?            | +/?               | +/?             | ?          | ?            | ?        | +             | ?        | ?                       | +           | ?            | +           | +                         | +          |
| Protect and enhance our rich environment and valued landscapes, creating a network of spaces, supporting wildlife and biodiversity and improving the health and wellbeing of our communities.   | +              | +                 | +               | +          | +            | +        | +             | ?        | +                       | ?           | +            | ?           | +                         | +          |
| Reduce the causes of climate change and adapt to ensure that all district developments enable the carbon emissions reduction and increased resilience as quickly as possible.   | +              | +                 | +               | +          | +            | +        | +             | ?        | +                       | +           | +            | +           | +                         | +          |

**Key**

|                                    |                   |   |                     |
|------------------------------------|-------------------|---|---------------------|
| +                                  | <b>Compatible</b> | ? | <b>Uncertain</b>    |
| 0                                  | <b>Neutral</b>    | - | <b>Incompatible</b> |
| Mixed scores are presented as e.g. |                   |   | +/-                 |

5.2.4 Overall, the vision and strategic objectives are judged to be compatible with the SA objectives. A number of areas were identified in the assessment undertaken at Draft Options stage where the minor amendments could have been made. Some of these have been addressed:

- SA Objective 6: water quality, investment in water infrastructure and resilient supply is now referenced in the Vision. Water efficiency referenced in the second Strategic Objective:
- SA Objective 7: resilience to the effects of climate change is included in the final Strategic Objective.

5.2.5 The following areas of uncertainty or enhancement remain:

- SA Objective 2 relates to climate change mitigation:
  - ▶ The vision refers to ‘low-carbon design’ and objectives specifically refer to low carbon housing. The strategic objectives could be enhanced with clear reference to commercial/employment development. Potentially, the third objective could be amended to read *“Create a thriving low-carbon economy with a wide range of jobs, including more highly-paid roles, to support increased prosperity for all throughout the district.”*
  - ▶ The strategic objective relating to improved links to the continent, while creating a transport network which enables residents to access their day to day needs in 15 minutes, has a mixed relationship with SA Objective 2 relating to the minimisation of greenhouse gases (GHG). The scale of any increase in GHG emissions associated with improved links to the continent is uncertain although Local Plan policies could be expected to mitigate negative effects.
- SA Objective 3 relates to biodiversity. The eleventh strategic objective could reference the need for development to have contributed to biodiversity net gain.
- The relationship between the vision and SA Objective 4 (including safeguarding of minerals) and SA Objective 5 relating to landscape (including designated landscapes) is uncertain because the location of development is unknown at this stage. Potentially, the vision could be amended to state that areas of designated, as well as important, landscapes have been conserved/enhanced.
- SA Objective 8 relates to waste management. The strategic objectives could be supplemented by an additional objective related to resource use and waste management and supporting, for example, achievement of the circular economy.
- Whilst the vision does include reference to an enhanced historic environment (consistent with SA Objective 9) it is suggested that the strategic objectives are strengthened by reference to the World Heritage Site to read: *“Capitalise on our rich and distinctive heritage and culture, including our World Heritage Site, enhancing character, sense of place and quality of life, supporting tourism and the local economy for our residents, visitors and businesses”*;
- The strategic objective relating to heritage and culture encourages tourism. As worded, there are uncertain outcomes in relation to SA Objective 1, 2 and other SA objectives because growth in the tourism sector could impact on air quality and GHG emissions. However, it can be expected that Local Plan policies could help to address such concerns.
- SA Objective 11 includes consideration of best and most versatile agricultural land. An additional strategic objective that seeks to promote sustainable resource use, including the effective use of land/soil resources, could be included to address this.

### 5.3 Housing Growth Options

5.3.1 The preferred housing growth option in the Draft Local Plan (as set out in Policy SS3) has been appraised against the SA objectives in accordance with the approach set out in **Section 4**. The findings of the appraisal are presented in **Appendix E**. This section sets out the appraisal and summarises the likely effects of the preferred growth figure and the identified reasonable alternatives.

#### Considered housing growth options

5.3.2 For the purposes of this SA Report, the preferred housing growth option of 1,252 dwellings per annum (dpa), as set out in Policy SS3 of the Draft Local Plan, and the reasonable alternatives identified by the Council have been appraised. The Council has identified the following options for a housing growth figure in the District over the plan period (2020 to 2045):

- Preferred Option - Local Housing Need is 1,252 dwellings per annum (dpa) (31,300 dwellings over the LP period 2020-2045);
- Alternative option 10% increase 1,377 dpa (34,425 dwellings over the LP period 2020-2045); and
- Alternative option 20% increase 1,502 dpa (37,550 dwellings over the LP period 2020-2045).

5.3.3 **Table 5.2** sets out a summary of the appraisal of the housing growth options. The detailed matrix containing commentary of the scoring is contained in **Appendix E**.

**Table 5.2 Summary SA of strategic housing growth options**

| Option   | SAO 1: Air Quality | SAO 2: Climate change | SAO 3: Biodiversity | SAO 4: Geology | SAO 5: Landscape | SAO 6: Water | SAO 7: Flood risk | SAO 8: Waste Management | SAO 9: Heritage | SAO 10: Dwellings | SAO 11: Land use | SAO 12: Employment | SAO 13: Transport | SAO 14: Sustainable communities |
|--|--------------------|-----------------------|---------------------|----------------|------------------|--------------|-------------------|-------------------------|-----------------|-------------------|------------------|--------------------|-------------------|---------------------------------|
| Preferred Option<br>Standard Method<br>1,252 dpa | -/?                | +/- -                 | +/- -<br>/?         | -              | +/- -<br>/?      | -            | -/?               | --/?                    | --/?            | ++                | +/- -            | ++                 | +/- -             | -                               |
| Standard Method<br>Plus 10%<br>1,377 dpa         | -/?                | +/- -                 | +/- -<br>/?         | -              | +/- -<br>/?      | -            | -/?               | --/?                    | --/?            | ++                | +/- -            | ++                 | +/- -             | -/?                             |
| Standard Method                                  | -/?                | +/- -                 | +/- -<br>/?         | -/?            | +/- -<br>/?      | -            | -/?               | --/?                    | --/?            | +<br>+/?          | --               | ++                 | +/- -             | -/?                             |

| Option                | SAO 1: Air Quality | SAO 2: Climate change | SAO 3: Biodiversity | SAO 4: Geology | SAO 5: Landscape | SAO 6: Water | SAO 7: Flood risk | SAO 8: Waste Management | SAO 9: Heritage | SAO 10: Dwellings | SAO 11: Land use | SAO 12: Employment | SAO 13: Transport | SAO 14: Sustainable communities |
|-----------------------|--------------------|-----------------------|---------------------|----------------|------------------|--------------|-------------------|-------------------------|-----------------|-------------------|------------------|--------------------|-------------------|---------------------------------|
| Plus 20%<br>1,502 dpa |                    |                       |                     |                |                  |              |                   |                         |                 |                   |                  |                    |                   |                                 |

### Summary appraisal of the Preferred Option – 1,252 dpa

- 5.3.4 The governments standard methodology forms the starting point for identifying the level of housing need that needs to be met in the district over the plan period, in accordance with the NPPF. 1,252 dpa is therefore the minimum number of homes expected to be planned for over the plan period using this method.
- 5.3.5 The standard methodology figure of 1,252 dpa has been assessed as having a minor positive effect against five objectives.
- 5.3.6 In relation to housing (SA Objective 10) all options were assessed as having a significant positive effect as it is considered to meet the identified housing need for the district. The requirement would provide a significant uplift on recent delivery (which has in part been affected by the Covid-19 pandemic).
- 5.3.7 Significant positive effects were also identified regarding economy (SA Objective 12) for all options. This assessment is predicated on the basis that the level of housing growth will generate economic benefits associated with construction and, in the longer term, new housing and associated population growth will in turn support investment in services and facilities. New housing and associated population growth will support, as a minimum, Canterbury city centre and town centre facilities within Herne Bay and Whitstable, which can help to enhance the viability and vitality of existing businesses. The Preferred Option would also ensure enough housing to house an economically active population required to fulfil employment opportunities in the District. No other significant positive effects were assessed.
- 5.3.8 Mixed minor positive and significant negative effects were assessed for climate change (SA Objective 2) for all options. Negative effects are anticipated to arise from housing growth generating an increase in GHG both during construction (e.g. due to emissions from HGV movements and plant and associated with embodied carbon in construction materials) and once development is complete and occupied (e.g. due to increased traffic generation and energy use in new dwellings). However, the implementation of building regulations, Future Homes Standard and Local Plan policy can have a significant effect with homes built later in the plan period (or sooner dependent on policy) more likely to accord with the expectations of net zero. Higher levels of development could also support opportunities for the provision of combined heat and power networks and provide greater flexibility for passive solar gain through effective layout and design.
- 5.3.9 Mixed minor positive and significant negative effects were assessed for biodiversity (SA Objective 3) for all options. It is likely that the levels of growth proposed in all the options

will require substantial development on greenfield sites with consequential effects on biodiversity and nature conservation. However, the implementation of Local Plan policies related to biodiversity will mitigate some of the adverse effects (through avoidance and enhancement measures) whilst implementation of requirements for (at least) 10% biodiversity net gain (BNG) as required through the Environment Act, would also lead to positive effects. There is some uncertainty as effects will be dependent on actual development locations and proximity to sensitive sites and habitats.

- 5.3.10 For all options, mixed positive and significant negative effects were also found for landscape (SA Objective 5) reflecting that housing growth envisaged is likely to affect landscapes as new greenfield locations will be required, given the low number of brownfield development sites available, although there is potential for townscapes to be improved through new development. There is some uncertainty about the presence of positive effects and the extent of negative effects. Similarly, for the preferred option, mixed positive and significant negative effects were assessed against land use and soil (SA Objective 11) due to the loss of greenfield land and potential impact on the best and most versatile agricultural land (Grades 1 to 3). However, there will be some opportunities to bring forward brownfield land.
- 5.3.11 Mixed positive and significant negative effects were identified with regards to sustainable transport (SA Objective 13) for all options. This reflects that growth at the levels envisaged would increase pressure on the road network and public transport infrastructure. However, the growth could also stimulate greater investment in public transport across the district.
- 5.3.12 Significant negative effects were assessed for waste (SA Objective 8) reflecting the scale of development envisaged under all options. The construction of new dwellings will require significant raw materials and the generation of waste. During occupation waste will be generated by households, although there would be opportunities to integrate recycling best practice. There is some uncertainty over the exact waste generated and ability to reuse waste generated through the construction phase.
- 5.3.13 Significant negative effects were assessed for the historic environment (SA Objective 9) reflecting the scale of development envisaged under all options. There are a range of assets through the district including the World Heritage Site (WHS) comprising of Canterbury Cathedral, St Augustine's Abbey and St Martin's Church. Housing growth could have an adverse effect on designated and undesignated heritage assets as a result of the direct loss of assets during construction or due to impacts on their setting during construction and once development has been completed. The levels of housing need to be accommodated in all options are likely to have an adverse effect on the historic environment, although the magnitude of effects would be likely to be reduced through the site selection methodology which seeks to protect historic assets. There is potential for significant effects for all options assessed, although not certain.
- 5.3.14 The assessment identified the potential for housing growth to have minor negative effects on a range of objectives including air quality (SA Objective 1), geology (SA Objective 4) water resource and quality (SA Objective 6), and flood risk (SA Objective 7) and sustainable communities (SA Objective 14). There is some uncertainty with regards to air quality and flood risk dependent on the location of the development. The effects on water quality (SA Objective 6) have been identified as negative as new development will add pressure to water resources in an area of water stress whilst pressures on capacity at wastewater treatment facilities will be experienced that will require mitigation.

### Summary appraisal of the LHN with 10% uplift – 1,377 dpa

- 5.3.15 The higher growth option of 1,377 dpa is considered to perform similarly to the lower (preferred option) figure against most of the SA objectives. Significant positive effects have been assessed against housing (SA Objective 1) and employment (SA Objective

12). The higher amount of growth is considered to provide additional benefits to the economy due to the additional construction jobs but also the additional potential to stimulate growth in a diversified economy.

- 5.3.16 The option is considered to have potential for similar effects for the remaining objectives. There is greater uncertainty with regards to health and sustainable communities (SA Objective 14) given the additional housing requirement under this option.

### Summary appraisal of the LHN with 20% uplift – 1,502 dpa

- 5.3.17 The 20% uplift option is considered to largely perform similarly the preferred and 10% uplift option. With regards to housing (SA Objective 10) greater uncertainty over the ability to deliver the housing, given the much lower rates of completed development than this experienced in the district in recent years.
- 5.3.18 With regards to the remaining objectives the effects are largely similar. Given the greater quantum of the development there is likely to be a greater likelihood of significant negative effects on a range of environmental SA objectives. With regards to land use (SA Objective 11), given the greater housing requirement and therefore the proportionally lower scale of brownfield land likely to be delivered to meet the overall requirement, the minor positive effects assessed in the previous options, are considered unlikely. Therefore, significant negative effects are assessed.

### Reasons for the selection of the preferred housing growth option

- 5.3.19 In order to identify the number of homes needed, the NPPF states that a standard methodology to calculate the Local Housing Need (LHN) should be used as the starting point for the calculation of local plan housing requirements. The standard methodology is set out in the housing and economic needs assessment PPG<sup>8</sup>. The Council prepared a Housing Need Assessment (HNA) 2021. This identified a need of 1,120 homes per year, creating a need of 22,400 new homes over the Local Plan period of 2020-2040 as envisaged in the Draft District Vision and Local Plan options consultation 2021.
- 5.3.20 The 2021 consultation was presented on the basis of a 20 year plan period (covering the years 2020-2040). The spatial options considered in the consultation (as appraised in the accompanying SA Report) included different scenarios in terms of housing need. While there were different spatial elements, the housing need figure was either meeting the need, or an additional 6,000 - 9,000 homes.
- 5.3.21 The Council has had regard to the responses from the Options consultation, the spatial growth strategy and decision to extend the draft Local Plan to cover 2020-2045 (25 years instead of 20 years), and proposes to meet the district's housing needs as identified through the governments standard methodology (the LHN figure), rather than seeking to provide additional housing above that LHN figure. The requirement is therefore based on the LHN figure which is identified as 1,252 homes per year, creating a need of 31,300 new homes over the Local Plan period of 2020-2045.

### Reasons for the rejection of alternative housing growth options

- 5.3.22 The PPG<sup>9</sup> clearly identifies that any deviation from the standard method must be supported with robust justification and only used in exceptional circumstances. There is currently no robust evidence to justify an alternative methodology, and include a 10% or

<sup>8</sup> Available at: <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

<sup>9</sup> PPG 002 Reference ID: 2a-002-20190220 <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>



20% uplift in the standard method figure as proposed under the alternative options. The level of growth required under the standard methodology will help facilitate affordable housing, infrastructure and employment growth.

- 5.3.23 None of the alternative options were considered to perform any better in sustainability terms than the preferred option.

## 5.4 Employment Growth Options

- 5.4.1 For the purposes of this SA Report, the preferred employment growth option is based on the Labour Demand Scenario in the Economic Development and Tourism Study Update (2022), as set out in Policy SS3 of the Draft Local Plan, and the reasonable alternatives identified by the Council have been appraised. The Council has identified the following options for employment growth in the District over the plan period (2020 to 2045) in **Table 5.3**.

**Table 5.3 Employment growth options assessed**

| Option / Floorspace by type                      | Office (sqm) | Light Industrial (sqm) | General Industrial (sqm) | Storage and distribution (sqm) | Total (sqm) |
|--|--------------|------------------------|--------------------------|--------------------------------|-------------|
| <b>Labour Demand Scenario (Preferred option)</b> | 38,480       | 52,030                 | 15,270                   | 66,440                         | 172,220     |
| <b>Labour Supply Scenario</b>                    | 18,          | 24,645                 | 7,215                    | 31,370                         | 81,410      |
| <b>Labour Demand Scenario with 10% uplift</b>    | 42,348       | 57,233                 | 16,797                   | 73,084                         | 189,462     |

- 5.4.2 **Table 5.4** sets out a summary of the appraisal of the employment growth options. The detailed matrix containing commentary of the scoring is contained in **Appendix E**.

**Table 5.4 Summary SA of strategic employment growth options**

| Option                                      | SAO 1: Air Quality | SAO 2: Climate change | SAO 3: Biodiversity | SAO 4: Geology | SAO 5: Landscape | SAO 6: Water | SAO 7: Flood zone | SAO 8: Waste Management | SAO 9: Heritage | SAO 10: Dwellings | SAO 11: Land use | SAO 12: Employment | SAO 13: Transport | SAO 14: Sustainable communities |
|---|--------------------|-----------------------|---------------------|----------------|------------------|--------------|-------------------|-------------------------|-----------------|-------------------|------------------|--------------------|-------------------|---------------------------------|
| Labour Demand Scenario (Preferred approach) | -/?                | -                     | +/- /?              | -              | +/- /?           | -            | -/?               | -/?                     | -/?             | 0                 | +/- -            | ++                 | +/- - /?          | +/-                             |
| Labour Supply Scenario                      | -/?                | -                     | +/- /?              | -              | +/- /?           | -            | -/?               | -                       | -/?             | 0                 | +/-              | + + /?             | +/-               | +/-                             |
| Labour Demand Scenario with 10% uplift      | -/?                | -                     | +/- /?              | -              | +/- /?           | -            | -/?               | -/?                     | -/?             | 0                 | +/- -            | ++                 | +/- - /?          | +/-                             |

**Summary appraisal of the Preferred Option – Labour Demand Scenario**

- 5.4.3 Significant positive effects are assessed for all options for the economy (SA Objective 12). The Canterbury Economic Development and Tourism Study (EDTS) Focused Update (June 2022) provides an update to the 2020 EDTS reflecting the impacts of the COVID-19 pandemic and provides two scenarios for consideration of potential employment floorspace (based on Labour Supply and Labour Demand scenarios). The proposed figures meet these requirements. All options would encourage investment in businesses and infrastructure which would lead to a stronger economy in the district. The construction of new employment space under all options would support the construction sector and has the potential to create spend in the local supply chain. This may also support construction skills development. However, effects in this regard will be temporary and the extent to which the jobs that may be created benefit the district’s residents will depend on the number of jobs created and the approach of firms to filling positions. The provision of local employment opportunities may help to drive investment in skills. However, the extent to which job creation is locally significant will depend on the type of jobs created (in the context of the local labour market), their location/accessibility and the recruitment policies of prospective employers.
- 5.4.4 A mix of minor positive and significant negative effects have been assessed for land use (SA Objective 11) reflecting the potential for some development to be located on previously developed land. However, the majority of development associated with the option would be expected to take place on greenfield land. Mixed minor positive and significant negative effects are assessed for transport (SA Objective 13). All options would be expected to increase levels of traffic during both the construction of employment

premises to meet the floorspace requirements and once development is complete. This may result in congestion with associated negative effects including driver delay and an increase in road traffic accidents. The extent to which new employment development affects car use will be dependent on its accessibility which is uncertain. Locations within and on the edge of Canterbury urban area and the main urban areas of Whitstable and Herne Bay, for example, may support opportunities for walking and cycling and integrated public transport services. There is some uncertainty.

- 5.4.5 No further significant effects are assessed. A mix of minor positive and minor negative effects were assessed for biodiversity reflecting likely impacts on habitats and species but potential for positive effects related to BNG (SA Objective 3). However, there is some uncertainty. A mix of minor positive and minor negative effects were assessed for landscape (SA Objective 5), reflecting the potential impacts on landscape but opportunities for employment development to help improve landscape through reuse of brownfield land, and sustainable communities (SA Objective 14), reflecting the positive effect of employment on communities, but impacts from construction and ongoing occupation of new employment uses.
- 5.4.6 The assessment identified the potential for employment growth to have minor negative effects on a range of objectives including air quality (SA Objective 1), climate (SA Objective 2), geology (SA Objective 4), water resource and quality (SA Objective 6), flood risk (SA Objective 7), waste (SA Objective 8) and heritage (SA Objective 9). There is some uncertainty with regards to air quality, flood risk and heritage dependent on the location of the development. The effects on water quality (SA Objective 6) have been identified as negative as new development will add pressure to water resources in an area of water stress whilst pressures may also be experienced at wastewater treatment facilities that will require mitigation.

### Summary appraisal of the Labour Supply Scenario

- 5.4.7 This option would provide around half of the employment floorspace identified in the preferred option. With regards to the economy (SA Objective 12) significant positive effects are assessed. However, there is some uncertainty around the significance identified as the option may not fully meet the potential demand expected over the plan period (despite providing a 'minimum' requirement based on labour supply). The preferred Labour Demand Scenario option and the alternative Labour Demand Scenario with 10% uplift would support achievement of the identified demand. Overall, the magnitude of negative effects is considered likely to be less in this option compared to the preferred option with lower demand for greenfield land (SA Objective 11) and reduced impacts on transport (SA Objective 13). For these objectives a mix of minor positive and negative effects is assessed. For the remaining objectives the effects are considered to be largely similar to the preferred option.

### Summary appraisal of the Labour Demand Scenario with 10% uplift

- 5.4.8 Similar effects were assessed for this option as the preferred option for all SA Objectives. Given the 10% uplift it can be expected that the potential for negative effects is slightly heightened under this option compared to the preferred.

### Reasons for the selection of the preferred employment growth option

- 5.4.9 The Labour demand scenario is based on the 2022 EDTS economic forecast and considers the effects of Covid-19, whereas the Labour supply scenario is based on population projections. Therefore, the Labour demand scenario has been used to identify the need for employment land in the district. The Labour demand scenario will encourage

employment related development in the district which will provide options in the market without over saturating it and support further jobs improving the district's economy.

### Reasons for the rejection of alternative employment growth option

- 5.4.10 The Labour Supply Scenario has not been taken forward as it is based on population projections and does not meet the full projected demand as set out in the 2022 EDTS.
- 5.4.11 The 10% uplift option has not been taken forward as historically employment land has been over allocated in Local Plans but not delivered. Therefore, the Options consultation included a question on how business space should be provide, and the majority of respondents agreed with the preferred option of retaining deliverable sites and providing flexibility for employment sites. The Call for Sites also failed to identify sufficient suitable, additional deliverable sites that were available to meet the 10% uplift option. This option was not taken forward as the focus was on a growth option which could be met by available sites which are likely to be developed.

## 5.5 Retail Growth Options

- 5.5.1 For the purposes of this SA Report, the preferred retail growth option is based on the Retail and Leisure Study Update (2022) (RLSU), as set out in Policy SS3 of the Draft Local Plan, and the reasonable alternatives identified by the Council have been appraised. The Council has identified the options for retail growth figure in the District over the plan period (2020 to 2045) as shown in **Table 5.5**.

**Table 5.5 Retail growth options assessed**

| Option / Floorspace by type                 | Convenience Retail Use (sqm) | Comparison Retail Use (sqm) |
|---|------------------------------|-----------------------------|
| RLSU requirement to 2035 (Preferred Option) | 414                          | 5,290                       |
| RLSU requirement to 2030                    | -623                         | 2,707                       |
| RLSU requirement to 2045                    | 2,517                        | 13,295                      |

- 5.5.2 **Table 5.6** sets out a summary of the appraisal of the retail growth options. The detailed matrix containing commentary of the scoring is contained in **Appendix E**.

**Table 5.6 Summary SA of retail growth options**

| Option                            | SAO 1: Air Quality | SAO 2: Climate change | SAO 3: Biodiversity | SAO 4: Geology | SAO 5: Landscape | SAO 6: Water | SAO 7: Flood zone | SAO 8: Waste Management | SAO 9: Heritage | SAO 10: Dwellings | SAO 11: Land use | SAO 12: Employment | SAO 13: Transport | SAO 14: Sustainable communities |
|-----------------------------------|--------------------|-----------------------|---------------------|----------------|------------------|--------------|-------------------|-------------------------|-----------------|-------------------|------------------|--------------------|-------------------|---------------------------------|
| RLSU To 2035 (Preferred approach) | -/?                | -                     | +/- /?              | 0              | +/- /?           | -            | -/?               | -                       | +/- /?          | 0                 | +/-              | ++                 | +/-               | +/-                             |
| RLSU To 2030                      | -/?                | -/?                   | 0/?                 | 0              | 0/?              | 0            | -/?               | -                       | +/- /?          | 0                 | +/-              | +                  | +/-               | +/-                             |
| RLSU To 2045                      | -/?                | -                     | +/- /?              | 0              | +/- /?           | -            | -/?               | -                       | +/- /?          | 0                 | +/-              | + /+/?             | +/-               | +/-                             |

**Summary appraisal of the Preferred Option – RLSU To 2035**

- 5.5.3 Significant positive effects are identified regarding economy (SA Objective 12). The Canterbury Retail and Leisure Study Update (RLSU Update) (May 2022) identifies a range of requirements for comparison and convenience floorspace which are reflected in the options here. The RLSU identifies that retail is experiencing changes in consumer behaviour, hastened by the Covid-19 pandemic. The preferred option is considered to meet the retail needs of the district (based on the RLSU), and support existing Canterbury, Whitstable and Herne Bay centres and therefore the option is considered to support this objective. No other significant positive effects were assessed.
- 5.5.4 A mix of minor positive and minor negative effects were assessed for biodiversity reflecting likely impacts on habitats and species but potential for positive effects related to BNG (SA Objective 3). However, there is some uncertainty. A mix of minor positive and negative effects are assessed for landscape (SA Objective 5) and historic environment (SA Objective 9). Development of new retail floorspace within city/town centres and edge of centre locations could provide opportunities to support the historic environment within Canterbury City Centre, Whitstable town centre and Herne Bay town centre. Adverse effects on these heritage assets may be felt during construction of new retail use and also in the longer term once development has been completed. New retail floorspace may also present opportunities to improve townscape (such as through the regeneration of previously developed sites or under used or vacant premises within or on the edge of city and town centres) which could have a positive effect on this objective. However, some greenfield land, which can be more sensitive in landscape terms than redeveloped brownfield land, would be expected in all options.
- 5.5.5 A mix of positive and negative effects are assessed for land use (SA Objective 11) for all options reflecting the likelihood that the retail quantum being developed under all options would likely include some development of existing sites and premises, which may be

delivered in city/town centre locations. However, some new build on greenfield is also likely.

- 5.5.6 A mix of positive and negative effects are assessed for transport (SA Objective 13) and health and sustainable communities (SA Objective 14) for all options. Should future retail development be focused within Canterbury, Herne Bay and Whitstable, then the retail development would be physically accessible to the majority of the District's population although some car travel is inevitable. Negative effects will be experienced during construction. The provision of retail in locations that would support addressing any existing under provision may also support a reduced need to travel further to access shops.
- 5.5.7 Minor negative effects are assessed for air quality, climate change, biodiversity, , water, flood risk and waste management (SA objectives 1, 2, 3, , 6, 7, and 8). Neutral effects are assessed for geology (SA Objective 4) and housing (SA Objective 10).

### Summary appraisal of RLSU figure to 2030

- 5.5.8 No significant effects are assessed for this option. The lower requirement in the RLSU under this option would lead to employment and economic benefit, and support retail provision but to a lower scale than the preferred and RLSU to 2045 option.
- 5.5.9 With regards to biodiversity (SA Objective 3) and landscape (SA Objective 5) given the very low amount of floorspace identified as required, a neutral effect is assessed for the RLSU to 2030 figure. Some uncertainty is identified. Similarly, a neutral effect is identified for water resources and quality (SA Objective 6). The option performs similarly for remaining objectives.

### Summary appraisal of RLSU figure to 2045

- 5.5.10 The RLSU to 2045 option is largely considered to perform similarly to the preferred option. With regards to economy and employment (SA Objective 12), significant effects are assessed but some uncertainty is identified. The RLSU identifies that there is some uncertainty over longer term retail figures and therefore this is reflected in the scoring for the RLSU to 2045 option. The effects assessed for the remaining objectives are similar to the preferred option. Given the higher quantum the potential for negative environment effects is greater.

### Reasons for the selection of the preferred retail growth option

- 5.5.11 The preferred approach in the Draft Local Plan is based on the RLSU figure to 2035. As a 10 year period from the start of the Local Plan would be until 2030, the retail needs until 2035 have been used in the development strategy as this allows the draft Local Plan to plan for the minimum 10 years from the anticipated adoption date of 2024.

### Reasons for the rejection of alternative retail growth options

- 5.5.12 The Retail and Leisure Study Update (May 2022) states 'The long term projections to 2045 should be treated with caution due to the inherent uncertainties described earlier. The priority for the emerging Local Plan should seek to accommodate retail floorspace projections over a 10 year period or up to 2035.' The Council has therefore determined that the preferred approach is appropriate and reflects the evidence base and the NPPF, which urges caution over longer term projections for retail needs, whilst the other options considered would not provide the appropriate figures to inform the Draft Local Plan.

- 5.5.13 The RLSU to 2045 option was considered to perform similarly to the preferred option in sustainability terms. The lower RLSU to 2030 was not considered to provide the range of benefits of the preferred approach.

## 5.6 Preferred Spatial Strategy

### Appraisal of Draft Local Plan spatial strategy

#### The Preferred Spatial Strategy

- 5.6.1 A range of alternative spatial strategies and a preferred approach were appraised in the SA Report that accompanied the District Vision and Options Report 2021. This section presents a summary of the emerging spatial strategy and appraisal of the preferred spatial growth option. The preferred approach has developed from that preferred at the Options Report stage although remains largely as envisaged in the Draft Options stage. The preferred spatial strategy comprises:
- Canterbury Urban Area will be the principal focus for development in the district.
  - Whitstable and Herne Bay Urban Areas will be a secondary focus, where development will be principally driven by the need for new infrastructure including schools and improved transport connectivity.
  - A new freestanding community will be pursued to meet a proportion of growth.
  - Proportionate development will be allocated at all Rural Service Centre at a suitable scale which supports the function and character of the settlement.
  - A limited amount of growth will be allocated at Local Service Centres, where suitable sites are available, at a suitable scale which supports the function of the settlement.
  - No residential development will be allocated in the countryside.

#### Reasons for selection of the Preferred Spatial Strategy

- 5.6.2 To develop the new Local Plan, the council ran an ‘issues’ consultation in 2020 and a ‘Draft district vision and Local Plan options’ consultation in 2021. The proposed spatial strategy is informed by responses to these consultations in addition to other key evidence, including the Strategic Land Availability Assessment (SLAA).
- 5.6.3 The Draft Options presented six spatial strategy options and set out a preferred approach to focus on Canterbury. The options presented in 2021 were “theoretical” or “extreme” growth scenarios, not informed by land availability, to ascertain the public’s priorities for the spatial distribution of growth. It was always clear that additional evidence, such as land availability, would need to be considered as the council developed its preferred growth strategy.
- 5.6.4 The consultation responses showed growth focused in Canterbury to be preferred, followed by growth focused at the coast and the new freestanding settlement option.
- 5.6.5 Following an initial assessment of the submissions from the first call for sites, which was completed in spring 2021, it was considered that there were insufficient suitable sites in Canterbury to meet the district’s housing needs in this area alone. Similarly, there were insufficient suitable sites at the coast to meet the district’s housing needs, and very limited land availability in the rural areas.

- 5.6.6 Even when combining the suitable sites at Canterbury, those at the coast and a modest supply from sites at the most sustainable rural settlements, there was still a very significant shortfall in supply against the total housing needs of the district. Delivery on a new garden community was therefore deemed appropriate to help meet the district's needs.
- 5.6.7 Through these processes, and informed predominantly by the consultation responses and by land availability, a blend of growth options is therefore proposed including a focus on Canterbury, expansion at Whitstable, a new freestanding settlement, and limited expansion at the most sustainable rural settlements.

### Identification of reasonable alternative garden community locations

- 5.6.8 Given the emerging spatial strategy and consideration of the requirement for a garden community location, and recognising the need to identify additional sites to meet the housing needs, a second Call for Sites was launched in May 2021. As part of the second round of the Call for Sites, the council also undertook a process to proactively contact owners of land adjacent to large sites assessed as suitable in the first round of assessment. Additionally, as the creation of a new freestanding settlement received positive feedback at the Draft Options consultation stage, the Council contacted landowners to ascertain potential availability following a high level review of potential locations for a new freestanding settlement, taking into account major constraints such as environmental and heritage designations. Possible locations were identified as:
- to the south-west of Yorklets,
  - north of Bekesbourne,
  - west of Aylesham and
  - east of Blean.
- 5.6.9 The second Call for Sites received fewer submissions than the first, and these were also assessed against the SLAA methodology. In terms of the potential new freestanding settlements, no sites were submitted to the south-west of Yorklets and only one site was submitted to the north of Bekesbourne, which was of insufficient size to support a freestanding settlement. These two potential locations were therefore not taken forward as reasonable alternatives as no land was considered to be available to deliver the scale of development and the range of benefits that could be accrued through the delivery of a new community. Therefore, two options were identified as reasonable alternatives (west of Aylesham and east of Blean) and these have been appraised in the SA.

### Appraisal of the proposed garden community location and the reasonable alternative location

- 5.6.10 The Draft Local Plan includes the identification of a Garden Community. The sites that make up the broad location of the proposed Garden Community have been assessed. The effects are identified in **Table 5.8**. The reasonable alternative location has also been assessed and the effects summarised below in **Table 5.9**.



**Table 5.7 Summary SA of proposed Garden Community location**

| SHELAA Site Ref: | Site Address:  | SAO 1: Air Quality | SAO 3: Biodiversity | SAO 4: Geology | SAO 5: Landscape | SAO 6: Water | SAO 7: Flood Risk | SAO 9: Heritage | SAO 10: Dwellings | SAO 11: Land use | SAO 12: Employment | SAO 13: Transport | SAO 14: Sustainable communities |
|------------------|--|--------------------|---------------------|----------------|------------------|--------------|-------------------|-----------------|-------------------|------------------|--------------------|-------------------|---------------------------------|
| SLAA262          | Land west and East of Cooting Lane, Adisham          | 0                  | -                   | 0              | --               | -            | ++                | -               | ++                | --               | ++                 | ++/--             | ++/-                            |
| SLAA268          | Land On The South East Side Of Cooting Lane, Adisham | 0                  | --                  | 0              | --               | -            | ++                | --              | ++                | --               | ++                 | ++/--             | ++                              |
| SLAA267          | TT21601 - Land at Cooting Farm                       | 0                  | --                  | --             | --               | -            | ++                | --              | ++                | --               | ++                 | ++/--             | ++                              |

**Table 5.8 Summary SA of alternative Garden Community location**

| SHELAA Site Ref: | Site Address:    | SAO 1: Air Quality | SAO 3: Biodiversity | SAO 4: Geology | SAO 5: Landscape | SAO 6: Water | SAO 7: Flood Risk | SAO 9: Heritage | SAO 10: Dwellings | SAO 11: Land use | SAO 12: Employment | SAO 13: Transport | SAO 14: Sustainable communities |
|------------------|------------------|--------------------|---------------------|----------------|------------------|--------------|-------------------|-----------------|-------------------|------------------|--------------------|-------------------|---------------------------------|
| SLAA264          | Amery Court Farm | 0                  | --                  | --             | --               | --           | ++                | --/?            | ++                | +/--             | ++/-               | ++/--             | ++/--                           |

## Summary of appraisal of preferred Cooting Farm Garden Community location

- 5.6.11 The three sites that comprise the preferred garden community location were considered to have significant positive effects on housing (SA Objective 10). This reflects the scale of the sites and the ability to deliver a significant quantum of housing. Significant positive effects were assessed for employment (SA Objective 12). This reflects the good access available from the site to neighbouring Local Service Centre at Adisham, although an allocation for a garden community could also be expected to provide a level of employment on site.
- 5.6.12 With regards to transport (SA Objective 13) a mix of significant positive and negative effects are assessed. This reflects the location's proximity to bus stops and to Adisham railway station, to the north of the site. Aylesham railway station is also located to the east of the site. The identification of negative effects reflects that there is potential for significant adverse impacts on highways network, which would have to be mitigated through any development proposals for the site location. Across the three sites significant positive effects are assessed for health and sustainable communities (SA Objective 14). Minor negative effects for site SLAA262 reflect that the site is adjacent to the railway line in the north of the broad location.
- 5.6.13 The broad location that comprises these sites is within 400m of Ileden and Oxenden Woods SSSI and ancient woodland. Significant negative effects are therefore assessed for biodiversity (SA Objectivity 3). However, there are no designations on site. Mitigation will be required to mitigate, or avoid, any effects on these assets. The sites comprising the broad location are located in the open countryside on the edge of the Local Service Centre of Adisham and west of Aylesham. Significant negative effects were assessed for landscape (SA Objective 5). This assessment reflects the proximity of the site to the Kent Downs Area of Outstanding Natural Beauty (AONB), with site SLAA267 being partially within the AONB, and the encroachment into open countryside. Strategic scale landscape mitigation will be required for development of the location. Any development scheme should also seek to avoid development taking place in the AONB.
- 5.6.14 With regards to the historic environment (SA Objective 9) significant negative effects have been assessed. The location is within Bloodden (Adisham), and adjacent to Adisham Conservation Areas. The location is also adjacent to Grade 2 Listed Buildings: Dane Court, Woodland's Farmhouse and Cooting Farmhouse and locally listed buildings. Mitigation of effects will be required.
- 5.6.15 Significant positive effects are assessed for flood risk (SA Objective 7), reflecting that the location is within Flood Zone 1. Any development should ensure that surface water is addressed through appropriate onsite management. One of the sites (SLAA267) comprising the broad location is located within a Mineral Safeguarding Area (MSA) and therefore significant negative effects are assessed for geology (SA Objective 4). A minerals assessment should be undertaken prior to any development. Additionally, significant negative effects were assessed for land use (SA Objective 11). This reflects the scale of greenfield land (approximately 204 ha overall) that would be required to deliver the sites.
- 5.6.16 Neutral effects were assessed for air quality (SA Objective 1).

## Summary appraisal of Blean Amery Farm Court option

- 5.6.17 This broad location is adjacent to the village of Blean, north of Canterbury. The broad location performs similarly to the preferred Cooting Farm location in terms of housing (SA Objective 10) and employment (SA Objective 12). This reflects likely scale of housing that could be accommodated. However, some minor negative effects are assessed for the

economy (SA Objective 12) as the location would involve the loss of a small amount of employment land.

- 5.6.18 Significant positive and negative effects are assessed for sustainable transport (SA Objective 13) and health and sustainable communities (SA Objective 14). The site is accessible to public transport, in the form of bus stops being within walking distance, but significant concerns regarding the impact on the highway network have been identified. This would require mitigation. The site would be well located in relation to GP provision/open space, but would involve the loss of open space. However, provision of facilities and open space would be expected for a development of this scale.
- 5.6.19 Significant negative effects are assessed for biodiversity (SA Objective 3). The location includes West Blean and Thornden Woods SSSI and ancient woodland, whilst the Blean Complex SAC, Church Woods SSSI and Blean Woods NNR is within 400m. Significant negative effects are also assessed for landscape (SA Objective 5) due to the potential for change in character of the site and open countryside in this location. Any landscape effects would need to be mitigated.
- 5.6.20 Significant positive effects are also assessed for flood risk (SA Objective 7), reflecting that the location is within Flood Zone 1. Any development should ensure that surface water is addressed through appropriate onsite management.
- 5.6.21 The broad location is located within a Mineral Safeguarding Area (MSA) and therefore significant negative effects are assessed for geology (SA Objective 4). A minerals assessment should be undertaken prior to any development. Significant negative effects are assessed due to the presence of waterbodies on site (SA Objective 6). Additionally, significant negative effects were assessed for land use (SA Objective 11). This reflects the scale of greenfield land (approximately the site is 175 ha overall) that would be required to deliver the site. However, minor positive effects are also assessed given that some previously developed land would be brought forward under this option.
- 5.6.22 Significant negative effects are assessed for the historic environment (SA Objective 9). The location is adjacent to several Grade 2 Listed Buildings (Arbele Farmhouse, Amery Court, Frog Hall and Well Court) and Locally Listed Buildings and development could have an adverse impact on the assets and/or their setting. The location is also partially within Amery Court (Blean), Canterbury and Whitstable Railway (Hackington & Blean), and Tyler Hill Conservation Areas. There are some uncertainties around the possible impacts on the World Heritage Site, its setting or views to and from it.
- 5.6.23 Neutral effects were assessed for air quality (SA Objective 1).

### Reasons for the selection of the preferred garden community location

- 5.6.24 The land submitted west of Aylesham is considered to be of a sufficient size, when combined, to provide an opportunity for a new freestanding settlement in the district, and to address, in large part, the identified shortfall in supply against the district's housing needs. The proximity to railway stations at both Adisham and Aylesham provide sustainable transport options, and there is a potential of the train frequency being increased. The site also has the potential to provide strategic benefits such as community facilities, infrastructure including green infrastructure, accessible open space and transport, and a mix of high quality housing including affordable housing and older person accommodation.

### Reasons for the rejection of the reasonable alternative

- 5.6.25 Land east of Blean (SLAA264) was not considered suitable or appropriate for a free standing settlement due to its close proximity to the Blean Woods which has the potential

to adversely impact the designated sites including Blean Complex SAC, Church Woods, Blean SSSI and Blean Woods NNR, the site includes West Blean and Thornden Woods SSSI and, moreover, there was no clear access strategy that would enable effective and appropriate access to the site. In addition to not being able to provide effective road access, the location means the site is not directly connected to the strategic road network and traffic would use Rough Common Road or go through the city centre, increasing congestion. This would be increased due to a heavy reliance on private cars as there are no rail connections nearby. Therefore, this location was not progressed as a garden community.

5.6.26 The preferred location is considered to perform better in sustainability terms than the alternative option.

### Appraisal of preferred Spatial Strategy

5.6.27 **Table 5.9** sets out a summary appraisal of the spatial strategy, as a whole, with effects summarised below. The detailed appraisal is set out in **Appendix F**. The policies that comprise the Spatial Strategy section of the Draft Local Plan are appraised in **Section 5.8**.

**Table 5.9 Appraisal of the Preferred Spatial Strategy**

|                            | SAO 1: Air Quality | SAO 2: Climate change | SAO 3: Biodiversity | SAO 4: Geology | SAO 5: Landscape | SAO 6: Water | SAO 7: Flood Risk | SAO 8: Waste Management | SAO 9: Heritage | SAO 10: Dwellings | SAO 11: Land use | SAO 12: Employment | SAO 13: Transport | SAO 14: Sustainable communities |
|----------------------------|--------------------|-----------------------|---------------------|----------------|------------------|--------------|-------------------|-------------------------|-----------------|-------------------|------------------|--------------------|-------------------|---------------------------------|
| Preferred Spatial Strategy | +/-                | +/- -                 | +/- - /?            | -              | +/- -            | +/- /?       | -/?               | - -/?                   | +/- /?          | ++                | +/- -            | ++                 | + +/- - /?        | + +/-                           |

5.6.28 The Draft Local Plan spatial strategy would see a principal focus on the Canterbury Urban Area with a secondary focus on Whitstable and Herne Bay Urban Areas. The spatial strategy also includes a new freestanding community which will be pursued to meet a proportion of growth. Development in Rural Service Centres and Local Service Centres will be at suitable scale to support the function and character of the settlement. Development in the countryside will be strictly controlled.

5.6.29 The proposed delivery of 1,252 dwellings per annum (equivalent to 31,300 dwellings over the plan period) would enable development in line with the Local Housing Need (LHN) figure. The spatial strategy would direct development to Canterbury, Herne Bay and Whitstable, in addition to growth in Rural and Local Service Centres helping to meet need across the district, alongside substantial delivery in the proposed Garden Community. Significant positive effects are therefore assessed against housing (SA Objective 10). The growth will require a substantial uplift on the average growth rates in recent years (notwithstanding the impact of the Covid-19 pandemic on delivery) so there is some uncertainty about achieving this delivery rate.

- 5.6.30 The focus on Canterbury Urban Area is likely to drive economic growth within the city itself and more broadly across the district, whilst development (including employment development and support for appropriate retail provision) within the Whitstable and Herne Bay areas would support investment in these locations. Focusing residential growth in Canterbury, along with a range of transport infrastructure, would also help to support the universities, which are important employers and help to support economic growth within the district. Improvements to park and ride facilities and improved access would also support efforts to boost tourism and spend within Canterbury. Significant positive effects are assessed against SA Objective 12 (economy).
- 5.6.31 An increase in population and households and new employment floorspace will generate more transport movements. This could result in increased pressure on the road network and public transport infrastructure. It could be considered that the development of upgraded and new road infrastructure, public transport investment and improved opportunities for walking and cycling, within and around Canterbury, could help address congestion within the city centre. It is expected that, although a degree of self-containment could be generated within the new Garden Community, journeys will have to be made to other higher order settlements for services, facilities and employment. Although the proximity to railway stations would support sustainable transport choices, there is an inevitable increase in vehicular movements within and to/from this location to higher service areas. The spatial strategy is therefore considered to have a mix of significant positive and negative effects on transport although there is some uncertainty dependent on location of development (SA Objective 13).
- 5.6.32 The spatial strategy includes the provision of new country parks, parks and gardens, sports facilities, accessible open space. Allied with proposed improvements to highway circulation within and around Canterbury, public transport and walking and cycling provision, this is expected to generate a positive effect in relation to the promotion of healthy lifestyles, and could help to reduce emissions to air associated with car use. However, construction will have effects on health through, for example, stress related to disturbance, noise and vibration and respiratory problems exacerbated by construction traffic emissions and dust. A mix of significant positive and minor negative effects are assessed against the health and wellbeing (SA Objective 14).
- 5.6.33 The spatial strategy is considered to have a mix of minor positive and significant negative effects on climate change (SA Objective 2) due to the embodied carbon in the construction phase associated with the levels of housing growth and GHG emissions during occupancy. However, the implementation of building regulations, Future Homes Standard and local plan policy can have a significant effect with homes built later in the plan period (or sooner dependent on policy) more likely to accord with the expectations of net zero. The Garden Community location is potentially well connected to railway stations however travel to other settlements would be likely to increase private vehicle use.
- 5.6.34 The residential, employment and retail growth associated with the spatial strategy would be expected to result in a substantial release of greenfield land. Although focusing growth within Canterbury Urban Area and lower growth in Whitstable and Herne Bay urban areas may help secure previously developed land (PDL) and increase the amount of PDL used, which has decreased in recent years. The Option would be expected to see the use of greenfield land (and therefore land assumed to have greater biodiversity value than PDL). However, there may be opportunities to support greater connectivity for the biodiversity and green infrastructure networks especially with the introduction of the requirement for biodiversity net gain in the Environment Act (2021). A mix of positive and significant negative effects are assessed against biodiversity (SA Objective 3) and land use (SA Objective 11).
- 5.6.35 By focusing on the Canterbury Urban Area, the spatial strategy would be expected to increase pressures on landscapes around the City and its visual setting. Housing growth

under the strategy would be expected to place pressure on the landscapes across the district. The development location of the Garden Community is in close proximity to the Kent Downs AONB. It would provide a substantial encroachment into the countryside south of Adisham and west of Aylesham and would result in the loss of a significant area of greenfield land. However, a new freestanding community could provide scope for integrated and well-designed, strategic, landscape mitigation measures. Overall, opportunities may be realised to enhance landscape and townscape character through, for example, the provision of green infrastructure or high-quality design standards which reflects local character. A mix of minor positive and significant negative effects are assessed against landscape (SA Objective 5).

- 5.6.36 The Option focusses growth in Canterbury Urban Area which may increase pressures on the World Heritage Site (WHS), and other historic and cultural assets within and surrounding the City. Development may also help increase access to assets and the option would also support environmental improvements to the city centre. A mix of positive and negative effects are identified against SA Objective 9 (historic environment). The extent of negative effects may increase or be lessened, dependent on the particular location of development.
- 5.6.37 The option would have mix of effects on water resource and quality (SA Objective 6). This reflects the potential for new development to place pressure on water supplies (especially due to the area being under water stress) and wastewater infrastructure. However, there is greater uncertainty as to whether the effects would potentially be significant dependent on the delivery of water efficient development and water infrastructure. However, the proposed provision of the Broad Oak reservoir would help to mitigate water supply issues.
- 5.6.38 Minor negative effects with some uncertainties are assessed against SA Objective 7. The strategy would direct development to Canterbury, which has extensive areas of flood risk linked to the River Stour, but the implementation of a Flood Risk Assessment (FRA) for relevant development sites can be assumed to ensure significant effects are avoided.
- 5.6.39 The construction and subsequent occupation of new dwellings will require raw materials and the generation of waste, although there would be opportunities to integrate material reuse and recycling best practice, and depending on local markets, this could be used to encourage growth of the circular economy. Significant negative effects with some uncertainties are assessed for waste options dependent on the reuse of waste generated (SA Objective 8)
- 5.6.40 Overall, the spatial strategy would have significant positive effects for housing (SA Objective 10) and the economy (SA Objective 12), a mix of significant positive and minor negative effects on health (SA Objective 14), and significant positive and significant negative effects on sustainable transport (SA Objective 13). However, there are also likely a mix of minor positive and significant negative effects on climate change (SA Objective 2), biodiversity (SA Objective 3), landscape (SA Objective 5) and land use (SA Objective 11). However, the extent and magnitude of such effects is uncertain at this stage.

## Reasons for rejection of options

- 5.6.41 The Draft Options SA Report set out the reasoning for Council's rejection of the options considered at that stage. The preferred option at this stage provides an iteration of the previous preferred option and the reasoning for the change in spatial strategy to include a new free-standing community is set out above.

## 5.7 Site allocations

- 1.1.5 To deliver the Spatial Strategy, the Draft Local Plan directs growth broadly to sustainable locations within the following:
- Canterbury area;
  - Whitstable area;
  - Herne Bay area; and the
  - Rural area (including a new Garden Community).
- 1.1.6 All of the proposed site allocations contained within the Draft Local Plan have been subject to a site-specific SA as part of the preparation of this Report using the tailored site appraisal criteria and associated thresholds of significance contained in **Appendix G**. Additionally, reasonable alternatives considered by the Council in developing the Draft Local Plan have also been subject to appraisal using the same criteria. The site assessments have been undertaken by officers of Canterbury City Council.
- 1.1.7 The findings of the appraisal of both the proposed site allocations and reasonable alternatives are presented in **Appendix G**. It should be noted that this appraisal does not take into account the provisions of the associated site allocation policies contained in the Draft Local Plan nor the mitigation provided by the other proposed Local Plan policies (as considered separately in **Section 5.8**). This is to ensure that all sites are considered equally.

## Housing Allocations

- 1.2.1 The proposed sites to be allocated for primarily housing development have been subject to SA using the methodology set out in **Section 4** and the site assessment framework in **Appendix G**.
- 1.2.2 In addition to new sites identified through consideration of the Strategic Land Availability Assessment (SLAA) the Draft Local Plan identifies a range of sites taken forward from the 2017 Local Plan. The sites that are not included with the SLAA but have been subject to SA.
- 1.2.3 **Tables 5.10 to 5.13** set out summary appraisals by area below. The associated site policies are appraised in **Section 5.8**. The sites that comprise the garden community location have been summarised in **Section 5.6**.

**Table 5.10 Summary SA of proposed housing allocations – Canterbury area**

| SLAA Site Ref: | Site Address:   | Proposed allocation reference | SAO 1: Air Quality | SAO 3: Biodiversity | SAO 4: Geology | SAO 5: Landscape | SAO 6: Water | SAO 7: Flood zone | SAO 9: Heritage | SAO 10: Dwellings | SAO 11: Land use | SAO 12: Employment | SAO 13: Transport | SAO 14: Sustainable communities |
|----------------|---|-------------------------------|--------------------|---------------------|----------------|------------------|--------------|-------------------|-----------------|-------------------|------------------|--------------------|-------------------|---------------------------------|
| SLAA099        | 43-45 St George's Place   | C2                            | --                 | -                   | 0              | 0                | -            | ++                | --              | +/-               | +                | ++/-               | ++/-<br>/?        | ++                              |
| SLAA151        | Merton Park   | C6                            | -                  | --                  | --             | --               | --           | ++                | --/?            | ++/-              | +/-              | ++/?               | ++/-              | ++/-                            |
| SLAA128        | Land at Langton Lane  | C6                            | 0                  | --                  | 0              | -                | -            | ++                | 0               | +                 | --/<br>?         | +                  | ++/-              | ++                              |
| SLAA259        | Land on the west side of Hollow Lane                                | C7                            | 0                  | --                  | --             | --               | --           | ++                | 0/?             | ++                | --               | ++                 | +/-               | ++/-                            |
| SLAA090        | Milton Manor House  | C8                            | 0                  | --                  | --             | --/?             | --           | ++                | 0               | ++/-              | +/-              | 0                  | ++/-              | ++                              |
| SLAA137 B      | Land North of Cockerig Road   | C9                            | 0                  | --                  | 0              | --/?             | --           | ++                | 0               | +                 | --/<br>?         | 0                  | ++/-<br>/?        | +                               |
| SLAA122        | Land south of Littlebourne Road                                     | C12                           | 0                  | --                  | --             | --               | --           | ++                | --/?            | ++                | --               | ++                 | ++/-<br>-         | ++                              |
| SLAA105        | Land to the north of the railway line and south of Bekesbourne Lane | C13                           | 0                  | --                  | --             | --               | --           | ++                | --              | ++                | --               | ++                 | ++/-<br>-         | ++/-                            |
| SLAA266        | Land on Bekesbourne Lane at Hoath Farm/ Land                        | C14                           | 0                  | -                   | --             | --               | --           | ++                | --              | +                 | --               | ++                 | ++/-              | +                               |



| SLAA Site Ref: | Site Address:   | Proposed allocation reference | SAO 1: Air Quality | SAO 3: Biodiversity | SAO 4: Geology | SAO 5: Landscape | SAO 6: Water | SAO 7: Flood zone | SAO 9: Heritage | SAO 10: Dwellings | SAO 11: Land use | SAO 12: Employment | SAO 13: Transport | SAO 14: Sustainable communities |
|----------------|---|-------------------------------|--------------------|---------------------|----------------|------------------|--------------|-------------------|-----------------|-------------------|------------------|--------------------|-------------------|---------------------------------|
|                | north of Bekesbourne Lane   |                               |                    |                     |                |                  |              |                   |                 |                   |                  |                    |                   |                                 |
| SLAA183        | Canterbury Golf Club  | C15                           | 0                  | --                  | --             | -                | 0            | ++                | 0               | ++                | +/-              | +                  | ++/-              | ++/-                            |
| SLAA239        | Becket House  | C17                           | -                  | -                   | 0              | 0/?              | -            | ++                | --/?            | +                 | ++               | ++/-               | ++                | ++                              |
| SLAA156        | Land at Station Road East   | C18                           | -                  | -                   | 0              | +                | -            | ++                | --              | +                 | +                | ++                 | ++/?              | ++/-                            |
| SLAA102        | Land at the Former Chaucer Technology School, Canterbury, Spring Lane CT1 1SU | C19                           | 0                  | -/?                 | --             | +                | -            | ++                | 0               | +                 | ++               | ++                 | ++                | ++/-                            |
| SLAA162        | Folly Farm  | C20                           | 0                  | --                  | --             | -                | 0            | ++                | --              | +                 | --/?             | 0                  | ++                | +/-                             |
| 2017LP         | Wincheap  | C23                           | -                  | --                  | --             | +                | --           | --                | --/?            | ++                | ++               | ++/-               | ++/-              | ++/-                            |

**Table 5.11 Summary SA of proposed housing allocations – Whitstable area**

| SLAA Site Ref: | Site Address:               | Proposed allocation reference | SAO 1: Air Quality | SAO 3: Biodiversity | SAO 4: Geology | SAO 5: Landscape | SAO 6: Water | SAO 7: Flood zone | SAO 9: Heritage | SAO 10: Dwellings | SAO 11: Land use | SAO 12: Employment | SAO 13: Transport | SAO 14: Sustainable communities |
|----------------|-----------------------------|-------------------------------|--------------------|---------------------|----------------|------------------|--------------|-------------------|-----------------|-------------------|------------------|--------------------|-------------------|---------------------------------|
| 2017 LP        | Whitstable Harbour          | W2                            | 0                  | --                  | --             | +                | --           | --                | -               | +/?               | ++               | ++/-<br>-/?        | ++                | ++/-<br>/?                      |
| SLAA104        | Brooklands Farm, Whitstable | W5                            | 0                  | --                  | --             | --               | --           | --                | --              | ++                | --               | ++/?               | ++/-<br>-         | ++/-                            |
| SLAA132        | Land South of Thanet Way    | W6                            | 0                  | --                  | 0              | --               | -            | ++                | 0               | ++                | --               | ++                 | +/-               | ++                              |
| SLAA172        | Land at Golden Hill         | W7                            | 0                  | --                  | 0              | --               | 0            | ++                | 0               | ++/<br>-          | +/-<br>-         | ++                 | ++/-              | ++                              |
| SLAA247        | Land east of Bodkin Farm    | W8                            | 0                  | --                  | 0              | --               | --           | --                | 0               | ++                | --               | ++                 | ++/-<br>-         | ++/-                            |
| SLAA223        | St Vincent's Centre         | W9                            | 0                  | -                   | 0              | 0                | 0            | ++                | 0               | +                 | +                | ++                 | ++                | ++/-                            |
| SLAA222        | 37 Kingsdown Park           | W10                           | 0                  | --                  | 0              | 0                | 0            | ++                | 0               | +/-               | +                | ++                 | ++                | ++                              |

**Table 5.12 Summary SA of proposed housing allocations – Herne Bay area**

| SLAA Site Ref: | Site Address:  | Proposed allocation reference | SAO 1: Air Quality | SAO 3: Biodiversity | SAO 4: Geology | SAO 5: Landscape | SAO 6: Water | SAO 7: Flood zone | SAO 9: Heritage | SAO 10: Dwellings | SAO 11: Land use | SAO 12: Employment | SAO 13: Transport | SAO 14: Sustainable communities |
|----------------|--|-------------------------------|--------------------|---------------------|----------------|------------------|--------------|-------------------|-----------------|-------------------|------------------|--------------------|-------------------|---------------------------------|
| SLAA240        | Land at Greenhill adjacent Thornden Close (Land to the West of Thornden Wood Road) | HB4                           | 0                  | --                  | --             | --               | --           | --                | 0               | ++                | --               | ++                 | ++/-<br>-         | ++/-                            |
| SLAA067        | Land comprising Nursery Industrial Units and former Kent Ambulance Station         | HB5                           | 0                  | -                   | 0              | +                | 0            | ++                | 0               | +                 | +                | ++/-<br>/?         | ++                | ++/-                            |
| SLAA226 a      | Blacksole Farm and Moyne   | HB8                           | 0                  | --                  | --             | +/-              | --           | ++                | --              | +/-               | ++               | ++/-               | ++                | ++/-                            |
| SLAA013        | Former Metric Site, Sweechbridge Road, Herne Bay                                   | HB9                           | 0                  | -                   | 0              | +/-              | 0            | ++                | 0               | +                 | +                | ++/?               | ++                | ++/-<br>/?                      |
| 2017LP         | Eddington Business Park  | HB10                          | 0                  | --/?                | --             | +/-              | --           | --                | 0               | +/?               | ++/<br>--/<br>?  | ++                 | ++/-              | ++/-<br>-/?                     |

**Table 5.13 Summary SA of proposed housing allocations – Rural area**

| SLAA Site Ref: | Site Address:                          | Proposed allocation reference | SAO 1: Air Quality | SAO 3: Biodiversity | SAO 4: Geology | SAO 5: Landscape | SAO 6: Water | SAO 7: Flood zone | SAO 9: Heritage | SAO 10: Dwellings | SAO 11: Land use | SAO 12: Employment | SAO 13: Transport | SAO 14: Sustainable communities |
|----------------|--|-------------------------------|--------------------|---------------------|----------------|------------------|--------------|-------------------|-----------------|-------------------|------------------|--------------------|-------------------|---------------------------------|
| SLAA036        | Mill Field                             | R4                            | 0                  | -                   | 0              | --               | 0            | ++                | --              | +                 | --/<br>?         | ++                 | ++/-<br>-         | ++                              |
| SLAA218        | Great Pett Farmyard                    | R6                            | 0                  | -                   | 0              | --/?             | -            | ++                | --              | +                 | +                | ++/-               | +                 | ++                              |
| SLAA110        | Land to the West of Rattington Street  | R8                            | 0                  | --                  | 0              | --               | --           | ++                | --              | ++                | --               | ++                 | ++/-<br>-         | ++                              |
| SLAA115        | Land at Ashford Road                   | R9                            | 0                  | --                  | --             | +/-              | --           | ++                | 0               | 0                 | +/-<br>-/?       | +                  | +                 | +                               |
| SLAA163        | Bread and Cheese Field                 | R12                           | 0                  | --                  | --             | -                | -            | ++                | 0               | ++                | --               | ++                 | ++/-              | ++/-<br>-                       |
| SLAA146        | Land at Hersden                        | R13                           | 0                  | --                  | 0              | --/?             | --           | ++                | 0               | +                 | --/<br>?         | ++                 | ++/-<br>/?        | ++                              |
| SLAA098        | Land off The Hill, Littlebourne        | R15                           | 0                  | --                  | --             | --               | -            | ++                | --              | ++                | --               | ++                 | ++/-<br>-         | ++                              |
| SLAA145        | Land North of Court Hill, Littlebourne | R16                           | 0                  | --                  | --             | +/-              | -            | ++                | 0               | +                 | +/-<br>-/?       | ++/-               | +/-               | ++                              |
| SLAA011        | Land North of Popes Lane               | R18                           | 0                  | --                  | 0              | --               | --           | ++                | --              | ++                | --               | ++                 | ++/-<br>-         | ++                              |

| SLAA Site Ref: | Site Address:  | Proposed allocation reference | SAO 1: Air Quality | SAO 3: Biodiversity | SAO 4: Geology | SAO 5: Landscape | SAO 6: Water | SAO 7: Flood zone | SAO 9: Heritage | SAO 10: Dwellings | SAO 11: Land use | SAO 12: Employment | SAO 13: Transport | SAO 14: Sustainable communities |
|----------------|--|-------------------------------|--------------------|---------------------|----------------|------------------|--------------|-------------------|-----------------|-------------------|------------------|--------------------|-------------------|---------------------------------|
| SLAA066        | The Paddocks, Shalloak Road, Sturry  | R19                           | 0                  | --                  | 0              | -/?              | 0            | ++                | 0               | +                 | --/?             | ++                 | ++/?              | ++                              |
| SLAA180        | Aylesham South   | R20                           | 0                  | --                  | 0              | --               | -            | ++                | --              | ++                | --               | 0                  | ++/-              | ++/-                            |
| SLAA185        | Land at Station Road/Land west of Cooting Lane, south of Station Road, Adisham | R22                           | 0                  | -                   | 0              | --               | -            | ++                | --              | +                 | --/?             | ++                 | ++/-              | ++                              |
| SLAA062        | Land adjacent to Valley Road, Barham   | R23                           | 0                  | -                   | --             | --               | --           | --                | --              | +                 | --/?             | ++                 | ++/?              | ++                              |
| SLAA235        | Land at Goose Farm, Shalloak Road, Broad Oak                                   | R24                           | 0                  | --                  | 0              | +/-              | 0            | ++                | 0               | +                 | ++               | ++/-               | ++                | +                               |
| SLAA045        | Land fronting Mayton Lane, Broad Oak   | R25                           | 0                  | -                   | 0              | -                | 0            | ++                | -               | +                 | --/?             | ++                 | ++/-              | +                               |
| SLAA202        | Land at Church Farm, Hoath   | R27                           | 0                  | -                   | 0              | -                | 0            | ++                | --              | +                 | --/?             | ++                 | ++/-              | ++                              |

## Summary of findings

- 5.7.1 All proposed housing allocations have been assessed as having a positive effect on housing (SA Objective 1) with the majority expected to have a significant positive effect on delivery of housing in the district due to being over 100 dwellings or over 2.9 hectare in size. Overall, the scale of provision of housing identified in the allocations is considered to be significant, helping to meet the Local Housing Need (LHN) figure for the district.
- 5.7.2 The majority of sites were assessed as having neutral effects on air quality (SA Objective 1). However, SLAA099 - 43-45 St George's Place is within the Canterbury 3 AQMA and was assessed as having significant negative effects. Minor negative effects were assessed for SLAA151 - Merton Park and Wincheap, due to be being with 500m of the Canterbury 3 AQMA, and SLAA239 - Becket House and SLAA156 - Land at Station Road East due to being within 500m of the Canterbury AQMA.
- 5.7.3 Negative effects were assessed for sites in relation to biodiversity (SA Objective 3). The majority of sites were assessed as having significant negative effects which reflects locations being within 400m of designated conservation site or ancient woodland. Four sites were also assessed as having a Local Wildlife Site within the boundary, which results in significant negative effects. However, it is anticipated that potential effects on biodiversity could be lessened through the application of Draft Local Plan policies and at the individual planning application stage, when detailed design and mitigation measures will also be considered (such as ecological mitigation and enhancement measures). Furthermore, the requirements for biodiversity net gain for all new development (as envisaged in the Environment Bill) will mitigate further.
- 5.7.4 With regards to geology (SA Objective 4) a number of sites were assessed as having significant negative effects. Ten sites within the Canterbury area, two in Whitstable, three in Herne Bay, and five within the rural area were identified as being wholly or partially site within Mineral Safeguarding Areas (MSA) and were therefore assessed as having significant negative effects.
- 5.7.5 With regards to landscape (SA Objective 5), a range of effects were assessed. Many sites were assessed as having significant negative effects. The majority of these related to the scale and location of development, being largely located in edge of settlement locations. Sites SLAA062 - Land adjacent to Valley Road, Barham and SLAA2 -Great Pett Farmyard were assessed as having significant negative effect due to being located in the Kent Downs Area of Outstanding Natural Beauty (AONB).
- 5.7.6 With regards to water resource and quality (SA Objective 6), a range of effects were assessed. A number of sites were assessed as having significant negative effects due to being located within 10m of a waterbody (or including a waterbody on site). Six sites were assessed as having significant negative effects linked to the location of the site being on a Source Protection Zone (SPZ) 1.
- 5.7.7 The majority of sites are within Flood Zone 1 (SA Objective 7) and have therefore been assessed as having significant positive effects. However, seven sites were assessed as having significant negative effects due to being partly or wholly located in Flood Zone 3. However, it is anticipated that potential effects will be lessened through the application of Draft Local Plan policies and the requirement for a Flood Risk Assessment (FRA) for relevant development sites.
- 5.7.8 Mixed effects were assessed for sites with regards to historic environment. Where significant negative effects were identified these reflect the potential for the sites to have an effect on designated assets, including Listed Buildings in close proximity to the site boundary. Site SLAA156 - Land at Station Road East includes Grade 2 Listed Building: Canterbury East Signal Box. However, the Draft Local Plan contains proposed policies

which seek to minimise the adverse effects of development on the district's historic assets. The majority of sites were assessed as having neutral effects.

- 5.7.9 The sites assessed comprise a range of greenfield, brownfield and mixed sites. Therefore, a range of effects are identified for the sites assessed for land use (SA Objective 11). These range from significant positive effects where the sites comprise of large brownfield areas through to significant negative effects where sites are greenfield (>3ha) or contained land in agricultural land classification (ALC) grades 1, 2 or 3.
- 5.7.10 For employment and economy (SA Objective 12) many sites were assessed as having significant positive effects in recognition of the connectivity to employment, services and facilities. However, a number of sites were identified as also having negative effects due to the potential loss of employment land to accommodate new housing (SLAA099 - 43-45 St George's Place, Canterbury, SLAA067 - Land comprising Nursery Industrial Units and former Kent Ambulance Station, Herne Bay, SLAA218 - Great Pett Farmyard, Bridge, and SLAA235 - Land at Goose Farm Shalloak Road, Broad Oak in part). Due to the scale of the loss of employment land at SLAA239 - Becket House, Canterbury (>1ha), significant negative effects were also assessed. Similarly, most of the proposed sites scored positively or significantly positively for transport (SA Objective 13) in recognition of the connectivity to public transport provision. However, a number of sites also were assessed as having negative effects mostly due to impacts on the highways network.
- 5.7.11 The sites were largely assessed as having positive or significant positive effects on health and sustainable communities (SA Objective 14) reflecting proximity to GPs, open space, education facilities. However, a number of sites were assessed as having negative effects due to the loss of open space or community facilities (which would be required to be mitigated appropriately). Additionally, some negative effects were assessed due to the location having potentially suitable neighbouring uses, including railway lines or major roads.
- 5.7.12 In accordance with site scoring framework, all sites were assessed having a not applicable score for climate change (SA Objective 2) and waste (SA Objective 8).

## Employment Allocations

- 1.2.4 The proposed sites to be allocated have been subject to SA using the methodology set out in **Section 4** and the site assessment framework in **Appendix G**.
- 1.2.5 In addition to new sites identified through consideration of the Strategic Land Availability Assessment (SLAA) the Draft Local Plan identifies a range of sites taken forward from the 2017 Local Plan. The sites that are not included with the SLAA but have been subject to SA.
- 1.2.6 **Table 5.14** set out summary appraisals of the employment allocations. The associated site policies are appraised in **Section 5.8**.

**Table 5.14 Summary SA of proposed employment allocations**

| SLAA Site Ref: | Site Address:                                  | Proposed allocation reference | SAO 1: Air Quality | SAO 3: Biodiversity | SAO 4: Geology | SAO 5: Landscape | SAO 6: Water | SAO 7: Flood zone | SAO 9: Heritage | SAO 10: Dwellings | SAO 11: Land use | SAO 12: Employment | SAO 13: Transport | SAO 14: Sustainable communities |
|----------------|--|-------------------------------|--------------------|---------------------|----------------|------------------|--------------|-------------------|-----------------|-------------------|------------------|--------------------|-------------------|---------------------------------|
| SLAA155        | Canterbury Business Park                       | C21                           | 0                  | --                  | --             | --               | 0            | ++                | --              | 0                 | --               | ++                 | ++/-<br>-         | +                               |
| SLAA056        | Land on the eastern side of Shellford Landfill | C22                           | 0                  | --                  | --             | -/?              | --           | ++                | 0               | 0                 | ++               | ++                 | +/-               | +                               |
| SLAA042        | Hawthorne Corner                               | HB6                           | 0                  | -                   | --             | -                | --           | ++                | 0               | 0                 | --/<br>?         | ++                 | ++/-              | ++                              |
| SLAA068        | Former Gas Holder Site                         | HB7                           | 0                  | -                   | 0              | +                | 0            | ++                | 0               | 0                 | +                | ++                 | ++                | ++                              |
| 2017LP         | Altira   | HB8                           | 0                  | --/?                | --             | -                | --           | ++                | 0               | 0                 | --               | ++                 | ++/-              | ++                              |
| SLAA115        | Land at Ashford Road                           | R9                            | 0                  | --                  | --             | +/-              | --           | ++                | 0               | 0                 | +/-<br>/?        | +                  | +                 | +                               |
| SLAA153        | Milton Manor Concrete Batching Plant           | R10                           | 0                  | --                  | --             | -                | --           | --                | --/?            | 0                 | ++               | ++                 | ++                | +                               |



- 5.7.13 All sites were assessed as having significant positive effects on employment (SA Objective 12) except for SLAA115 - Land at Ashford Road which has minor positive effects. This reflects the scale of employment land provision to be provided on these sites and links to existing employment areas and centres.
- 5.7.14 Significant positive effects were assessed for flood risk (SA Objective 7) reflecting the location of sites in Flood Zone 1, except for SLAA153 – Milton Manor Concrete Batching Plant, which is located partly in Flood Zone 3.
- 5.7.15 A mix of effects were assessed for transport (SA Objective 13). Although every site was assessed as having positive effects linked to proximity to public transport provision. Four sites (SLAA155 – Canterbury Business Park, SLAA056 – Land on the eastern side of Shellford Landfill, SLAA042 - Hawthorne Corner and Altira) were assessed as having adverse effects on the highway network.
- 5.7.16 For health and sustainable communities (SA Objective 14) positive effects were assessed for all sites. For the three sites located in the Herne Bay area (SLAA042 – Hawthorne Corner, SLAA068 – Former Gas Holder Site and Altira) these effects are assessed as significant positive reflecting good access to a range of services and no neighbouring use issues.
- 5.7.17 The sites assessed comprise a range of greenfield and brownfield. Therefore, a range of effects are identified for the sites assessed for land use (SA Objective 11). These range from significant positive effects where the sites comprise of large brownfield areas through to significant negative effects where sites are greenfield (>3ha) or contained land in agricultural land classification (ALC) grades 1, 2 or 3.
- 5.7.18 In relation to biodiversity (SA Objective 3) significant negative effects were assessed for four of the sites in recognition of them being located with 400m of designated conservation sites. Additionally, Great Stour, Ashford to Fordwich LWS is within the site SLAA153 – Milton Manor Concrete Batching Plant.
- 5.7.19 With regard to landscape (SA Objective 5) a mix of effects were assessed although all were assessed as having negative effects except SLAA068 – Former Gas Holder Site which is a brownfield site within a largely developed area. SLAA115- Land at Ashford Road was assessed as having a mix of positive and negative effects. SLAA155 - Canterbury Business Park was assessed as having significant negative effects due to its location in the Kent Downs AONB. With regards to historic environment (SA Objective 9) two sites were assessed as having potential for significant negative effects: SLAA155 - Canterbury Business Park and SLAA153 - Milton Manor Concrete Batching Plant due to proximity to Listed Buildings.
- 5.7.20 Significant negative effects were also assessed for geology (SA Objective 4) for all sites bar one, due to their location within an MSA. With regard to water quality and resource (SA Objective 6) all but two sites were assessed as having significant negative effects due to having water bodies on site or in close proximity to the site. Additionally, SLAA153 - Milton Manor Concrete Batching Plant is located with SPZ1.
- 5.7.21 Neutral effects were assessed for air quality (SA Objective 1) and housing (SA Objective 10). In accordance with site scoring framework, all sites were assessed having a not applicable score for climate change (SA Objective 2) and waste (SA Objective 8).

## Country Park and Reservoirs Allocations

- 1.2.7 The proposed sites to be allocated for country park and reservoir have been subject to SA using the methodology set out in **Section 4** and the site assessment framework in **Appendix G**. One site is allocated at Broad Oak for a reservoir (which is assessed

below). Another country park is proposed under Policy R20. The site forms part of SLAA180 - Aylesham South and the assessment of this site has been summarised in the housing allocations above.

1.2.8

**Table 5.15** set out summary appraisal. The associated site policy is appraised in **Section 5.8**.

**Table 5.15 Summary SA of proposed Country Park and reservoir**

| SLAA Site Ref: | Site Address:       | Proposed allocation reference | SAO 1: Air Quality | SAO 3: Biodiversity | SAO 4: Geology | SAO 5: Landscape | SAO 6: Water | SAO 7: Flood zone | SAO 9: Heritage | SAO 10: Dwellings | SAO 11: Land use | SAO 12: Employment | SAO 13: Transport | SAO 14: Sustainable communities |
|----------------|---------------------|-------------------------------|--------------------|---------------------|----------------|------------------|--------------|-------------------|-----------------|-------------------|------------------|--------------------|-------------------|---------------------------------|
| SLAA233        | Broad Oak Reservoir | R26                           | 0                  | --                  | --             | --               | --           | +                 | --              | -                 | ++ / --          | ++                 | ++ / -            | ++ / -                          |

## Summary of findings

- 5.7.22 The site was assessed as having a range of effects. With regards to employment and economy (SA Objective 12) significant positive effects were assessed due to the proximity to the rural service centre of Broad Oak. A mix of significant positive and negative effects were assessed for land use (SA Objective 11) reflecting the mix of greenfield and brownfield land.
- 5.7.23 In relation to transport (SA Objective 13) a mix of significant and negative effects were assessed reflecting the good access to public transport but potential for significant adverse impacts on the highway if not mitigated. A mix of effects were assessed for health and community (SA Objective 14) reflecting the good access to facilities and services but loss of open space (although this would be mitigated through provision of a Country Park).
- 5.7.24 Significant negative effects were assessed for biodiversity (SA Objective 3) reflecting that the site includes West Blean and Thornden Woods SSSI, Ancient Woodland and Little Hall and Kemberland Woods and Pasture LWS. Significant effects were also assessed for geology (SA Objective 4) due to the site being within a MSA and for water resource and quality (SA Objective 6), due to the site including a waterbody. With regards to the historic environment (SA Objective 9) significant negative effects were assessed as the site includes a Grade II Listed Building and locally listed building with other designated and non-designated assets in close proximity to the site.

## Reasons for the selection of the preferred site allocations and for the rejection of Alternatives at this stage

- 1.1.8 The reasons for the selection of the proposed site allocations contained in the Draft Local Plan and for the rejection of alternatives considered by the Council and appraised as part of this SA Report are set out in **Appendix G**.

## 5.8 Plan Policies

- 5.8.1 The following section includes a summary of the draft local plan policies. The full appraisals are available in **Appendix H to K**.

### Spatial Strategy Policies

- 5.8.2 The summary of the appraisal is focussed on the likely significant effects found in the assessment. The detailed assessment is set out in **Appendix H**.
- 5.8.3 Given the scope of the spatial strategy policies significant effects have been assessed for the majority of SA Objectives. Significant positive significant effects are assessed for SA housing (SA Objective 10) and economy (SA Objective). The policies include setting out the development requirements in terms of meeting the LHN and the employment needs. The spatial strategy sets out the settlement hierarchy and the strategic approach to deliver the necessary infrastructure to support housing and employment growth. Additionally, the policies would help to support Canterbury City Centre and Whitstable and Herne Bay town centres. Improved infrastructure and connectivity may also increase the ability for people to sustainably access town centre services and amenities, and support tourism and the night-time economy.
- 5.8.4 Mixed significant positive effects are assessed for the majority of SA Objectives. With regards to air quality (SA Objective 1), the policies support significant open space provision and a variety of measures to improve connectivity by sustainable transport

measures, particularly within and around Canterbury, including the Canterbury Circulation Plan (CCP), which includes designated cycle lanes, enhanced public realm and pedestrian routes, shared neighbourhoods. Improvements are also envisaged to the connectivity of the coastal towns. SS2 sets out the requirement for the co-location of services and facilities with new residential development. A mix of significant positive and minor negative effects are therefore also assessed for the cumulative effects on transport (SA Objective 13).

- 5.8.5 Overall, with regards to climate change (SA Objective 2) mixed significant positive and negative effects are assessed. Although the carbon required to deliver the requirements under Policy SS3 is considered likely to be significant, Policy SS2 seeks new development to be net zero compliant, whilst SS1 supports carbon sequestration and large-scale renewable energy, whilst SS5 supports a shift to low carbon journeys. As mentioned above the proposed connectivity through improved walking and cycling routes and co-location of facilities and services would also support this objective.
- 5.8.6 Effects on biodiversity (SA Objective 3) are also considered to be mixed. Policy SS1 supports investment in natural and semi natural open space, parks and gardens and two new country parks. The policy also protects and seeks to enhance features including rivers, streams and ponds. A requirement for a 20% biodiversity net gain is also included in the policy wording. The policy also supports the full recovery of the Stodmarsh Nature Reserve (which is a SAC, SPA, Ramsar) to meet its targets for water quality and improve biodiversity, and thus will support achievement of nutrient neutrality. Overall, significant positive effect is assessed as well as minor negative effects. The requirements in SS3 would result in significant negative effects, although biodiversity net gain would likely see some mitigation of significant negative effects and potentially support positive effects. SS5 would support infrastructure including the provision of country parks and wastewater treatment which would support achievement of this objective and nutrient neutrality. With regards to water resource and quality (SA Objective 6) similar effects are assessed, as the policies would support water resources (through, for example, the identification of Broad Oak reservoir) and water efficiency in new development, some pressures on water resources are inevitable.
- 5.8.7 The effects on landscape (SA Objective 5) are also assessed as mixed significant positive and minor negative overall. Policy SS1 would include provision for a range of new open spaces and protection and enhancement of existing green and blue infrastructure. These measures are considered likely to have significant positive effects on this objective. However, the policy also supports renewable energy schemes, which may have landscape impacts. Significant positive effects are assessed for Policy SS2 in reflecting the policy provisions for development that is responsive to local character, townscape and landscape and provides open space. Policy SS3 sets out the development requirements and seeks to direct development to sustainable settlements. The rural character of the countryside will be protected as part of the policy. This is likely to support protection of important landscapes. However, there are likely landscape effects associated with the scale of development.
- 5.8.8 Significant negative effects are assessed for waste management (SA Objective 8). Policy SS3 would support new development which will lead to waste generation during construction and occupation which is potentially significant given the scale of development. Additionally, the infrastructure envisaged in the policies would require the use of resources and lead to waste generation, particularly in the construction phase. Positive effects are likely associated with Policy SS1, SS2 and SS5. These are reflected in the cumulative effect assessment.
- 5.8.9 The district benefits from a variety of designated and undesignated heritage assets, including rich archaeology. Canterbury City includes a World Heritage Site (WHS) comprising of the Cathedral, St Augustine's Abbey and St Martin's Church as well as a

range of listed buildings and scheduled monuments. There are nearly 100 conservation areas, over 50 scheduled monuments and nearly 2,000 listed buildings in the District as a whole. SS2 specifically states that the historic environment will be conserved and enhanced and also references increasing accessibility to the WHS. This is considered to have likely significant positive effects on this objective (SA Objective 9). However, there are negative effects associated with the scale of development in SS3.

- 5.8.10 It is recognised that there are a limited number of suitable brownfield sites (i.e. sites that are not significantly constrained or with no valuable existing use) that could be developed within the district. Therefore, the spatial strategy requirements are largely to be developed within allocations on greenfield land. SS1 does support the provision of significant open space and the provision of multifunctional green infrastructure. These measures are expected to help to support the sustainable use of land and conserve soil quality. Cumulatively, the policies have therefore been assessed as having mixed positive and significant negative effects on land use (SA Objective 11).
- 5.8.11 Policy SS1 would support the protection and enhancement of open spaces, whilst Policy SS2 supports, amongst other things, the provision of developments connected to services and facilities by walking and cycling opportunities, the co-location of community facilities and services, and the provision of high-quality open space. The implementation of Policy SS3 would help to create opportunities in the urban and rural areas and support vibrant and vital town centres. This could ensure that employment opportunities and services and facilities are accessible, helping to promote healthy lifestyles. There is also strong evidence showing that work is generally good for physical and mental health and well-being. Policy SS5 would support the provision of necessary infrastructure, including health care facilities and open space. In this context, these policies have been assessed as having a positive effect on this objective. However, there are impacts during the construction phase, and often as a result of occupation, where increased noise and emissions can affect adjacent occupiers. Overall SA Objective 14 is considered to have a mixed significant positive and minor negative effects.

## Canterbury Policies

- 5.8.12 The summary of the appraisal is focussed on the likely significant effects found in the assessment. The detailed assessment is set out in **Appendix I**.
- 5.8.13 A mix of significant positive and negative effects are assessed for biodiversity (SA Objective 3). The policies set out a requirement for 20% biodiversity net gain, alongside other environmental improvements, though it is important to note that uncertainty exists regarding the capacity of some policies to meet 20% net gain requirements. Several of the policies would result in the consumption of a large amount of greenfield land. Sites associated with policies C2, C6, C7, C8, C9, C12, C13, C14, C15, C19, C20, C21, C22 and C23 have been identified as having the potential to affect an International/National designation (often Ancient Woodlands), local designation and/or protected species. Many of the policies identify a need for open spaces, landscape buffers, green infrastructure, habitat improvement, rectification of habitat severance, the provision of pollinator habitats and other requirements to aid in mitigating their effects on biodiversity assets and species. The policies therefore often provided either minor negative or a mixture of minor negative and minor positive effects. Policy C24, through the creation of wetland habitat to address nutrient neutrality issues, and offset the impact of development on the nitrogen and phosphate levels at Stodmarsh, would have a significant positive effect on local biodiversity. Due to the scale of the development, they govern within the Canterbury area, policies C4, C5 and C11 are scored as having significant negative effects with the potential for some minor positives. Overall, some uncertainties are also identified about the in-combination effects of the allocations identified in the Regulation 18 HRA.

- 5.8.14 A mix of positive and significant negative effects are assessed for landscape (SA Objective 5). Policies C1, C2, C3, C4, C17, C18, C19 and C23 would create/encourage development primarily within the existing built environment of Canterbury, and could provide opportunities for the character of the built environment of Canterbury to be enhanced. A mixture of minor positive to minor negative effects are identified for their effects on landscapes. Policy C24 would help to improve local landscapes through the creation of wetland habitats, providing positive effects. Whilst policies C6, C7, C12, C13 include requirements for landscaping and buffers to mitigate the visual impact of the development, it is considered that the potential for significant negative effects on landscape (identified in site assessments) remain. Policies C5 (covering south west Canterbury overall) and C11 (covering east Canterbury overall) are also identified as having similar effects. Policies C10 and C16 would create new road infrastructure that could have significant negative effects on local landscapes. However, there is uncertainty depending on the specific route and detailed design, which could mitigate and reduce such effects.
- 5.8.15 A mix of significant positive and minor negative effects are assessed for water resource and quality (SA Objective 6). The provision of wetland under Policy C24 would support water quality improvements at Stodmarsh which is likely to have significant positive effects on water quality. It has been assumed that the other policies of the Local Plan would help to mitigate effects on water resource, through for example water efficiency measures. Policies C6, C7, C12 and C13 require the creation of new wastewater treatment works and policy C15 requires connections from its site to be made to the wastewater treatment works created by policies C12 and C13. This would ensure wastewater is properly managed for the developments delivered by these policies, supporting water quality improvements.
- 5.8.16 A mix of significant positive and significant negative effects are assessed for flood risk (SA Objective 7). Policies C2, C6, C7, C8, C9, C12, C13, C14, C15, C17, C18, C19, C20, C21 and C22 would allow for development in Flood Zone 1 and are therefore identified as having significant positive effects. Policy C24 would create new wetland habitat that could aid in the management of the surrounding areas. However, C23 would enable development in an associated site partly within Flood Zone 2 and 3.
- 5.8.17 Significant positive effects are assessed for housing (SA Objective 10). The policies have the potential to provide or encourage high quality housing within the Canterbury area and would therefore have positive effects on improving the housing availability and quality. The policies would provide 50 dwellings in the city centre allocation, 2941 in South West Canterbury, 2186 in East Canterbury in addition to further delivery within the urban area. Given the cumulative scale of the housing provision the policies are assessed as having significant positive effects on SA Objective 10.
- 5.8.18 The policies would result a mix of significant positive and significant negative effects on land use (SA Objective 11). This reflects the mix of greenfield and brownfield sites identified. Policies C2, C17, C18, C19, C22 and C23 would see the development of mainly brownfield land and are therefore scored as having a significant positive effect. Policies C6, C7, C8, C9, C12, C13, C14, C20 and C21 would see the development of mainly greenfield land or agricultural land.
- 5.8.19 With regard to economic development (SA Objective 12) the policies would help to deliver a range of housing and employment sites within the Canterbury area and support the vitality and vibrancy of the city centre. The policies would cumulatively seek to support existing employment areas and provide: a minimum of 8,000 sqm business floorspace, including flexible work space, in South West Canterbury; 8,000 sqm in East Canterbury; and 51,400 sqm at Canterbury business park. Significant positive effects are assessed. The transport infrastructure improvements created by C10 and C16 could aid the local

economy (SA Objective 12) considerably and a significant positive effect is identified on this basis.

- 5.8.20 The policies would cumulatively have significant positive and minor negative effects in terms of encouraging public and sustainable transport use (SA Objective 13). Policies C6, C7, C8, C12, C13, C21, C23 include requirements for public transportation improvements, new bus routes and/or creation of bus stops to be created, which would generate positive effects. Policies C5 and C6 identify a need for park and ride facilities, which would increase the accessibility of bus transportation and encourage its use. Policy C14 requires development to ensure it maximises any connectivity to surrounding public transport, which would generate positive effects. The proposed improvements in several policies are wide ranging and include cycle routes, Public Rights of Way improvements, bus lanes, one way systems to improve traffic flow, and priority for public transport. Whilst the policies themselves seek to ensure the associated developments would be as well connected and accessible as possible, it is likely the development created by these policies would be primarily reliant on private vehicle use, based on current transport use. Some negative effects are therefore also assessed. Policies C10 and C16 identify safeguarded routes for the South West Link Road and Eastern Movement Corridor. These are likely to have significant effects on aiding efforts to reduce congestion in the city centre although would also likely increase vehicle use outside the city centre.
- 5.8.21 The policies would broadly provide significant positive effects and minor negative effects with regards to creating healthy communities (SA Objective 14). Policies C4, C5, C6, C7, C11, C12 and C13 would seek to ensure the provision of new schools/educational facilities. Policy C4, C5, C6, C7 would require the creation of new health facilities. The creation of new facilities would generate significant positive effects. Though policies C6, C15 and C18 could result in the loss of community facilities these policies do seek to replace this provision. These objectives therefore have a mixed score of significant positive and minor negative effect.
- 5.8.22 No other significant effects are assessed. With regard to historic environment (SA Objective 9) a mix of minor positive with negative effects are assessed. The policies in this section contain a range of measures to protect and enhance the assets within the city including the World Heritage Site (WHS) and measures to mitigate impacts on view and setting of the WHS in new development locations. The policies in this subsection have also been assessed as having a mix of minor negative effects on air quality, climate change, soil and waste (SA Objective 1, 2, 4, 8).

## Whitstable Policies

- 5.8.23 The summary of the appraisal is focussed on the likely significant effects found in the assessment. The detailed assessment is set out in **Appendix I**.
- 5.8.24 A mix of positive and significant negative effects are assessed for landscape (SA Objective 5). W1 would see sensitive regeneration of the Whitstable Town Centre and W2 would be likely to support regeneration of Whitstable Harbour. A minor positive effect was identified for these policies. Policies W9 and W10 would result in the development of sites within the built environment of Whitstable and could support improvements to townscape. The other policies would result in development on the outskirts of Whitstable's built environment, making such sites ability to mitigate their landscape effects more limited. Policies W4, W5, W6, W7 and W8 are identified as having significant negative effects. Whilst policies W4, W5, W6, W7 and W8 include requirements for landscaping and buffers to mitigate the visual impact of the development, it is considered that the potential for significant negative effects on landscape (identified in the associated site assessments) remain.



- 5.8.25 A mix of significant positive and minor negative effects are assessed for flood risk (SA Objective 7). The majority of associated sites are within Flood Zone 1. Policies W2, W5 and W8 would result in the creation of development in an area at risk of flooding. Policies W5 and W8 mention the need to ensure residential development is located outside of flood zones 2 and 3. Policies W5 and W8 are identified as having a minor negative effect.
- 5.8.26 Significant positive effects are assessed for housing (SA Objective 10). The policies have the potential to provide or encourage high quality housing within Whitstable and would therefore have positive effects on improving the housing availability and quality (SA Objective 10). The associated sites for W4- W8 have the potential to deliver significant scale of housing. South Whitstable would provide 1,690 dwellings, whilst the urban area would include provision for a further 267 dwellings. Given the cumulative scale of the housing provision the policies are assessed as having significant positive effects on SA Objective 10.
- 5.8.27 The policies would result a mix of significant positive and negative effects on land use (SA Objective 11). This reflects the mix of greenfield and brownfield sites identified. Policies W1, W2, W9 and W10 would see the creation of new development entirely or primarily upon brownfield/previously developed land. Policy W7 would see the creation of development on a mixture of brownfield and greenfield land. The remaining policies would see the release of substantial greenfield land in the Whitstable area.
- 5.8.28 Significant positive effects are assessed for the economy (SA Objective 12). Policy W1 would allow for a wide range of development within the Whitstable Town Centre, seeking to support the Primary Shopping Area and providing new office development. Policy W2 would encourage fishing, commercial, business, employment, leisure, parking, and residential development within Whitstable Harbour. Policy W3 identifies the Commercial Area at Estuary View should be supported and should complement the town centre by providing new business, commercial and leisure opportunities. Policies W4–W7 would ensure the creation of large scale mixed development, including the creation of new business floorspace and flexible working spaces (4,000sqm business floorspace). These policies would also provide a park and bus facility that would support the accessibility of any business and retail spaces created. Policies W8, W9 would create smaller scale employment opportunities in the creation of new school, shopping and community facilities opportunities alongside investment in the construction of housing.
- 5.8.29 No other significant effects are assessed. The policies in this subsection have been assessed as having a mix of minor positive and negative effects on air quality, climate change, biodiversity, historic environment, transport and health (SA Objective 1, 2, 3, 9, 13, 14). Overall, some uncertainties are identified about the in-combination effects of the allocations identified in the Regulation 18 HRA. Minor effects assessed for minerals, water, waste (SA Objective 4, 6, 8).

## Herne Bay Policies

- 5.8.30 The summary of the appraisal is focussed on the likely significant effects found in the assessment. The detailed assessment is set out in **Appendix I**.
- 5.8.31 A mix of minor positive with significant negative effects are assessed for landscape (SA Objective 5). Policies HB1, HB2, HB5, HB7 and HB9 would result in the creation of development within the built environment of Herne Bay, contributing to the local built environments character and potentially providing improvements to townscapes. These policies are identified as having a minor positive effect. Policies HB4, HB6, HB8 and HB10 would see the creation of development on the edge of Herne Bay's built environment, potentially affecting the areas local character and having negative effects on local landscapes. The site associated with HB4 could potentially have significant negative

effects as the associated site would result in large scale development on the fringes of Herne Bay's built environment and within the Green Gap that separates Herne Bay from Whitstable. However, the effectiveness of landscaping buffers required in the policy wording may reduce these to minor. Some uncertainty over the effects of policy HB4 are therefore identified. Policy HB3 whilst encouraging such development, does also contain requirement for these and other policies to mitigate their landscape effects, providing a mixture of minor positive and minor negative effects.

- 5.8.32 A mix of significant positive and significant negative effects are assessed for flood risk (SA Objective 7). The majority of associated sites are within Flood Zone 1. Policies HB4 and HB10 would see the creation of mixed use development within areas at risk of flooding. Policy HB4 does require that no residential development would take place within Flood Zone 2 & 3, but would create economic, educational and/or health facilities located within such zones. Policies HB4 and HB10 are therefore identified as having negative effects on flooding (SA Objective 7) with HB10 being significant as no flood risk mitigation is included in the policy wording. However, the other policies of the Draft Local Plan would aid in reducing the potential affects from development on land at risk of flooding.
- 5.8.33 Policies HB1, HB2, HB3, HB4, HB5, HB8, HB9 and HB10 all have the potential to provide or encourage high quality housing within Herne Bay and would therefore have positive effects on improving the housing availability and quality (SA Objective 10) within Herne Bay. Given the cumulative scale of the housing provision within the Herne Bay area, including allocation of at least 246 dwellings in the urban, the policies are assessed as having significant positive effects on SA Objective 10.
- 5.8.34 A mix of significant positive and significant negative effects are assessed for land use and soil quality (SA Objective 11). This reflects the mix and scale of greenfield and brownfield sites that are associated with these policies promote.
- 5.8.35 Significant positive effects are assessed for employment and economy (SA Objective 12). The policies would provide either housing, retail and/or employment/economic development. Housing is important for supporting economic growth and land for new employment/economic development allows for new businesses or existing businesses to grow, aiding in creating economic growth. Overall, some 47,085 sqm of employment floorspace is identified for allocation within the policies. The policies also contain infrastructure improvements that would have a direct effect of increasing the accessibility of Herne Bay as a whole, including its existing to and from its existing businesses.
- 5.8.36 With regards to health and sustainable communities (SA Objective 14) the policies would provide a more accessible Herne Bay, strengthening existing and future communities. The policies would also provide new housing and/or employment opportunities that would work to support communities. Policy HB2 seeks to regenerate areas within Herne Bay. Policies HB3, HB4, HB5, HB8 and HB9 would all provide or contribute to educational facilities and policies HB3, HB4 and HB10 would all provide new community facilities. The policies are assessed as having a significant positive effect for the community (SA Objective 14). There is potential for the construction and operation of new housing, employment and retail development to have a negative effect on the health and wellbeing of residents near development sites and along transport routes. Negative effects are therefore also assessed.
- 5.8.37 No other significant effects were assessed. The policies in this subsection have been assessed as having a mix of minor positive and negative effects on air quality, climate change, biodiversity, historic environment and transport (SA Objective 1, 2, 3, 9, 13). Overall, some uncertainties are identified about the in-combination effects of the allocations identified in the Regulation 18 HRA. Minor negative effects assessed for minerals, water, waste (SA Objective 4, 6, 8).

## Rural Area Policies

- 5.8.38 The summary of the appraisal is focussed on the likely significant effects found in the assessment. The detailed assessment is set out in **Appendix I**.
- 5.8.39 Given the nature of the policies allowing for the creation of development within the rural areas of the district, the potential effects on biodiversity (SA Objective 3) are wide ranging. A mix of significant positive and minor negative effects are assessed. Whilst development in the rural area has potential to result in the loss of habitat/greenfield land, a number of the associated sites for the policies would also develop previously developed/brownfield land. The policies provide a range of biodiversity enhancing measures to minimise negative effects and provide benefits within policy wording. The Broad Oak reservoir and Country Park provided by policy R26 would provide significant positives and minor negative effects through protecting a large amount of habitat and creating habitat but would also cause temporary disruption to existing habitats whilst the reservoir and Country Park is created. Policy R20 would have similar effects from the creation of a Country Park (alongside residential development). There are some residual uncertainties in relation to R12 due to the proximity of the associated site to Stodmarsh SAC/SPA/Ramsar although the HRA at regulation 18 stage assesses that there are no adverse effects on the integrity of Stodmarsh. Overall, some uncertainties are also identified about the in-combination effects of the allocations identified in the HRA.
- 5.8.40 Effects on landscape (SA Objective 5) are assessed as cumulative a mix of significant positive and negative. The associated site for Policy R1 is located adjacent to the boundary of the Kent Downs AONB. Although a number of measures are proposed within the policy to reduce landscape effects, a significant negative effect is assessed. However, there is some uncertainty as the proposed measures could reduce effects. R6 is a brownfield site located within the Kent Downs AONB. Policy R6 requires a range of landscape and design measures to reduce any negative effects on the AONB and enhance the site which could provide landscape/design enhancements. There is some uncertainty about this. A number of policies promote development that could be expected to have minor negative effects on landscapes within the district whilst other policies would see enhancements to brownfield sites. Many policies contain landscape mitigating factors, such as the planting of landscape buffers/woodland, measures to preserve amenity, and require development to be in accordance with the in Canterbury Landscape Character and Biodiversity Appraisal. The other policies of the Local Plan, especially those associated with design and conserving landscape character, would aid in ensuring these policies do not create significant negative effects. The provision of Country Parks is likely to support enhanced landscapes.
- 5.8.41 A mix of significant positive and minor negative effects are assessed for water resource and quality (SA Objective 6). The presence of significant positive effects reflects the policy R26 for the provision of Broad Oak reservoir. This is required to help address water stress within the area and proposed by South East Water within their Water Resources Management Plan 2019 and the emerging Water Resources South East Regional Plan. Thus, a significant positive effect is identified.
- 5.8.42 A mix of significant positive and significant negative effects are assessed for flood risk (SA Objective 7). The majority of associated sites are within Flood Zone 1 although a few sites are within Flood Zone 2 and 3. However, the other policies of the Draft Local Plan would aid in reducing the potential effects from development on land at risk of flooding.
- 5.8.43 Significant positive effects are assessed for housing (SA Objective 10). The policies have the potential to provide or encourage high quality housing within a Garden Community, Rural Service Centres and Local Service Centres and would therefore have positive effects on improving the housing availability and quality (SA Objective 10). The associated sites have the potential to deliver significant scale of housing of approximately 3,200 in the

Garden Community, 1,317 in Rural Service Centres and 70 in Local Service Centres, whilst appropriate windfall development is also supported. Given the cumulative scale of the housing provision the policies are assessed as having significant positive effects on SA Objective 10.

- 5.8.44 The policies would result a mix of significant positive and negative effects on land use (SA Objective 11). This reflects the mix of greenfield and brownfield sites identified in the policies.
- 5.8.45 Significant positive effects are assessed for the economy (SA Objective 12). Policies R1, R7, R8, R9, R10, R14, R21 and R24 would provide or support the provision of some form of economic development (SA Objective 12) and are therefore identified as having a significant positive effect. The policies would cumulatively provide housing which will support continued growth and healthiness of the local economy.
- 5.8.46 Many of the policies would create accessibility and transportation improvements across Canterbury to ensure their respective developments are accessible places by sustainable and active travel methods (SA Objective 13). Such improvements are wide ranging from walking and cycle routes, Public Rights of Way improvements, bus routes and priority for public transport to name a few. However, the policies would also place a strain on the existing infrastructure and public transport of CCC area. The developments are broadly considered to have a minor to significant positive and negative effects against SA Objective 13.
- 5.8.47 The policies all seek to create safe spaces that allow local communities (SA Objective 14) to grow and thrive. The policies often contain considerable requirements for open space and/or community, health, and educational facilities, which are all fundamental to local communities. The policies also seek to ensure their respective developments are accessible by sustainable and active travel means, ensuring communities are interconnected and highly accessible. Some of the policies govern small sites, but even these sites seek to ensure proportionate land and build contributions are secured for early years, primary, secondary and SEND education plus proportionate contributions for primary healthcare and other necessary off-site community infrastructure. However, it is recognised that during the construction phase that negative effects will be experienced. A range of minor positive and negative effects is assessed, besides for policy R28, which would have only minor positive effects and R1 which would have minor positive and significant negative effects.
- 5.8.48 No other significant effects were assessed.

## District Wide Strategic Policies

- 5.8.49 The District Wide Strategic Policies were assessed in the component thematic sections and the findings are summarised below. The summary is focussed on the significant effects found in the assessment. The detailed assessment is set out in **Appendix J**.

### Housing and new communities

- 1.1.9 The Policies of DS1 to DS7 are focused on the creation of housing that meets the needs of the district and ensuring such housing has the required infrastructure to ensure they are accessible. The policies would result in the creation of affordable housing across the district with more appropriate specialist accommodation being provided alongside small-scale and exception site housing in rural areas.
- 1.1.10 Cumulatively, the policies are assessed as having a significant positive effect on housing (SA Objective 10) and sustainable communities (SA Objective 14) through the creation of new housing developments that would aid in the creation of new communities or support

existing communities. The policies were assessed as having significant positive effects on transport (SA Objective 13) as policies DS6 and DS7 specifically require sustainable transport infrastructure improvement that would encourage active and/or sustainable travel methods.

- 1.1.11 For objectives related to air quality, biodiversity and historic environment (SA Objective 1, 3 and 9) a mix of minor positive and minor negative effects is assessed. For climate change, landscape, water and soil (SA Objectives 2, 3, 5, 6 and 11) a mix of significant positive and minor effect is assessed. This, in part, reflects Policy DS6 which scored as having a significant positive effect against most of the SA Objectives as it will create housing developments that are of a sustainable design whilst providing detailed requirements in order to achieve this.
- 1.1.12 Where policies were identified as having a cumulative minor negative effect, this reflects the impact of new development which is considered likely to have impacts upon their surroundings, use resources and land, and produce emissions that could affect air quality and contribute to climate change. No significant negative effects were assessed.
- 1.1.13 No other significant effects were assessed.

## Employment and the local economy

- 5.8.50 The policies were cumulatively assessed as having a significant positive effect on the economy (SA Objective 12) as they would help create development that would help the local economy. Policies DS8 to DS12 seeks to create new economic and educational development across the district. This includes appropriate development in rural areas, town and village centres, existing and proposed economic centres and tourist development. Educational development provided by policy DS9 would be located primarily within existing university or educational campuses but does allow for potential educational development elsewhere. The educational development created by policy DS9 will be important for the education of the district's population to enable them to be economically active.
- 5.8.51 The policies were assessed as having significant positive effects on encouraging sustainable transport (SA Objective 13) due to encouraging transportation methods other than the private car and locating development within town centres that often already have good access to other forms of transportation (public transport).
- 5.8.52 Whilst all the policies would have some minor positive effects for local communities (SA Objective 14) due to aiding the creating of new places to work/learn, which creates new or strengthens existing communities, policy DS10 specifically seeks to create community facilities within the town centres and village centres that exist within the Local Plan area. Overall, significant positive cumulative effects were assessed.
- 5.8.53 No other significant effects were assessed.

## Movement, transportation and air quality

- 1.1.14 The policies DS13 to DS16 are focused upon improving the accessibility, infrastructure, and air quality of the district area.
- 1.1.15 Significant positive effects are identified against air quality and carbon emissions (SA Objective 1 and 2) as the policies seek to reduce development impacts upon air quality and emissions respectively. The policies would achieve this in a number of ways, primarily through encouraging sustainable (public transport) and active travel (walking & cycling) modes of transportation. Policy DS16's primary focus is on the maintaining of the CCC area's air quality and contains requirements for developments to not produce

unacceptable levels of emissions or effects on air quality. The policies would have minor positive effects on biodiversity (SA Objective 3) through improving air quality.

- 1.1.16 The sustainable and active travel requirements of the policies would all aid in the achievement of a strong economy (SA Objective 12) as having the needed infrastructure and accessible places is fundamental to economic growth and operations. However, policy DS15 is focused upon improving highways and parking within the CCC area and goes further than the other policies. It seeks to improve how freight is transported and ensure developments do not compromise, and instead improve, local and wider infrastructure (including highways). Policy DS15 was therefore identified as having a significant positive effect on SA Objective 12.
- 1.1.17 All of the policies scored as having a significant positive effect against transport and sustainable communities (SA Objective 13 and 14) as they encourage sustainable forms of transport and seek to ensure that community facilities and spaces are accessible by a wide range of transportation methods. These policies would essentially create a more integrated and accessible built environment allowing for the creation and enhancement of sustainable communities.

## Open space, natural and historic environment

- 5.8.54 The policies of DS17 to DS26 are wide ranging policies that are concerned with the protection of biodiversity assets, landscapes, historic assets, the creation of new open spaces and the creation of renewable energy and carbon sequestration developments.
- 5.8.55 Cumulative significant positive effects are assessed for climate change (SA Objective 2). Policies DS21 and DS25 were assessed as having a significant positive effect due to them requiring developments to be resilient to the effects of climate change and enabling the development of renewable energy developments. Policy DS25 also allows for the development of carbon sequestration development, which would directly capture important greenhouse gasses and preventing them from contributing to climate change.
- 5.8.56 The policies would support the protection and enhancement of biodiversity assets across the district and therefore significant positive effects are assessed for SA Objective 3. For example, DS21 would require 20% biodiversity net gain, DS23 protects the designated Blean Woodland Complex, whilst policies DS17 to DS19 all afford protection to important biodiversity designations, which contain a number of habitats and biodiversity species.
- 5.8.57 Significant positive effects were identified for landscape (SA Objective 5) as the protection of biodiversity assets is likely to also ensure the landscape characteristics of the district are maintained and not compromised. Policy DS21 also seeks to enhance landscape character across the rural and urban environments. However, the provision of renewable energy under DS25 may lead to some negative landscape effects, although uncertain.
- 5.8.58 Significant positive effects were assessed for water resources (SA Objective 6) and flood risk (SA Objective 7). This particular relates to Policy DS20 which would ensure development within the district is not at risk of flooding, adequately addressing any flood risks identified/caused and ensure the local water environment is protected. Policy DS17 also scored a significant positive for its protection of the district's water resources, as it protects important coastlines and saltwater marshes. Additionally, Policy DS17 would, amongst other things, support the achievement of nutrient neutrality, thereby supporting water quality within the District.
- 5.8.59 Policy DS26 is focused upon the protection of the historic assets of the district and therefore scored a significant positive against historic environment (SA Objective 9), as the policy would ensure development does not compromise the historic environment and

its character and setting. Together with the protection of natural environment assets a cumulative significant positive effect is assessed.

- 5.8.60 Whilst most of the policies have a negligible relationship to transport (SA Objective 13), policies DS21 and DS24 would both have a significant positive effect as they require the implementation of green and/or blue infrastructure that interconnects into the existing green/blue infrastructure network. This ensures new developments are well connected through green/blue infrastructure and helps ensure more sustainable modes of travel are more viable, primarily walking and / or cycling. Overall, significant positive effects were assessed.
- 5.8.61 The policies are broadly positive for healthy communities (SA Objective 14), as the protection of biodiversity assets, landscapes and the creation of renewable energy would all allow for more sustainable and healthier communities and enhance the communities that already exist. Policies DS21 and DS24 enforce the need for green infrastructure as part of new developments and ensuring new developments have adequate access to open spaces. Significant positive effects were therefore assessed for the policies overall.
- 5.8.62 No other significant effects were assessed.

## Development Management Policies

- 5.8.63 The summary below is focussed on the significant effects found in the assessment. The detailed assessment is set out in **Appendix K**.
- 5.8.64 Policies DM1 to DM19 cover the Development Management policies for the Local Plan. These policies therefore cover a large variety of built and natural environment topics, ranging from conversions and extensions to parking requirements, flood risk, waste management, noise and light pollution, and contaminated land to name but a few. The potential effect from these policies is therefore wide ranging, with many of them having no relationship to many of the SA Objectives or have minor to neutral effects. However, significant positive cumulative effects were identified for a range of SA Objectives.
- 5.8.65 The policies were assessed as having a significant positive effect on biodiversity (SA Objective 3). Policies DM11 and DM12 would ensure residential and non-residential development would seek to improve local biodiversity assets and not harm them. Similarly, although being related to flood risk and sustainable drainage, policies DM14 and DM15 identified that the addressing of these issues should also provide biodiversity enhancement/benefits.
- 5.8.66 Policies DM11 and DM12 would ensure residential and non-residential development is well designed and in accordance with their surroundings, ensuring such developments do not compromise local landscapes and their character. Though policy DM14 relates to managing flood risk, it also contains a requirement for any flood risk management elements to contribute positively to the landscape. Lighting can compromise local landscapes and especially at night. The criteria for lighting contained within policy DM18 would ensure local landscapes are not compromised from the inappropriate lighting and light pollution. Policy DM13 was assessed as having a minor negative effect on landscape (SA Objective 5) due to its potential effects on local landscapes, though the other policies of the Local Plan should ensure biomass developments mitigate their potential effects on the landscape as much as possible. These policies were therefore scored as having a significant positive effect on landscape (SA Objective 5).
- 5.8.67 The policies were assessed as having a significant positive effect on water resource/quality and flood risk (SA Objective 6 and 7). Policies DM14, DM15 and DM16 all relate to the water environment and water management. Policies DM14 and DM15 would protect water resources and environment through the proper management of flood

risk and the use of sustainable drainage systems. Policy DM16 is focused upon the protection of the water environment, ensuring only development that enhance existing aquatic environments and ecosystems would be approved. Policy DM16 also requires development to be in accordance with the objectives of the Water Framework Directive.

- 5.8.68 Policy DM4 would ensure all development that occurs within the district reduces the amount of waste produced and be in accordance with the principles of a circular economy. This will support a reduction in waste arising through construction. Policies DM11 and DM12 would ensure residential and non-residential development is of an appropriate size and scale, ensuring resources are not needlessly wasted. Policy DM13 would take a waste product (biomass) and convert it into renewable energy. These policies were therefore, cumulatively, identified as having a significant positive effect on waste (SA Objective 8).
- 5.8.69 Policy DM8 seeks to stop historic shop frontages from being lost/damaged, ensuring these important historic assets are retained. Policies DM9, DM11 and DM12 would all ensure that development, including advertising, does not harm nearby historic assets or compromise their character and setting. These policies were therefore cumulatively identified as having a significant positive effect on the historic environment (SA Objective 9).
- 5.8.70 Significant positive effects were assessed for housing (SA Objective 10). Policies DM1, DM2, DM3, DM5 and DM10 would result in the creation of housing, though the scale of housing produced by these policies would be low. However, these policies, through creating flexibility in the location and ways that housing can be developed, would potentially allow for the creation of specialised housing that caters to the community's housing needs. The housing created by these policies would be supported by policy DM11, which would ensure any housing created would be of high quality. Similarly, policies DM14 and DM15 would ensure housing is not at risk of flooding and sustainably manages any drainage requirements. These policies were therefore scored as having a significant positive effect on housing (SA Objective 10), though it should be noted that policies DM1, DM2, DM3, DM5 and DM10 were also scored as having a minor positive effect due to them potentially only providing a small amount of housing over the lifetime of the Local Plan.
- 5.8.71 Policy DM19 would aid in the rectification of contaminated land and therefore scored a significant positive against sustainable land use (SA Objective 11). Overall, significant positive effects were assessed.
- 5.8.72 Policies DM5 and DM12 would aid in allowing people to pursue active travel whilst maintain the accessibility of places. Policy DM5 would ensure that the parking needs of residents is satisfied without compromising the pedestrian experience. These policies are therefore cumulatively assessed as having a significant positive effect against transport (SA Objective 13).
- 5.8.73 The policies are assessed as having a significant positive effect on healthy communities (SA Objective 14). Policy DM5 would ensure new development, including community and health development, would have sufficient parking facilities to make such development accessible for all. Policy DM7 would ensure new development within the area is safer and leads to the creation of safe, crime reducing spaces. Policies DM17 and DM18 would ensure new development would only have acceptable noise and lighting effects on their surroundings, leading to the creation of better spaces for residents and communities.
- 5.8.74 No further significant effects were assessed.



## 5.9 Cumulative, Synergistic and Secondary Effects

- 5.9.1 In determining the significance of effects of a plan or programme, the SEA Regulations requires that consideration is given to the cumulative nature of the effects. This section considers the potential for the policies and proposals contained within the Draft Local Plan to act in-combination both with each other and other plans and programmes to generate cumulative (including synergistic and secondary) effects.

### Cumulative Effects Arising from the Draft Local Plan

- 5.9.2 **Table 5.16** presents the appraisal of the cumulative effects of the Draft Local Plan by summarising the cumulative effects of each policy chapter (Chapters 1 to 7) on the SA objectives and by providing an overall judgement on the cumulative effect of the plan policies (including proposed site allocations) as a whole.
- 5.9.3 The appraisal of cumulative effects highlights that the majority of the SA objectives will experience positive effects as a result of the implementation of the policies and proposals contained in the Draft Local Plan. Significant positive effects are expected in respect of the following SA objectives: climate change; water; flood risk; housing; economy; transport; health and wellbeing. This reflects the likely socio-economic benefits associated with the delivery of housing, employment and related community facilities, services and infrastructure in the district over the plan period and the focus of the majority of this growth in and adjacent to the Canterbury Urban Area, Whitstable Urban Area, Herne Bay Urban Area, a single Garden Community location, and at a range of Rural and Local Service Centres within the rural area. It also reflects the strong framework provided by the plan policies that will help to conserve and enhance the district's natural and built environments.
- 5.9.4 Despite the overall positive cumulative effects associated with the implementation of the Draft Local Plan, cumulative negative effects have also been identified against many of the SA objectives including: air quality, climate change, biodiversity; geology; landscape; water; flood risk; waste; cultural heritage; transport; health and sustainable communities. This principally reflects impacts associated with the construction and operation of new development including land take, resource use, emissions and loss of landscape character and the location of proposed site allocations. However, the Draft Local Plan includes policies which seek to manage these effects (including through development requirements related to proposed site allocations) and in consequence, it is expected that significant adverse effects will be largely avoided, although some uncertainty remains. The Draft Local Plan has been assessed as having mixed positive and significant negative effects on land use. The Draft Local Plan policies and proposals seek to deliver a range of brownfield sites but would deliver the majority of new development on greenfield land. In consequence, a cumulative significant negative effect has also been identified in respect of land use.

**Table 5.16 Results of the Cumulative Effects Appraisal**

| SA Objective  | Spatial Strategy Policies | Canterbury Policies | Whitstable Policies | Herne Bay Policies | Rural Area Policies | District Wide Strategic – Housing and New Communities | District Wide Strategic – Employment and the local economy | District Wide Strategic – Movement, transportation and air quality | District Wide Strategic – Open space, natural and historic environment | Development Management Policies | Cumulative | Commentary   |
|---|---------------------------|---------------------|---------------------|--------------------|---------------------|---|--|--|--|---------------------------------|------------|--|
| <b>1. To reduce air pollution and encourage improvements in air quality</b> | + +/-                     | -/?                 | +/-                 | +/-                | -                   | +/-   | -  | ++   | +  | +/-                             | +/-        | It is anticipated that the draft Local Plan would have a mixed positive and minor negative effect on the achievement of the SA objective. Growth over the plan period will result in increased emissions to air during both the construction of new development and once development is complete. However, focusing the majority of development in and adjacent to the urban areas, the promotion of strategic scale development that seeks to integrate facilities and services, and the delivery of strategic improvements to the walking/cycling network sustainable transport are all likely to reduce the need to travel by car and associated emissions to air. Investment in transportation infrastructure may also help to address air quality issues including at the Canterbury and Herne AQMAs. |
| <b>2. To minimise greenhouse gases that cause climate change and</b>        | + +/-                     | -                   | +/-                 | +/-                | -                   | + +/-   | -  | ++   | ++   | + +/-                           | + +/-      | It is anticipated that the policies of the draft Local Plan would have a mixed significant positive and minor negative effect on the achievement of the SA objective.  |

| SA Objective   | Spatial Strategy Policies | Canterbury Policies | Whitstable Policies | Herne Bay Policies | Rural Area Policies | District Wide Strategic – Housing and New Communities | District Wide Strategic – Employment and the local economy | District Wide Strategic – Movement, transportation and air quality | District Wide Strategic – Open space, natural and historic environment | Development Management Policies | Cumulative | Commentary   |
|--|---------------------------|---------------------|---------------------|--------------------|---------------------|---|--|--|--|---------------------------------|------------|--|
| deliver a managed response to its effects                            |                           |                     |                     |                    |                     |   |  |  |  |                                 |            | New development will result in increased energy use and associated greenhouse gas emissions with carbon in construction. However, as noted above, various measures are proposed to reduce the need to travel by car and associated emissions of greenhouse gases. The Draft Local Plan also provides a strong policy framework that seeks to achieve net zero developments, carbon sequestration, and promote climate change adaptation through the siting and design of development. Policies also support the delivery of appropriate renewable and low carbon energy development. |
| 3. To conserve, connect and enhance biodiversity across the District | + +/-                     | + +/- /?            | +/-/?               | +/-/?              | + +/-               | +/-   | -/?  | +  | ++   | ++                              | +/-/?      | It is anticipated that the policies of the draft Local Plan would have a mixed positive and negative effect on the achievement of the SA objective. Growth in terms of new housing and economic development together with the delivery of new infrastructure is likely to have adverse effects on biodiversity through, for example, land take and disturbance with associated impacts on habitats and species. However, the policies contained in the Draft Local Plan such as SS1 and  |

| SA Objective   | Spatial Strategy Policies | Canterbury Policies | Whitstable Policies | Herne Bay Policies | Rural Area Policies | District Wide Strategic – Housing and New Communities | District Wide Strategic – Employment and the local economy | District Wide Strategic – Movement, transportation and air quality | District Wide Strategic – Open space, natural and historic environment | Development Management Policies | Cumulative | Commentary   |
|--|---------------------------|---------------------|---------------------|--------------------|---------------------|---|--|--|--|---------------------------------|------------|--|
|  |                           |                     |                     |                    |                     |   |  |  |  |                                 |            | Policies DS21, DS23, seeking 20% biodiversity net gain, as well as the site specific policies provide a strong framework that is expected to help ensure that development does not have adverse effects on designated nature conservation sites and protect habitats and species thereby minimising or offsetting adverse ecological effects arising from development. The Regulation 18 HRA has identified some uncertainties about in combination effects which are also reflected in the score at this stage. |
| <b>4. To conserve geological sites and safeguard mineral resources within the District</b> | +/-                       | -                   | -/?                 | -/?                | -/?                 | 0   | -/?  | 0  | 0/?  | +                               | +/-        | It is anticipated that the draft Local Plan would have a mix of minor positive and negative effects on the achievement of the SA objective. However, there is some uncertainty over the exact location of some of the development.   |
| <b>5. To conserve and enhance the landscapes of the District</b>                           | + +/-                     | +/- - /?            | +/- - /?            | +/- - /?           | + +/- -/?           | + +/-   | +/-  | +  | ++   | ++                              | +/-/?      | It is anticipated that the draft Local Plan would have a mixed minor positive and minor negative effect on the achievement of the SA objective. Development will affect the character of the district's landscapes   |

| SA Objective            | Spatial Strategy Policies | Canterbury Policies | Whitstable Policies | Herne Bay Policies | Rural Area Policies | District Wide Strategic – Housing and New Communities | District Wide Strategic – Employment and the local economy | District Wide Strategic – Movement, transportation and air quality | District Wide Strategic – Open space, natural and historic environment | Development Management Policies | Cumulative | Commentary  |
|-------------------------|---------------------------|---------------------|---------------------|--------------------|---------------------|---|--|--|--|---------------------------------|------------|---|
| for people and wildlife |                           |                     |                     |                    |                     |   |  |  |  |                                 |            | <p>and townscapes, particularly given the area of greenfield land that will be required to accommodate growth over the plan period. However, it is anticipated that the application of the proposed Local Plan policies such as SS1, SS2, Policy DS18, and Policy DS19 and the site specific development requirements contained in policy wording will help to largely minimise adverse effects in this regard.</p> <p>The adoption of strategic scale landscape mitigation at proposed large sites at Canterbury, Whitstable, Herne Bay and the Garden Community have measures that would be expected to help mitigate adverse effects on landscape character. However, some significant effects would remain for some allocations. The redevelopment of brownfield sites and the provision of green infrastructure also presents opportunities to enhance landscape and townscape.</p> <p>In this regard, the policies contained in the Draft Local Plan (including site-specific development requirements) seek to</p> |

| SA Objective  | Spatial Strategy Policies | Canterbury Policies | Whitstable Policies | Herne Bay Policies | Rural Area Policies | District Wide Strategic – Housing and New Communities | District Wide Strategic – Employment and the local economy | District Wide Strategic – Movement, transportation and air quality | District Wide Strategic – Open space, natural and historic environment | Development Management Policies | Cumulative | Commentary   |
|---|---------------------------|---------------------|---------------------|--------------------|---------------------|---|--|--|--|---------------------------------|------------|--|
|   |                           |                     |                     |                    |                     |   |  |  |  |                                 |            | <p>conserve and enhance landscape, promote good design and protect visual amenity.</p> <p>On balance, the Draft Local Plan has been assessed as having a cumulative mixed positive and negative effect on this objective, although some uncertainty remains.</p>   |
| <b>6. To protect water resources and ensure a high quality of inland and coastal waters</b> | + +/-                     | + +/- /?            | -                   | -                  | + +/-               | + +/-   | -  | +  | ++   | ++                              | + +/-      | <p>It is anticipated that the policies of the Draft Local Plan would have a mixed significant positive and minor negative effect on the achievement of the SA objective. This reflects that the Draft Local Plan will increase pressure on water resources, but includes a range of measures, including water efficiency. The Draft Local Plan includes the Broad Oak Reservoir and measures to address nutrient neutrality, through mitigation for the Stodmarsh designated site.</p> |
| <b>7. To reduce the risk of flooding and where appropriate prevent coastal erosion</b>      | +/-/?                     | + +/- -/?           | + +/-               | + +/- -            | + +/- -/?           | 0   | 0  | 0  | ++   | ++                              | + +/-      | <p>It is anticipated that the policies of the draft Local Plan would have a mixed significant positive and minor negative effect on the achievement of the SA objective. A number of proposed site allocations are within areas of flood risk. However, the policies of the Draft Local Plan seek to minimise flood</p>  |

| SA Objective   | Spatial Strategy Policies | Canterbury Policies | Whitstable Policies | Herne Bay Policies | Rural Area Policies | District Wide Strategic – Housing and New Communities | District Wide Strategic – Employment and the local economy | District Wide Strategic – Movement, transportation and air quality | District Wide Strategic – Open space, natural and historic environment | Development Management Policies | Cumulative | Commentary   |
|--|---------------------------|---------------------|---------------------|--------------------|---------------------|---|--|--|--|---------------------------------|------------|--|
|  |                           |                     |                     |                    |                     |   |  |  |  |                                 |            | risk and ensure that development does not give rise to flood risk elsewhere, in accordance with a sequential, risk-based approach.   |
| <b>8. To promote sustainable waste management</b>  | +/- -                     | -                   | -                   | -                  | -                   | 0   | -  | +  | +/-/?  | ++                              | +/-        | It is anticipated that the policies of the draft Local Plan would have a mixed positive and negative effect on this SA objective. Growth will generate waste. It is anticipated that there would be opportunities to utilise recycled and sustainably sourced construction materials as part of new developments and in this regard, the policies contained in the Draft Local Plan (such as DM4) promotes effective waste management and support for a circular economy. This would help to reduce the likely scale of waste arisings generated through construction. |
| <b>9. To preserve, enhance, promote and capitalise on the significant qualities, fabric, setting and</b> | + +/-                     | +/-/?               | +/-                 | +/-/?              | -/?                 | +/-   | +/-/?  | +  | ++   | +                               | +/-/?      | It is anticipated that the policies of the draft Local Plan would have a mixed positive and negative effect on the achievement of the SA objective. New development has the potential to affect the District’s cultural heritage assets both directly (through the loss of, or damage to, assets) or indirectly  |

| SA Objective   | Spatial Strategy Policies | Canterbury Policies | Whitstable Policies | Herne Bay Policies | Rural Area Policies | District Wide Strategic – Housing and New Communities | District Wide Strategic – Employment and the local economy | District Wide Strategic – Movement, transportation and air quality | District Wide Strategic – Open space, natural and historic environment | Development Management Policies | Cumulative | Commentary  |
|--|---------------------------|---------------------|---------------------|--------------------|---------------------|---|--|--|--|---------------------------------|------------|---|
| accessibility of the District's historic environment                             |                           |                     |                     |                    |                     |   |  |  |  |                                 |            | (through effects on setting). In this regard, the potential for negative effects on cultural heritage has been identified in respect of a number of the proposed site allocations. However, the policies contained in the Draft Local Plan such as SS2 and DS26, as well as the development requirements for specific sites, seek to conserve and enhance the district's cultural heritage assets, including the Canterbury WHS, and are expected to help ensure that adverse effects are minimised and that opportunities are sought to enhance assets and their settings. |
| 10. To ensure the supply of high quality homes, which cater for identified needs | ++                        | ++                  | ++                  | ++                 | ++                  | ++  | NA   | +  | NA   | ++                              | ++         | It is anticipated that the policies of the draft Local Plan would have a significant positive effect on the achievement of the SA objective. This reflects that the Draft Local Plan meets the identified Local Housing Need (LHN) figure and ensures that housing provision is situated in Canterbury, Whitstable, Herne Bay and a range of settlements in the rural area that will help to meet local needs.  |
| 11. To promote the sustainable use of land and                                   | +/- -                     |                     |                     |                    |                     | + +/-   | +/-  | 0  | +  | ++                              | +/- -      | It is anticipated that the policies of the draft Local Plan would have a mixed minor positive and significant negative effect on  |



| SA Objective  | Spatial Strategy Policies | Canterbury Policies | Whitstable Policies | Herne Bay Policies | Rural Area Policies | District Wide Strategic – Housing and New Communities | District Wide Strategic – Employment and the local economy | District Wide Strategic – Movement, transportation and air quality | District Wide Strategic – Open space, natural and historic environment | Development Management Policies | Cumulative | Commentary   |
|---|---------------------------|---------------------|---------------------|--------------------|---------------------|---|--|--|--|---------------------------------|------------|--|
| conserve soil quality   |                           | + +/-<br>'          | + +/-<br>'          | + +/-<br>'         | + +/-<br>'          |   |  |  |  |                                 |            | the achievement of the SA objective. This reflects the loss of greenfield land but also that a number of previously developed sites would also come forward, within a number of allocated sites, and as windfall through supportive policy provision.  |
| 12. To achieve a strong and sustainable economy, and revitalise town, local and rural centres | ++                        | ++                  | ++                  | ++                 | ++                  | +   | ++   | ++   | +  | +                               | ++         | It is anticipated that the draft Local Plan would have a significant positive effect on the achievement of the SA objective. This reflects the range of economic sites and premises that would be supported through the plan (including within new allocations) and the positive approach to supporting Canterbury city centre, Whitstable town centre and Herne Bay town centre. The Draft Local Plan identifies requirements in line with the evidence based Labour Demand Scenario employment forecast. |
| 13. To promote and encourage sustainable transport  | + +/-                     | + +/-<br>/?         | +/-                 | +/-                | +/-                 | ++  | ++   | ++   | ++   | ++                              | + +/-      | It is anticipated that the policies of the Draft Local Plan would have a mixed significant positive and minor negative effect on the achievement of the SA objective. This reflects the range of sustainable transport measures included in the Draft Local Plan. However, private vehicle would be expected to increase.  |

| SA Objective  | Spatial Strategy Policies | Canterbury Policies | Whitstable Policies | Herne Bay Policies | Rural Area Policies | District Wide Strategic – Housing and New Communities | District Wide Strategic – Employment and the local economy | District Wide Strategic – Movement, transportation and air quality | District Wide Strategic – Open space, natural and historic environment | Development Management Policies | Cumulative | Commentary  |
|---|---------------------------|---------------------|---------------------|--------------------|---------------------|---|--|--|--|---------------------------------|------------|---|
| 14. To promote safe, healthy, inclusive and sustainable communities | + +/-                     | + +/- /?            | +/-                 | +/-                | + +/-               | ++  | ++   | ++   | ++   | ++                              | + +/-      | <p>It is anticipated that the policies of the draft Local Plan would have a mixed significant positive and minor negative effect on the achievement of the SA objective. New development focussed in Canterbury, Whitstable and Herne Bay will help to ensure development is accessible to key services and facilities such as GP surgeries.</p> <p>Whilst growth could place pressure on existing healthcare facilities, the Draft Local Plan policies are expected to help mitigate such effects through, for example, protecting existing facilities, delivering healthcare provision and community facilities on larger sites, seeking developer contributions towards new provision.</p> |

## Cumulative effects arising from other plans and programmes

- 5.9.5 The policies and proposals contained in the Draft Local Plan sit within the context of a number of other plans and programmes including the local plans of surrounding local authorities. These plans and programmes are identified at **Appendix C** and include, for example:
- Dover District Local Development Framework- Core Strategy (adopted February 2010) and Land Allocations Plan (2015)
  - Thanet Local Plan (2020);
  - Swale Borough Draft Local Plan (2017);
  - Ashford Local Plan (2019);
  - Folkestone & Hythe Core Strategy (2022)
  - Kent Local Transport Plan 4 (2016);
  - South Water Resources Management Plan; and
  - South East River Basin District: River Basin Management Plan.
- 5.9.6 The cumulative effects arising from the interaction of the Draft Local Plan with other plans and programmes have been considered. No significant negative cumulative effects have been identified, although increased development within neighbouring local authorities will be likely to generate adverse cumulative effects on SA objectives relating to: biodiversity, due to increased visitor pressure on nature conservation sites; transport, due to increased vehicle movements and associated congestion; climate change, as a result of increased greenhouse gas emissions associated with new development; air quality, principally due to increased vehicle movements and associated emissions to air; land use, reflecting the cumulative loss of greenfield land; and waste and resources, due to an anticipated cumulative increase in waste associated with new development and the requirement for materials in the construction of new development. However, these cumulative effects could be minimised through the policy measures contained across a number of the emerging/adopted Local Plans including the Draft Local Plan.

## 5.10 Mitigation and Enhancement

- 5.10.1 The appraisal has identified a range of measures to help address potential negative effects and enhance positive effects associated with the implementation of the Draft Local Plan. These measures are highlighted within the detailed appraisal matrices contained at **Appendices E, F, H, I, J and K** and will be considered by the Council in refining the Local Plan.

## 6. Conclusions, Monitoring and Next Steps

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### 6.1 Conclusions

- 6.1.1 This SA Report has presented the findings of the appraisal of the Draft Local Plan. The principal conclusions of the appraisal are presented below.

#### Vision and Strategic Objectives

- 6.1.2 The Vision seeks to ensure a range of good quality homes, a strong and resilient economy with quality jobs, higher educational attainment, low carbon design and good public transport links. Overall, the Vision performs well when assessed against the SA objectives although there are uncertainties and potential conflicts could arise between growth, resource use and environmental factors. The appraisal has found the Strategic Objectives to be broadly supportive of the SA objectives. Where conflicts or uncertainties have been identified, this generally relates to, on the one hand, the aspiration for growth of housing and employment, and on the other, the need to protect and enhance environmental assets and minimise resource use. However, incompatibility can be overcome by specific Local Plan policies focused on issues related environmental policy areas.

#### Housing Growth Option

- 6.1.3 The Draft Local Plan sets out a preferred option of 1,252 dwellings per annum over the plan period based on the government's standard methodology for calculating housing need. The appraisal found positive effects against seven objectives. In relation to housing (SA Objective 10) the option was assessed as having a significant positive effect as it is considered to meet the identified housing need identified in the standard methodology and employment (SA Objective 12). This assessment is predicated on the basis that the level of housing growth will generate economic benefits and help meet the housing needs of the district's population.
- 6.1.4 Mixed positive and negative effects were identified regarding climate change, biodiversity, landscape, land use, and transport (SA Objectives 2, 3, 5, 11, 13). Effects on climate change, biodiversity, landscape, land use and transport were identified as being significant negative. This reflects the potential for positive benefits and negative aspects related to growth of this level. The assessment identified the potential for housing growth to have minor negative effects on a range of objectives including air quality (SA Objective 1), geology (SA Objective 4), water quality (SA Objective 6), flood risk (SA Objective 7) and health and communities (SA Objective 14). Significant negative effects with uncertainty were identified in respect of the historic environment (SA Objective 9) and waste (SA Objective 8).

#### Employment Growth Option

- 6.1.5 The Draft Local Plan sets out a preferred option for a combined 172,220 sqm of employment land (comprising office, light industrial, general industrial and warehousing uses). Significant positive effects were assessed for employment and economy (SA Objective 12) as the figure would meet the evidenced figure for Labour Demand within the

district. No further significant positive effects were identified during the appraisal of the preferred employment target. The preferred option was assessed as having mixed positive and negative effects with regards to biodiversity (SA Objective 3), landscape (SA Objective 5) and health and sustainable communities (SA Objective 42), and positive and significant negative effects in relation to land use (SA Objective 11), transport (SA Objective 13) reflecting that it would lead to negative environmental effects during construction and potentially operation. This reflects the option would likely include the substantial release of greenfield land and a reduced ability to avoid the best and most versatile agricultural land (Grades 1 to 3). The preferred option was considered likely to have a negative effect on air quality (SA Objective 1), climate (SA Objective 2), water (SA Objective 6), flood risk (SA Objective 7), waste (SA Objective 8) and heritage (SA Objective 9) due to impacts associated with the construction and operation of new development. However, there is uncertainty related to most of these effects.

## Retail Growth Option

- 6.1.6 The Draft Local Plan sets out a preferred option to meet the identified retail floorspace needs for the period up to 2035. Significant positive effects were assessed for employment and economy (SA Objective 12) as the figure would meet the evidenced need within the district and support the vibrancy and vitality of town centres. No further significant positive effects were identified during the appraisal of the preferred employment target. The preferred option was assessed as having mixed positive and negative effects with regards to biodiversity (SA Objective 3), landscape (SA Objective 5), heritage (SA Objective 9), land use (SA Objective 11), transport (SA Objective 13) and sustainable communities (SA Objective 14). The preferred option was considered likely to have a negative effect on air quality (SA Objective 1), climate change (SA Objective 2), water (SA Objective 6), flood risk (SA Objective 7) and waste (SA Objective 8) due to impacts associated with the construction and operation of new development. However, there is uncertainty related to most of these effects.

## Spatial Strategy

- 6.1.7 The Draft Local Plan sets out a spatial strategy with a principal focus within Canterbury Urban Area, with development in the Whitstable and Herne Bay Urban Areas as a secondary focus, a new freestanding community, with development in Rural Service Centres and at Local Service Centres to support the function of the settlements. The preferred option would have significant positive effects on housing (SA Objective 10). Significant positive employment and economic effects (SA Objective 12) were identified.
- 6.1.8 A mix of positive and negative effects were assessed for many of the remaining objectives. With regards to climate change (SA Objective 2), biodiversity (SA Objective 3), land use (SA Objective 11) the negative effects were assessed as potentially being significant. These findings reflect the substantial loss of greenfield around the main urban areas and within the new garden community location, with additional loss in other settlements. Minor positive effects are identified through the potential to provide biodiversity and green infrastructure enhancements. There is some uncertainty with regards to the type, duration and magnitude of effects. Significant positive and minor negative effects were assessed for health and sustainable communities (SA Objective 14) whilst for transport (SA Objective 13) the mix of effects assessed is significant in term of positive and negative effect.

## Site allocations

- 6.1.9 Overall, the scale of housing and employment land to be delivered through proposed site allocations is considered to be significant and will help to meet the future needs of the district. Therefore, significant positive effects have been identified in respect of housing (SA Objective 10), employment and the economy (SA Objective 12) and health and sustainable communities (SA Objective 14), although cumulatively development could place pressure on key services and facilities (if unmitigated).
- 6.1.10 There is the potential for new development to result in adverse environmental effects (and in some cases, significant negative effects). However, in many cases (such as in respect of biodiversity, water, flood risk, cultural heritage and landscape) it is anticipated that the potential adverse effects could be mitigated or reduced at the project level. In this context, the site-specific development requirements contained in the area based policies, strategic policies, and the more general management policies will help minimise adverse effects and enhance positive effects associated with the delivery of the proposed site allocations. There are some residual uncertainties in relation to R12 due to the proximity of the associated site to Stodmarsh SAC/SPA/Ramsar although the HRA at regulation 18 stage concludes that there would be no adverse effects on integrity. Overall, some uncertainties are also identified about the in-combination effects of the allocations identified in the HRA.
- 6.1.11 Cumulatively, development will result in the loss of a substantial area of greenfield land including a number of sites that are classified as grades 1, 2 or 3 agricultural land (land in grades 1, 2 and 3a is classified as the best and most versatile agricultural land at Annex 2 of the National Planning Policy Framework). In consequence, there is the potential for significant negative effects on land use (SA Objective 11).

## Draft Local Plan policies

- 6.1.12 The majority of the SA objectives will experience positive effects as a result of the implementation of the policies and proposals contained in the Draft Local Plan. Significant positive effects are expected in respect of the following SA objectives: housing (SA Objective 10); employment and the economy (SA Objective 12); transport (SA Objective 13); and health and wellbeing (SA Objective 14). This reflects the likely socio-economic benefits associated with the delivery of housing, employment and related community facilities, services and infrastructure over the plan period. Significant positive effects were also found for a number of environmental objectives: climate change (SA Objective 2); water (SA Objective 6) and flood risk (SA Objective 7). Minor positive effects were found for air quality (SA Objective 1); biodiversity (SA Objective 3), geology (SA Objective 4); landscape (SA Objective 5); and cultural heritage (SA Objective 9). This reflects the framework provided by the plan policies that will help to conserve and enhance the district's natural and built environments.
- 6.1.13 Despite the overall positive cumulative effects associated with the implementation of the Draft Local Plan, cumulative negative effects have also been identified against the SA objectives except those related to housing and economy. This principally reflects impacts associated with the construction and operation of new development including resource use, emissions and loss of landscape character, effects on heritage, and the location of proposed site allocations. However, the Draft Local Plan sets out a variety of policies which seek to manage these effects. Therefore, it is expected that significant adverse effects will be largely avoided, although some uncertainty remains dependent on the location of development and the implementation of effective avoidance and mitigation measures at the planning application stage. The Draft Local Plan has been assessed as having mixed minor positive and significant negative effects on waste (SA Objective 8) and land use (SA Objective 11) due to the proposed land take and likely waste generated that will require management.

## 6.2 Monitoring

- 6.2.1 It is a requirement of the SEA regulations to establish how the significant sustainability effects of implementing the Local Plan will be monitored. However, as earlier government guidance on SEA (ODPM et al, 2005) notes, it is not necessary to monitor everything, or monitor an effect indefinitely. Instead, monitoring needs to be focused on significant sustainability effects.
- 6.2.2 Monitoring the Local Plan for sustainability effects can help to answer questions such as:
- Were the SA's predictions of sustainability effects accurate?
  - Is the Local Plan contributing to the achievement of desired SA objectives?
  - Are mitigation measures performing as well as expected?
  - Are there any adverse effects? Are these within acceptable limits, or is remedial action desirable?
- 6.2.3 Monitoring should be focussed on:
- significant sustainability effects that may give rise to irreversible damage, with a view to identifying trends before such damage is caused;
  - significant effects where there was uncertainty in the SA and where monitoring would enable preventative or mitigation measures to be undertaken; and
  - where there is the potential for effects to occur on sensitive environmental receptors.
- 6.2.4 **Appendix L** identifies a number of potential indicators that could be used for monitoring the sustainability impacts of the emerging Local Plan. The list contains a number of indicators which are already in common use. The monitoring indicators will be developed as plan preparation continues.
- 6.2.5 The Council produces an Authority Monitoring Report (AMR) which contains both authority-wide and local level data which could be used to monitor the effects of the Local Plan against a number of the SA objectives. Where appropriate, these indicators have informed the proposed monitoring indicators.

## 6.3 Consultation on this SA Report

- 6.3.1 This SA Report is being issued for consultation. We would welcome your views on any aspect of this SA Report. In particular, we would like to hear your views as to whether the effects which are predicted are likely and whether there are any significant effects which have not been considered.
- 6.3.2 The consultation will run from: Monday 24 October 2022 to Monday 16 January 2023.

## 6.4 Next steps

- 6.4.1 The findings of this SA Report, together with consultation responses and further evidence base work, will be used to help refine the Draft Local Plan leading to consultation on the Local Plan Publication Draft (Regulation 19) version of the Local Plan.

