



Canterbury City Council

CANTERBURY DISTRICT LOCAL PLAN 2040

Sustainability Appraisal Report - Draft Canterbury
District Local Plan 2040 (Regulation 18)





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Sustainability Appraisal Report - Draft Canterbury District
Local Plan 2040 (Regulation 18)

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NON-TECHNICAL SUMMARY

This is the Non-Technical Summary (NTS) of the Sustainability Appraisal (SA) of the Draft Canterbury District Local Plan (2040) (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 NTS provides an overview of the SA of the Draft Local Plan. Canterbury City Council (the Council), with support from WSP UK Ltd (WSP), 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 and the Herne Bay Area Action Plan (2010). The new Local Plan will guide growth and development in the district for the period up to 2040. It is anticipated it will provide:

- The District Vision by 2040 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 and the Kent Mineral and Waste Local Plan, it will form the Development Plan for the local authority area.

THE DRAFT CANTERBURY DISTRICT LOCAL PLAN (2040) (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;
- 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 2004¹ (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

Consistent with Government guidance², 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. A total of 31 responses were received to the scoping consultation and these included submissions from the statutory SEA consultation bodies (Environment Agency, Historic England, Natural England) and a range of other interested stakeholders. Responses related to all aspects of the Scoping Report and resulted in amendments to the baseline, plans and programmes review and proposed 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 (2021) which was consulted on between 28 May and 30 July 2021 and the consultation on the Draft Local Plan (2022) undertaken between 24 October 2022 and Monday 16 January 2023. Responses received to the SA Report that accompanied the Draft District Vision and Local Plan Options (2021) and Draft Local Plan (2022) 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 (2020-2040).

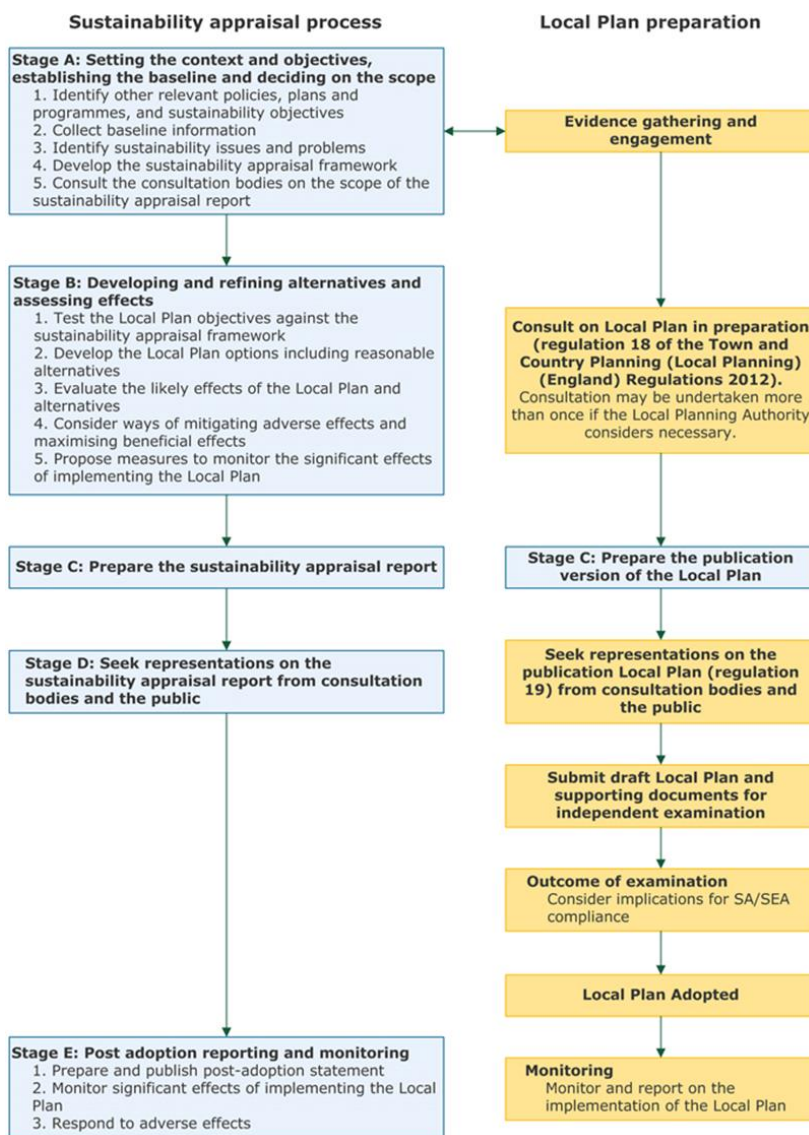
¹ Statutory Instrument 2004 No. 1633 *The Environmental Assessment of Plans and Programmes Regulations 2004*. Available from [SEA Regulations](#)

² MHCLG (2023), *Planning Practice Guidance*, Strategic environmental assessment and sustainability appraisal Paragraph: 013 Reference ID: 11-013-20140306 and ODPM (2005) *A Practical Guide to the Strategic Environmental Assessment Directive*.

At **Stage C**, a final SA Report will be prepared alongside preparation of the publication draft Local Plan and will be made available for consultation alongside the publication draft Local Plan prior to consideration by an independent planning inspector under **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**).

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

SA Objective	Sub-objective
1. To reduce air pollution and encourage improvements in air quality	1.1 Minimise poor air quality and encourage improvements 1.2 Minimise and mitigate adverse effects of poor air quality 1.3 Support the achievement of air quality improvement objectives within the designated AQMAS
2. To minimise greenhouse gases that cause climate change and deliver a managed response to its effects	2.1 Minimise greenhouse gas emissions 2.2 Deliver high standards of energy efficiency in new development 2.3 Support the use of renewable energies 2.4 Support increased resilience to climate change
3. To conserve, connect and enhance biodiversity across the District	3.1 Support the achievement of biodiversity net gain 3.2 Conserve, protect and enhance protected sites in accordance with the protection hierarchy (i.e. international, national or locally designated) 3.3 Support improvements to biodiversity in non-designated areas of the District 3.4 Support improvements to ecological networks including connectivity of habitats 3.5 Support species adaptation and migration to reduce impacts of climate change and ensure resilience 3.6 Encourage carbon sequestration
4. To conserve geological sites and safeguard mineral resources within the District	4.1 Aim to protect and prevent damage to geologically important sites, such as RIGS 4.2 Balance the need for development with safeguarding mineral resources and infrastructure
5. To conserve and enhance the landscapes of the District for people and wildlife	5.1 Conserve, protect and enhance protected sites in accordance with the protection hierarchy (i.e. international, national or locally designated) 5.2 Support improvements to existing non-designated landscapes
6. To protect water resources and ensure a high quality of inland and coastal waters	6.1 Protect and enhance ground and surface water quality 6.2 Avoid adverse impacts on coastal waters, fisheries and bathing waters 6.3 Promote the sustainable and efficient use of water resources
7. To reduce the risk of flooding and where	7.1 Avoid inappropriate development in areas at risk from flooding and coastal erosion

appropriate prevent coastal erosion	7.2 Support priorities identified within the Isle of Grain to South Foreland Shoreline Management Plan (or subsequent updates or amendments)
8. To promote sustainable waste management	8.1 Encourage a reduction in the amount of waste generated 8.2 Ensure the management of waste is consistent with the waste management hierarchy
9. To preserve, enhance, promote and capitalise on the significant qualities, fabric, setting and accessibility of the District's historic environment	9.1 Preserve and enhance designated heritage assets including their setting and contribution to local character and distinctiveness 9.2 Support improvements to existing non-designated heritage assets 9.3 Aim to promote sustainable access to the historic environment 9.4 Aim to capitalise on the potential of heritage assets to deliver sustainable benefits 9.5 Encourage new developments to contribute to the maintenance and enhancement of the historic character through design, layout and setting
10. To ensure the supply of high quality homes, which cater for identified needs	10.1 Promote increased access to affordable housing 10.2 Support the timely delivery of market and affordable housing 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 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
11. To promote the sustainable use of land and conserve soil quality	11.1 Encourage the efficient use of previously developed land 11.2 Avoid the unnecessary loss of best and most versatile agricultural land 11.3 Encourage appropriate building densities within developments 11.4 Support the reduction in land contamination
12. To achieve a strong and sustainable economy, and revitalise town, local and rural centres	12.1 Support the provision of jobs in the right places to meet the identified employment needs 12.2 Encourage investment in businesses, people and infrastructure to improve productivity 12.3 Support the vitality and viability of town and city centres 12.4 Promote sustainable tourism 12.5 Support a safe and attractive night economy 12.6 Support a sustainable marine and coastal economy 12.7 Support a sustainable rural economy
13. To promote and encourage sustainable transport	13.1 Promote consistency with the sustainable transport hierarchy and improvements to support increased use of sustainable transport methods 13.2 Support the reduction in the need to travel 13.3 Support the reduction of traffic congestion and improve road safety

	13.4 Encourage investment to improve transport infrastructure
14. To promote safe, healthy, inclusive and sustainable communities	<p>14.1 Support equal access and improvements to green and blue infrastructure, the countryside and open spaces including parks</p> <p>14.2 Support equal access and improvements to community and health infrastructure, services and facilities to meet day-to-day needs</p> <p>14.3 Support the delivery of connected communities which maximise social interaction including high quality public realm to create a sense of place</p> <p>14.4 Minimise light and noise pollution</p> <p>14.5 Promote healthy lifestyles including through sport and physical activity</p> <p>14.6 Support the reduction of actual levels of crime</p>

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

Significant Positive Effect	++	Likely to have a significant positive effects
Minor Positive Effect	+	Likely to have a positive effects
Neutral	0	Neutral
Minor Negative Effect	-	Likely to have negative effects
Significant Negative Effect	--	Likely to have significant negative effects
Uncertain	?	Uncertain
No Relationship	NA	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 1,149 dwellings per annum over the plan period based on the government's standard methodology for calculating housing need. The appraisal found positive effects against a number of SA 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 likely being significant. 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), waste (SA Objective 8) and health and communities (SA Objective 14). Significant negative effects with uncertainty were identified in respect of the historic environment (SA Objective 9).

Employment Growth Option

The Draft Local Plan sets out a preferred option for a combined 141,100 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.

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 settlement 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

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 R5 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. Additionally, with regards to C12, further transport modelling is identified as being required with regards to potential for impacts on Blean Complex SAC. However, the Regulation 18 HRA notes that existing data and models suggest that the Draft Local Plan will have no adverse effect on Blean Complex SAC, alone or in combination, due to air quality changes. The Regulation 18 HRA identifies that no adverse effects alone or in combination in regards to recreational pressure on the Blean Complex SAC would



be expected as currently drafted. 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. In consequence, there is the potential for significant negative effects on land use (SA Objective 11).

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;
- Development Management Policies; and
- Carried Forward 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	Carried Forward Policies	Cumulative
1. To reduce air pollution and encourage improvements in air quality	+ +/-	-/?	+/-	+/-	-	+/-	-	++	+	+/-	-	+/-
2. To minimise greenhouse gases that cause climate change 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	Carried Forward Policies	Cumulative
deliver a managed response to its effects												
3. To conserve, connect and enhance biodiversity across the District	+ +/-	+ +/- -/?	+/-/?	+/-/?	+ +/- /?	+/-	-/?	+	++	++	-	+/- /?
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	+ +/-	+/- - /?	+/- -	+/- - /?	+ +/- /?	+ +/-	+/-	+	++	++	--	+/-/?
6. To protect water resources and ensure a high quality of inland and coastal waters	+ +/-	+ +/- /?	-	-	+ +/-	+ +/-	-	+	++	++	-	+ +/-
7. To reduce the risk of flooding and where appropriate	+/-/?	+ +/- -/?	+ +/-	+ +/- -	+ +/- /?	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, transportation and air quality	District Wide Strategic – Open space, natural and historic environment	Development Management Policies	Carried Forward 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	+	0/?	++	++	++
11. To promote the sustainable use of land and conserve soil quality	+/- -	+ +/- -	+ +/- -	+ +/- -	+ +/- -	+ +/-	+/-	0	+	++	--/?	+/- -
12. To achieve a strong and sustainable economy, and revitalise town,	++	++	++	++	++	+	++	++	+	+	++	++



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	Carried Forward Policies	Cumulative
local and rural centres												
13. To promote and encourage sustainable transport	+ +/-	+ +/- /?	+/-	+/-	+/-	++	++	++	++	++	++	+ +/-
14. To promote safe, healthy, inclusive and sustainable communities	+ +/-	+ +/- /?	+/-	+/-	+ +/-	++	++	++	++	++	+/?	+ +/-

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.

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 land use (SA Objective 11) due to the proposed land take. Some uncertainty is also identified as this stage in relation to biodiversity (SA Objective 3) pending further development of the HRA.

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: 11 March 2024 and 3 June 2024.

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.

1 INTRODUCTION

1.1 OVERVIEW

- 1.1.1. Canterbury City Council (the Council) is currently preparing the Canterbury District Local Plan (2040) (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 2040³. The Council, with support from WSP UK Ltd (WSP)⁴, 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 2040 (Regulation 18) (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 2040. It is being consulted on between 11 March 2024 and 3 June 2024.
- 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 objectives, policies and proposed site allocations that comprise the Draft Local Plan. The purposes of the SA are:
- to ensure that the likely significant environmental and socio-economic effects of the Draft Local Plan and any reasonable alternatives are identified, characterised and assessed;
 - to help identify appropriate measures to avoid, reduce or mitigate adverse effects and to enhance beneficial effects associated with the implementation of the Draft Local Plan wherever possible;
 - to provide a framework for monitoring the potential significant effects arising from the implementation of the Draft Local Plan;
 - to inform the Council's decisions on the Draft Local Plan; and
 - to demonstrate that the Draft Local Plan has been developed in a manner consistent with the requirements of the SEA Regulations.
- 1.2.2. More specifically, this SA Report sets out:
- an overview of the Canterbury District Local Plan Review;

³ The plan period formally covers 1 April 2020 to 31 March 2041, covering a 21 year plan period in total. References to 2020-2040 in this report should be taken as references to the full plan period.

⁴ Formerly Wood Group UK Ltd (Wood)

- 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.

1.3 THE CANTERBURY DISTRICT LOCAL PLAN (2020-2040)

REQUIREMENT TO PREPARE A LOCAL PLAN

- 1.3.1. The National Planning Policy Framework (NPPF) (December 2023)⁵ sets out the government's planning policies for England and how these are expected to be applied. The NPPF (paragraph 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 (paragraph 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 (paragraph 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

⁵ MHCLG (2023) *National Planning Policy Framework*. Available from: [NPPF](#)

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 (2020-2040)

- 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 and the Herne Bay Area Action Plan (2010). The new Local Plan will guide growth and development in the district for the period up to 2040. It is anticipated it will provide:
- The District Vision by 2040 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

- 1.3.7. A revised Local Development Scheme (LDS) is to be adopted by the Council in March 2024. 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.
- 1.3.8. The findings of this consultation informed the development of an initial Draft Canterbury District Local Plan (2020-2045) (Regulation 18 consultation) (Draft Local Plan (2022) from here on) between 24 October 2022 and 16 January 2023. The Draft Local Plan (2022) included a range of strategic site allocations for development, infrastructure provision and a new transport strategy. The consultation on the Draft Local Plan (2022) raised a number of concerns with the scale of growth proposed and, in particular, the proposals to restrict cross-city vehicular trips in Canterbury and the development of new roads on the outskirts of the city.
- 1.3.9. The findings from the consultation and further evidence gathering have informed the production of a revised Draft Local Plan (Regulation 18), which is the subject to the current consultation. The LDS envisages Publication Plan (Regulation 19) preparation and publication from July 2024 to May 2025; Submission (Regulation 22) and examination between June 2025 and January 2026; and Adoption February/March 2026.

1.4 DRAFT CANTERBURY DISTRICT LOCAL PLAN 2040 (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; and
- Proposed strategic and development management policies.

1.4.2. Each plan component is discussed in turn below.

Vision and Strategic Objectives

1.4.3. The Vision for the district to 2040 contained in the Draft Local Plan is reproduced below:

Vision for the district to 2040

A sustainable and resilient economy

The district will be stronger and more resilient by 2040, offering a diverse range of jobs through the development of our universities and colleges, regeneration of our city and town centres and investment in the green economy, underpinned by thriving small and community businesses throughout the district.

Investment in the city, our coastal towns and the rural areas will ensure the district's historic and natural environment can thrive to improve the visitor experience and support sustainable tourism.

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, improving environmental resilience and providing significant increases in biodiversity.

Opportunities for nature-based responses to climate change and other environmental challenges will be maximised and our urban areas will be greener and healthier.

Significant investment in our water environment and infrastructure will improve river and coastal water quality, provide a resilient water supply and minimise flood risk.

Improved connectivity

High-quality public transport infrastructure, comprehensive walking and cycling networks and accessible community facilities will help to improve air quality, respond to the challenges of climate change and enhance the quality of life for our residents.

Healthy communities

Existing communities will be enhanced and new healthy communities will be of high-quality, low-carbon design with opportunities to exercise and socialise for all.

Regeneration of our city and town centres will support investment in cultural infrastructure while the delivery of new education facilities, including secondary school provision at the coast, will help to improve skills in our communities.

A range of new homes will meet the needs of the district, ensuring the right type of homes are delivered in the right places to improve affordability and support our communities.

- 1.4.4. 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

- 1.4.5. The Draft Local Plan sets out development requirements:

- Housing – to deliver 1,149 houses per annum, equivalent to 24,129 dwellings between 2020 and 2040;
- Employment – to provide 141,100 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

- 1.4.6. The Draft Local Plan sets out a range of allocations to help meet the identified needs of the district:

- A range of housing and employment allocations in the Canterbury, Whitstable, Herne Bay and Rural areas.
- A new settlement at land north of the University of Kent.

LOCAL PLAN POLICIES

- 1.4.7. 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;
- Development Management Policies;
- Carried Forward Policies.

- 1.4.8. 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 2025.

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 (the Strategic Environmental Assessment (SEA) Regulations)⁶. 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)⁷ 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 (PPG)⁸ 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 based on proportionate evidence.

STAGES IN THE SUSTAINABILITY APPRAISAL PROCESS

- 1.5.4. Consistent with Government guidance⁹, 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).

⁶ Statutory Instrument 2004 No. 1633 The Environmental Assessment of Plans and Programmes Regulations 2004. Available from SEA Regulations

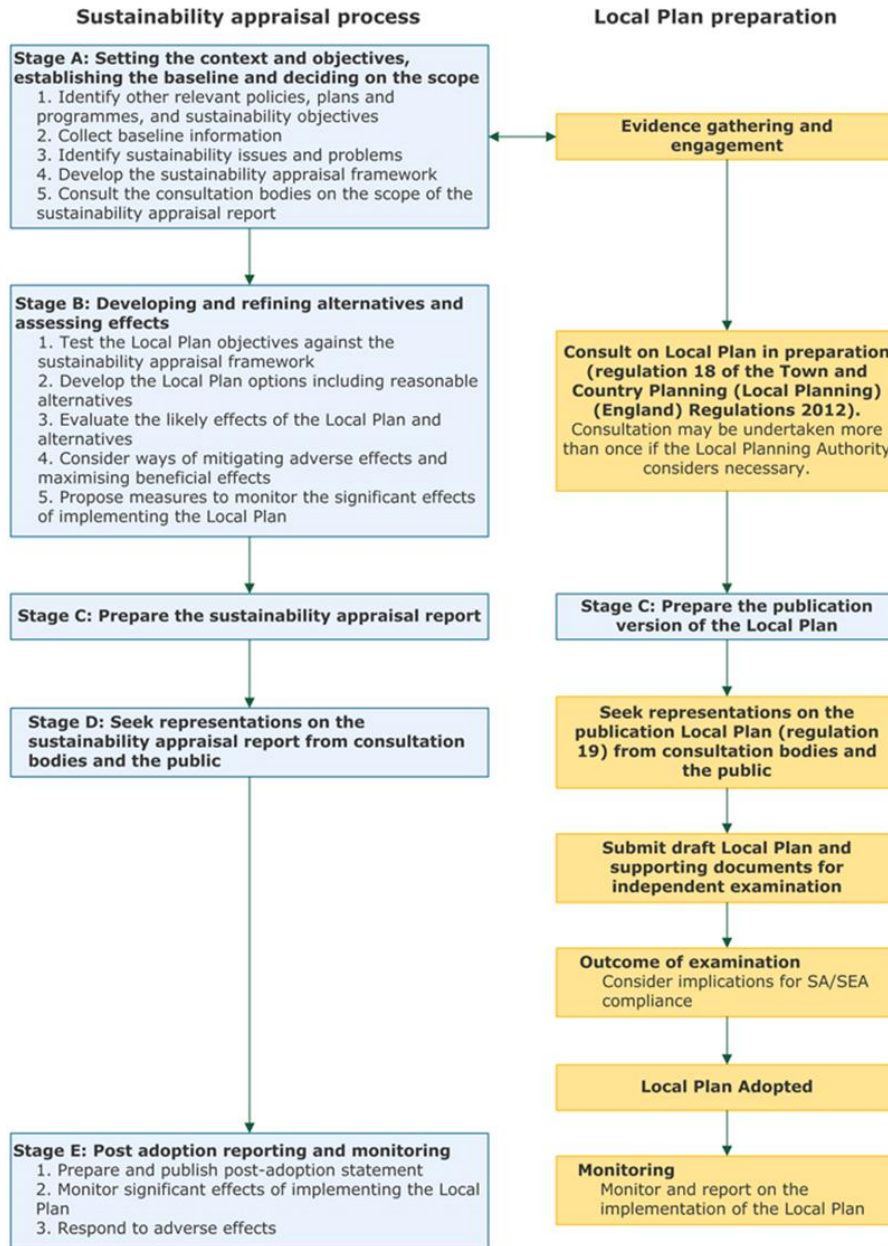
⁷ MHCLG (2023) *National Planning Policy Framework*. Available from: [NPPF](#)

⁸ MHCLG (2023), *Planning Practice Guidance*, Strategic environmental assessment and sustainability appraisal, Paragraph: 001 Reference ID: 11-001-20190722

⁹ MHCLG (2023), *Planning Practice Guidance*, Strategic environmental assessment and sustainability appraisal Paragraph: 013 Reference ID: 11-013-20140306 and ODPM (2005)) *A Practical Guide to the Strategic Environmental Assessment Directive*.

- 1.5.5. The Scoping Report was subject to a six-week consultation between 28th October and 9th December 2019. A total of 31 responses were received to the scoping consultation and these included submissions from the statutory SEA consultation bodies (Environment Agency, Historic England, Natural England) and a range of other interested stakeholders. Responses related to all aspects of the Scoping Report and resulted in amendments to the baseline, plans and programmes review and proposed 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.
- 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 (2021) which was consulted on between 28 May and 30 July 2021 and the consultation on the Draft Local Plan (2022) undertaken between 24 October 2022 and Monday 16 January 2023. Responses received to the SA Report that accompanied the Draft District Vision and Local Plan Options (2021) and Draft Local Plan (2022) 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 (2020-2040).
- 1.5.7. At **Stage C**, a final SA Report will be prepared alongside preparation of the publication draft Local Plan and will be made available for consultation alongside the publication draft Local Plan prior to consideration by an independent planning inspector under **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, the 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** - Presents the analysis of the District's social, economic and environmental baseline 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 Effects 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. 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, Water 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. As this review spans the period of departure from the European Union (EU), relevant EU directives are referenced, as they remained part of the retained EU law.

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
Air Quality		
Ensure that air quality is maintained or enhanced and that emissions of air pollutants are kept to a minimum.	Environment Act 2021 – National Environment Targets (2022); 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.
Climate Change, Adaptation and Mitigation		
<p>Minimise the effects of climate change.</p> <p>Reduce emissions of greenhouse gases that may cause climate change.</p> <p>Encourage the provision of renewable energy.</p> <p>Move towards a low carbon economy.</p> <p>Promote adaptation to the effects of climate change.</p>	Paris Climate Change Agreement; COP28; IPCC reports; The Climate Change Act (2008) and Climate Change Act (2050 Target Amendment) Order 2019; UK Climate Projections; Net Zero Strategy – Build Back Greener; Powering Up Britain – Net Zero Growth Plan; Kent Net Zero Action Plan and Results; Kent Council Strategy 2022-2026.	The SA Framework should include a specific objective relating to climate change mitigation and adaptation.
Biodiversity		
<p>Protect and enhance biodiversity, including designated sites, species of principal importance, habitats and ecological networks.</p> <p>Identify opportunities for green infrastructure provision.</p>	The Conservation of Habitats and Species Regulations 2017; 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; Environment Act 2021; UK Environment Improvement Plan 2023; Strategic Access Management and Monitoring Strategies; Green Infrastructure Strategy (2018-2031) & associated evidence document and action plan; Kent Nature Partnership Biodiversity Strategy 2020 to 2045; Local Nature Recovery Strategy (early stages of production).	The SA Framework should include a specific objective relating to the protection and enhancement of biodiversity including green infrastructure provision.
Landscape, Land Use and Geology		
Protect and enhance the quality and distinctiveness of natural landscapes	NPPF; Safeguarding our Soils – A Strategy for England; Canterbury Landscape	The SA Framework should include a specific objective relating to the protection and

<p>and townscapes including the Kent Downs AONB.</p> <p>Promote access to the countryside.</p> <p>Promote high quality design that respects and enhances local character.</p> <p>Protect the undeveloped coast.</p> <p>Encourage the use of previously developed (brownfield) land.</p> <p>Protect soil quality and minimise the loss of Best and Most Versatile agricultural land.</p>	<p>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; Draft Open Space Strategy (2022)</p>	<p>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>
<p>Water: Flooding, Water Quality and Resources</p>		
<p>Protect and enhance surface and groundwater quality.</p> <p>Improve water efficiency.</p> <p>Avoid development in areas of river, surface, ground, and coastal flood risk.</p> <p>Reduce the risk of flooding arising from new development.</p> <p>Ensure timely investment in water management infrastructure to accommodate new development.</p> <p>Promote the use of Sustainable Urban Drainage Systems.</p>	<p>Water Framework Directive Regulations; Flood and Water Management Act 2010; Flood and Water Management Act 2010; Water for Life, NPPF; Water Resources Management Plan (2020-2080); Plan for Water; South East River Basin District: River Basin Management Plan; Water Resources South East Regional Plan; Kent Spatial Risk Assessment for Water 2021/22 Update; Climate Change Risk and Impact Assessment for Kent and Medway (2020).</p>	<p>The SA Framework should include specific objectives relating to the protection and enhancement of water quality and quantity and minimising flood risk.</p>
<p>Waste</p>		
<p>Promote the use of substitute or secondary and recycled materials and minerals waste.</p> <p>Ensure the timely provision of infrastructure to support new development.</p>	<p>National Planning Policy for Waste (NPPW); Resources and Waste Strategy for England; Joint Municipal Waste Management Strategy (2018/19 to 2020/21)</p>	<p>The SA Framework should support effective waste management and reuse of resources.</p>
<p>Population and Human Health</p>		
<p>Address deprivation and reduce inequality through regeneration.</p> <p>Ensure social equality and prosperity for all.</p> <p>Provide high quality services, community facilities and social infrastructure that are accessible to all.</p>	<p>NPPF; Fair Society, Healthy Lives; Sports England: Towards an active nation; NHS Long Term Plan; Joint Strategic Needs Assessment; Canterbury Riverside Strategy 2023 to 2028</p>	<p>The SA framework should include objectives relating to:</p> <ul style="list-style-type: none"> • supporting access to community and health services;

<p>Promote improvements to health and wellbeing.</p> <p>Promote healthier lifestyles.</p> <p>Minimise noise pollution.</p> <p>Reduce crime including the fear of crime.</p>		<ul style="list-style-type: none"> • addressing deprivation and promoting equality and inclusion; • the provision of high quality community facilities and services; • supporting high quality public realm. • promote healthy lifestyles.
<p>Historic Environment</p>		
<p>Conserve and enhance cultural heritage assets and their settings including the World Heritage Site.</p> <p>Maintain and enhance access to cultural heritage assets.</p> <p>Respect, maintain and strengthen local character and distinctiveness.</p> <p>Improve the quality of the built environment.</p>	<p>The World Heritage Convention (UNESCO); NPPF; A Heritage Strategy for Canterbury District; Conservation Area Appraisals.</p>	<p>The SA Framework should include a specific objective relating to the conservation and enhancement of cultural heritage.</p>
<p>Housing</p>		
<p>Meet the full affordable and private market housing need for Canterbury within the administrative boundary where possible.</p> <p>Make appropriate provision for Gypsies, Travellers and Travelling Showpeople.</p> <p>Support opportunities for custom and self-build.</p>	<p>NPPF; Planning for the Future White Paper: Thames Estuary 2050 Growth Commission Report: 2050 Vision; Housing, Homelessness and Rough Sleeping Strategy (2018-23) & 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"> • the provision of housing to meet current and future needs; • supporting development of a mix of type and tenures; • reducing homelessness
<p>Economy</p>		
<p>Ensure that there is an adequate supply of employment land to meet local needs and to attract inward investment.</p> <p>Encourage economic diversification including growth in high value economic sectors.</p> <p>Create local employment opportunities.</p> <p>Enhance skills in the workforce to reduce unemployment and deprivation.</p>	<p>NPPF; Thames Estuary 2050 Growth Commission Report: 2050 Vision; South East Local Enterprise Partnership (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 & associated Supplementary</p>	<p>The SA Framework should include objectives relating to:</p> <ul style="list-style-type: none"> • the enhancement of education and skills; • delivery of employment land that supports economic diversification and the creation of high quality, local jobs; • enhancing the area's town and other centres.

<p>Improve educational attainment and ensure the appropriate supply of high-quality educational facilities.</p> <p>Promote the vitality of retail and leisure sectors within town centres.</p>	<p>Planning Documents (SPDs); Economic Development and Tourism Study (2020, 2022, 2023); Retail and Leisure Study Update (2020, 2022): Corporate Plan 2021 to 2024.</p>	
<p>Transport</p>		
<p>Encourage sustainable transport and reduce the need to travel.</p> <p>Reduce traffic and congestion.</p> <p>Improve public transport provision.</p> <p>Encourage walking and cycling.</p> <p>Enhance accessibility to key community facilities, services and jobs for all.</p> <p>Ensure timely investment in transportation infrastructure to accommodate new development.</p> <p>Locate new housing development in sustainable locations or in locations that can be made sustainable.</p>	<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"> • reducing the need to travel, particularly by car; • the promotion of sustainable forms of transport such as walking and cycling; • maintaining and enhancing accessibility to key facilities, services and jobs; • reducing congestion and enhancing road safety; • investment in transportation infrastructure to meet future needs.

3 BASELINE

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, Water 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 Issue
Air Quality	The main source of air pollution in the district is road traffic emissions from major roads, notably the A2, A28 and A299. Two Air Quality Management Areas (AQMAs) operate in relation to nitrogen dioxide (NO2) where a national air quality objective is not likely to be achieved.
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).

Topic Area	Key Sustainability Issue
	<p>The need to maintain the general trend in the decrease of emission of greenhouse gases (particularly CO₂) within the district, especially by trying to reduce the amount of CO₂ from transport in particular on A roads.</p> <p>The need to promote sustainable forms of energy and encourage renewable energy projects in the appropriate location.</p> <p>To become as energy efficient as possible, while reducing the overall energy consumption.</p>
Biodiversity	<p>Ensure development does not negatively impact biodiversity, and conserve and enhance biodiversity and protected sites and species.</p> <p>The need to minimise or mitigate any adverse impacts of: coastal squeeze; increased levels of public access/disturbance; increased development; and any associated impacts on the District's rich biodiversity.</p> <p>The need to achieve biodiversity net gain (BNG) within new development and improve the environment including through the long-term enhancement and creation of well-connected, functional habitats.</p>
Landscape, Land Use and Geology	<p>To conserve and enhance landscape character and protected sites, by ensuring development is of high quality, especially where it could impact upon protected sites important for their contributions to the landscape.</p> <p>Ensuring sites which are deemed important for their geological or mineral resources are conserved and protected; including minimising developments which could prevent or hinder essential extractions.</p>
Water: Flooding, Water Quality and Resources	<p>The need to minimise flood risk and maximise flood resilience through better catchment management, nature based solutions for managing flood risk and flood resilience, appropriate siting of new developments, and ensuring new development improves the flood resilience of their surroundings.</p> <p>Protect groundwater especially within Source Protection Zones (SPZ), Nitrate Vulnerable Zone (NVZ) and Drinking Water Safeguard Zone (DWSZ).</p> <p>The need to ensure there is a sufficient supply of water and adequate capacity at wastewater treatment works.</p> <p>The need to manage and protect water resources in response to climate change, population growth and lifestyle choices, ensuring there is a reduction in the usage of water per capita by improving domestic design to ensure water usage is minimised, with greater use of greywater collecting and use.</p>
Waste	<p>Ensuring the waste hierarchy continues to be implemented leading to a decreasing proportion of waste is disposed of in landfill, while recovery and reuse options (recycling, composting and electricity) continue to increase.</p> <p>The need to reduce the volume of construction, demolition and excavation wastes produced by new developments, change of uses or conversions.</p> <p>The need to support ongoing efforts to support reductions in waste generation and support waste re-use.</p>
Population and Human Health	<p>Ensuring the District's growing, ageing population have their needs considered and where possible provided for.</p>

Topic Area	Key Sustainability Issue
	<p>Reducing the level of deprivation within the District, especially for the Lower Super Output Areas (LSOAs) that are within the 10% and 20% most deprived areas in Kent within the Index of Multiple Deprivation (2019).</p> <p>Ensuring community infrastructure and services (such as general practitioners), are available and accessible to all communities and residents, and improving those where necessary.</p> <p>Ensuring that the residents of Canterbury that experience some form of disability, especially where their day to day activities are 'limited a lot' or 'limited a little' receive support through a more welcoming built environment and have access to needed facilities and a range of transportation options.</p> <p>Ensure that formal and informal opportunities for all to take part in sport and be physically active are protected, provided and enhanced.</p>
Historic Environment	<p>Ensure the heritage of the District is protected, promoted and allowed to prosper.</p> <p>The need to 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.</p>
Housing	<p>Encourage development towards previously developed land and minimise the impact of development on the District's sensitive environmental receptors, whilst maximising opportunities for biodiversity net gain.</p> <p>The need to ensure there is a supply of appropriate, well designed, located and affordable housing (in all tenures) to meet the needs of the District.</p> <p>The need to provide 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).</p> <p>The need to ensure developments are built at appropriate densities, maximising the land available without over developing, and with a high design quality.</p>
Economy	<p>Ensure appropriate levels of employment land and seek to avoid loss of too much employment floorspace, such as B1a, D2 and B2.</p> <p>Ensuring rent is appropriately set.</p> <p>Encouraging a reduction in the number of individuals unemployed or economically inactive.</p> <p>Ensure jobs which are provided are in the right places to meet the identified employment needs.</p> <p>Ensure the District continues to be highly educated.</p> <p>Ensure tourism rates continue to grow in a sustainable manner.</p> <p>Supporting broader economic recovery after the COVID-19 pandemic.</p>
Transport	<p>The need to change how people use their private car to minimise the number of single occupancy trips and encourage carpooling.</p> <p>Reduce the number of cars on the road in general to reduce congestion.</p>

Topic Area	Key Sustainability Issue
	<p>The need to 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.</p> <p>Ensure that the provision of sustainable transport is appropriate in location, quantity and standard, to encourage mode shift.</p> <p>Encourage investment in transport infrastructure, to increase transport choice and reduce congestion.</p> <p>Encourage the co-location of community facilities in walkable, well-connected neighbourhoods, wherever possible.</p> <p>The need to reduce out-commuting.</p>

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

SA Objective	Sub-objective	Relevant SEA Topic
	3.4 Support improvements to ecological networks including connectivity of habitats 3.5 Support species adaptation and migration to reduce impacts of climate change and ensure resilience 3.6 Encourage carbon sequestration	
4. To conserve geological sites and safeguard mineral resources within the District	4.1 Aim to protect and prevent damage to geologically important sites, such as RIGS 4.2 Balance the need for development with safeguarding mineral resources and infrastructure	Material assets
5. To conserve and enhance the landscapes of the District for people and wildlife	5.1 Conserve, protect and enhance protected sites in accordance with the protection hierarchy (i.e. international, national or locally designated) 5.2 Support improvements to existing non-designated landscapes	Landscape, fauna, flora, water
6. To protect water resources and ensure a high quality of inland and coastal waters	6.1 Protect and enhance ground and surface water quality 6.2 Avoid adverse impacts on coastal waters, fisheries and bathing waters 6.3 Promote the sustainable and efficient use of water resources	Water, climatic factors, human health
7. To reduce the risk of flooding and where appropriate prevent coastal erosion	7.1 Avoid inappropriate development in areas at risk from flooding and coastal erosion 7.2 Support priorities identified within the Isle of Grain to South Foreland Shoreline Management Plan (or subsequent updates or amendments)	Water, human health
8. To promote sustainable waste management	8.1 Encourage a reduction in the amount of waste generated 8.2 Ensure the management of waste is consistent with the waste management hierarchy	Material assets
9. To preserve, enhance, promote and capitalise on the significant qualities, fabric, setting and accessibility of the District's historic environment	9.1 Preserve and enhance designated heritage assets including their setting and contribution to local character and distinctiveness 9.2 Support improvements to existing non-designated heritage assets 9.3 Aim to promote sustainable access to the historic environment 9.4 Aim to capitalise on the potential of heritage assets to deliver sustainable benefits 9.5 Encourage new developments to contribute to the maintenance and enhancement of the historic character through design, layout and setting	Cultural heritage, landscape

SA Objective	Sub-objective	Relevant SEA Topic
<p>10. To ensure the supply of high quality homes, which cater for identified needs</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 & travellers and self build</p> <p>10.4 Promote an appropriate mix of dwelling types, sizes and tenures</p> <p>10.5 Promote the reduction in the amount of homelessness within the district</p> <p>10.6 Promote high quality design in new housing developments</p>	<p>Population, human health, material assets</p>
<p>11. To promote the sustainable use of land and conserve soil quality</p>	<p>11.1 Encourage the efficient use of previously developed land</p> <p>11.2 Avoid the unnecessary loss of best and most versatile agricultural land</p> <p>11.3 Encourage appropriate building densities within developments</p> <p>11.4 Support the reduction in land contamination</p>	<p>Soil, human health</p>
<p>12. To achieve a strong and sustainable economy, and revitalise town, local and rural centres</p>	<p>12.1 Support the provision of jobs in the right places to meet the identified employment needs</p> <p>12.2 Encourage investment in businesses, people and infrastructure to improve productivity</p> <p>12.3 Support the vitality and viability of town and city centres</p> <p>12.4 Promote sustainable tourism</p> <p>12.5 Support a safe and attractive night economy</p> <p>12.6 Support a sustainable marine and coastal economy</p> <p>12.7 Support a sustainable rural economy</p>	<p>Material assets, human health, population</p>
<p>13. To promote and encourage sustainable transport</p>	<p>13.1 Promote consistency with the sustainable transport hierarchy and improvements to support increased use of sustainable transport methods</p> <p>13.2 Support the reduction in the need to travel</p> <p>13.3 Support the reduction of traffic congestion and improve road safety</p> <p>13.4 Encourage investment to improve transport infrastructure</p>	<p>Air, human health, population, climatic factors</p>

SA Objective	Sub-objective	Relevant SEA Topic
14. To promote safe, healthy, inclusive and sustainable communities	14.1 Support equal access and improvements to green and blue infrastructure, the countryside and open spaces including parks 14.2 Support equal access and improvements to community and health infrastructure, services and facilities to meet day-to-day needs 14.3 Support the delivery of connected communities which maximise social interaction including high quality public realm to create a sense of place 14.4 Minimise light and noise pollution 14.5 Promote healthy lifestyles including through sport and physical activity 14.6 Support the reduction of actual levels of crime	Human health, population

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 site allocations; and
- Draft strategic and development management 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 guidance¹⁰ Task B1). The Vision and Strategic Objectives 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:

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

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 2040, 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;

¹⁰ ODPM (2005) *A Practical Guide to the Strategic Environmental Assessment Directive*. Available online from: <https://assets.publishing.service.gov.uk/media/5a78ec0740f0b62b22cbddd2/practicalguidesea.pdf>

- 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 N**. 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

Significant Positive Effect	+ +	Likely to have significant positive effects
Minor Positive Effect	+	Likely to have positive effects
Neutral	0	Neutral
Minor Negative Effect	-	Likely to have negative effects
Significant Negative Effect	- -	Likely to have significant negative effects
Uncertain	?	Uncertain
No Relationship	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 – Example Matrix

SA Objective	Score	Commentary
10. To ensure the supply of high quality homes, which cater for identified needs	+ +	<p>Likely Significant Effects</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>Mitigation</p> <p>Mitigation and enhancement measures are outlined here.</p> <p>Assumptions</p>

		<p>Any assumptions made in undertaking the appraisal are listed here.</p> <p>Uncertainties</p> <p>Any uncertainties encountered during the appraisal are listed here.</p>
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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 N**.

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 L**. Definitions of significance used to inform the appraisal are set out in **Appendix N**.

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.

WHEN THE SA WAS UNDERTAKEN AND BY WHOM

- 4.3.13. The SA of the Draft Local Plan was undertaken by WSP from December 2023 to February 2024 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.

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.
- The full impact of the Covid-19 pandemic on longer term trends.

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 2035.
- 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 THE EFFECTS OF THE DRAFT LOCAL PLAN

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 (Section 5.9);
- A summary of proposed mitigation and/or enhancements (Section 5.10).

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 Draft Canterbury District Local Plan (2020-2045) (Regulation 18 Consultation) (2022). The Vision is set out below.

Vision for the district to 2040

A sustainable and resilient economy

The district will be stronger and more resilient by 2040, offering a diverse range of jobs through the development of our universities and colleges, regeneration of our city and town centres and investment in the green economy, underpinned by thriving small and community businesses throughout the district.

Investment in the city, our coastal towns and the rural areas will ensure the district's historic and natural environment can thrive to improve the visitor experience and support sustainable tourism.

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, improving environmental resilience and providing significant increases in biodiversity.

Opportunities for nature-based responses to climate change and other environmental challenges will be maximised and our urban areas will be greener and healthier.

Significant investment in our water environment and infrastructure will improve river and coastal water quality, provide a resilient water supply and minimise flood risk.

Improved connectivity

High-quality public transport infrastructure, comprehensive walking and cycling networks and accessible community facilities will help to improve air quality, respond to the challenges of climate change and enhance the quality of life for our residents.

Healthy communities

Existing communities will be enhanced and new healthy communities will be of high-quality, low-carbon design with opportunities to exercise and socialise for all.

Regeneration of our city and town centres will support investment in cultural infrastructure while the delivery of new education facilities, including secondary school provision at the coast, will help to improve skills in our communities.

A range of new homes will meet the needs of the district, ensuring the right type of homes are delivered in the right places to improve affordability and support our communities.

5.2.2. The Vision is supported by 12 strategic objectives which set out how the district will be developed in the period to 2040:

- Create a thriving economy with a wide range of jobs to support increased prosperity for all throughout the district.
- Support the growth and development of our universities and colleges as a centre of innovation and learning excellence, which stimulates business start-ups and generates skilled jobs.
- Capitalise on our rich and distinctive heritage and culture, enhancing character, sense of place and quality of life, supporting sustainable tourism and the local economy for our residents, visitors and businesses.
- Create accessible vibrant town centres, improving safety and access for all, and high quality open spaces, enabling residents, visitors and businesses to shop, stay and enjoy their leisure time.
- Reduce the causes of climate change and adapt to ensure all district developments enable the carbon emissions reduction and increased resilience as quickly as possible.
- Protect and enhance our rich environment and valued landscapes, creating a network of green spaces, protecting and enhancing green gaps between settlements, supporting nature's recovery and biodiversity and improving the health and wellbeing of our communities.
- Create a transport network with a focus on district-wide public transport and 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.
- Take advantage of and improve our links to and from London and the Continent, while creating a transport network which enables most residents, particularly those in the urban areas, to access their day-to-day needs locally through healthy, environmentally-friendly journeys.
- 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.
- Provide affordable high-quality housing for people at every stage in their lives, 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 easy access to community facilities and open space.



- Support the sustainable growth of our rural communities through the provision of affordable housing, community facilities and public transport infrastructure while taking advantage of opportunities to protect and grow the rural economy.

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														
Item (note numbers have been added to the Draft Local Plan strategic objectives)	1. Air Quality	2. Climate change	3. Biodiversity	4. Geology	5. Landscape	6. Water	7. Flood Risk	8. Waste management	9. Historic environment	10. Housing	11. Land use	12. Economy	13. Transport	14. Health and sustainable communities
Draft District Vision	+/?	+/?	+/?	?	+	+	?	?	+	+	?	+	+	+
1. Create a thriving economy with a wide range of jobs to support increased prosperity for all throughout the district.	+/?	+/?	+/?	0	?	?	?	?	?	+	?	+	?	+
2. Support the growth and development of our universities and colleges as a centre of innovation and learning excellence, which stimulates business start-ups and generates skilled jobs.	+/?	+/?	+/?	0	?	?	?	?	?	+	?	+	?	+
3. Capitalise on our rich and distinctive heritage and culture, enhancing character, sense of place and quality of life, supporting sustainable tourism and the local economy for our residents, visitors and businesses.	+/?	+/?	+/?	0	0	0	+	?	+	+	+	+	+/?	+
4. Create accessible vibrant town centres, improving safety and access for all, and high quality open spaces, enabling residents, visitors and businesses to shop, stay and enjoy their leisure time.	+/?	+/?	+/?	?	?	?	+	?	?	+	?	+	+	+
5. Reduce the causes of climate change and adapt to ensure all district developments enable the carbon emissions reduction and increased resilience as quickly as possible.	+	+	+	+	+	+	+	?	+	+	+	+	+	+



SA Objective														
Item (note numbers have been added to the Draft Local Plan strategic objectives)	1. Air Quality	2. Climate change	3. Biodiversity	4. Geology	5. Landscape	6. Water	7. Flood Risk	8. Waste management	9. Historic environment	10. Housing	11. Land use	12. Economy	13. Transport	14. Health and sustainable communities
6. 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.	+	+	+	+	+	+	+	?	+	?	+	?	+	+
7. Create a transport network with a focus on district-wide public transport and 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.	+	+	?	?	?	?	?	0	?	+	?	+	+	+
8. Take advantage of and improve our links to and from London and the Continent, while creating a transport network which enables most residents, particularly those in the urban areas, to access their day-to-day needs locally through healthy, environmentally-friendly journeys.	+	+/-	0	?	?	?	+	0	?	+	?	+	+	+
9. 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.	+/?	+/?	+/?	?	?	?	+	?	?	+	?	+	+	+
10. Provide affordable high-quality housing for people at every stage in their lives, as part of mixed, sustainable communities.	+/?	+/?	+/?	0	?	?	?	?	?	+	?	+	+	+



SA Objective														
Item (note numbers have been added to the Draft Local Plan strategic objectives)	1. Air Quality	2. Climate change	3. Biodiversity	4. Geology	5. Landscape	6. Water	7. Flood Risk	8. Waste management	9. Historic environment	10. Housing	11. Land use	12. Economy	13. Transport	14. Health and sustainable communities
11. 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	?	+	?	?	?	+	?	+	+	+
12. 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	?	?	?	?	?	+	?	+	+	+

Key

+	Compatible	?	Uncertain
0	Neutral	-	Incompatible
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. The following areas of uncertainty or enhancement remain:

- SA Objective 2 relates to climate change mitigation:
 - The vision refers to ‘low-carbon design’ and the strategic objectives specifically refers to low carbon housing, enabling carbon emission reduction in all development and encourage low carbon travel. The strategic objectives could be enhanced with clear reference to commercial/employment development. Potentially, the first 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 through environmentally friendly journeys, 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 sixth strategic objective could reference the need for development to contribute 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. The sixth strategic objective does make reference to protecting ‘valued landscapes’ and protecting elements of the natural environment that are highly important to the landscape (such as green spaces).
- SA Objective 8 relates to waste management. Whilst the vision and a number of the strategic objectives make reference to sustainability, resource use and waste management is not specifically referenced. 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 the 2022 Draft Local Plan SA Report, the appraisal considered the preferred housing growth option at that stage of 1,252 dwellings per annum (dpa) over the plan period between 2020 and 2045, an option based on a figure with a 10% uplift (1,377 dpa) and a further option based on a figure with a 20% uplift (1,502 dpa) (in Section 5.3 of the report). Since the consultation on the 2022 Draft Local Plan, the Council has updated the preferred housing figure to 1,149 based on its up-to-date assessment of the Local Housing Need (LHN), which has identified a decrease in the required housing annual need based on the standard methodology, required to be employed by government. Additionally, the Council has reduced the plan period to 21 years to cover the period 2020/21 to 2040/41, which is reduction from the previous 25 years.
- 5.3.3. Therefore, for the purposes of this SA Report, the preferred housing growth requirement of 1,149 dpa (24,129 dwellings over the plan period), and the reasonable alternatives identified by the Council (which include a 10% and 20% buffer above that) have been appraised. Therefore, the following housing growth options have been appraised:
- Local Housing Need of 1,149 dwellings per annum (24,129 dwellings over the LP period 2020/21 - 2040/41) (Preferred Option).
 - Alternative option 10% increase 1,264 homes per annum (26,544 dwellings over the LP period 2020/21 - 2040/41).
 - Alternative option 20% increase 1,379 homes per annum (28,959 dwellings over the LP period 2020/21 - 2040/41).
- 5.3.4. **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: Housing	SAO 11: Land use	SAO 12: Economy	SAO 13: Transport	SAO 14: Health and sustainable communities
Preferred Option Standard Method 1,149 dpa	-/?	+/- -	+/- - /?	-	+/- - /?	-	-/?	-/?	- -/?	++	+/- -	++	+/- -	-

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: Housing	SAO 11: Land use	SAO 12: Economy	SAO 13: Transport	SAO 14: Health and sustainable communities
Standard Method Plus 10% 1,264 dpa	-/?	+/- -	+/- - /?	-	+/- - /?	-	-/?	--/?	--/?	++	+/- -	++	+/- -	-
Standard Method Plus 20% 1,379 dpa	-/?	+/- -	+/- - /?	-/?	+/- - /?	-	-/?	--/?	--/?	+ +/?	+/- - /?	++	+/- -	-/?

Summary appraisal of the Preferred Option – 1,149 dpa

- 5.3.1. The findings of the appraisal are largely similar to those identified for the preferred figure in the 2022 Draft Local Plan SA Report. The preferred option and alternatives are all lower than the options considered in 2022 due to the lower LHN figure and reduction in the period from 25 to 21 years.
- 5.3.2. The government’s 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. 1,149 dpa is therefore the minimum number of homes expected to be planned for over the plan period using this method.
- 5.3.3. The standard methodology figure of 1,149 dpa has been assessed as having a minor positive effect against five objectives. 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 begun to recover following the Covid-19 pandemic).
- 5.3.4. 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.

- 5.3.5. 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.
- 5.3.6. 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.
- 5.3.7. 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. The release of land under the preferred LHN figure is substantially lower than that under the LHN preferred figure appraised in the SA Report (2022) (especially when considered in respect to the shortened plan period), however, the release is still expected to likely be significant, given the more limited supply of brownfield land within the District. The lower figure though does seek to ensure that the effects on land use can be minimised as far as possible.
- 5.3.8. Mixed significant positive and 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.
- 5.3.9. Minor negative effects were assessed for waste (SA Objective 8) reflecting the scale of development envisaged under the preferred option figure. The reduced quantum aligned to the LHN and shorter plan period is likely to be accompanied by a substantially lower amount of waste generated and greater opportunities for effective waste management than the previously assessed figure in the SA Report (2022). However, there is some uncertainty over the exact waste generated and ability to reuse waste generated through the construction phase.
- 5.3.10. 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.

- 5.3.11. 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), 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 – 1,264 dpa

- 5.3.12. The higher growth option of 1,264 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.
- 5.3.13. The option is considered to have potential for similar effects for the remaining objectives. With regards to waste (SA Objective 8), given the higher amounts of development envisaged, effects are likely to be significant. 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, 379 dpa

- 5.3.14. The dwellings per annum for the 20% uplift figure is equivalent to the 10% uplift assessed in the SA Report (2022) (which stood at 1,377 dpa) and substantially less than the previously assessed 20% uplift (which stood at 1,502 dpa). Over the shortened plan period the total housing figure of 28,959 for the for the 20% uplift option is substantially less than both the total housing figures for the 10% and 20% uplift options assessed in the SA Report (2022).
- 5.3.15. The revised 20% uplift option is considered to largely perform similarly the 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.
- 5.3.16. 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 the environmental SA objectives.

REASONS FOR THE SELECTION OF THE PREFERRED HOUSING GROWTH OPTION

- 5.3.17. In order to identify the number of homes needed, the NPPF states that a standard methodology to calculate the 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

PPG¹¹. In accordance with the application of the methodology this figure can change annually. The Council prepared a Housing Need Assessment (HNA) 2021 which 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 in 2021. In the Draft Local Plan (2022) the LHN figure of 1,252 was used as the basis of the Local Plan, reflecting revised affordability ratios published in March 2022, which led to a higher LHN figure.

- 5.3.18. The figure of 1,149 is the revised LHN, which is based on updated affordability ratio and household growth figures in accordance with the application of the national methodology set out in the NPPF and associated PPG. The LHN annual figure (over the 21 year plan period) broadly aligns with the LHN figure identified in the Draft 2021 District Vision and Local Plan Options consultation in 2021.
- 5.3.19. The Draft District Vision and Local Plan Options (June 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. In the Draft Local Plan (2022), the Council 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 proposed to meet the district's housing needs as identified through the government's standard methodology (the LHN figure), rather than seeking to provide additional housing above that LHN figure. The preferred option requirement at that stage was therefore based on the LHN figure identified at that stage as 1,252 homes per year, creating a need of 31,300 new homes over the Local Plan period of 2020-2045.
- 5.3.20. Following the consultation on the Draft Local Plan (2022) and the consideration of consultation responses received, and further evidence gathering (including, crucially, the updated LHN for the district that has been identified in accordance with the NPPF and PPG), the Council has determined that 1,149 homes per year, which is consistent with that most up-to-date LHN figure, over the shortened plan period is the preferred approach. This approach is consistent with the NPPF and PPG.

REASONS FOR THE REJECTION OF ALTERNATIVE HOUSING GROWTH OPTIONS

- 5.3.21. The PPG¹² 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 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.
- 5.3.22. None of the alternative options were considered to perform any better in sustainability terms than the preferred option.

¹¹ Available at: <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

¹² PPG 002 Reference ID: 2a-002-20190220 <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

5.4 EMPLOYMENT GROWTH OPTIONS

CONSIDERED 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 (EDTS) Update (2023), and the reasonable alternatives identified by the Council have been appraised. The Council has identified the options for employment growth in the district over the plan period (2020 to 2040) outlined in **Table 5-3**. The figures outlined are all lower than those considered in the SA Report (2022) as they reflect the reduced plan period.
- 5.4.2. The figures are based on the updated EDTS (2023), which represents the latest evidence with regards to employment needs within the district. The labour demand scenario uses projections of employment growth (labour demand) and considers growth prospects over the plan period (taking into account the effects of the Covid-19 pandemic and other macro-economic trends upon economic growth) to identified floorspace requirements. The labour supply scenario considers how many jobs, and hence how much employment space, would be necessary to broadly match forecast growth of the resident workforce in Canterbury District. This focuses on the future supply of labour and estimates the number of new jobs needed to match future working age population rather than the demand for labour.

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)
Labour Demand Scenario (Preferred option)	30,780	45,160	11,200	53,960	141,100
Labour Supply Scenario	13,145	19,245	4,810	23,120	60,320
Labour Demand Scenario with 10% uplift	33,858	49,676	12,320	59,356	155,210

- 5.4.3. **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 risk	SAO 8: Waste Management	SAO 9: Heritage	SAO 10: Housing	SAO 11: Land use	SAO 12: Economy	SAO 13: Transport	SAO 14: Health and 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

- 5.4.4. No changes have been made to the appraisal outlined in the SA Report (2022). Significant positive effects are assessed for all options for the economy (SA Objective 12). The Canterbury Economic Development and Tourism Study (EDTS) Update (2023) provides an update to the 2020 EDTS and 2022 EDTS 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 (although may occur across the plan period as construction activities for different sites at different times are likely to lead to ongoing positive effects) 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.
- 5.4.5. 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.

- 5.4.6. 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.
- 5.4.7. 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

- 5.4.8. 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

- 5.4.9. 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

- 5.4.10. The Labour demand scenario is based on the 2023 EDTS update 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 OPTIONS

- 5.4.11. 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 2023 EDTS update.
- 5.4.12. 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 2021 Options consultation included a question on how business space should be provided and the majority of respondents agreed with the preferred option of retaining deliverable sites and providing flexibility for employment sites. The Call for Sites has also failed to identify sufficient suitable, additional deliverable sites that were available to meet the 10% uplift option. This option was therefore not taken forward in the 2022 Draft Local Plan as the focus was on a growth option which could be met by available sites which are likely to be developed. Since the Draft Local Plan consulted on in 2022 the Council has reduced the plan period (from 25 to 21 years) and updated the evidence on the employment land requirements set out in the 2023 EDTS update. The reasons for not taking forward the higher figure at this stage reflect the reasoning for not taking forward a higher requirement in the 2022 Draft Local Plan (a lack of additional, deliverable sites and focus of sites that are likely to be developed).

5.5 RETAIL GROWTH OPTIONS

CONSIDERED 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) 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 2040) as shown in **Table 5-5**. The options considered are the same as those considered in the SA Report (2022) except for the figure to 2040. The SA Report (2022) assessed a higher figure to 2045, reflecting the end of the plan period proposed at that stage. The figures assessed reflect that the NPPF states that in planning retail needs Council's should look at least 10 years ahead. The reasonable alternatives are therefore: a 10 year period from the start of the plan period (2030); to 2035; and to the end of the plan period (2040).

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 2040	1,383	8,688

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 risk	SAO 8: Waste Management	SAO 9: Heritage	SAO 10: Housing	SAO 11: Land use	SAO 12: Economy	SAO 13: Transport	SAO 14: Health and sustainable communities
RLSU To 2035 (Preferred approach)	-/?	-	+/- /?	0	+/- /?	-	-/?	-	+/- /?	0	+/-	++	+/-	+/-
RLSU To 2030	-/?	-/?	0/?	0	0/?	0	-/?	-	+/- /?	0	+/-	+	+/-	+/-
RLSU To 2040	-/?	-	+/- /?	0	+/- /?	-	-/?	-	+/- /?	0	+/-	+ /? /?	+/-	+/-

Summary appraisal of the Preferred Option – RLSU To 2035

- 5.5.3. The options considered are unchanged from those assessed in the SA Report (2022), except for the RLSU to 2040 figure. This figure includes less retail floorspace than the RLSU to 2045 option assessed in the SA Report (2022). No changes have been identified for the assessment of the preferred option. 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 2040 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 2040

- 5.5.10. The RLSU to 2040 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 2040 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

- 5.5.1. The preferred approach in the Draft Local Plan is based on the RLSU (2022) figure to 2035. This allows the draft Local Plan to plan for the minimum 10 years from the anticipated adoption date of

2025. This also allows for greater flexibility to account for fluctuations in retail than the longer, 2040 plan period figure. The RLSU (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 option (up to 2030) considered would not provide the appropriate figures to inform the Draft Local Plan.

REASONS FOR THE REJECTION OF ALTERNATIVE RETAIL GROWTH OPTIONS

- 5.5.2. The RLSU to 2040 option was considered to perform similarly to the preferred option in sustainability terms, however given that the figure is identified as being needed to be treated with caution, the Council has decided to not take forward the higher 2040 figure. The lower RLSU to 2030 was not considered to provide the range of benefits of the preferred approach and by the time of adoption of the Local Plan will not cover a 10 year period.

5.6 PREFERRED SPATIAL STRATEGY

APPRAISAL OF THE DRAFT LOCAL PLAN 2040 SPATIAL STRATEGY

Development of the preferred Spatial Strategy

- 5.6.1. The Council has produced a Development Topic Paper to accompany the Draft Local Plan which sets out the process by which the preferred spatial strategy has been established. The development of the spatial strategy is briefly summarised here.
- 5.6.2. A range of alternative spatial strategies and a preferred approach were outlined in the District Vision and Options Report (2021) and appraised in the SA Report that accompanied it. The Draft Local Plan (2022) included a spatial strategy setting out the broad principles for development to 2045. A blend of the spatial growth options consulted on the Draft Options Report 2021 was identified as the preferred spatial strategy including a focus on Canterbury, expansion at Whitstable, a new freestanding settlement, and limited expansion at the most sustainable rural settlements. This was based on Option C (as appraised in the Draft Options SA Report (2021)) with the addition of a freestanding community. The preferred spatial strategy was appraised in Section 6 of the SA Report (2022) that accompanied the Draft Local Plan (2022).
- 5.6.3. Around 2,000 individuals and organisations provided representations on the Draft Local Plan (2022) and some of the main themes which emerged were:
- opposition to the proposed transport strategy, including the Eastern Movement Corridor (eastern bypass) around Canterbury;
 - widespread public perception of “over development” and links to the loss of agricultural land around Canterbury and Whitstable in particular; and
 - specific objections to the proposed new freestanding settlement at Cooting Farm, to the west of Aylesham.
- 5.6.4. The Council therefore reconsidered the available evidence on the amount of growth to be planned for and the associated transport infrastructure. Through this process the Council:
- Reviewed the outcomes of the Draft Options SA Report (2021) with regards to the appraisal of the spatial strategy options.

- Reviewed and reconsidered the amount of growth whilst retaining consistency with government requirements;
- Reviewed and revised the transport strategy to focus on the delivery of a sustainable transport led approach and removed the Eastern Movement Corridor;
- Reviewed the sites available and sites assessment, removing a number of sites:
 - Land south of Littlebourne Road, Canterbury (1,400 dwellings) - transport infrastructure constraints;
 - Land south of Bekesbourne Lane, Canterbury (645 dwellings) - transport infrastructure constraints;
 - Canterbury Golf Club (74 dwellings) - ecology constraints and loss of sports facility;
 - Land at Golden Hill, Whitstable (120 dwellings) - land availability constraints, land now identified as a Green Infrastructure space;
 - Mill Field, Blean (36 dwellings) - pedestrian and cycle accessibility and third party land availability constraints;
 - Land to the west of Rattington Street, Chartham (170 dwellings) - access and transport infrastructure constraints;
 - South Aylesham (420 dwellings) - transport infrastructure and landscape constraints;
 - 37 Kingsdown Park (7 dwellings) - land availability constraints;
 - Land at Cooting Farm, Adisham (3,200 dwellings) - transport and landscape constraints.
- Identified an alternative new settlement location north of the University of Kent.

5.6.5. In consequence, the preferred spatial strategy for the Draft Local Plan 2024 (which draws on Option A assessed amongst the range of alternatives in the SA Report (2021)) comprises:

- Canterbury Urban Area as the principal focus for development in the district.
- Whitstable and Herne Bay Urban Areas as the secondary focus, where development will be principally driven by the need for new infrastructure including schools and improved transport connectivity.
- A new freestanding community (at land north of the University of Kent) will be pursued to meet a proportion of growth.
- Proportionate development will be allocated at Rural Service Centres 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.

5.6.6. The Council considers that the principles of the spatial strategy that underpin the Draft Canterbury District Local Plan 2040 (Regulation 18) consultation 2024 (as outlined in paragraph 5.6.5) remain largely consistent with the previous Regulation 18 draft Local Plan (2022), with a reduced overall quantum of growth (and shorter plan period), revised location of a new settlement (see the following section for further consideration of this), and removal of the Eastern Movement Corridor.

Summary appraisal

5.6.7. **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 5-7 - 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: Housing	SAO 11: Land use	SAO 12: Economy	SAO 13: Transport	SAO 14: Health and sustainable communities
Preferred Spatial Strategy	+/-	+/- -	+/- - /?	-	+/-	+/- /?	-/?	-/?	+/- /?	++	+/- -	++	+/-	+ +/-

- 5.6.8. 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 settlement which will be pursued to meet a proportion of growth (circa 2,000 dwellings). 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.
- 5.6.9. The proposed delivery of 1,149 dwellings per annum (equivalent to 24,129 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 new settlement. Significant positive effects are therefore assessed against housing (SA Objective 10). Despite, having a reduced quantum of growth since the previous Regulation 18 Draft Local Plan (2022), 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.
- 5.6.10. 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).
- 5.6.11. 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. Furthermore, focusing development within the most sustainable settlements would help to reduce transport required. It is expected that, although a degree of self-containment could be generated within the new settlement, some journeys will have to be made to other higher order settlements for services, facilities and employment, with the location likely to support accessibility to Canterbury. Overall, the spatial strategy is therefore considered to have a mix of positive and negative effects on transport (SA Objective 13).

- 5.6.12. The spatial strategy includes the provision of a new country park, 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).
- 5.6.13. 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.
- 5.6.14. 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 brownfield land and increase the amount of brownfield used, which has decreased in recent years. The preferred spatial strategy would be expected to see the use of greenfield land (and therefore land assumed to have greater biodiversity value than brownfield). As noted in the assessment of the housing growth options, the release of land under the preferred LHN figure and employment growth is substantially lower than that under the LHN preferred figure appraised in the SA Report (2022) (especially when considered in respect to the shortened plan period). However, the release is still expected to likely be significant, given the more limited supply of brownfield land within the District. The lower figures in a shorter plan period though does help to ensure that the effects on land use can be minimised as far as possible. A mix of positive and significant negative effects are assessed against land use (SA Objective 11).
- 5.6.15. A mix of positive and significant negative effects are assessed against biodiversity (SA Objective 3). The site location of the new settlement is within 400m of Blean Woods SAC. Further Habitats Regulations Assessment (HRA) work is underway to establish with certainty regarding the potential for impacts with regards to air quality impacts on the SAC, pending the finalisation of transport modelling. However, the Regulation 18 HRA notes that existing data and models suggest that the Draft Local Plan will have no adverse effect on Blean Complex SAC, alone or in combination, due to air quality changes. Some uncertainty is therefore identified, and at this stage significant negative effects are assessed. 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). The Regulation 18 HRA identifies that no

adverse effects alone or in combination in regards to recreational pressure on the Blean Complex SAC would be expected as currently drafted.

- 5.6.16. 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. 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 negative effects are assessed against landscape (SA Objective 5).
- 5.6.17. The preferred spatial strategy 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 preferred 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.
- 5.6.18. The preferred 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.
- 5.6.19. 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) and any specific actions required to address flood risk for relevant development sites would avoid or mitigate the impacts on flood risk.
- 5.6.20. 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)
- 5.6.21. 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 positive and negative effects on landscape (SA Objective 5) and 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), and land use (SA Objective 11). However, the extent and magnitude of such effects is uncertain at this stage.

REASONS FOR SELECTION OF THE PREFERRED SPATIAL STRATEGY

- 5.6.22. As outlined above, the Council has undertaken further consideration of the spatial strategy since the Draft Local Plan (2022). The preferred spatial strategy is largely similar to that set out in the Draft Local Plan (2022) but includes a lower quantum of growth which aligns with the Canterbury Focus A option considered in the Draft Options SA Report (2021), removes the circulation plan and Eastern Movement Corridor, and provides a new settlement location.

- 5.6.23. The Council's Development Topic Paper outlines that having considered the results and differences between the SA undertaken at the Draft Local Plan Options (2021) stage, the findings of the assessment of the preferred spatial strategy in the SA Report (2022), all consultation responses received to the Draft Local Plan (2022), including from key stakeholders, and the further development of the evidence base; the Council considers that reducing the plan period from 2044/45 to 2040/41 to align with the national policy requirement of a minimum 15 years from adoption, reducing the number of allocations, and aligning the spatial growth strategy with Canterbury Focus A would be the best reflection of concerns and minimise some of the significant negative impacts of the Local Plan. The Council's specific consideration of the change in the identification of the new settlement location, which forms part of the spatial strategy, is considered in the following section.
- 5.6.24. The new Draft Local Plan (2024) therefore provides for substantially fewer homes and lower employment growth than previously proposed, but meets government requirements on housing supply and provides a spatial strategy that provides a range of positive impacts and allows for the negative impacts to be minimised as far as possible.

REASONS FOR REJECTION OF OPTIONS

- 5.6.25. The Draft Options SA Report (2021) set out the reasoning for Council's rejection of the options considered at that stage.
- 5.6.26. The preferred option at this stage provides an iteration of the previous preferred option with the reasoning for the change in spatial strategy outlined above. The preferred spatial strategy is considered to perform better in sustainability terms than the preferred spatial strategy outlined in the Draft Local Plan (2022).
- 5.6.27. The Council's specific consideration of the change in the identification of the new settlement location, which forms part of the spatial strategy, is considered in the following section.

APPRAISAL OF THE NEW SETTLEMENT LOCATION AND ALTERNATIVES

- 5.6.28. The Draft Local Plan includes the identification of a new settlement. The identification of the alternatives for a new settlement at the Draft Local Plan (2022) stage is set out in Section 5.6 of the SA Report (2022). As noted above with regard to the spatial strategy, the Council identified an alternative site to Cooting Farm (preferred at Draft Local Plan (2022) stage) at Land North of the University of Kent, following consideration of the consultation responses and further evidence gathering.
- 5.6.29. The site that makes up the location of the proposed new settlement has been assessed. The effects are identified in **Table 5-8**. The reasonable alternative locations (Cooting Farm and Amery Court) have also been assessed and the effects summarised below in **Table 5-9** and **Table 5-10**.
- 5.6.30. The alternatives are described as follows:
- Land North of the University of Kent – Strategic Land Availability Assessment (SLAA) site SLAA319 (c.102 hectares (ha)) (comprised of SLAA158B, 158C and 158D and an additional parcel of land). The site is located in the open countryside between the Rural Service Centre of Blean and the Village of Tyler Hill. Identified for c.2,000 new homes.
 - Land at Cooting Farm (c.205 ha) formed a broad location for the development of a new garden community (for c.3,200 homes) in the Draft Local Plan (2022). The site is located in the open

countryside just outside the Hamlet of Blooden and Local Service Centre of Adisham. It is comprised of three SLAA sites:

- SLAA262 – Land west and East of Cooting Lane, Adisham
 - SLAA268 – Land On The South East Side Of Cooting Lane, Adisham
 - SLAA267 - TT21601 - Land at Cooting Farm
- Amery Court Farm - site SLAA264. (c.174 hectares in size). The site is located in the open countryside to the north of the Urban Area of Canterbury, and east of the Rural Service Centre of Blean.



Table 5-8 - Summary SA of proposed new settlement north of University of Kent

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: Housing	SAO 11: Land use	SAO 12: Economy	SAO 13: Transport	SAO 14: S Health and sustainable communities
SLAA319	Land north of University of Kent	0	--	--	--	--	++	--	++	++/--	++	++/--	++/- /?

Table 5-9 – Summary SA of Cooting Farm (alternative)

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: Housing	SAO 11: Land use	SAO 12: Economy	SAO 13: Transport	SAO 14: Health and 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 5-10 - Summary SA of Amery Court Farm (alternative)

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: Housing	SAO 11: Land use	SAO 12: Economy	SAO 13: Transport	SAO 14: Health and sustainable communities
SLAA264	Amery Court Farm	0	--	--	--	--	++	--/?	++	+/-	++/-	++/-	++/-

Summary of appraisal of preferred University of Kent new settlement location

- 5.6.31. The site that comprises the Land North of University of Kent was considered to have significant positive effects on housing (SA Objective 10). This reflects the scale of the site (over 100 ha) and the ability to deliver a significant quantum of housing. Significant positive effects were assessed for employment (SA Objective 12). This reflects that an allocation for a new settlement could also be expected to provide a level of employment on site.
- 5.6.32. Significant positive effects were 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.
- 5.6.33. With regards to land use (SA Objective 11) a mix of significant positive and negative effects were assessed. This reflects that the site includes elements of brownfield land, although it is predominantly a greenfield site.
- 5.6.34. Significant positive and negative effects were assessed for sustainable transport (SA Objective 13) whilst significant positive and minor negative effects, with some uncertainty, are assessed for 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, and Blean Primary School, which would need to be re-provided. Provision of facilities and open space would be expected for a development of this scale, given the scale of the site, and application of the site appraisal criteria.
- 5.6.35. Significant negative effects were assessed for biodiversity (SA Objective 3). The location includes Ancient Woodland and is within 400m of Blean Complex Special Area of Conservation (SAC), West Blean and Thornden Woods Site of Special Scientific Interest (SSSI), Church Woods SSSI and Blean Woods National Nature Reserve (NNR). Blean Pastures Local Wildlife (LWS) is also located within the site. Habitats Regulations Assessment (HRA) work is underway to establish with certainty regarding the potential for impacts with regards to air quality impacts on the SAC, pending the finalisation of transport modelling. However, the Regulation 18 HRA notes that existing data and models suggest that the Draft Local Plan will have no adverse effect on Blean Complex SAC, alone or in combination, due to air quality changes. Some uncertainty is therefore identified, and at this stage significant negative effects are assessed. The Regulation 18 HRA identifies that no adverse effects alone or in combination in regards to recreational pressure on the Blean Complex SAC would be expected as the Local Plan is currently drafted.
- 5.6.36. Significant negative effects were also assessed for landscape (SA Objective 5) due to the potential for change in character of the site and open countryside in this location, which is also a green gap. Any landscape effects would need to be minimised and mitigated for as far as possible. Strategic scale landscape mitigation will be required for development of the location.
- 5.6.37. With regards to the historic environment (SA Objective 9) significant negative effects were assessed. The site contains a Scheduled Ancient Monument, is adjacent to Church of St Cosmus and St Damian Grade 2* Listed Building and Church Cottage, Blean House, Hothe Court Farmhouse and Barn adjoining Hothe Court Grade 2 Listed Buildings and development could have an adverse impact on the assets and / or their setting, as well as the World Heritage Site (Canterbury Cathedral). The site is partially within Blean Conservation Area, Amery Court (Blean)

Conservation Area, and Hothe Court Conservation Area and adjacent to Canterbury and Whitstable Railway (Hackington & Blean) Conservation Area. These effects will need to be minimised and mitigated.

- 5.6.38. The site is located within a Mineral Safeguarding Area (MSA) and therefore significant negative effects were assessed for geology (SA Objective 4). Significant negative effects were also assessed due to the presence of waterbodies on site (SA Objective 6).
- 5.6.39. Neutral effects were assessed for air quality (SA Objective 1).

Summary of appraisal of Cooting Farm Garden Community location (alternative)

- 5.6.40. The three sites that comprise the Cooting Farm alternative 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.
- 5.6.41. With regards to transport (SA Objective 13) a mix of significant positive and negative effects were 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.
- 5.6.42. Significant positive effects were 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.
- 5.6.43. The broad location that comprises these sites is within 400m of Ileden and Oxenden Woods SSSI and ancient woodland. Significant negative effects were 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.
- 5.6.44. Significant negative effects were assessed for landscape (SA Objective 5). This assessment reflects the proximity of the combination of sites for this option 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.
- 5.6.45. With regards to the historic environment (SA Objective 9) significant negative effects were 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.
- 5.6.46. 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.

5.6.47. Neutral effects were assessed for air quality (SA Objective 1).

Summary appraisal of Blean Amery Farm Court option

- 5.6.48. This broad location is adjacent to the village of Blean, north of Canterbury. The broad location performs similarly to the preferred new settlement 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.
- 5.6.49. Significant positive and negative effects were 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.
- 5.6.50. Significant positive effects were 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.
- 5.6.51. Significant negative effects were 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 are all within 400m. Given the location of the site there could be expected to be similar considerations in relation to HRA matters.
- 5.6.52. 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.
- 5.6.53. 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 were 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.
- 5.6.54. Significant negative effects were 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.

5.6.55. Neutral effects were assessed for air quality (SA Objective 1).

REASONS FOR THE SELECTION OF THE PREFERRED NEW SETTLEMENT LOCATION

- 5.6.56. The Council has produced a Development Topic Paper (2024) to accompany the Draft Local Plan which sets out the process by which the preferred new settlement location has been established and the reasoning for it. This is briefly summarised here.
- 5.6.57. The Draft Local Plan Options Consultation (2021) identified some support for a new settlement in the district as a means to accommodate housing growth. Of the sites submitted to the SLAA for housing development, only SLAA264 (near Blean), and the combination of sites SLAA262, SLAA268 and SLAA267 (near Adisham), were considered to be of a size and location where development would constitute a new sustainable community in the district. These three sites were identified as a broad location for the development of Cooting Farm Garden Community in the Draft Local Plan (2022).
- 5.6.58. Responses to the Draft Local Plan (2022) consultation raised significant concerns regarding the suitability of the site for allocation, including Natural England and the Kent Downs Area of Outstanding Beauty (AONB) Unit who objected to the site due to its proximity to designated sites including Kent Downs AONB, Ileden and Oxenden Woods SSSI and Ancient Woodland. Kent County Council also raised significant transport concerns, including impact on the highway network, whilst Dover District Council also objected to the proposal, raising concerns about the impact on development on Aylesham. The site promoter has been unable to sufficiently address the outlined concerns and therefore the site is no longer proposed for allocation.
- 5.6.59. Sites SLAA158B, 158C, 158D, 158E and 158F which form part of The University of Kent's landholdings to the north of Canterbury were identified as unsuitable in the SLAA. The sites were not considered for allocation in the Draft Local Plan (2022) as a freestanding community as there was no suitable access point identified. However, the sites were identified for further consideration over the Local Plan period.
- 5.6.60. Following the Draft Local Plan (2022) consultation, further technical evidence and a revised, increased site boundary, encompassing parts of SLAA158B, 158C and 158D as well as additional land to the south was submitted to the Council and assessed under SLAA319. Following the review of technical evidence to address matters of suitability and availability, it was concluded that the site was suitable, available and achievable. The primary issue regarding access to the site has been resolved following further technical work, and confirmation from the landowner that land at Blean Primary School would be available for an access (subject to its re-provision on site).
- 5.6.61. The site is therefore proposed for allocation as a mixed-use freestanding settlement, as an alternative to Cooting Farm identified in the Draft Local Plan (2022), to deliver approximately 2,000 homes and associated infrastructure. The site is considered to be an alternative that addresses the concerns raised in relation to Cooting Farm, particularly regarding impacts on nationally designated Kent Downs AONB and transport issues raised. While the site specific SA has identified significant and minor negative impacts, when reviewed alongside the SLAA, on the balance of positive and negative impacts and considering possible mitigation and design, it is considered that the majority of these impacts can be addressed through further refinement (and some uncertainty is still required to overcome with regards to the Blean Complex SAC).

REASONS FOR THE REJECTION OF THE REASONABLE ALTERNATIVES

- 5.6.62. Land at Cooting Farm near Adisham (SLAA262, SLAA268 and SLAA267) was previously identified as a preferred location. The reasoning for why the site has not been taken forward in the Draft Local Plan (2024) is outlined above.
- 5.6.63. 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. Although the impacts in terms in relation to the implementation of HRA may be able to be overcome, the site includes West Blean and Thornden Woods SSSI within the site boundary (which is not the case for the preferred Land North of University of Kent site location). There has been no evidence to demonstrate negative effects on the designations can be avoided. Additionally, it has not been demonstrated that the site is able to provide effective access or potential mitigation for any adverse impacts on the road network. This site has not been supported by any further evidence which demonstrates its suitability as an allocation.
- 5.6.64. Whereas the Land North of the University of Kent was already identified as a potential area of growth in the Draft Local Plan (2022) and subject to consultation where it received less negative comments than Cooting Farm. The site promoters have actively been engaging with the Council and other parties, and as such have provided evidence in regard to suitable access and possible transport mitigation, assessment of impact on ancient woodland and, at this stage, stakeholders and statutory consultees have not identified any major issues.

5.7 SITE ALLOCATIONS

- 5.7.1. To deliver the Spatial Strategy, the Draft Local Plan directs growth broadly to sustainable locations within the following:
- Canterbury area (including the new settlement);
 - Whitstable area;
 - Herne Bay area; and the
 - Rural area.
- 5.7.2. 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.
- 5.7.3. 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

- 5.7.4. 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**.

- 5.7.5. 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. These sites are not included with the SLAA but have been subject to SA.
- 5.7.6. **Tables 5-11 to 5-14** set out summary appraisals by area below. The associated site policies (area policies) are appraised in **Section 5.8**. The site that forms the new settlement has been summarised in **Section 5.6**.



Table 5-11 - 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 risk	SAO 9: Heritage	SAO 10: Housing	SAO 11: Land use	SAO 12: Economy	SAO 13: Transport	SAO 14: Health and sustainable communities
SLAA099	43-45 St George's Place	C2	--	-	0	0	-	++	--	+/-	+	++/-	++/-/?	++
SLAA192	Land to the rear of 62 Burgate (Identified as part of Opportunity Area)	C4	-	-	0	+	-	++	--	+	+	++/-/?	++/-/?	++
SLAA306	Land south and west of 62 Burgate (Identified as part of Opportunity Area)	C4	-	-	0	+	-	++	--	+	+	++/-/?	++/-/?	++
SLAA151	Merton Park	C6	-	--	--	--	--	++	--/?	++/-	+/-	++/?	++/-	++/-
SLAA128	Land at Langton Lane	C6	0	--	0	-	-	++	0	+	--/?	+	++/-	++
SLAA259	Land on the west side of Hollow Lane	C7	0	--	--	--	--	++	0/?	++	--	++	+/--	++/-
SLAA309	Nackington Police Station	C8	0	-	0	+	-	++	--	+	+	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 risk	SAO 9: Heritage	SAO 10: Housing	SAO 11: Land use	SAO 12: Economy	SAO 13: Transport	SAO 14: Health and sustainable communities
SLAA090	Milton Manor House	C9	0	--	--	--/?	--	++	0	++/-	+/-	0	++/-	++
SLAA137 B	Land North of Cockerling Road	C10	0	--	0	--/?	--	++	0	+	--/?	0	++/-/?	+
SLAA239	Becket House	C13	-	-	0	0/?	-	++	--/?	+	++	++/-	++	++
SLAA156	Land at Station Road East	C14	-	-	0	+	-	++	--	+	+	++	++/?	++/-
SLAA102	Land at the Former Chaucer Technology School, Canterbury, Spring Lane CT1 1SU	C15	0	-/?	--	+	-	++	0	+	++	++	++	++/-
SLAA162	Folly Farm	C16	0	--	--	-	0	++	--	+	--/?	0	++	+/-
SLAA065	Former Gas Holder Site, Simmonds Rd, Wincheap (Identified as part of Wincheap	C19	-	--	--	+/-	-	--	0	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 risk	SAO 9: Heritage	SAO 10: Housing	SAO 11: Land use	SAO 12: Economy	SAO 13: Transport	SAO 14: Health and sustainable communities
	broad location for development)													
SLAA181	Bamboo Tiger, Carpet Right, Beds4Less (Identified as part of Wincheap broad location for development)	C19	-	-	--	0	--	--	0	0	+	++/-	++	++
2017LP	Wincheap	C19	-	--	--	+	--	--	--/?	++	++	++/- -	++/- -	++/- -



Table 5-12 - 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 risk	SAO 9: Heritage	SAO 10: Housing	SAO 11: Land use	SAO 12: Economy	SAO 13: Transport	SAO 14: Health and sustainable communities
2017 LP	Whitstable Harbour	W2	0	--	--	+	--	--	-	+/?	++	++/- -/?	++	++/- /?
SLAA141	Oyster Indoor Bowling Centre and Whitstable Harbour Garage (Identified as part of Whitstable Harbour broad location for development)	W2	0	--	--	+	0	--	0	+	+	++/-	++	++/- -
SLAA104	Brooklands Farm, Whitstable	W4	0	--	--	--	--	--	--	++	--	++/?	++/- -	++/-
SLAA132	Land South of Thanet Way	W5	0	--	0	--	-	++	0	++	--	++	+/--	++
SLAA247	Land east of Bodkin Farm	W6	0	--	0	--	--	--	0	++	--	++	++/- -	++/-
SLAA223	St Vincent's Centre	W7	0	-	0	0	0	++	0	+	+	++	++	++/-



Table 5-13 - 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 risk	SAO 9: Heritage	SAO 10: Housing	SAO 11: Land use	SAO 12: Economy	SAO 13: Transport	SAO 14: Health and sustainable communities
SLAA240	Land at Greenhill adjacent Thornden Close (Land to the West of Thornden Wood Road)	HB4	0	--	--	--	--	--	0	++	--	++	++/- -	++/-
SLAA067	Land comprising Nursery Industrial Units and former Kent Ambulance Station	HB5	0	-	0	+	0	++	0	+	+	++/- /?	++	++/-
SLAA014	Blacksole Farm, Margate Road	HB8	0	--	0	+	--	++	--	+/-	+	++	++	++/-
SLAA026	Moyne	HB8	0	--	0	0	--	++	-	+/- /?	+	++	++/-	++/-
SLAA226 a	Blacksole Farm and Moyne	HB8	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 risk	SAO 9: Heritage	SAO 10: Housing	SAO 11: Land use	SAO 12: Economy	SAO 13: Transport	SAO 14: Health and sustainable communities
SLAA013	Former Metric Site, Sweechbridge Road, Herne Bay	HB9	0	-	0	+/-	0	++	0	+	+	++/?	++	++/-/?
2017LP	Eddington Business Park	HB10	0	--/?	--	+/-	--	--	0	+/?	++/-/?	++	++/-	++/-/?



Table 5-14 - 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 risk	SAO 9: Heritage	SAO 10: Housing	SAO 11: Land use	SAO 12: Economy	SAO 13: Transport	SAO 14: Health and sustainable communities
SLAA218	Great Pett Farmyard	R2	0	-	0	--/?	-	++	--	+	+	++/-	+	++
SLAA163	Bread and Cheese Field	R5	0	--	--	-	-	++	0	++	--	++	++/-	++/- -
SLAA146	Land at Hersden	R6	0	--	0	--/?	--	++	0	+	--/ ?	++	++/- /?	++
SLAA098	Land off The Hill, Littlebourne	R7	0	--	--	--	-	++	--	++	--	++	++/- -	++
SLAA214	Land off the Hill Littlebourne	R7	0	--	--	--	-	++	--	++	--	++	++/-	++
SLAA145	Land North of Court Hill, Littlebourne	R8	0	--	--	+/-	-	++	0	+	+/- -/?	++/-	+/-	++
SLAA011	Land North of Popes Lane	R9	0	--	0	--	--	++	--	++	--	++	++/- -	++
SLAA066	The Paddocks, Shalloak Road, Sturry	R10	0	--	0	-/?	0	++	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 risk	SAO 9: Heritage	SAO 10: Housing	SAO 11: Land use	SAO 12: Economy	SAO 13: Transport	SAO 14: Health and sustainable communities
SLAA185	Land at Station Road/Land west of Cooting Lane, south of Station Road, Adisham	R12	0	-	0	--	-	++	--	+	--/?	++	++/-	++
SLAA062	Land adjacent to Valley Road, Barham	R13	0	-	--	--	--	--	--	+	--/?	++	++/?	++
SLAA235	Land at Goose Farm, Shalloak Road, Broad Oak	R14	0	--	0	+/-	0	++	0	+	++	++/-	++	+
SLAA313	Land at Shalloak Road	R15	0	--	0	0	0	++	0	+/-	+	++	++/-	+
SLAA045	Land fronting Mayton Lane, Broad Oak	R16	0	-	0	-	0	++	-	+	--/?	++	++/-	+
SLAA202	Land at Church Farm, Hoath	R18	0	-	0	-	0	++	--	+	--/?	++	++/-	++

Summary of findings

- 5.7.7. 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.
- 5.7.8. 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 a number of other sites due to be being with 500m of the AQMAs within Canterbury (SLAA192- Land to the rear of 62 Burgate (Identified as part of Opportunity Area); SLAA306 - Land south and west of 62 Burgate (Identified as part of Opportunity Area); SLAA151 - Merton Park; SLAA065 - Former Gas Holder Site, Simmonds Rd, Wincheap (Identified as part of Wincheap broad location for development); SLAA239 - Becket House; SLAA156 - Land at Station Road East; SLAA181 - Bamboo Tiger, Carpet Right, Beds4Less (Identified as part of Wincheap broad location for development); 2017LP – Wincheap).
- 5.7.9. 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 whilst a small number have Local Wildlife Sites (LWS) within them. 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 Act) will provide biodiversity enhancement.
- 5.7.10. With regards to geology (SA Objective 4) a number of sites were assessed as having significant negative effects. Eight sites within the Canterbury area, three 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.
- 5.7.11. 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 SLAA218 - Great Pett Farmyard were assessed as having significant negative effect due to being located in the Kent Downs Area of Outstanding Natural Beauty (AONB).
- 5.7.12. 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). The majority of sites are within Flood Zone 1 (SA Objective 7) and have therefore been assessed as having significant positive effects. However, ten 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.

- 5.7.13. 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 a 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.
- 5.7.14. 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.
- 5.7.15. 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.
- 5.7.16. 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 unsuitable neighbouring uses, including railway lines or major roads.
- 5.7.17. 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

- 5.7.18. 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**.
- 5.7.19. 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. These sites are not included with the SLAA but have been subject to SA.
- 5.7.20. **Table 5-15** set out summary appraisals of the employment allocations. The associated site policies are appraised in **Section 5.8**.



Table 5-15 - 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 risk	SAO 9: Heritage	SAO 10: Housing	SAO 11: Land use	SAO 12: Economy	SAO 13: Transport	SAO 14: Health and sustainable communities
SLAA318	Land north of Canterbury West station	C3	-	-	--	+	-	++	--	0	+	++	++/- /?	++
SLAA155	Canterbury Business Park	C17	0	--	--	--	0	++	--	0	--	++	++/- -	+
SLAA056	Land on the eastern side of Shellford Landfill	C18	0	--	--	-/?	--	++	0	0	++	++	+/-	+
SLAA042	Hawthorne Corner	HB6	0	-	--	-	--	++	0	0	--/ ?	++	++/-	++
SLAA068	Former Gas Holder Site	HB7	0	-	0	+	0	++	0	0	+	++	++	++
2017LP	Altira	HB8	0	--/?	--	-	--	++	0	0	--	++	++/-	++
SLAA115	Land at Ashford Road	R3	0	--	--	+/-	--	++	0	0	+/- -/?	+	+	+
SLAA311	Land at Ashford Road (west)	R4	0	0	0	+/-	+/-	-	0	+	+/-	+	0	+

- 5.7.21. All sites were assessed as having significant positive effects on employment (SA Objective 12) except for SLAA115 - Land at Ashford Road and SLAA311 - Land at Ashford Road (west) which have 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.
- 5.7.22. 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.
- 5.7.23. A mix of effects were assessed for transport (SA Objective 13). 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, SLAA318 - Land north of Canterbury West station) were assessed as having adverse effects on the highway network, which would need to be addressed.
- 5.7.24. For health and sustainable communities (SA Objective 14) positive effects were assessed for all sites. For the four sites located in the Herne Bay area (SLAA042 – Hawthorne Corner, SLAA068 – Former Gas Holder Site, SLAA318 - Land north of Canterbury West station, and Altira) these effects are assessed as significant positive reflecting good access to a range of services and no neighbouring use issues.
- 5.7.25. 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. 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.
- 5.7.26. 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, and SLAA318 - Land north of Canterbury West station. SLAA115 - Land at Ashford Road and SLAA311 - Land at Ashford Road (west) were 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: SLAA318 - Land north of Canterbury West station due to proximity to Listed Buildings and location within a Conservation Area, and SLAA155 - Canterbury Business Park due to proximity to Listed Buildings.
- 5.7.27. Significant negative effects were also assessed for geology (SA Objective 4) for all sites bar two, due to their location within an MSA. With regard to water quality and resource (SA Objective 6) four sites were assessed as having significant negative effects due to having water bodies on site or in close proximity to the site.
- 5.7.28. 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 ALLOCATION

- 5.7.29. The proposed site to be allocated for country park and reservoir has 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). **Table 5-16** set out summary appraisal.



Table 5-16 - 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 risk	SAO 9: Heritage	SAO 10: Housing	SAO 11: Land use	SAO 12: Economy	SAO 13: Transport	SAO 14: Health and sustainable communities
SLAA233	Broad Oak Reservoir	R17	0	::	::	::	::	+	::	-	++/ ::	++	++/- -	++/- -

SUMMARY OF FINDINGS

- 5.7.30. 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.
- 5.7.31. 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).
- 5.7.32. 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.
- 5.7.33. 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

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 DRAFT LOCAL 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 L**.

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 sustainable transport 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 and minor negative 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, including public transport and walking and cycling, particularly within and around Canterbury. 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. SS4 sets out a bus-led transport strategy although some car movement increases are inevitable. 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, flood risk resilience, 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 a new country park. The policy also protects and seeks to enhance features including rivers, streams and ponds. A requirement for a 20% biodiversity net gain in new development is also included in the policy wording. The Council has undertaken a viability assessment which it considers demonstrates that this level of BNG (above the 10% legal requirement) is viable at the plan level and is also relying on evidence prepared by the Kent Nature Partnership. The Council has produced further explanation and justification within the Natural Environment and Open Space Topic Paper (2024), which accompanies the Draft Local Plan. 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, a 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 support positive effects. SS5 would support infrastructure including the provision of a country park and wastewater treatment which would support achievement of this objective and nutrient neutrality. With regards to water resource and quality (SA Objective 6) similar overall 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 although the extent is uncertain to some extent, depending on their delivery. 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 and development on greenfield sites that may be sensitive to change than previously developed sites.

- 5.8.8. Positive and 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. However, 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. SS1 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. The Council has undertaken a viability assessment which it considers demonstrates that this level of BNG (above the 10% legal requirement) is viable at the plan level and is also relying on evidence prepared by the Kent Nature Partnership. The Council has produced further explanation and justification within the Natural Environment and Open Space Topic Paper (2024),

which accompanies the Draft Local Plan. Some uncertainty exists regarding the capacity of some policies to meet 20% net gain requirements. Policy C20 seeks to deliver a strategic wetland which would create a large amount of wetland habitat. The policy seeks to offset the impact of development on the nitrogen and phosphate levels at Stodmarsh and therefore a significant positive effect is identified. Several of the policies would result in the consumption of a large amount of greenfield land. Sites associated with policies C2, C6, C7, C9, C10, C12, C15, C16, C17, C18 and C19 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.

- 5.8.14. With regards to C12, further transport modelling is identified as being required with regards to potential for air quality impacts on Blean Complex SAC. However, the Regulation 18 HRA notes that existing data and models suggest that the Draft Local Plan will have no adverse effect on Blean Complex SAC, alone or in combination, due to air quality changes. The Regulation 18 HRA identifies that no adverse effects alone or in combination in regards to recreational pressure on the Blean Complex SAC would be expected as currently drafted. Significant negative effects, with uncertainty are assessed. Overall, some uncertainties are also identified about the in-combination effects of the allocations identified in the HRA.
- 5.8.15. A mix of positive and significant negative effects are assessed for landscape (SA Objective 5). Whilst policies C6, C7, C12 and C17 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. Policy C11 would create new road infrastructure that would likely have negative effects on local landscapes. However, there is uncertainty depending on the specific route and detailed design, which could mitigate and reduce such effects.
- 5.8.16. 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 C20 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 and C12 require the creation of new wastewater treatment works. This would ensure wastewater is properly managed for the developments delivered by these policies, supporting water quality improvements.
- 5.8.17. A mix of significant positive and significant negative effects are assessed for flood risk (SA Objective 7). Policies C2, C3, C6, C7, C8, C9, C10, C12, C13, C14, C15, C16, C17 and C18 would allow for development in Flood Zone 1 and are therefore identified as having significant positive effects. Policy C20 would create new wetland habitat that could aid in the management of the surrounding areas. However, Policy C19 would create some residential development within Flood Zone 2 or 3 area, and therefore would be at risk of flooding and would have significant negative effects on this objective – although site specific FRA would help to address or reduce this risk, whilst the policy also requires only non-habitable rooms on the ground floor.
- 5.8.18. 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. Given the cumulative scale of the housing provision the policies are assessed as having significant positive effects on SA Objective 10.

- 5.8.19. 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. C1, C2, C3, C4, C8, C13, C14, C15, C18 and C19 would see the development of mainly brownfield land and or land within Canterbury itself, are therefore scored as having a significant positive effect. Policies C6, C7, C9, C10, C12, C16 and C17 would see the development of mainly greenfield land or agricultural land.
- 5.8.20. 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. A significant positive effect is identified on this basis.
- 5.8.21. The policies would cumulatively have significant positive and minor negative effects in terms of encouraging public and sustainable transport use (SA Objective 13). Policies C3, C6, C7, C8, C9, C12, C17 and C19 include requirements for public transportation improvements, new bus routes and/or creation of bus stops, which would generate positive effects. Policy C6 identifies a need for park and ride facilities, which would increase the accessibility of bus transportation and encourage its use. 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. Policy C11 identifies safeguarded routes for the South West Link Road. It is likely to aid efforts to reduce congestion in the city centre although would also likely increase vehicle use outside the city centre.
- 5.8.22. 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 and C12 would seek to ensure the provision of new schools/educational facilities. Policy C4, C5, C6 and C7 would require the creation of new health facilities. The creation of new facilities would generate significant positive effects. Though policies C6 and C14 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.
- 5.8.23. 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 minor negative effects on air quality, climate change, soil and waste (SA Objective 1, 2, 4, 8).

WHITSTABLE POLICIES

- 5.8.24. 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**.

- 5.8.25. 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. Policy W7 would result in the development of a site 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 and W6 are identified as having significant negative effects. Whilst these policies 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.
- 5.8.26. 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. Significant positive effects are identified for policies W3, W5 and W7 due to these policies resulting in the creation of development in areas not at risk of flooding. Policies W4 and W6 mention the need to ensure residential development is located outside of flood zones 2 and 3. Policies W4 and W6 are identified as having a minor negative effect.
- 5.8.27. 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-W6 have the potential to deliver significant scale of housing (around 1,870 dwellings). Given the cumulative scale of the housing provision the policies are assessed as having significant positive effects on SA Objective 10.
- 5.8.28. 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, and W7 would see the creation of new development entirely or primarily upon brownfield/previously developed land. The remaining policies would see the release of substantial greenfield land in the Whitstable area and have therefore been identified as having a significant negative effect against SA Objective 11.
- 5.8.29. 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 and W5 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 (led by policy W5 and supported by policy W3) that would support the accessibility of any business and retail spaces created. Policies W6 and W7 would create smaller scale employment opportunities in the creation of new school, shopping and community facilities opportunities alongside investment in the construction of housing.
- 5.8.30. 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). The Regulation 18 HRA findings are that there are no adverse effects on Swale SPA and Ramsar, Tankerton Slopes and

Swalecliffe SAC or Thanet Coast & Sandwich Bay Ramsar/SPA, Sandwich Bay SAC from these policies in relation to recreational pressure (with implementation of the Thanet Coast Strategic Access Management and Monitoring Plan (SAMM) North Kent Marshes SAMM) or in relation to functionally linked land. 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, and waste (SA Objective 4, 6, 8).

HERNE BAY POLICIES

- 5.8.31. 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**.
- 5.8.32. 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 Herne Bay policies to mitigate their landscape effects, providing a mixture of minor positive and minor negative effects.
- 5.8.33. 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. Both policies 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. Minor negative effects are assessed. The other policies of the Draft Local Plan would aid in reducing the potential affects from development on land at risk of flooding.
- 5.8.34. Significant positive effects are assessed for housing (SA Objective 10). 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, the policies are assessed as having significant positive effects on SA Objective 10.
- 5.8.35. 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. Significant positive effects are identified for policies HB1, HB2, HB3 and HB8. Policies HB4, HB6 and HB10 are considered to have significant negative effects, though some uncertainties exist regarding such effects for policy HB6 and HB10.
- 5.8.36. 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, approximate 56,000 sqm of employment and commercial 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.

- 5.8.37. 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.
- 5.8.38. 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). The Regulation 18 HRA findings are that there are no adverse effects on Swale SPA and Ramsar, Tankerton Slopes and Swalecliffe SAC or Thanet Coast & Sandwich Bay Ramsar/SPA, Sandwich Bay SAC from these policies in relation to recreational pressure (with implementation of the Thanet Coast Strategic Access Management and Monitoring Plan (SAMM) North Kent Marshes SAMM) or in relation to functionally linked land. 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

- 5.8.39. 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**.
- 5.8.40. 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 R17 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. There are some residual uncertainties in relation to R5 and R6 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 due to recreational pressure or urbanisation effects. Overall, some uncertainties are also identified about the in-combination effects of the allocations identified in the HRA.

- 5.8.41. Effects on landscape (SA Objective 5) are assessed as a cumulative mix of significant positive and minor negative. R2 relates to a brownfield site located within the Kent Downs AONB. Policy R2 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 a Country Park is likely to support enhanced landscapes.
- 5.8.42. 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 R17 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 (WRMP) 2019, their revised draft WRMP24 and the Water Resources South East Draft Regional Plan. Thus, a significant positive effect is identified.
- 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 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 a cumulatively significant scale of housing of in Rural Service Centres and 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 R3, R4, R11 and R14 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 also cumulatively provide housing which will support continued growth and healthiness of the local economy.
- 5.8.46. No other significant effects were assessed.

DISTRICT WIDE STRATEGIC POLICIES

- 5.8.47. 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

- 5.8.48. Policies 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.

- 5.8.49. 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.
- 5.8.50. 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.
- 5.8.51. 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.
- 5.8.52. No other significant effects were assessed.

Employment and the local economy

- 5.8.53. 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.
- 5.8.54. 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).
- 5.8.55. Whilst all the policies would have some minor positive effects for local communities (SA Objective 14) due to aiding the creation of new places to work/learn, which strengthens new and 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.
- 5.8.56. No other significant effects were assessed.

Movement, transportation and air quality

- 5.8.57. Policies DS13 to DS16 are focused upon improving the accessibility, infrastructure, and air quality of the district area.
- 5.8.58. 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 reducing the impact on the district'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.

- 5.8.59. 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 new developments contribute to the improvement of local and wider infrastructure (including highways). Policy DS15 was therefore identified as having a significant positive effect on SA Objective 12.
- 5.8.60. 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

- 5.8.61. Policies 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.
- 5.8.62. 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.
- 5.8.63. 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 (consideration which has been outlined above), DS23 Blean sets requirements for the safeguarding and enhancement of the Blean Woodland Complex which includes the SAC plus other designated and undesignated woodland blocks (i.e. non-SAC) that will contribute to the overall woodland resource and hence integrity of the SAC), whilst policies DS17 to DS19 all afford protection to important biodiversity designations, which contain a number of habitats and biodiversity species.
- 5.8.64. 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.
- 5.8.65. 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.

- 5.8.66. 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.
- 5.8.67. 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.
- 5.8.68. 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.
- 5.8.69. No other significant effects were assessed.

DEVELOPMENT MANAGEMENT POLICIES

- 5.8.70. The summary below is focussed on the significant effects found in the assessment. The detailed assessment is set out in **Appendix K**.
- 5.8.71. 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.
- 5.8.72. 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.
- 5.8.73. 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).

- 5.8.74. 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.
- 5.8.75. 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).
- 5.8.76. 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).
- 5.8.77. 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.
- 5.8.78. 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.
- 5.8.79. 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).

- 5.8.80. 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.
- 5.8.81. No further significant effects were assessed.

CARRIED FORWARD POLICIES

- 5.8.82. This chapter of the Local Plan carries forward site allocation policies, and associated infrastructure policies, to apply in the event that current planning applications lapse or are sought to be varied and for the small number of sites where no planning permission currently exists. The policies are extant and have been previously appraised in the Local Plan SA that accompanied the 2017 Canterbury District Local Plan. Appraisal is included here for completeness as the policies now form part of the Draft Local Plan suite of policies rather than being included in an appendix, as was the case in the 2022 Draft Local Plan. The summary of the appraisal is focussed on the likely significant effects found in the assessment. The detailed assessment is set out in **Appendix L**.
- 5.8.83. The development proposed by policy CF1 would likely result in significant landscape effects (SA Objective 5) as such a level of development would change local landscapes, fundamentally changing and impacting upon the important landscapes of Canterbury. No policy wording is included in these policies to mitigate landscape impacts. However, the local plan as a whole does contain such policy provisions.
- 5.8.84. Policies CF1 and CF2 would both see development located in areas at risk of flooding. Given flooding is a significant problem within Canterbury and that nationally it is advised that development is located not in areas at risk of flooding, significant negative effects with uncertainties are identified for these policies on flooding (SA Objective 7). However, the other policies of the Local Plan should help to mitigate flood risk/resilience effects.
- 5.8.85. Whilst the majority of the policies are identified as having minor negative effects with uncertainties or neutral effects on heritage (SA Objective 9), policies CF1 and CF2 are identified with a significant negative effect with uncertainties. This is due to these policies resulting in a considerable amount of development, which has the potential to disrupt the character and setting of the heritage assets of Canterbury. However, mitigation, through other policies would ensure that effects on heritage assets are avoided, minimised or mitigated.
- 5.8.86. Policies CF1 and CF2 would both provide a considerable amount of housing and have therefore been identified as having a significant positive effect in relation to housing (SA Objective 10). Policies CF1 and CF2 would have a significant negative effect on land use and soils (SA Objective 11) due to a considerable portion of their development being located upon greenfield land.
- 5.8.87. Policy CF1 provides for the creation of new employment development and housing related development and is therefore identified as having a significant positive effect on the economy, with the potential to revitalise local areas (SA Objective 12).

- 5.8.88. Policies CF3 to CF9 would result in development that improves infrastructure within Canterbury, allowing for its residents to better traverse the district. A significant positive effect is identified for transport (SA Objective 14).

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 5-17** presents the appraisal of the cumulative effects of the Draft Local Plan by summarising the cumulative effects of each policy chapter (Chapters 1 to 8) 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 new settlement 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 5-17 - 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	Carried Forward Policies	Cumulative	Commentary
1. To reduce air pollution and encourage improvements in air quality	+ +/-	-/?	+/-	+/-	-	+/-	-	++	+	+/-	-	+/-	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



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	Carried Forward Policies	Cumulative	Commentary
													transport, including a bus led transport strategy, 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.
2. To minimise greenhouse gases that cause climate change and deliver a managed response to its effects	++/-	-	+/-	+/-	-	++/-	-	++	++	++/-	+/-	++/-	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 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



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	Carried Forward Policies	Cumulative	Commentary
													<p>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.</p> <p>The Council has undertaken an evaluation of cumulative carbon emissions over the plan period (set out in the Climate Change Topic Paper 2024). The analysis indicates an overall total of 2,013,152 tCO₂e relating to the construction and operational emissions. The Topic Paper notes that the</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	Carried Forward Policies	Cumulative	Commentary
													draft policies would lead to a c45% reduction in operational carbon emissions from new development, equating to 231,823 tCO2e. The Topic Paper also acknowledges further traffic modelling is underway and will be used to assess implications of future iterations of the plan.
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



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	Carried Forward Policies	Cumulative	Commentary
												<p>policies contained in the Draft Local Plan such as Policy SS1, Policy DS17 requiring that developments comply with the nutrient mitigation strategy and sets expectations for water quality management and waste water treatment by developers and 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</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	Carried Forward Policies	Cumulative	Commentary
													uncertainties about in-combination effects which is also reflected in the score at this stage.
4. To conserve geological sites and safeguard mineral resources within the District	+/-	-	-/?	-/?	-/?	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.
5. To conserve and enhance the landscapes of the District for people and wildlife	+ +/-	+/- - /?	+/- -	+/- - /?	+ +/- /?	+ +/-	+/-	+	++	++	--	+/-/?	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 and townscapes, particularly given the area of greenfield land that will be required to accommodate growth over the plan



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	Carried Forward Policies	Cumulative	Commentary
													<p>period. However, it is anticipated that the application of the proposed Local Plan policies such as Policy SS1, Policy SS2, Policy DS18, and Policy DS19 and the site specific development requirements contained in policy wording will help to largely minimise or mitigate 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 new settlement 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</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	Carried Forward Policies	Cumulative	Commentary
													<p>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 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>
6. To protect water resources and ensure a high quality of	++/-	++/-/?	-	-	+ +/-	++/-	-	+	++	++	-	++/-	<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</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	Carried Forward Policies	Cumulative	Commentary
inland and coastal waters													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.
7. To reduce the risk of flooding and where appropriate prevent coastal erosion	+/-/?	+ +/- -/?	+ +/-	+ +/- -	+ +/- /?	0	0	0	++	++	--/?	+ +/-	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 risk and ensure that development does not give rise to flood risk elsewhere, in



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	Carried Forward Policies	Cumulative	Commentary
													accordance with a sequential, risk-based approach.
8. To promote sustainable waste management	+/-	-	-	-	-	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 generated through construction.



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	Carried Forward Policies	Cumulative	Commentary
9. To preserve, enhance, promote and capitalise on the significant qualities, fabric, setting and accessibility of the District's historic environment	+ +/-	+/-/?	+/-	+/-/?	-/?	+/-	+/-/?	+	++	+	-/?	+/-/?	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 (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



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	Carried Forward Policies	Cumulative	Commentary
													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. However, some uncertainty remains in relation to the potential for development to contribute positively and enhance the historic environment.
10. To ensure the supply of high quality homes, which cater for identified needs	++	++	++	++	++	++	NA	+	0/?	++	++	++	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



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	Carried Forward Policies	Cumulative	Commentary
													area that will help to meet local needs.
11. To promote the sustainable use of land and conserve soil quality	+/- -	+ +/- -	+ +/- -	+ +/- -	+ +/- -	+ +/-	+/-	0	+	++	--/?	+/- -	It is anticipated that the policies of the draft Local Plan would have a mixed minor positive and significant negative effect on 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. The reduced development growth requirements seek to minimise loss as far as possible.
12. To achieve a strong and sustainable economy, and revitalise town,	++	++	++	++	++	+	++	++	+	+	++	++	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



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	Carried Forward Policies	Cumulative	Commentary
local and rural centres													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	+ +/-	+ +/- /?	+/-	+/-	+/-	++	++	++	++	++	++	+ +/-	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 use 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	Carried Forward 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</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	Carried Forward Policies	Cumulative	Commentary
													contributions towards new provision.

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) (and emerging Dover District Local Plan to 2040, at examination);
 - Thanet Local Plan (2020);
 - Swale Borough Local Plan: Bearing Fruits 2031 (2017);
 - Ashford Local Plan 2030 (2019);
 - Folkestone & Hythe Core Strategy Review (2022) and Places and Policies Local Plan (2020).
 - Kent Local Transport Plan 4 2016-2031 (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

- 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, K and L** will be considered by the Council in refining the Local Plan.

6 CONCLUSION, MONITORING AND NEXT STEPS

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 1,149 dwellings per annum over the plan period based on the government's standard methodology for calculating housing need. The appraisal found positive effects against a number of SA 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 likely being significant. 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), waste (SA Objective 8) and health and communities (SA Objective 14). Significant negative effects with uncertainty were identified in respect of the historic environment (SA Objective 9).

EMPLOYMENT GROWTH OPTION

- 6.1.5. The Draft Local Plan sets out a preferred option for a combined 141,100 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 settlement 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 R5 due to the proximity of the associated site to Stodmarsh SAC/SPA/Ramsar although the HRA at rRegulation 18 stage concludes that there would be no adverse effects on integrity. Additionally, with regards to C12, further transport modelling is identified as being required with regards to potential for impacts on Blean Complex SAC. However, the Regulation 18 HRA notes that existing data and models suggest that the Draft Local Plan will have no adverse effect on Blean Complex SAC, alone or in combination, due to air quality changes. The Regulation 18 HRA identifies that no adverse effects alone or in combination in regards to recreational pressure on the Blean Complex SAC would be expected as currently drafted. 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. In consequence, there is the potential for significant negative effects on land use (SA Objective 11).

DRAFT LOCAL PLAN POLICIES AS A WHOLE

- 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 land use (SA Objective 11) due to



the proposed land take. Some uncertainty is also identified as this stage in relation to biodiversity (SA Objective 3) pending further development of the HRA.

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 M** 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: 11 March 2024 and 3 June 2024.

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.

Appendix A

QUALITY ASSURANCE CHECKLIST



Objectives and context	Where identified
The plan's or programme's purpose and objectives are made clear.	Section 1 and Section 2 sets out the background to the requirement for the Sustainability Appraisal including the SEA. It identifies that the SA is undertaken in relation to the Draft Local Plan. It sets out the plan period, the area covered and the purpose of the plan.
Environmental issues and constraints, including international and EC environmental protection objectives, are considered in developing objectives and targets.	Sustainability issues have been considered through: <ul style="list-style-type: none"> • A review of Plans, Policies and Programmes set out in 2 and Appendix C. • An analysis of baseline conditions set out in Section 3 and Appendix D.
SEA objectives, where used, are clearly set out and linked to indicators and targets where appropriate.	Section 4 and Table 4.1, The Sustainability Framework and Table 4.2 links the framework to SA/SEA themes. Decision-making criteria and potential indicators are set out in Appendix L and M.
Links with other related plans, programmes and policies are identified and explained.	Key messages, the source of messages and implications for the SA Framework are set out in Section 2, Table 2.1 and Appendix C.
Conflicts that exist between SEA objectives, between SEA and plan objectives and between SEA objectives and other plan objectives are identified and described.	Potential conflicts between SA objectives have been identified in Section 5 and will be identified in the on-going SA analysis and reports.
Scoping	Where identified
Consultation Bodies are consulted in appropriate ways and at appropriate times on the content and scope of the Environmental Report.	The Environmental Agency, Natural England and Historic England together with other parties were consulted on the Scoping Report and Issues Report. A summary of the responses received to the Scoping Report are set out in Appendix B. The consultation bodies will be consulted on the Draft Local Plan Regulation 18 SA Report.
The assessment focuses on significant issues.	Sustainability issues have been identified in Section 3, Baseline data and characteristics of Canterbury District and key sustainability issues and the consequences of not having a Local Plan are set out in Appendix D. Section 3.1 sets out the summary of the key sustainability issues.
Technical, procedural and other difficulties encountered are discussed; assumptions and uncertainties are made explicit.	Section 4.3 sets out the range of uncertainties and assumptions including recognition of the impact of the Covid-19 pandemic on the baseline data.
Reasons are given for eliminating issues from further consideration.	No issues have been knowingly eliminated from this SA Report.
Baseline information	Where identified

Relevant aspects of the current state of the environment and their likely evolution without the plan or programme are described.	Section 3 and Appendix D of this SA Report presents the baseline analysis of the district's social, economic and environmental characteristics including their likely evolution without the Local Plan.
Environmental characteristics of areas likely to be significantly affected are described, including areas wider than the physical boundary of the plan area where it is likely to be affected by the plan.	Section 3 and Appendix D identifies baseline data, where appropriate identifying areas which may be affected by the Local Plan.
Difficulties such as deficiencies in information or methods are explained.	Section 4.3 sets out the range of uncertainties and assumptions including recognition of the impact of the Covid-19 pandemic on the baseline data.
Prediction and evaluation of likely significant effects	Where identified
Likely significant social, environmental and economic effects are identified, including those listed in the SEA Directive (biodiversity, population, human health, fauna, flora, soil, water, air, climate factors, material assets, cultural heritage and landscape), as relevant.	Section 5 summarises the appraisal of the sustainability performance of the Draft Local Plan in terms of the Local Plan Vision and Strategic Objectives, preferred development requirements and Spatial Strategy, site allocations and policies. Detailed appraisal matrices are also provided at Appendix E to L that have been developed to meet the requirements of the SEA Directive.
Both positive and negative effects are considered, and where practicable, the duration of effects (short, medium or long-term) is addressed.	Both positive and negative effects are considered, and where practicable, the duration of effects (short, medium or long-term) is addressed. Positive and negative effects are considered within the appraisal matrices and within Section 5. Potential effects are identified in the short, medium and long-term.
Likely secondary, cumulative and synergistic effects are identified where practicable.	The cumulative effects of the Local Plan are considered in Section 5.9.
Inter-relationships between effects are considered where practicable.	Inter-relationships between effects are identified in the assessment commentary, where appropriate.
Where relevant, the prediction and evaluation of effects makes use of accepted standards, regulations, and thresholds.	These are identified in the commentary, where appropriate.
Methods used to evaluate the effects are described.	These are described in Section 4 and Appendices G and N.
Mitigation measures	Where identified
Measures envisaged to prevent, reduce and offset any significant	These are identified within the appraisal matrices.



adverse effects of implementing the plan are indicated.	
Issues to be taken into account in development consents are identified.	These are identified within the appraisal matrices.
The SA Report	Where identified
Is clear and concise in its layout and presentation.	The SA Report is clear and concise.
Uses simple, clear language and avoids or explains technical terms. Uses maps and other illustrations where appropriate. Maps and tables have been used to present the baseline information in Section 3 where appropriate.	Maps and tables have been used to present the baseline information in Appendix D where appropriate.
Explains the methodology used.	Section 4 presents the methodology used for assessment whilst consultation arrangements are discussed in Section 1.
Identifies sources of information, including expert judgement and matters of opinion.	Information is referenced throughout the SA Report.
Contains a non-technical summary Included.	Included.
Consultation	Where identified
The SEA is consulted on as an integral part of the plan-making process.	This SA Report is being consulted upon at the same time as the Draft Local Plan.
The consultation bodies, other consultees and the public are consulted in ways which give them an early and effective opportunity within appropriate time frames to express their opinions on the draft plan and SA Report.	This SA Report is being consulted upon at the same time as the Draft Local Plan.
Decision-making and information on the decision	Where identified
The SA Report and the opinions of those consulted are taken into account in finalising and adopting the plan.	Responses received to this SA Report will inform the preparation of the Local Plan Regulation 19 stage.
An explanation is given of how they have been taken into account.	This information will be provided in subsequent reports.



Reasons are given for choices in the adopted plan, in the light of other reasonable options considered.

Section 5 and Appendix G set out the reasons for the selection of the Council's preferred development requirements.



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