

Appendix E: Appraisal of Housing, Employment and Retail Growth Figures and Alternatives

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

NB: where more than one symbol is presented in a box it indicates that the appraisal has identified both positive and negative effects (please note that where a mix of scores is identified no colour has been added to the matrix). 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.



Housing quantum assessment

Options assessed

Three options for housing growth have been assessed:

- Local Housing Need is 1,149 dwellings per annum (24,129 dwellings over the LP period 2020/21 - 2040/41).
- 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)

Assessment

SA Objective	LHN Figure (1,149 dpa) Preferred Option	LHN plus 10% increase (1,264 dpa)	LHN plus 20% increase (1,379 dpa)	Commentary
1. To reduce air pollution and encourage improvements in air quality	-/?	-/?	-/?	<p>Likely significant effects</p> <p>There is the potential for the construction and occupation of new residential development to have negative effects on air quality due to, for example, emissions generated from plant and HGV movements during construction and increased vehicle movements once construction is complete. There are currently two Air Quality Management Areas (AQMAs) in the district and increased car use could exacerbate congestion and lead to greater occurrences of poor air quality within and close to the Canterbury 3 AQMA (declared in 2018 following an extension to Canterbury 2 AQMA) and Herne 1 AQMA and health deprived areas.</p> <p>The main source of air pollution in the district is road traffic emissions from major roads, notably the A2, A28 and A299. However, greater levels of development under the higher growth options may stimulate greater investment in public transport.</p> <p>Overall, all three options are considered to have minor negative effects. However, until the location of new development has been determined, the likelihood of adverse effects occurring, and their magnitude is uncertain. The magnitude of negative effects is likely to be greater with a higher development quanta.</p>

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				<p>Mitigation</p> <ul style="list-style-type: none"> Local Plan policies should seek to reduce congestion. New residential development should be located where it is accessible to key services, facilities and employment opportunities. <p>Assumptions</p> <ul style="list-style-type: none"> It is assumed that proposals to ensure no sale of new diesel/petrol engine vehicles after 2035, which will lead to an increased proportion of e-vehicles over time, may benefit air quality over the long-term. <p>Uncertainties</p> <ul style="list-style-type: none"> The exact magnitude of effects will be dependent on the location of development at the individual site level which is currently uncertain.
2. To minimise greenhouse gases that cause climate change and deliver a managed response to its effects	+/- -	+/- -	+/- -	<p>Likely significant effects</p> <p>Growth under all options for housing growth in the District would have an impact on GHG emissions with higher levels expected to have a greater impact. Negative effects are anticipated to arise from housing growth generating an increase in greenhouse gases 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). The scale of these effects will be most significant for the Local Housing Need (LHN) plus 20% option.</p> <p>However, the provision of new development also provides opportunity for more energy efficient houses and buildings (with more efficient boilers, insulation, and possible zero carbon energy generation) which could mean that carbon generation per dwelling or person would be lower than for existing, older housing stock. 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</p>

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				<p>and design. Some positive effects are therefore likely in relation to all options.</p> <p>Overall, all options are considered to have a mix of minor positive and significant negatives effect on climate change.</p> <p>Mitigation</p> <ul style="list-style-type: none"> Local Plan policies should promote high standards of energy efficient design including, where appropriate, renewable energy provision to support transition to net zero GHG emissions. Opportunities to promote and encourage sustainable modes of transport alongside new development should be supported and encouraged through policies in the Local Plan. <p>Assumptions</p> <ul style="list-style-type: none"> 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. <p>Uncertainties</p> <ul style="list-style-type: none"> The exact magnitude of effects will be dependent on the design and location of development at the individual site level (which is currently uncertain). Housing growth may present opportunities to increase investment in transport infrastructure and renewable energy.
3. To conserve, connect and enhance biodiversity across the District	+/- -/?	+/- -/?	+/- -/?	<p>Likely significant effects</p> <p>Housing growth could have an adverse effect on biodiversity as a result of land take/habitat loss, disturbance during construction and increased recreational pressure once development is complete. The District includes a range of designated and non-designated natural assets and includes all/part of five internationally designated areas: Stodmarsh (SAC, SPA, Ramsar); Blean Complex (SAC); Thanet Coast and Sandwich Bay (SPA, Ramsar); The Swale (SPA and Ramsar); and Tankerton Slopes and Swalecliffe (SAC). There are 15 SSSIs and 2 Marine</p>

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				<p>Conservation Zones. The condition of SSSIs has improved since 2008 with majority of land covered by SSSIs in favourable or unfavourable but recovering condition.</p> <p>It is likely that the levels of growth proposed in all the options will require development on greenfield sites with consequential effects on biodiversity and nature conservation. The proposed LHN preferred option (1,149dpa), LHN plus 10% figure (1,264dpa) and LHN plus 20% figure (1,379 dpa) have all been assessed as having a significant negative effect on this objective. As a higher scale of growth is achieved there is a greater likelihood of significant effects.</p> <p>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. In addition, the selection of sites, through the application of a site selection methodology that identifies the need to protect environmental assets (including nature conservation).</p> <p>The presence of designated European (and international) conservation sites in the area will necessitate a Habitats Regulations Assessment in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended). The findings of the assessment may require additional measures to be taken to avoid any adverse effects on the designated sites which will need to be reflected in Local Plan policies.</p> <p>Overall, the proposed LHN preferred option, 10% uplift and 20% uplift figures have been assessed as having significant negative effects on this objective. However, there is potential for some positive effects should biodiversity net gains be realised. There is also some uncertainty as effects will be dependent on actual development locations and proximity to sensitive conservation sites.</p> <p>Mitigation</p> <ul style="list-style-type: none"> Local Plan policies and proposals should seek to avoid negative effects on the District's

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				<p>biodiversity assets and identify opportunities for enhancing their quality where appropriate.</p> <ul style="list-style-type: none"> Careful consideration should be given to the selection of site allocations in order to avoid adverse effects on internationally, nationally and locally designated sites. Appropriate mitigation should be identified where necessary. Local Plan policies should plan for a network of green infrastructure assets, closely linked with existing and new development. <p>Assumptions</p> <ul style="list-style-type: none"> It is assumed that a higher proportion of 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 nature conservation. It is assumed that, on balance, the biodiversity value of brownfield sites is less than that of greenfield land. It is assumed the requirements for biodiversity net gain as required through the Environment Act are realised (as a minimum). <p>Uncertainties</p> <ul style="list-style-type: none"> The exact location of residential development to be delivered. The achievability of biodiversity net gain on all applicable sites.
4. To conserve geological sites and safeguard mineral resources within the District	-	-	-/?	<p>Likely significant effects</p> <p>Canterbury District includes five Regionally Important Geological Sites (RIGS) which have been designated due to being an important educational, research, historical or recreational resource.</p> <p>Additionally, three mineral resources are safeguarded within the District to avoid unnecessary sterilisation as development in these locations could potentially sterilise the mineral resources. The safeguarding areas are primarily found in the central area of the District around Canterbury City.</p>

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				<p>Overall, minor negative effects have been assessed against this objective for all housing growth options. The higher option may increase pressure on MSA the effect may be significant, although this is uncertain.</p> <p>Mitigation</p> <ul style="list-style-type: none"> • Support implementation of the Kent Minerals and Waste Local Plan. <p>Assumptions</p> <ul style="list-style-type: none"> • It is assumed that development would avoid being located on RIGS. <p>Uncertainties</p> <ul style="list-style-type: none"> • The exact location of future development.
5. To conserve and enhance the landscapes of the District for people and wildlife	+/- -/?	+/- -/?	+/- -/?	<p>Likely significant effects</p> <p>Canterbury's landscape includes part of the Kent Downs Area of Outstanding Natural Beauty (AONB) to the south which covers around 27% of the District. The District is largely covered by National Character Area (NCA) 113 North Kent Plain whilst a small area in the south is covered by NCA 119 North Downs and the northwestern corner by NCA 81 Greater Thames Estuary.</p> <p>Housing growth could have an adverse effect on landscape character associated with the need to direct a large proportion of development (under all housing figures) onto greenfield sites. However, the lower (preferred) growth option provides greater potential for a higher proportion of growth to be delivered on previously developed land.</p> <p>Development may also affect townscape and the visual amenity of residential and recreational receptors both in the short-term during construction and once development is complete. The general principle may be applied that the greater the number of houses the greater the effect on the landscape. However, this effect is dependent on the specific approach to meeting the identified need through policies and proposals within the Local Plan.</p> <p>Housing growth may also present opportunities to improve townscape which could have a positive effect on this objective in the short, medium and long term.</p>

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				<p>The preferred housing growth option (1,149 dpa) and alternative higher figures (1,264 dpa and 1,379 dpa) have been appraised as having a mix of positive and significant negative effects against this objective. There is some uncertainty about the presence of positive effects and the extent of negative effects.</p> <p>Mitigation</p> <ul style="list-style-type: none"> • The Local Plan should contain policies on high quality residential design. • Local Plan policies and proposals should seek to conserve and enhance the character and quality of the District's landscape. <p>Assumptions</p> <ul style="list-style-type: none"> • It is assumed that the landscape sensitivity of greenfield sites would be greater than brownfield land. <p>Uncertainties</p> <ul style="list-style-type: none"> • The location of development and the quality of the receiving landscapes and the proximity of sensitive receptors is unknown at this stage.
6. To protect water resources and ensure a high quality of inland and coastal waters	-	-	-	<p>Likely significant effects</p> <p>The construction of new residential development within the District and the associated increase in population has the scope, and can be expected, to increase demand on water resources with the potential to affect water availability. The south east is an area recognised as being in water stress.</p> <p>The Southern Water Draft Drainage and Wastewater Management Strategy (DWMP) identifies the need for investment in wastewater treatment works (WTW), upsizing of sewers and permitting reviews. The levels of growth are expected to put strain on wastewater infrastructure which will require mitigation. The impacts of development on water quality are particularly relevant for habitats at Stodmarsh SAC, SPA, Ramsar which is a key consideration.</p> <p>Depending on the exact location of new development and its proximity to water bodies and the prevailing quality of the waterbody, and groundwaters, there is also potential for adverse effects on water quality associated with construction activities and from occupation of dwellings.</p>

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				<p>Overall, all options are considered to have negative effects on the achievement of this objective. However, higher growth options may provide additional demand for water resources.</p> <p>Mitigation</p> <ul style="list-style-type: none"> Local Plan policies should support water efficiency measures, the implementation of SuDs, nutrient management (including the draft Canterbury District Nutrient Mitigation Strategy (2024), and wastewater treatment capacity enhancements where necessary. <p>Assumptions</p> <ul style="list-style-type: none"> New development will increase water resource use within the district in both the short term during construction and in the longer term once development is complete. It is assumed that the Council will continue to liaise with Southern Water with regard to wastewater infrastructure requirements for future development. Measures contained in the South East Water and Southern Water WRMP Water Resources Management Plan would be expected to help ensure that future water resource demands are met. <p>Uncertainties</p> <ul style="list-style-type: none"> The location of development with regards to sensitive water receptors.
7. To reduce the risk of flooding and where appropriate prevent coastal erosion	-/?	-/?	-/?	<p>Likely significant effects</p> <p>The District has many areas at risk of flooding. Flood zones 2 and 3 are mainly found alongside the coast and surrounding the main watercourses. Canterbury City Centre is especially at risk of flooding as some of the land alongside the River Stour is classified as functional floodplain (Zone 3b). It is assumed, to some extent, that any development that may be at risk of flooding would be subject to FRA, consistent with the requirements of the NPPF and therefore new developments would incorporate suitable flood alleviation/mitigation measures (thereby minimising the risk of flooding). It is important that developments consider the implications for changes in frequency and severity of surface water flood risk as evidenced by the UK Climate Change Risk Assessment (CCRA3) Evidence Report 2021.</p>



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				<p>Overall, all housing growth options are considered to have minor negative effects on the achievement of this objective. However, the effects are uncertain at this stage and depend on the location of new development.</p> <p>Mitigation</p> <ul style="list-style-type: none"> Local Plan policies should ensure that new development avoids increasing all forms of flooding. Local Plan policies should support achievement of greenfield runoff rates in new development. <p>Assumptions</p> <ul style="list-style-type: none"> It is assumed that, where appropriate, development proposals would be accompanied by a site-specific FRA. <p>Uncertainties</p> <ul style="list-style-type: none"> The exact location of development.
8. To promote sustainable waste management	-/?	- -/?	- -/?	<p>Likely significant effects</p> <p>The construction of new dwellings will require raw materials and the generation of waste. During occupation waste will be generated by households, although there would be opportunities to integrate recycling best practice. Commensurate with the level of growth, it is expected that the development of the higher options would lead to the greater use of raw materials during construction and the use of materials and generation of waste during occupancy than lower scales of development. The potential for significant negative effects is therefore greater at these higher levels.</p> <p>Overall, all options have been assessed as having negative effects on this objective. Greater levels of development are likely to have the greater levels of waste generation. The release of land under the preferred LHN figure is substantially lower than that under the LHN preferred figure appraised in the 2022 SA Report (especially when considered in respect to the shortened plan period) and all options overall are lower. This is likely to be accompanied by a large reduction in waste generated. However, there is some uncertainty about the exact scale of waste associated with construction or operation of all options.</p>



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				<p>Mitigation</p> <ul style="list-style-type: none"> Local Plan policies should support opportunities to reduce/recycle waste. Local Plan policies should support the use of recycled and secondary materials in new development. The reuse of construction waste should be supported. <p>Assumptions</p> <ul style="list-style-type: none"> It is assumed that the Kent County Council will make sufficient household waste recycling infrastructure provision available. <p>Uncertainties</p> <ul style="list-style-type: none"> The exact scale of waste associated with construction or operation is unknown at this stage.
<p>9. To preserve, enhance, promote and capitalise on the significant qualities, fabric, setting and accessibility of the District's historic environment</p>	<p>- /?</p>	<p>- /?</p>	<p>- /?</p>	<p>Likely significant effects</p> <p>The District includes a number of designated historic sites and assets including rich archaeology. Canterbury City includes a World Heritage Site (WHS) comprising 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. 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. There may also be opportunities for housing growth to enhance the settings of heritage assets as well as access to them.</p> <p>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 application of a site selection methodology which seeks to protect historic assets. The level of effects associated with all housing figure options are likely to be similar to one another; although this will depend upon the selection of individual sites. However, as a basic principle, the magnitude of effect is likely to be increased commensurate with the higher scale of growth under the higher option (LHN plus 20% of 1,379 dpa) compared to the lower LHN figure of 1,149 dpa. There is potential for significant effects at all figures, although not certain.</p>



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				<p>Overall, all of the housing quantum options are considered to have a significant negative effect on this objective. However, the magnitude is uncertain.</p> <p>Mitigation</p> <ul style="list-style-type: none"> • Policies contained within the Local Plan should seek to conserve and, where possible, enhance heritage assets including by promoting heritage-led development. • Policies within the Local Plan should promote high standards of architectural and urban design in new residential development. • The Local Plan should set out a strategic framework to preserve and enhance historic areas and promote high standards of new development. • Local Plan policies should support the aims of the WHS designation. <p>Assumptions</p> <ul style="list-style-type: none"> • None. <p>Uncertainties</p> <ul style="list-style-type: none"> • The exact location of development.
10. To ensure the supply of high quality homes, which cater for identified needs	++	++	++/?	<p>Likely significant effects</p> <p>The provision of dwellings under all options would meet the identified LHN for the District (identified as 1,149 dpa) and comply with the standard methodology for calculating housing need contained in national guidance and referenced in the NPPF 2021. The LHN is informed by the Housing Need Assessment (HNA) 2021.</p> <p>The higher growth options would see the provision of an additional 10% or 20% above the LHN which would allow for greater flexibility in achieving the need required in the District through the identification of a greater range and choice of housing sites. However, care would have to be taken to avoid an oversupply of sites that could impede delivery rates.</p> <p>The higher growth figure may support opportunities to support greater affordable housing provision. There are also potential positive implications for the type and mix of development</p>



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				<p>including specialised housing.</p> <p>Enabling delivery of the identified need will be in excess of what has been delivered in recent years with the highest completion rate seen in 2022/23 of 693 dwellings (with 444 in 2018/19, 602 in 2019/20, 463 in 2020/21, 682 in 2021/22, and 693 in 2022/23). The growth identified under all options will require a substantial uplift on the average growth delivery rates in recent years so there is some uncertainty about delivery. There is a question as to whether provision of a substantially higher requirement than the LHN (with the additional 20% above LHN) would be achievable over the plan period and therefore uncertainty is particularly noted for this option. However, given the lower LHN (than that identified in 2022) and shorter plan period there is less uncertainty.</p> <p>Overall, significant positive effects are assessed for all options. Some uncertainty is identified for the highest option.</p> <p>Mitigation</p> <ul style="list-style-type: none"> Local Plan policies should influence the mix of housing provision, including the provision of affordable housing and specialist accommodation. <p>Assumptions</p> <ul style="list-style-type: none"> It is assumed that the delivery of housing will accord with the Spatial Strategy for the District. <p>Uncertainties</p> <ul style="list-style-type: none"> 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 deliverability of the LHN compared to recent historic trends on housing completions.
11. To promote the sustainable use of land and conserve soil	+/- -	+/- -	+/- -/?	<p>Likely significant effects</p> <p>The higher options (LHN plus 10% at 1,264 dpa and LHN plus 20% at 1,379dpa) would involve the provision of an additional 115/230 dpa above the LHN preferred option (1,149 dpa) over the 21 year plan period. However, all options are substantially lower than those considered in the</p>



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quality				<p>2022 SA Report.</p> <p>All options would be expected to support some brownfield land redevelopment although substantial greenfield land release would be required for all development options. The greater the level of development the greater release of greenfield land. There are pockets of Agricultural Land Classification (ALC) Grade 1, which is the soil of highest quality, especially within the central areas of the District, although the majority is Grade 3. The ability to avoid the best and most versatile agricultural land would be lessened with the higher options.</p> <p>Overall, all options have been assessed as having a mix of positive and significant negative effects. This reflects the release of brownfield land is likely under all options but all will include the substantial release of greenfield land. The release of land under the preferred LHN figure is substantially lower than that under the LHN preferred figure appraised in the 2022 SA Report (especially when considered in respect to the shortened plan period), however, the release of greenfield land required is still expected to likely be significant, given the more limited supply of brownfield land within the District. The preferred, lower LHN figure though does seek to ensure that the effects on land use can be minimised as far as possible, whilst meeting identified housing needs. The magnitude of the effects to some extent is dependent on the location of development.</p> <p>Mitigation</p> <ul style="list-style-type: none"> Local Plan policies should encourage the effective use of land by re-using previously developed land, where possible, and encouraging appropriate housing densities. Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality. <p>Assumptions</p> <ul style="list-style-type: none"> None. <p>Uncertainties</p> <ul style="list-style-type: none"> The exact location of future development.



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12. To achieve a strong and sustainable economy, and revitalise town, local and rural centres	++	++	++	<p>Likely significant effects</p> <p>Housing development will generate economic benefits associated with construction e.g. direct job creation, supply chain benefits and increased spend in the local economy by contractors and construction workers. However, effects in this regard will be temporary and the extent to which the jobs that may be created benefit Canterbury’s residents will depend on the number of jobs created and the recruitment policies of prospective employers. Additionally, local spend will be determined by these factors.</p> <p>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.</p> <p>The higher growth option (LHN plus 20% equivalent to 1,379dpa) would provide a much higher scale of housing growth which would support greater opportunities for economic growth. However, all options are considered likely to have significant effects. Overall, all housing growth options have been assessed as having positive effects on this objective due to benefits derived from the quantum of development proposed under each option.</p> <p>Mitigation</p> <ul style="list-style-type: none"> • None. <p>Assumptions</p> <ul style="list-style-type: none"> • None. <p>Uncertainties</p> <ul style="list-style-type: none"> • 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.
13. To promote and encourage sustainable	+/- -	+/- -	+/- -	<p>Likely significant effects</p> <p>New residential development of the level envisaged by all options would increase the levels of traffic in the District both during construction and when development is complete. This could</p>



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transport				<p>result in additional congestion and highway capacity issues.</p> <p>However, all of the options have potential for positive effects. They could stimulate greater investment in public transport across the District and all options would (at the minimum) meet the LHN identified through the application of the standard methodology. This would support delivery of the number of houses required to support the needs of workers in the area.</p> <p>An increase in population and households within the District will generate more transport movements. Based on current trends, these movements are expected to be to by car with a continuation of (net) in-commuting. This could result in increased pressure on the road network and public transport infrastructure.</p> <p>Overall, the preferred LHN option, the LHN plus 10% option, and the LHN plus 20% option have been assessed as having mixed minor positive and significant negative effects. To some extent the magnitude of effects is dependent on travel choices and the location of new development, determined through the spatial strategy and location of sites. Directing development to the most sustainable locations would help to reduce or minimise the magnitude of negative effect associated with new housing growth.</p> <p>Mitigation</p> <ul style="list-style-type: none"> • Local Plan policies should direct new development to the most sustainable locations and towards settlements with greater levels of services and facilities. • Local Plan policies should, as a minimum, encourage developments to follow the movement hierarchy. • Local Plan policies should encourage the preparation of green travel plans as part of new development proposals. • Local Plan policies should positively promote walking and cycling as part of new developments, and encourage a modal shift of new residents. <p>Assumptions</p> <ul style="list-style-type: none"> • None.



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				<p>Uncertainties</p> <ul style="list-style-type: none"> The location of development.
14. To promote safe, healthy, inclusive and sustainable communities	-	-	-/?	<p>Likely significant effects</p> <p>Housing growth is likely to generate minor, temporary adverse effects on health in the short term during construction (e.g. as a result of emissions to air from HGV movements and plant). In the longer term, new housing could also adversely affect health due to, for example, emissions and increased traffic. This may be more pertinent in sensitive areas such as the Canterbury 3 and Herne 1 AQMA and for those with pre-existing health issues. Whilst effects will be dependent on the exact location of new development and its proximity to sensitive receptors, it can be assumed that new housing would largely be delivered within and in close proximity to existing residential areas.</p> <p>It is anticipated that all of the housing figures would involve accommodating development at greenfield sites which could result in the loss of some open space. The LHN plus 20% option is likely to generate the requirement for a larger release of greenfield land. The higher levels of growth also provide greater potential for increased demand on healthcare facilities in the District and which, if not appropriately mitigated, may undermine the quality of service. As part of the development options, it is assumed that provision will be made to ensure that community infrastructure and open space requirements will be met.</p> <p>However, the provision of housing could also lead to improvements in health, particularly for those residents who may be able to move from poor quality housing to newer properties. Poor housing condition is recognised as a key determinant of overall health. This may be particularly apparent with regards to older affordable housing stock and poor quality private rented accommodation. It would be expected that the higher housing figures would enable the development of higher number of affordable homes. However, the existence and extent of any positive effects is uncertain and dependent on the implementation and number of other factors.</p> <p>The extent to which new development promotes healthy lifestyles through, for example, walking and cycling will be in part dependent on its location and the accessibility of services, facilities,</p>



SA Objective	LHN Figure (1,149 dpa) Preferred Option	LHN plus 10% increase (1,264 dpa)	LHN plus 20% increase (1,379 dpa)	Commentary
				<p>jobs and open space which is uncertain.</p> <p>All of the housing figures options have been appraised as having negative effects on this objective. Given the greater scale of development in the LHN 20% figures this option may have a greater effect than the preferred option figure of 1,149 dpa, which is uncertain to some extent, although this is unlikely to be significant. There may be positive effects although these are uncertain.</p> <p>Mitigation</p> <ul style="list-style-type: none"> Local Plan policies should ensure that open space and health facilities are provided on site or contributions are sought to provision off site (where appropriate). Local Plan policies should ensure that development is not located in close proximity to unsuitable neighbouring uses. Local Plan policies should consider if/how accessibility to the countryside or open space can be promoted as part of new development. Developer contributions towards the provision of new healthcare facilities. <p>Assumptions</p> <ul style="list-style-type: none"> None. <p>Uncertainties</p> <ul style="list-style-type: none"> The exact location of development.

Employment floorspace quantum

Options assessed

Three options for employment growth are assessed. These are based on the Economic Development and Tourism Study Focused Update (2023).

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

Assessment

SA Objective	Labour Demand Scenario (Preferred Option)	Labour Supply Scenario	Labour Demand Scenario with 10% uplift	Commentary
1. To reduce air pollution and encourage improvements in air quality	-/?	-/?	-/?	<p>Likely significant effects</p> <p>There is the potential for the construction and occupation of new employment development to have negative effects on air quality due to, for example, emissions generated from plant and HGV movements during construction and increased vehicle movements once construction is complete.</p> <p>There are two Air Quality Management Areas (AQMA) in the District, and increased car use and HGV movements linked to employment development could exacerbate congestion and lead to greater occurrences of poor air quality. The main source of air pollution in the district is road traffic emissions from major roads, notably the A2, A28 and A299.</p>



SA Objective	Labour Demand Scenario (Preferred Option)	Labour Supply Scenario	Labour Demand Scenario with 10% uplift	Commentary
				<p>The extent to which new employment development affects car use and related emissions will be dependent on its accessibility which is uncertain. Should future development be focused on locations accessible to Canterbury City and the main urban areas of Herne Bay and Whitstable, in particular, then opportunities may be available to promote walking and cycling and public transport use, reducing emissions to air associated with travel by car.</p> <p>Overall, all employment growth options are considered to have minor negative effects. Although the magnitude of effects may increase with the higher Labour Demand Scenario growth options. However, until the location of new development has been determined, the likelihood of adverse effects occurring, and their magnitude is uncertain.</p> <p>Mitigation</p> <ul style="list-style-type: none"> Local Plan policies should seek to reduce congestion. New employment development should be accessible from existing/planned residential areas. <p>Assumptions</p> <ul style="list-style-type: none"> It is assumed that proposals to ensure no sale of new diesel/petrol engine vehicles after 2035, which will lead to an increased proportion of e-vehicles over time, may benefit air quality over the long-term. <p>Uncertainties</p> <ul style="list-style-type: none"> The exact magnitude of effects will be dependent on the location of employment development at the individual site level which is currently uncertain.
2. To minimise greenhouse gases that cause climate change and deliver a managed response to its effects	-	-	-	<p>Likely significant effects</p> <p>Minor negative effects are anticipated to arise from employment growth generating an increase in greenhouse gases 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 (e.g. due to increased traffic generation and energy use in new buildings). The scale of these effects will be most significant for the higher Labour Demand Scenarios (including the preferred employment growth option) given the additional floorspace envisaged under these options.</p>



SA Objective	Labour Demand Scenario (Preferred Option)	Labour Supply Scenario	Labour Demand Scenario with 10% uplift	Commentary
				<p>The provision of new development provides the opportunity for more energy efficient commercial buildings (with more efficient boilers, insulation, and possible low carbon energy generation) which could mean that carbon generation per square metre of floorspace would be lower than at present. This could help mitigate some of the effects. Higher levels of development could support opportunities for the provision of combined heat and power networks and provide greater flexibility for passive solar gain through effective layout and design.</p> <p>Overall, all options have been assessed as having negative effects on achievement of this objective.</p> <p>Mitigation</p> <ul style="list-style-type: none"> Local Plan policies should support the integration of energy efficient measures into the design of new buildings and through energy efficient layouts. <p>Assumptions</p> <ul style="list-style-type: none"> 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. <p>Uncertainties</p> <ul style="list-style-type: none"> The exact magnitude of effects will be dependent on the design and location of development at the individual site level (which is currently uncertain).
3. To conserve, connect and enhance biodiversity across the District	+/-/?	+/-/?	+/-/?	<p>Likely significant effects</p> <p>The development of new employment floorspace could adversely affect biodiversity as a result of land take/habitat loss and disturbance, or increased emissions to air, during construction and through ongoing emissions in operation. It is likely that the levels of growth proposed in all the options will require development on greenfield sites with consequential effects on biodiversity and nature conservation. However, the magnitude is uncertain to some extent as it is dependent on the presence and proximity to sensitive receptors.</p> <p>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. The application of a site selection methodology that protects environmental assets (including nature conservation) would also support this.</p>

SA Objective	Labour Demand Scenario (Preferred Option)	Labour Supply Scenario	Labour Demand Scenario with 10% uplift	Commentary
				<p>The presence of designated European (and international) conservation sites in the area will necessitate a Habitats Regulations Assessment in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended). The findings of the assessment may require additional measures to be taken to avoid any adverse effects on the designated sites which will need to be reflected in Local Plan policies.</p> <p>Overall, the proposed preferred option (Labour Demand Scenario) and alternatives have been assessed as having minor negative effects on this objective. However, there is the potential for significant negative effects to arise should development result in adverse effects on designated sites, although this is currently uncertain. Due to the additional scale of growth, the preferred Labour Demand Scenario and Labour Demand Scenario plus 10% are more likely to have significant effects, although there is some uncertainty as effects will be dependent on actual development locations and proximity to sensitive conservation sites. Some positive effects may occur under each option linked to the provision of BNG.</p> <p>Mitigation</p> <ul style="list-style-type: none"> Local Plan policies and proposals should seek to avoid negative effects on the District's biodiversity assets and identify opportunities for enhancing their quality where appropriate. Careful consideration should be given to the selection of site allocations in order to avoid adverse effects on internationally, nationally and locally designated sites. Appropriate mitigation should be identified where necessary. Local Plan policies should plan for a network of green infrastructure assets, closely linked with existing and new development. <p>Assumptions</p> <ul style="list-style-type: none"> It is assumed that a higher proportion of 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 nature conservation. It is assumed that, on balance, the biodiversity value of brownfield sites is less than that of greenfield land.



SA Objective	Labour Demand Scenario (Preferred Option)	Labour Supply Scenario	Labour Demand Scenario with 10% uplift	Commentary
				<ul style="list-style-type: none"> It is assumed the requirements for biodiversity net gain as required through the Environment Act are realised (as a minimum). <p>Uncertainties</p> <ul style="list-style-type: none"> The exact location of new employment floorspace.
4. To conserve geological sites and safeguard mineral resources within the District	-	-	-	<p>Likely significant effects Canterbury District includes five Regionally Important Geological Sites (RIGS) which have been designated due to being an important educational, research, historical or recreational resource.</p> <p>Additionally, three mineral resources are safeguarded within the District to avoid unnecessary sterilisation as development in these locations could potentially sterilise the mineral resources. The safeguarding areas are primarily found in the central area of the District around Canterbury City.</p> <p>Overall, minor negative effects have been assessed against this objective for all employment floorspace options.</p> <p>Mitigation</p> <ul style="list-style-type: none"> Support implementation of the Kent Minerals and Waste Local Plan. <p>Assumptions</p> <ul style="list-style-type: none"> It is assumed that development would avoid being located on RIGS. <p>Uncertainties</p> <ul style="list-style-type: none"> The exact location of future employment floorspace.
5. To conserve and enhance the landscapes of the District for people and wildlife	+/-/?	+/-/?	+/-/?	<p>Likely significant effects The development of new employment floorspace could have an adverse effect on landscape / townscape character. Such effects may be felt during construction and once development is complete, although the likelihood of adverse effects occurring, and their magnitude, will be dependent on the scale, density and location of new development in the context of the landscape sensitivity of the receiving environment.</p> <p>The general principle that may be applied is that the greater the amount of employment</p>



SA Objective	Labour Demand Scenario (Preferred Option)	Labour Supply Scenario	Labour Demand Scenario with 10% uplift	Commentary
				<p>floorspace the greater the effect on the landscape. However, this effect is dependent on the specific approach to meeting the identified need through policies and proposals within the Local Plan. New employment growth may also present opportunities to improve townscape (such as through the regeneration of previously developed sites) which could have a positive effect on this objective. However, under all options there is likely to be a focus on greenfield land, which can be more sensitive in landscape terms than redeveloped brownfield land.</p> <p>Overall, all employment growth options have been assessed as having a mixed positive and negative effect on this objective, although the presence and of magnitude of effect will be dependent in part on the location and design of new development. The increased scale of development under the Labour Demand Scenario based options would be likely to place greater pressure on greenfield sites relative to Labour Supply option.</p> <p>Mitigation</p> <ul style="list-style-type: none"> • The Local Plan should contain policies on high quality design. • Local Plan policies and proposals should seek to conserve and enhance the character and quality of the District’s landscape. <p>Assumptions</p> <ul style="list-style-type: none"> • It is assumed that the landscape sensitivity of greenfield sites would be greater than brownfield land. <p>Uncertainties</p> <ul style="list-style-type: none"> • The location of development and the quality of the receiving landscapes and the proximity of sensitive receptors is unknown.
6. To protect water resources and ensure a high quality of inland and coastal waters	-	-	-	<p>Likely significant effects</p> <p>The construction of new employment floorspace within the District has the scope, and can be expected, to increase demand on water resources with the potential to affect water availability. The south east is an area recognised as being in water stress. Some commercial or industrial processes may place significant requirements on water resources.</p> <p>All of the options for employment growth are considered to have minor negative effects on the achievement of this objective. However, higher growth may provide additional demand for water</p>



SA Objective	Labour Demand Scenario (Preferred Option)	Labour Supply Scenario	Labour Demand Scenario with 10% uplift	Commentary
				<p>resources.</p> <p>Mitigation</p> <ul style="list-style-type: none"> Local Plan policies should support water efficiency measures, the implementation of SuDs, and wastewater treatment capacity enhancements where necessary. <p>Assumptions</p> <ul style="list-style-type: none"> The planning application process and regulatory and permitting provisions will ensure that no significant adverse effects on water quality. <p>Uncertainties</p> <ul style="list-style-type: none"> The exact location of developments and the potential impact on waterbodies is uncertain at this stage.
7. To reduce the risk of flooding and where appropriate prevent coastal erosion	-/?	-/?	-/?	<p>Likely significant effects</p> <p>The District has many areas at risk of flooding. Flood zones 2 and 3 are mainly found alongside the coast and surrounding the main watercourses. Canterbury City Centre is especially at risk of flooding as some of the land alongside the River Stour is classified as functional floodplain (Zone 3b). It is assumed that new development proposals which may result in an increase in flood risk will be accompanied by a Flood Risk Assessment (FRA) and incorporate suitable flood alleviation measures thereby minimising the risk of flooding.</p> <p>It is considered that any adverse effects from employment development associated with all growth option levels will be mitigated through the implementation of NPPF compliant Local Plan policies related to flood risk and sustainable drainage. New development proposals which may be at risk or pose a risk of flooding elsewhere would be subject to the strict tests to ensure suitability. The selection of sites in the Local Plan, through the application of a site selection methodology, would also seek to avoid areas of high flood risk. Most employment developments would fall under the ‘less vulnerable’ category of development.</p> <p>Overall, all employment growth options are considered to have minor negative effects on the achievement of this objective. However, the effects are uncertain at this stage and depend on the location of new development.</p> <p>Mitigation</p>

SA Objective	Labour Demand Scenario (Preferred Option)	Labour Supply Scenario	Labour Demand Scenario with 10% uplift	Commentary
				<ul style="list-style-type: none"> Local Plan policies should ensure that new development avoids increasing all forms of flooding. Local Plan policies should support achievement of greenfield runoff rates in new development. <p>Assumptions</p> <ul style="list-style-type: none"> It is assumed that, where appropriate, development proposals would be accompanied by a site-specific FRA. <p>Uncertainties</p> <ul style="list-style-type: none"> The exact location of development.
8. To promote sustainable waste management	-/?	-	-/?	<p>Likely significant effects</p> <p>The employment development construction phase will require raw materials and the generation of waste although it is anticipated that a proportion of this waste would be reused/recycled. Raw materials may also be required during the operational phase, depending on the employment use, although the volume and type of resources required would be dependent on the type and scale of use. There would also be an increase in commercial waste arisings although again, it is anticipated that a proportion of this waste would be reused or recycled.</p> <p>Commensurate with the level of growth, it is expected that the development under the Labour Supply Scenario would lead to the lower use of raw materials during construction and the use of materials and generation of waste during occupancy than the higher options. The potential for significant negative effects is therefore greater under the Labour Demand Scenarios. However, there is some uncertainty about the magnitude.</p> <p>Overall, all employment growth options have been assessed as having minor negative effects on this objective.</p> <p>Mitigation</p> <ul style="list-style-type: none"> Local Plan policies should seek to support the reuse of construction waste material where possible. <p>Assumptions</p> <ul style="list-style-type: none"> Sufficient waste infrastructure is available or can be made available.



SA Objective	Labour Demand Scenario (Preferred Option)	Labour Supply Scenario	Labour Demand Scenario with 10% uplift	Commentary
				<p>Uncertainties</p> <ul style="list-style-type: none"> The scale of waste generated through construction and operation of new employment provision.
<p>9. To preserve, enhance, promote and capitalise on the significant qualities, fabric, setting and accessibility of the District's historic environment</p>	<p>-/?</p>	<p>-/?</p>	<p>-/?</p>	<p>Likely significant effects</p> <p>The District has a wide range of designated and undesignated heritage assets including the World Heritage Site (WHS). Adverse effects on these heritage assets may be felt during construction of new employment floorspace and also in the longer term once development has been completed. Such effects may be direct where development involves the loss of, or alteration to, assets or indirect where elements which contribute to the significance of assets are harmed. The likelihood of these effects occurring (and their magnitude) is dependent on the type, location and design of new development.</p> <p>The levels of employment growth to be accommodated in all options is likely to have an adverse effect on the historic environment, although the magnitude of effects would be likely to be reduced through the application of a site selection methodology which seeks to protect historic assets and consideration of historic environment matters at the detailed planning application stage. The level of effects associated with all options are likely to be similar to one another; although this will depend upon the individual sites that come forward to meet the identified floorspace requirement. However, as a basic principle, the magnitude of effect is likely to be increased commensurate with the higher scale of growth under the Labour Demand Scenario options compared to the lower floorspace figure in the Labour Supply Scenario option.</p> <p>Overall, all employment growth options are considered to have a minor negative effect on this objective. However, the magnitude is uncertain.</p> <p>Mitigation</p> <ul style="list-style-type: none"> Local Plan policies should ensure that historic environment is conserved and enhanced in accordance with the NPPF. Local Plan policies should promote high standards of architecture and urban design. <p>Assumptions</p> <ul style="list-style-type: none"> None.



SA Objective	Labour Demand Scenario (Preferred Option)	Labour Supply Scenario	Labour Demand Scenario with 10% uplift	Commentary
				<p>Uncertainties</p> <ul style="list-style-type: none"> The exact location of new development (and proximity to sensitive receptors) is unknown at this stage.
<p>10. To ensure the supply of high quality homes, which cater for identified needs</p>	0	0	0	<p>Likely significant effects All options are considered to indirectly support housing needs by providing employment floorspace within the District to meet evidenced need. However, all options are considered to not have a direct effect on achievement of this objective.</p> <p>Overall, neutral effects are assessed for each employment growth option.</p> <p>Mitigation</p> <ul style="list-style-type: none"> None. <p>Assumptions</p> <ul style="list-style-type: none"> None. <p>Uncertainties</p> <ul style="list-style-type: none"> None.
<p>11. To promote the sustainable use of land and conserve soil quality</p>	+/- -	+/-	+/- -	<p>Likely significant effects The higher growth options for employment land development (Labour Demand and Labour Demand plus 10%) would require a greater release of greenfield land with a smaller proportion of growth likely to make use of brownfield land (although some use of brownfield land would be expected in all options). It is also likely that the ability to avoid the best and most versatile agricultural land (Grades 1 to 3) would be lessened with the higher growth options.</p> <p>Overall, the lower growth option (Labour Supply Scenario) has been assessed as having mixed minor positive and negative effects. The higher Labour Demand based employment growth options have been assessed as having mixed minor positive and significant negative effects. However, the magnitude of the effects is dependent on the location of development.</p> <p>Mitigation</p> <ul style="list-style-type: none"> Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.



SA Objective	Labour Demand Scenario (Preferred Option)	Labour Supply Scenario	Labour Demand Scenario with 10% uplift	Commentary
				<ul style="list-style-type: none"> Local Plan policies should prioritise the reuse of brownfield land before greenfield land. <p>Assumptions</p> <ul style="list-style-type: none"> None. <p>Uncertainties</p> <ul style="list-style-type: none"> The location of development.
<p>12. To achieve a strong and sustainable economy, and revitalise town, local and rural centres</p>	<p>++</p>	<p>+ +/?</p>	<p>++</p>	<p>Likely significant effects</p> <p>The Canterbury Economic Development and Tourism Study (EDTS) Focused Update (2023) accompanies the EDTS Focused Update produced in 2022. It recasts the study period to align with the 21 year plan period (2020-2041) and provides an update to the 2020 EDTS and 2022 EDTS Focussed Update, which reflected the impacts of the COVID-19 pandemic. The EDTS provides two scenarios for consideration of potential employment floorspace (based on Labour Supply and Labour Demand scenarios).</p> <p>The construction of new employment space under all options would support the construction sector and has the potential to create spend in the local supply chain. This may also support construction skills development. However, effects in this regard will be temporary and the extent to which the jobs that may be created benefit the District's residents will depend on the number of jobs created and the approach of firms to filling positions. All options would encourage investment in businesses and infrastructure which would lead to a stronger economy in the District.</p> <p>Between October 2022 to September 2023, 65.8% of the District's population (aged 16-64) was economically active, below the South East regional average (81.3%) and national Great Britain average (78.8%). Unemployment rates (4.1%) were similar to the regional (3.3%) and the national average (3.7%), albeit slightly higher. 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. Jobs growth would, in-turn, increase the amount of money spent in the local economy and there may also be supply chain benefits associated with new or expanded businesses.</p>



SA Objective	Labour Demand Scenario (Preferred Option)	Labour Supply Scenario	Labour Demand Scenario with 10% uplift	Commentary
				<p>The Labour Supply Option draws on the baseline standard methodology projected requirements for housing need and would therefore meet the minimum projected levels of employment land that may be required. Both Labour Demand Scenario Option and the 10% uplift Option would provide a significant uplift on the Labour Supply Option. The EDTS Focused Update (2023) identifies that steady growth in the District’s job base is expected over the plan period to 2041 and Labour Demand scenario reflects this.</p> <p>Overall, all options are assessed as having positive significant positive effects on this objective. However, given that the Labour Supply Scenario would provide around half the floorspace of the Labour Demand Option there is some uncertainty over the significance as it may not fully meet the potential demand expected over the plan period (despite providing a ‘minimum’ requirement based on labour supply).</p> <p>Mitigation</p> <ul style="list-style-type: none"> • None. <p>Assumptions</p> <ul style="list-style-type: none"> • None. <p>Uncertainties</p> <ul style="list-style-type: none"> • 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 location of new employment development.
13. To promote and encourage sustainable transport	+/- -/?	+/-	+/- -/?	<p>Likely significant effects</p> <p>The provision of employment proposed under all options could 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 highest growth figures (Labour Demand Scenario and Labour Demand plus 10%) may lead to significant effects in this regard.</p> <p>The extent to which new employment development affects car use will be dependent on its</p>



SA Objective	Labour Demand Scenario (Preferred Option)	Labour Supply Scenario	Labour Demand Scenario with 10% uplift	Commentary
				<p>accessibility which is uncertain. Locations within and on the edge of Canterbury urban area and the main urban areas of Whitstable and Herne Bay may support opportunities for walking and cycling and integrated public transport services.</p> <p>The Labour Demand Scenario option (141,100 sqm) and the plus 10% uplift option (155,210 sqm) propose a substantially higher level of floorspace provision than the Labour Supply option (60,320sqm) and, as such, the potential for adverse effects on the road network associated with increased traffic volumes may be increased, particularly if this leads to further in-commuting to fill jobs associated with the floorspace.</p> <p>Overall, minor positive and negative effects are assessed for the Labour Supply option. For the Labour Demand Scenario and plus 10% uplift options (due to the substantial uplift in employment land and additional offices floorspace) significant negative effects are assessed. However, there is greater uncertainty for higher growth options as to the extent of these effects.</p> <p>Mitigation</p> <ul style="list-style-type: none"> Local Plan policies should support walking and cycling and seek contributions to public transport provision where possible. The development of green travel plans should be supported where possible. <p>Assumptions</p> <ul style="list-style-type: none"> None. <p>Uncertainties</p> <ul style="list-style-type: none"> The location of new employment development.
14. To promote safe, healthy, inclusive and sustainable communities	+/-	+/-	+/-	<p>Likely significant effects</p> <p>The construction of employment floorspace has the potential to have a localised and short-term negative effect on the health and wellbeing of residents, particularly those who are in close proximity to development sites and/or along transport routes. Effects may include, for example, respiratory problems associated with construction traffic and dust. These issues will be more pertinent for those with pre-existing health issues or for areas of greater deprivation. Effects would be expected to be greater for higher levels of development associated with the preferred Labour Demand Scenario and 10% uplift options which would include higher growth than the</p>



SA Objective	Labour Demand Scenario (Preferred Option)	Labour Supply Scenario	Labour Demand Scenario with 10% uplift	Commentary
				<p>Labour Supply Scenario. However, for all options, these effects are expected to be temporary and not significant.</p> <p>Once premises are occupied, there may be further adverse effects on health arising from, in particular, emissions to air associated with the movement of workers to/from sites and operational traffic (including HGVs) and noise. Given the general in-commuting trend the creation of new employment opportunities associated with all options could increase this unless balanced with residential development.</p> <p>The extent to which new employment development promotes healthy lifestyles through, for example, walking and cycling will be dependent on its accessibility which is at present uncertain. Should future development be focused within or adjoining Canterbury, Herne Bay and Whitstable, then there would be greater opportunities for it to be physically accessible to a relatively large labour pool which may promote walking and cycling (and, potentially, reduce emissions to air associated with car use).</p> <p>All options would support the provision of jobs in the district. Unemployment is known to have a negative effect on mental wellbeing.</p> <p>Overall, all options have been assessed as having a mix of minor positive and negative effects on this objective. For the Labour Demand Scenario and 10% uplift options, which identify greater levels of employment floorspace, the negative effects may be greater.</p> <p>Mitigation</p> <ul style="list-style-type: none"> Local Plan policies should ensure that development is not located in close proximity to unsuitable neighbouring uses. Local Plan policies should support employment development in locations that can be accessed by sustainable transport modes. <p>Assumptions</p> <ul style="list-style-type: none"> None. <p>Uncertainties</p> <ul style="list-style-type: none"> The location of additional employment land required is unknown at this stage.

Retail floorspace quantum

Options assessed:

Three options for retail floorspace have been assessed. The options are informed by the Retail and Leisure Study Update (RLSU) (May 2022).

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

Assessment

SA Objective	RLSU To 2035 Preferred Option	RLSU To 2030	RLSU To 2040	Commentary
1. To reduce air pollution and encourage improvements in air quality	-/?	-/?	-/?	<p>Likely significant effects</p> <p>There is the potential for the construction and occupation of new retail development to have negative effects on air quality due to, for example, emissions generated from plant and HGV movements during construction and increased vehicle movements once construction is complete.</p> <p>The delivery of new floorspace in town centre locations, well served by public transport, could help support linked trips with positive benefits for air quality. However, the location of new development</p>



SA Objective	RLSU To 2035 Preferred Option	RLSU To 2030	RLSU To 2040	Commentary
				<p>is not known. However, focussing more development in Canterbury City centre may exacerbate existing air quality issues.</p> <p>Overall, minor effects are assessed for all options with some uncertainty.</p> <p>Mitigation</p> <ul style="list-style-type: none"> • None. <p>Assumptions</p> <ul style="list-style-type: none"> • It is assumed that proposals to ensure no sale of new diesel/petrol engine vehicles after 2035, which will lead to an increased proportion of e-vehicles over time, may benefit air quality over the long-term. <p>Uncertainties</p> <ul style="list-style-type: none"> • The location of development and the ability of retail users to make linked trips and make use of public transport or active travel routes to access retail floorspace.
<p>2. To minimise greenhouse gases that cause climate change and deliver a managed response to its effects</p>	-	-/?	-	<p>Likely significant effects</p> <p>Minor negative effects are anticipated to arise from retail growth generating an increase in greenhouse gases 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 (e.g. due to increased traffic generation and energy use in new buildings).</p> <p>The provision of new development provides the opportunity for more energy efficient retail buildings (with more efficient boilers, insulation, and possible low carbon energy generation) which could mean that carbon generation per square metre of floorspace would be lower than at present. However, it is recognised that some retail development opportunities will come forward in existing buildings where opportunities are less.</p> <p>Overall, all options have been assessed as having negative effects on achievement of this objective. However, given the very low floorspace figures under the RLSU to 2030 scenario the magnitude is likely to be very minor.</p>

SA Objective	RLSU To 2035 Preferred Option	RLSU To 2030	RLSU To 2040	Commentary
				<p>Mitigation</p> <ul style="list-style-type: none"> Local Plan policies should support the integration of energy efficient measures into the design of new buildings and through energy efficient layouts. <p>Assumptions</p> <ul style="list-style-type: none"> 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 that proposals to ensure no sale of new diesel/petrol engine vehicles after 2035, which will lead to an increased proportion of e-vehicles over time, may benefit air quality over the long-term. <p>Uncertainties</p> <ul style="list-style-type: none"> The location of development and the ability of retail users to make linked trips and make use of public transport or active travel routes to access retail floorspace.
<p>3. To conserve, connect and enhance biodiversity across the District</p>	<p>+/-?</p>	<p>0/?</p>	<p>+/-?</p>	<p>Likely significant effects</p> <p>The development of new retail floorspace could adversely affect biodiversity as a result of land take/habitat loss and disturbance, or increased emissions to air, during construction and through ongoing emissions in operation. Given the overall fairly low levels of retail floorspace the release of greenfield land may be quite limited, whilst there may be a number of opportunities to make use of existing buildings to house retail use to.</p> <p>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. Some positive effects may occur under each option linked to the provision of BNG.</p> <p>Overall, given the very low amount of floorspace a neutral effect is assessed for the RLSU to 2030 figure. For the RLSU to 2035 and 2040 figures a mixture of minor positive and minor negative effects with some uncertainty is assessed.</p> <p>Mitigation None.</p>



SA Objective	RLSU To 2035 Preferred Option	RLSU To 2030	RLSU To 2040	Commentary
				<p>Assumptions None.</p> <p>Uncertainties The extent of the release of greenfield land required to meet the requirements.</p>
<p>4. To conserve geological sites and safeguard mineral resources within the District</p>	0	0	0	<p>Likely significant effects Canterbury District includes five Regionally Important Geological Sites (RIGS) which have been designated due to being an important educational, research, historical or recreational resource. Additionally, three mineral resources are safeguarded within the District to avoid unnecessary sterilisation as development in these locations could potentially sterilise the mineral resources. The safeguarding areas are primarily found in the central area of the District around Canterbury City.</p> <p>Overall, given the scale of floorspace envisaged under each option, and the ability to ensure new development avoids sensitive geological receptors neutral effects have been assessed against this objective for all employment floorspace options.</p> <p>Mitigation</p> <ul style="list-style-type: none"> • Support implementation of the Kent Minerals and Waste Local Plan. <p>Assumptions</p> <ul style="list-style-type: none"> • It is assumed that development would avoid being located on RIGS. <p>Uncertainties</p> <ul style="list-style-type: none"> • The exact location of future retail floorspace.
<p>5. To conserve and enhance the landscapes of the District for people and wildlife</p>		0?		<p>Likely significant effects New retail floorspace could have an adverse effect on landscape / townscape character. Such effects may be felt during construction and once development is complete, although the likelihood of adverse effects occurring, and their magnitude, will be dependent on the scale, density and location of new development in the context of the landscape sensitivity of the receiving environment. 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 (although may be very limited under the RLSU to 2030</p>

SA Objective	RLSU To 2035 Preferred Option	RLSU To 2030	RLSU To 2040	Commentary
	+/-/?		+/-/?	<p>option).</p> <p>Overall, the higher RLSU to 2035 and RLSU to 2040 options are assessed as having a mixed positive and negative effect on this objective, although the presence and magnitude of effects will be dependent in part on the location and design of new development. The lower RLSU to 2030 option is assessed as neutral although there is some uncertainty dependent on the location of limited new retail floorspace required under this option.</p> <p>Mitigation</p> <ul style="list-style-type: none"> The Local Plan should contain policies on high quality design. Local Plan policies and proposals should seek to conserve and enhance the character and quality of the district’s landscape. <p>Assumptions</p> <ul style="list-style-type: none"> It is assumed that the landscape sensitivity of greenfield sites would be greater than brownfield land. <p>Uncertainties</p> <ul style="list-style-type: none"> The location of development and the quality of the receiving landscapes and the proximity of sensitive receptors is unknown.
6. To protect water resources and ensure a high quality of inland and coastal waters	-	0	-	<p>Likely significant effects</p> <p>New retail floorspace has the scope, and can be expected, to increase demand on water resources with the potential to affect water availability. The south east is an area recognised as being in water stress and new development would pressure on this resource. Overall, given the very low amount of floorspace a neutral effect is assessed for the RLSU to 2030 figure. The RLSU to 2035 and 2040 figures are assessed as having a minor negative.</p> <p>Mitigation</p> <ul style="list-style-type: none"> Local Plan policies should support water efficiency measures, the implementation of SuDs, and wastewater treatment capacity enhancements where necessary. <p>Assumptions</p> <ul style="list-style-type: none"> The planning application process and regulatory and permitting provisions will ensure that no significant adverse effects on water quality.

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				<p>Uncertainties</p> <ul style="list-style-type: none"> The exact location of developments and the potential impact on waterbodies is uncertain at this stage.
<p>7. To reduce the risk of flooding and where appropriate prevent coastal erosion</p>				<p>Likely significant effects</p> <p>The district has many areas at risk of flooding. Flood zones 2 and 3 are mainly found alongside the coast and surrounding the main watercourses. Canterbury City Centre is especially at risk of flooding as some of the land alongside the River Stour is classified as functional floodplain (Zone 3b). Some new retail development could be expected within or on the edge of Canterbury City Centre. It is assumed that new development proposals which may result in an increase in flood risk will be accompanied by a Flood Risk Assessment (FRA) and incorporate suitable flood alleviation measures thereby minimising the risk of flooding. The NPPF strict tests would ensure suitability of sites used for new retail floorspace whilst retail use itself falls under the ‘less vulnerable’ category of development.</p> <p>Overall, all retail floorspace options are considered to have minor negative effects on the achievement of this objective. However, the effects are uncertain at this stage and depend on the location of new development.</p> <p>Mitigation</p> <ul style="list-style-type: none"> Local Plan policies should ensure that new development avoids increasing all forms of flooding. Local Plan policies should support achievement of greenfield runoff rates in new development. <p>Assumptions</p> <ul style="list-style-type: none"> It is assumed that, where appropriate, development proposals would be accompanied by a site-specific FRA. <p>Uncertainties</p> <ul style="list-style-type: none"> The exact location of development.
<p>8. To promote sustainable waste</p>	-	-	-	<p>Likely significant effects</p> <p>The construction of retail floorspace will require raw materials and the generation of waste even if development makes use of existing premises. During occupation waste will also be generated,</p>



SA Objective	RLSU To 2035 Preferred Option	RLSU To 2030	RLSU To 2040	Commentary
management				<p>although there would be opportunities to integrate recycling best practice. It is expected that the development of the higher options would lead to the greater use of raw materials during construction and the use of materials and generation of waste during occupancy than the lowest RLSU to 2030 option. The potential for significant negative effects is therefore greater at these higher levels.</p> <p>Overall, all options have been assessed as having minor negative effects on this objective.</p> <p>Mitigation</p> <ul style="list-style-type: none"> Local Plan policies should support opportunities to reduce/recycle waste. Local Plan policies should support the use of recycled and secondary materials in new development. The reuse of construction waste should be supported. <p>Assumptions</p> <ul style="list-style-type: none"> None. <p>Uncertainties</p> <ul style="list-style-type: none"> The exact scale of waste associated with construction or operation is unknown at this stage.
9. To preserve, enhance, promote and capitalise on the significant qualities, fabric, setting and accessibility of the District's historic environment				<p>Likely significant effects</p> <p>The district has a wide range of designated and undesignated heritage assets including the World Heritage Site (WHS). 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. The likelihood of effects occurring and the magnitude of effect is dependent on the type, location and design of new development.</p> <p>Development of new retail floorspace within town centre 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 through revitalising underutilised or vacant sites. Additionally, retail development may support the positive re-use of assets such as Listed Buildings although this is uncertain.</p> <p>Overall, a mix of minor positive and minor negative effects is assessed for all options. The</p>



SA Objective	RLSU To 2035 Preferred Option	RLSU To 2030	RLSU To 2040	Commentary
	+/-/?	+/-/?	+/-/?	<p>likelihood of negative effects is likely to be greater for the RLSU to 2035 and RLSU to 2040 floorspace options. The presence of positive effects and the magnitude of any positive and negative effects is uncertain.</p> <p>Mitigation</p> <ul style="list-style-type: none"> Local Plan policies should ensure that historic environment is conserved and enhanced in accordance with the NPPF. Local Plan policies should promote high standards of architecture and urban design. <p>Assumptions</p> <ul style="list-style-type: none"> None. <p>Uncertainties</p> <ul style="list-style-type: none"> The exact location of new development (and proximity to sensitive receptors) is unknown at this stage.
10. To ensure the supply of high quality homes, which cater for identified needs	0	0	0	<p>Likely significant effects</p> <p>Convenience shopping supports the day-to-day needs of the residents of the CCC area. However, it is considered the options would have neutral effects on achievement of this objective.</p> <p>Mitigation</p> <ul style="list-style-type: none"> None. <p>Assumptions</p> <ul style="list-style-type: none"> None. <p>Uncertainties</p> <ul style="list-style-type: none"> None.
11. To promote the sustainable use of land and conserve soil quality	+/-	+/-	+/-	<p>Likely significant effects</p> <p>The higher growth options for retail floorspace would require a greater release of greenfield land with a smaller proportion of growth likely to make use of brownfield land. However, under all options there would be likely development of some existing sites and premises, which may be delivered in town centre locations.</p> <p>Overall, all retail growth options have been assessed as having mixed minor positive and negative</p>



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				<p>effects. However, the magnitude of the effects is dependent on the location of development.</p> <p>Mitigation</p> <ul style="list-style-type: none"> Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality. Local Plan policies should prioritise the reuse of brownfield land before greenfield land. <p>Assumptions</p> <ul style="list-style-type: none"> None. <p>Uncertainties</p> <ul style="list-style-type: none"> The location of development.
<p>12. To achieve a strong and sustainable economy, and revitalise town, local and rural centres</p>	++	+	+ +/-	<p>Likely significant effects</p> <p>Canterbury city centre, Whitstable town centre and Herne Bay town centre are recognised as key city/town centres in the district. The appropriate and evidenced based level of retail floorspace need within the district is key to ensuring their viability and vitality of the District’s centres.</p> <p>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.</p> <p>All figures are considered to meet the retail needs (based on the RLSU) and therefore the options are considered to support this objective. However, RLSU identifies that there is some uncertainty over longer term figures and therefore this is reflected in the scoring for the RLSU to 2040 option.</p> <p>During development (through construction and supply chain employment) and through occupation linked to ongoing work force requirements, all options would support the economic investment in the local economy.</p> <p>All options would meet the evidenced retail needs, and support city/town centre first approach, and therefore are considered to be significant positive effect on this objective. However, as noted above, some uncertainty over the RLSU to 2040 figure is identified.</p>



SA Objective	RLSU To 2035 Preferred Option	RLSU To 2030	RLSU To 2040	Commentary
				<p>Mitigation</p> <ul style="list-style-type: none"> Local Plan policies should help support regeneration and investment in town centres. <p>Assumptions</p> <ul style="list-style-type: none"> A city/town centre first approach will be employed. <p>Uncertainties</p> <ul style="list-style-type: none"> The location of new development and the contribution to city and town centres.
13. To promote and encourage sustainable transport	+/-	+/-	+/-	<p>Likely significant effects</p> <p>The options are all considered likely to result in some additional traffic movements. However, the delivery of new floorspace within existing centres, or established retail areas, is unlikely to place significant pressures on transportation (unless delivered in the same location which is unlikely). 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. Overall, a mix of minor and positive effects are assessed.</p> <p>Mitigation</p> <ul style="list-style-type: none"> None. <p>Assumptions</p> <ul style="list-style-type: none"> None. <p>Uncertainties</p> <ul style="list-style-type: none"> The location of new retail development and the contribution they may make to linked trips within town centres.
14. To promote safe, healthy, inclusive and sustainable communities	+/-	+/-	+/-	<p>Likely significant effects</p> <p>All options would support retail provision within the district. The location of the new development would determine the accessibility of these services although it can be assumed that this would primarily be delivered in city/town centres, edge of centres or at recognised retail locations. The extent to which new retail development will help promote healthy lifestyles through, for example, walking and cycling will be dependent on this accessibility. All options would support a level of new employment (although this may be relatively low, especially for the RLSU to 2030 figure). Should</p>



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				<p>future retail development be focused within Canterbury, Herne Bay and Whitstable, then the retail development would be physically accessible to the majority of the districts population although some car travel is inevitable. Effects will be experienced during construction. Overall, a mix of effects is assessed.</p> <p>Mitigation</p> <ul style="list-style-type: none"> • None. <p>Assumptions</p> <ul style="list-style-type: none"> • None. <p>Uncertainties</p> <ul style="list-style-type: none"> • None.