

Folkestone Harbour

Health Impact Assessment

October 2024

Prepared on behalf of Folkestone Harbour and Seafront Development Company

Folkestone Harbour

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1 Introduction

1.1 Background

- 1.1.1 This Health Impact Assessment (HIA) has been prepared by the Savills Health and Social Impact Assessment team within the Environment & Infrastructure department, on behalf of Folkestone Harbour and Seafront Development Company (hereafter referred to as 'the Applicant'), in support of the reserved matters application for the redevelopment of Plots F, G & H (hereafter referred to as 'the harbour plots') within the approved masterplan for the Folkestone harbour and seafront site (hereafter referred to as the 'whole masterplan area').
- 1.1.2 HIA is a process to identify and assess the potential health outcomes (both adverse and beneficial) of a proposed project, plan or programme and to deliver evidence-based recommendations that maximise health gains and reduce or remove potential negative impacts on health and wellbeing.
- 1.1.3 In this instance, the purpose of this HIA is to investigate, address and assess potential health risks to the host community directly attributable to what is proposed, to test healthy urban design features associated with the harbour plots area (and whole masterplan area) to support the existing neighbouring community, and to communicate how the project aligns with and is supportive of local health and wellbeing priorities.

1.2 Report Structure

- 1.2.1 The remainder of the HIA is structured as follows:
- Section 2: Policy and Legislative Context;
 - Section 3: Approach and Methodology;
 - Section 4: Project Profile;
 - Section 5: Health and Wellbeing Baseline;
 - Section 6: Assessment;
 - Section 7: Mitigation and Monitoring; and
 - Section 8: Conclusions and Recommendations.

2 Policy and Legislative Context

2.1 Introduction

- 2.1.1 This section presents the national and local legislative and policy requirements pertinent to the assessment of health. On the basis that a wide range of environmental, social and economic factors have the potential to influence health, many local policies which relate to these determinants are also relevant to health. However, to ensure a focused list of relevant policies and to avoid duplication of policies pertinent to the inter-related technical reports that inform the HIA, the policies referenced in this section have been selected only if they explicitly mention health and/or wellbeing.
- 2.1.2 The policy and guidance have been applied to inform the process, scope, focus and methodology of the HIA.

2.2 National policy and guidance

National Planning Policy Framework

- 2.2.1 The National Planning Policy Framework (NPPF) (Ministry of Housing, Communities and Local Government, 2023) sets out the planning policies for England.
- 2.2.2 Promoting healthy and safe communities is a central theme, whereby the NPPF states that planning policies and decisions should aim to achieve healthy, inclusive and safe places and beautiful buildings which promote social interaction (including opportunities for meetings between people who might not otherwise come into contact with each other), are safe and accessible, and enable and support healthy lifestyles (paragraph 96).
- 2.2.3 Furthermore, the NPPF (paragraph 97) states that to provide the social, recreational and cultural facilities and services that communities need, planning policies and decisions should:
- plan positively for the provision and use of shared spaces, community facilities and other local services;
 - take into account and support the delivery of local strategies to improve health, social and cultural wellbeing;
 - guard against the unnecessary loss of valued facilities and services;
 - ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community; and
 - ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.

National Planning Policy Framework: draft text for consultation

- 2.2.4 Minor changes to the “promoting healthy and safe communities” section of the NPPF are proposed in the draft text for consultation (Ministry of Housing, Communities & Local Government, 2024).
- 2.2.5 References to “beautiful” buildings/spaces, which were added in the latest iteration, have been removed. Clarification on school places makes specific reference to early years and post-16

facilities. Most notably, text has been added to state that significant weight should be placed on the importance of new, expanded or upgraded public service infrastructure when considering proposals for development.

National Planning Practice Guidance

2.2.6 The National Planning Practice Guidance (NPPG) (Ministry of Housing, Communities and Local Government, 2022) supports the NPPF and provides guidance across a range of topic areas, including ‘healthy and safe communities’. It is recognised in the NPPG that the design and use of the built and natural environments, including green infrastructure are major determinants of health and wellbeing, whereby a “healthy place” is one which:

- supports and promotes healthy behaviours and environments and facilitates a reduction in health inequalities for people of all ages;
- will provide the community with opportunities to improve their physical and mental health, and support community engagement and wellbeing;
- is inclusive and promotes social interaction; and
- meets the needs of children and young people to grow and develop, as well as being adaptable to the needs of an increasingly elderly population and those with dementia and other sensory or mobility impairments.

2.2.7 In addition, engagement with individuals and/or organisations, such as the relevant Director(s) of Public Health, will help ensure local public health strategies and any inequalities are considered appropriately.

2.3 Local policy and guidance

Introduction

2.3.1 Relevant local policy documents comprise the Places & Policies Local Plan (Folkestone & Hythe District Council, 2020) and Core Strategy Review (Folkestone & Hythe District Council, 2022). Following the approach outlined within paragraph 2.1.1, local policies pertinent to health and wellbeing are outlined in more detail below.

Places & Policies Local Plan

2.3.2 Policy HW2 (Improving the Health and Wellbeing of the Local Population and Reducing Health Inequalities) states that for residential development of 100 or more units and non-residential development in excess of 1,000sqm a Health Impact Assessment will be required, which will measure the wider impact of the development on healthy living and the demands that may be placed on health services and facilities arising from the development. Policy HW2 goes on to state that “Where significant impacts are identified, measures to address the health requirements of the development should be provided and/or secured by planning obligations or planning conditions as appropriate.”

2.3.3 Policy HW3 (Development That Supports Health, Fulfilling and Active Lifestyles) states that to increase, create and safeguard opportunities for healthy, fulfilling and active lifestyles and to reduce the environmental impact of importing food, development proposals should:

- incorporate productive landscapes in the design and layout of buildings and landscaping of all major developments;
- not result in the net loss of existing allotments; and
- not result in the loss of the best and most versatile agricultural land (Grades 1, 2 and 3a) unless there is a compelling and overriding planning reason to do so and mitigation is provided through the provision of productive landscapes on-site or in the locality.

Core Strategy Review

2.3.4 Policy SS8 (New Garden Settlement – Sustainability and Healthy New Town Principles) states that (amongst other factors), proposals shall create a vibrant, healthy place to live by promoting physical activity and more active lifestyles for all age groups, facilitating community building. Preventative health care measures shall include:

- the provision of high quality public open spaces that are easily accessible for all age groups;
- noise and air pollution mitigation measures such as distance buffers between the M20/High Speed 1 transport corridor and the development, incorporating landscaping within the buffers designed to integrate with the wider green infrastructure network;
- the design of streets and spaces shall encourage community outdoor activities including play and meeting places and the provision of tactile public art, with homes orientated to encourage informal overlooking. Provision should be made for elderly people through the careful consideration of access, mobility, facilities, shelter and seating, with opportunity given for intergenerational activity; and
- sustainable access and transport shall be promoted.

2.3.5 Policy SS9 (New Garden Settlement – Infrastructure, Delivery, Phasing and Management) states that regarding delivery of infrastructure and phasing, the settlement should be self-sufficient regarding education, health, community, transport and other infrastructure, where necessary allowing for the expansion and improvement of nearby facilities such as secondary education and waste.

2.4 Policy, legislative context and guidance summary

2.4.1 The policy and legislative context review reinforces the importance of building health into planning, where more health-conscious planning and development can prevent, reduce and delay the need for clinical intervention and social care, but also reduce health inequality while fostering healthy, independent living for longer.

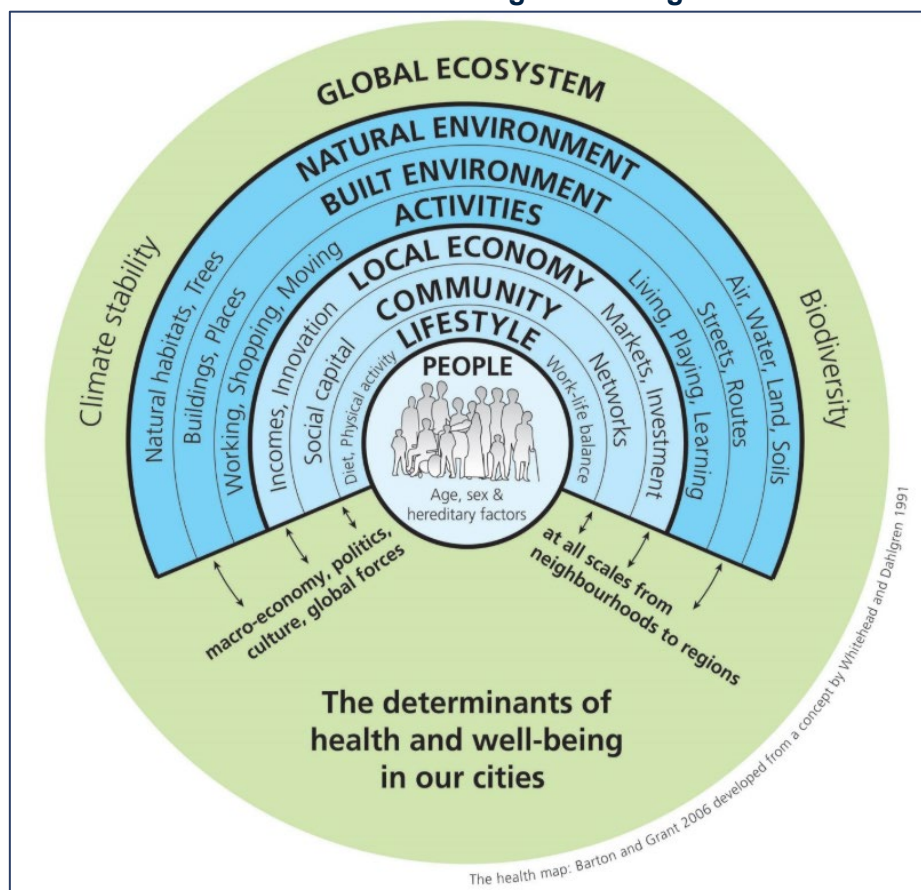
2.4.2 These points are echoed in the local policy, and further worded to address local health challenges, priorities and needs. The health assessment guidance frames a generic approach that ensures the project is viewed through a public health lens to ensure health protection, health promotion and healthcare are considered, and that both health issues and opportunities are explored to deliver an enduring and positive health legacy.

2.4.3 The review has been applied to inform the HIA process and methodology, the baseline and health themes explored, and further underpins the appraisal and actions.

3 Approach and Methodology

3.1.1 The assessment of health and wellbeing impacts applies a broad socio-economic model of health (see Figure 3.1) that encompasses conventional health impacts such as disease, accidents and risk, along with wider health determinants vital to achieving good health and wellbeing such as employment and local amenity. It addresses both physical and mental health outcomes, and also considers equality and social impacts where possible.

Figure 3.1: The determinants of health and wellbeing in our neighbourhoods



Source: A health map for the local human habitat (Barton & Grant, 2006)

3.1.2 The assessment methodology follows a source-pathway-receptor model to identify and assess population and health effects that are plausible and directly attributable to the harbour plots area (and whole masterplan area). As shown in Table 3.1, a hazard source itself does not constitute a health risk: it is only when there is a hazard source, a sensitive receptor and a pathway of exposure that there is a potential risk to human health. The same is true for potential health benefits where a positive influence must be present alongside a pathway of exposure and a receptor for there to be a potential health improvement.

3.1.3 Where a source-pathway-receptor linkage exists, it is then the nature of the specific hazard source or positive influence; the magnitude of impact via the pathway of exposure; and the sensitivity of the receptor that will determine what level of health risk or benefit is predicted, if any.

Table 3.1: Source-pathway-receptor model

Source	Pathway	Receptor	Plausible Health Impact	Explanation
x	✓	✓	No	There is not a clear source from where a potential health impact could originate.
✓	x	✓	No	The source of a potential health impact lacks a means of transmission to a population.
✓	✓	x	No	Receptors that would be sensitive or vulnerable to the health outcome are not present.
✓	✓	✓	Yes	Identifying a source, pathway and receptor does not mean a health outcome is a likely significant effect; health impacts should be assessed (describing what effect will occur and its likelihood) and likely health effects are then evaluated for significance.

Source: Health in Environmental Impact Assessment – A Primer for a Proportionate Approach (IEMA, 2017)

3.1.4 When defining potential population and health determinants associated with a project, it is also useful to consider three broad domains of public health:

- health protection (i.e. environmental objective thresholds set to be protective of health);
- health promotion (i.e. ways in which to support healthy lifestyles, improve socio-economic status and address inequality); and
- healthcare (i.e. provision, effectiveness and equity of access to healthcare services).

3.2 HIA methodology

3.2.1 The London Healthy Urban Development Unit (HUDU) Rapid HIA Tool has been applied in this instance as Folkestone & Hythe planning policy does not outline any specific HIA methodology to be followed. The HUDU assessment matrix comprises a range of criteria categorised by the following eleven topics or broad determinants:

- housing design and affordability;
- access to health and social care services and other social infrastructure;
- access to open space and nature;
- air quality, noise and neighbourhood amenity;
- accessibility and active travel;
- crime reduction and community safety;
- access to healthy food;
- access to work and training;
- social cohesion and inclusive design;
- minimising the use of resources; and
- climate change.

3.2.2 Each theme comprises several criteria, whereby the relevancy to the harbour plots area (and whole masterplan area) and direction/details of any potential impact on health and wellbeing are determined. Where appropriate, recommended mitigation and enhancement measures are provided in the final column.

4 Project Profile

4.1 Site description, setting and context

- 4.1.1 As shown in Figure 4.1, the whole masterplan area occupies approximately 23 ha of Folkestone’s seafont, including part of the harbour and harbour arm at its eastern end, and is bounded by the Leas Park to its west and a steep embankment to its north.
- 4.1.2 The harbour plots area (which this reserved matters application relates to) is made up of Plots F, G and H (outlined in orange with red text), and makes up approximately 5 ha of the whole masterplan area on its eastern extent.

Figure 4.1: Site location



- 4.1.3 The harbour plots area is a brownfield site, having previously accommodated the ferry terminal and the Rotunda Amusement Park. The site formerly accommodated some vacant and partially used commercial buildings, with retail and leisure uses.
- 4.1.4 The existing site was not open to the public until after outline consent was granted. It was a Transport International Routiers (TIR) Lorry Park and contained numerous dilapidated and abandoned buildings; the Harbour Arm and stations were derelict hazardous structures which were inaccessible. Since then, the site has been restored as part of the enabling works investment, and developed to include meanwhile uses; these are mainly food and beverage stalls, some cafés and restaurants housed in repurposed shipping containers as well as the Goods Yard with the large screen showing movies, sports events and even state ceremonies. There are also some units in the old waiting rooms on the Harbour Arm and the lighthouse.

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4.1.5 The area is currently characterised by the remaining historical structures that formed the Harbour mainly the station, the Customs House, the Harbour Master's House and the Signal Box, as well as some smaller outbuildings. This also includes the harbour arm, Goods Yard and Harbour Arm car park.

4.2 Project description summary

4.2.1 The development proposals seek to redevelop the Harbour Plots (phases 5 and 6) at the Folkestone Seafront, creating new high quality residential and commercial buildings. These proposals will deliver the following:

- 15 new buildings comprising of residential and commercial uses;
- commercial floorspace comprising of 7,466.8 sqm (GIA);
- 410 dwellings (apartments and duplexes ranging from 1 bed to 4 beds);
- high quality landscaping throughout the scheme;
- associated facilities, including cycle stores and refuse/recycling stores;
- 582 residential car parking bays and;
- 328 public / visitor car parking spaces.

4.3 Study area

4.3.1 There are two elements to the HIA study area:

- the study area for baseline data collection in order to establish the existing local burden of poor health and associated sensitivity to changes in the environmental and socio-economic environment; and
- the study area for receptors assessed, and the associated environmental and socio-economic changes at these receptors.

4.3.2 Environmental health determinants (such as changes to air quality and noise exposure) typically have a local distribution pattern, where the hazards are limited by their concentration and physical dispersion characteristics. Likewise, changes in transport nature and flow rate have a particular distribution on the local road network.

4.3.3 As baseline data is limited to administrative boundaries, collection of demographic and physical health data (relevant to environmental health determinants) focusses on Folkestone Harbour ward and Folkestone Central ward, which the harbour plots area is located within and adjacent to, respectively.

4.3.4 Socio-economic health determinants (such as employment and related income generation) have a wider geographic scope of influence than environmental health determinants due to the willingness to commute significant distances to work. While data is collected at the ward level for context, the focus for socio-economic baseline statistics should be on Folkestone and Hythe district.

4.3.5 The study area defining the relevant sensitive receptors identified for assessment purposes is proposed to remain consistent with the inter-related technical reports provided to support the planning application, which the HIA relies upon.

4.4 Local health priorities

4.4.1 The Kent Joint Health and Wellbeing Strategy (Kent Health and Wellbeing Board, n.d.) outlines the following five outcomes:

- every child has the best start in life;
- effective prevention of ill health by people taking greater responsibility for their health and wellbeing;
- the quality of life for people with long term conditions is enhanced and they have access to good quality care and support;
- people with mental health issues are supported to 'live well'; and
- people with dementia are assessed and treated earlier, and are supported to 'live well'.

4.4.2 The following priorities will be applied to each outcome area:

- tackle key health issues where Kent is performing worse than the England average;
- tackle health inequalities;
- tackle the gaps in provision; and
- transform services to improve outcomes, patient experience and value for money.

5 Health and Wellbeing Baseline

5.1 Introduction

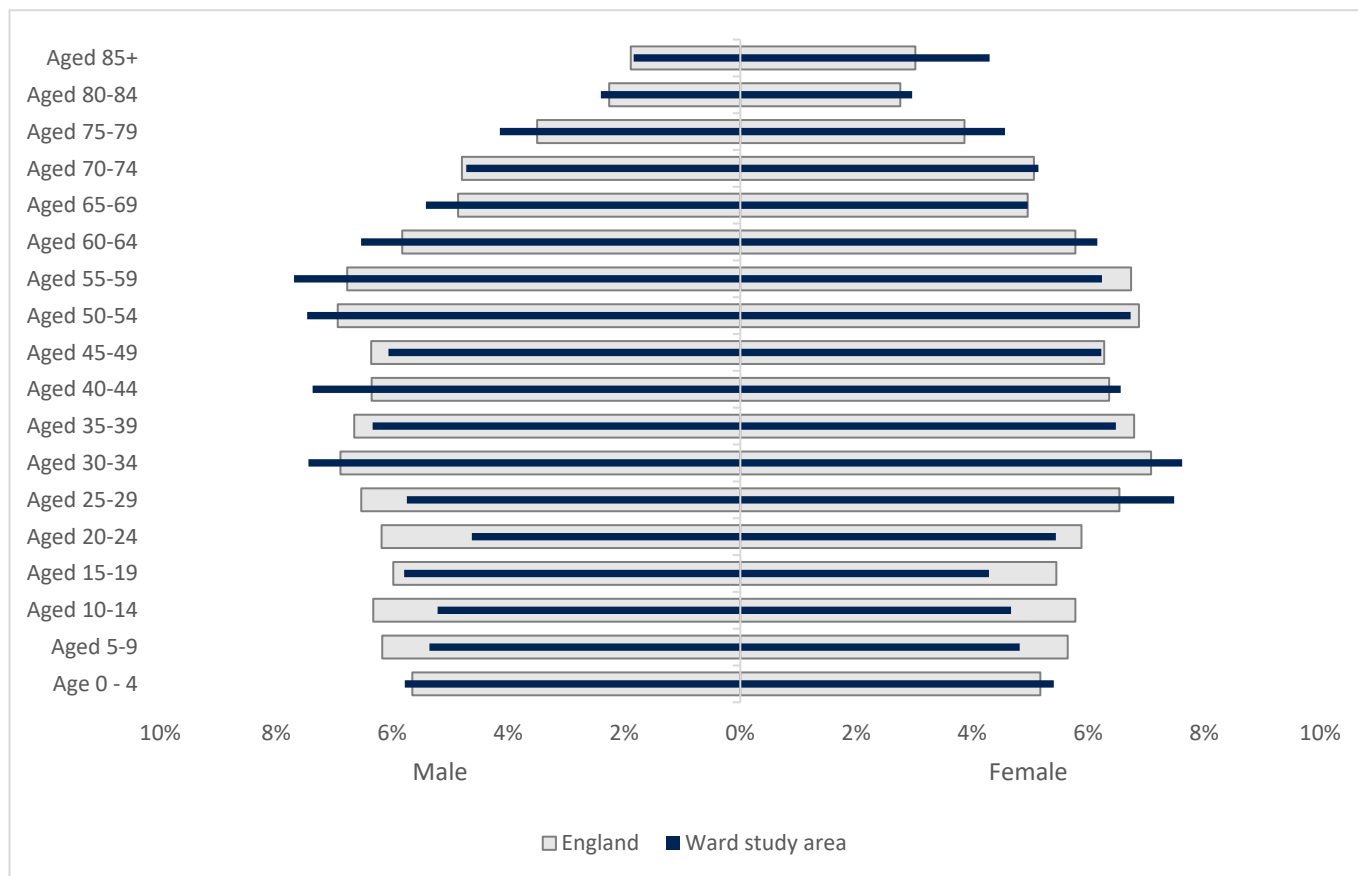
- 5.1.1 Different communities have varying susceptibility to health and wellbeing effects (both adverse and beneficial) as a result of social and demographic structure, behaviour and relative economic circumstance.
- 5.1.2 The aim of the following information is to outline the local health and socio-economic circumstance of the communities living within the ward study area and Folkestone & Hythe district. It should be noted that the description of the whole population, and of the populations within the study area, do not exclude the probability that there will be some individuals or groups of people who do not conform to the overall profile.

5.2 Demography, deprivation and socio-economic circumstance

- 5.2.1 Figure 5.1 shows the age structure of the ward study area in comparison to the national average. As shown, the ward study area is generally more elderly population than the national average, with a higher proportion of the population (both male and female) aged 0-4 years, 30-34 years, 40-44 years, 60-69 years and 75-84 years. In addition, there is a higher proportion of the male population in the ward study area aged 50-59 years, and a higher proportion of the female population in the ward study area aged 25-29 years, 70-74 years and 85+ years.
- 5.2.2 Conversely, there is a smaller proportion of the study area population (both male and female) aged 5-24 years and 45-49 years

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Figure 5.1: Age structure – Folkestone Central and Folkestone Harbour wards vs England



Source: Nomis Population Estimates/Projections (local authority based and small area) (Nomis, 2022)

5.2.3 As outlined in paragraph 4.3.4, while socio-economic data is collected at the ward level for context, the focus for socio-economic baseline statistics should be on Folkestone & Hythe district as socio-economic health determinants have a wider geographic scope of influence. As shown in Table 5.1, all indicators at the ward level have a worse socio-economic circumstance than all relevant comparators. Most notably, long term unemployment in the ward study area is four times higher than the national average.

5.2.4 This is also the case for the majority of indicators at the district level. The exceptions to this are older people in deprivation, overcrowded houses and fuel poverty, which are all better than the national average but worse than the county average.

Table 5.1: Deprivation and socio-economic circumstance

Indicator	Date	Ward study area	Folkestone & Hythe district	Kent	England
Deprivation and socio-economic circumstance					
IMD Score (2019)	2019	38.2	24.1	19.5	21.7
Income deprivation (%)	2019	22.8	14.5	11.4	12.9
Child poverty (%)	2019	33.7	20.1	15.8	17.1
Older people in deprivation (%)	2019	21.2	13.9	11.6	14.2

Indicator	Date	Ward study area	Folkestone & Hythe district	Kent	England
Older people living alone (%)	2011	45.6	31.7	30.2	31.5
Overcrowded houses (%)	2011	18.1	8	6.9	8.7
Fuel poverty (%)	2020	16.2	10.8	9.8	13.2
Unemployment (%)	2021-22	10.2	5.6	4.5	5
Long term unemployment (crude rate per 1,000)	2021-22	7.9	3.7	1.6	1.9
Key:					
	Better than the England average				
	Worse than the England average				

Source: OHID Local Health (OHID, n.d.)

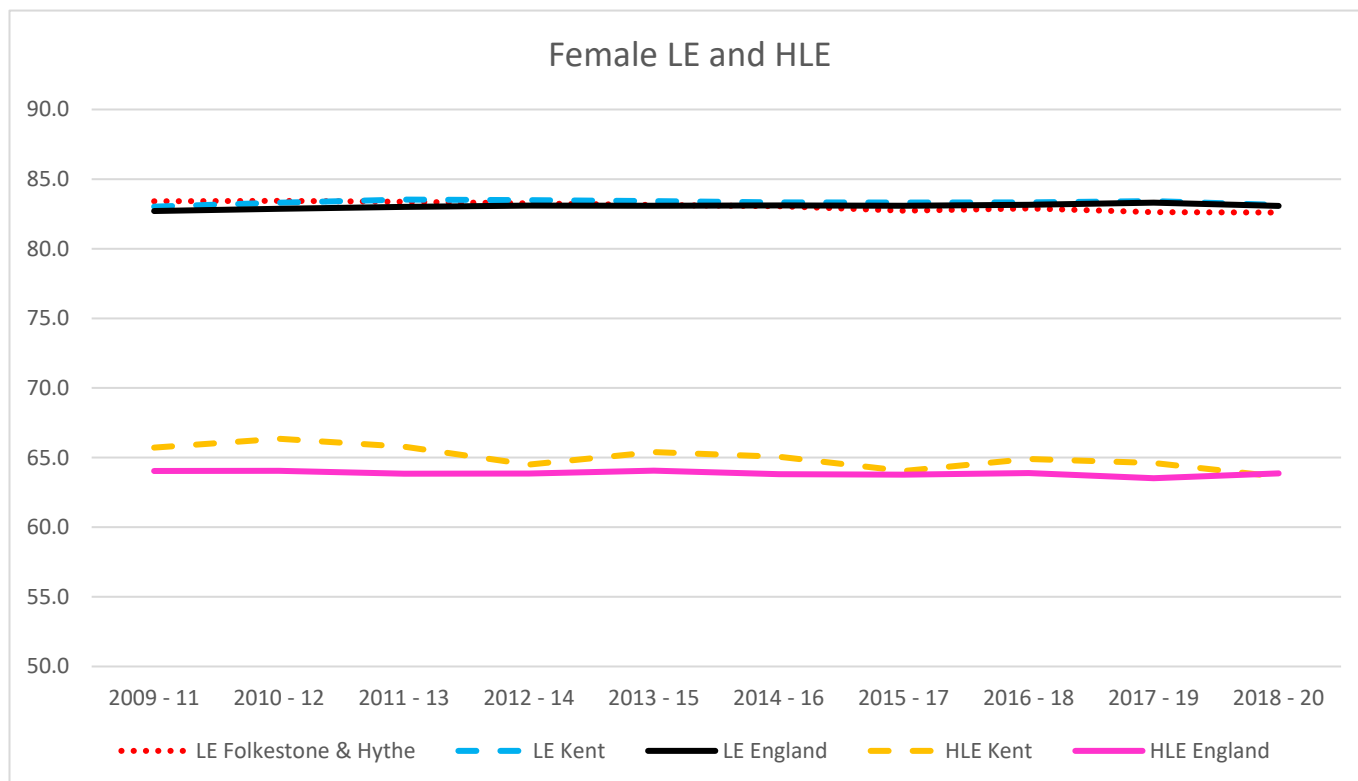
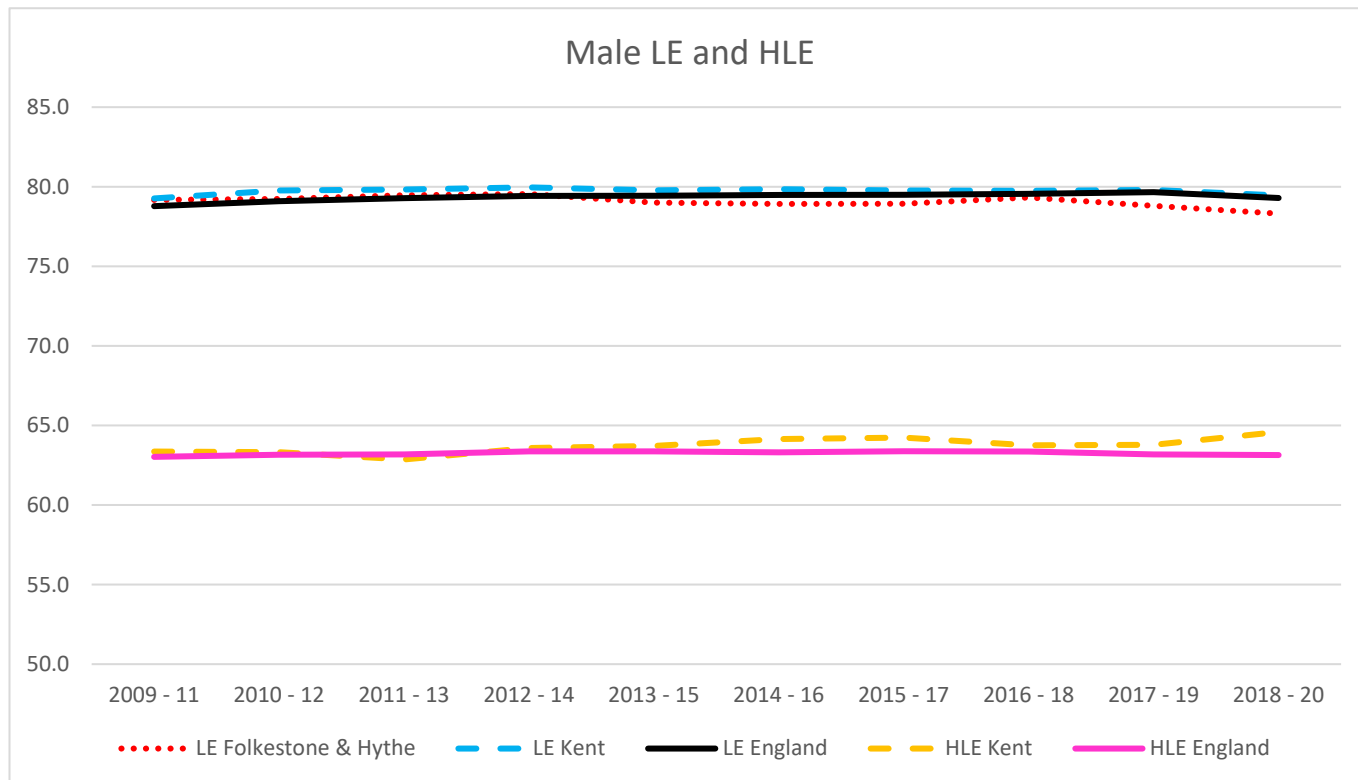
5.3 Life expectancy and physical health

Life expectancy

- 5.3.1 Figure 5.3 shows time-series data, spanning 2009-20 for life expectancy (LE) and healthy life expectancy (HLE) (i.e. the number of years spent in good health) for Folkestone & Hythe, Kent, and England. HLE data was not available for Folkestone & Hythe.
- 5.3.2 Both male and female LE in Folkestone & Hythe have seen a general reduction since 2009-11 to a level which is lower than the county and national averages.
- 5.3.3 HLE for males in Kent has shown a general increase since 2009-11, while female HLE in Kent has decreased since 2009-11. Both are contrary to the national trends which have remained relatively static over the same time period.

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Figure 5.2: Life expectancy and healthy life expectancy

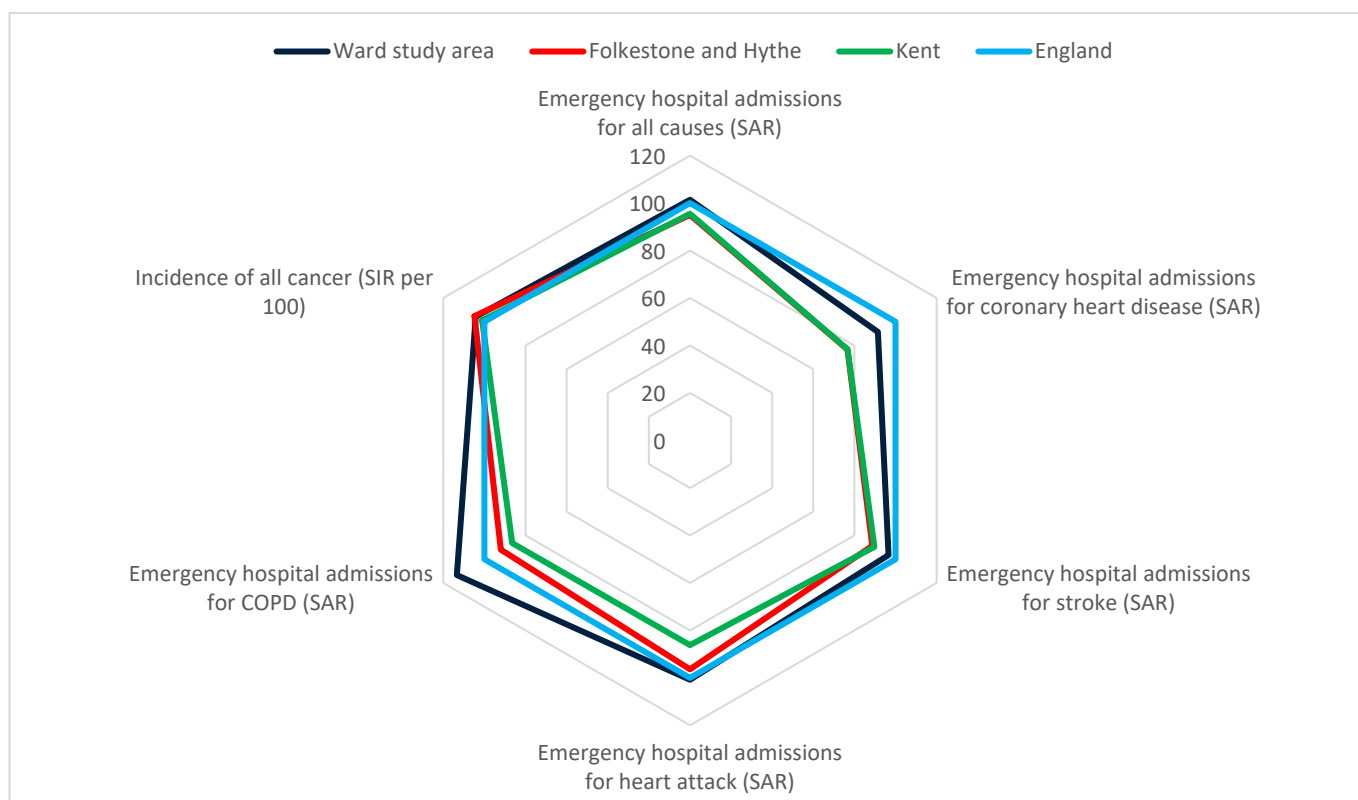


Source: OHID Public Health Profiles (OHID, n.d.)

Hospital admissions and cancer incidence

- 5.3.4 Figure 5.3 shows emergency hospital admissions within the ward study area and all relevant comparators.
- 5.3.5 Emergency hospital admissions for all causes in the ward study area are higher than all relevant comparators. When analysing specific health outcomes, the same is true for heart attacks and COPD. Emergency hospital admissions for CHD and stroke in the ward study area are lower than the national average, but higher than the district and county averages.
- 5.3.6 In the absence of emergency hospital admission data for cancer, the statistics relating to the incidence have been collected. The incidence of all cancer is higher in the ward study area are higher than the county and national average, but marginally lower than the district average.

Figure 5.3: Emergency hospital admissions and cancer incidence statistics



Source: OHID Local Health (OHID, n.d.); N.B. Emergency hospital admissions data are Standardised Admissions Ratio (SAR) for the years 2015-16 to 2019-20 and incidence of all cancer are Standardised Incidence Ratio (SIR) per 100 for the years 2015-2019

Mortality

- 5.3.7 Figure 5.4 shows standardised mortality rates for the ward study area and all relevant comparators.
- 5.3.8 Mortality rates from all causes within the ward study area are higher than all relevant comparators. The same is true when analysing mortality rate for the majority of specific health outcomes. The exceptions to this are coronary heart disease and stroke.

Figure 5.4: Mortality statistics





Source: OHID Local Health (OHID, n.d.); N.B. Mortality rate data are Standardised Mortality Rate (SMR) for the years 2016-2020

5.4 Mental health, lifestyle and behavioural risk factors

- 5.4.1 Table 5.2 shows the hospital stays for self-harm and suicide rates, which are indicative of mental health. Hospital stays for self-harm within the ward study area are higher than all relevant comparators. Folkestone & Hythe district is the lowest geography for which suicide rate statistics are available; the rate of suicide in Folkestone & Hythe district is higher than the national average and lower than the county average.
- 5.4.2 Table 5.2 also shows lifestyle and behavioural risk factors in children and adults. When analysing lifestyle and behavioural risk factors of children, the prevalence of overweight children (including obesity) and the prevalence of obesity (including severe obesity) in Reception and Year 6 is higher in the ward study area than all relevant comparators. Smoking prevalence at 15 years is higher in the ward study area than all relevant comparators.
- 5.4.3 In terms of the adult population, Folkestone & Hythe district is the lowest geography for which statistics relating to hospital stays for alcohol-related conditions, overweight or obese adults, and the percentage of adults who are physically active, are available for. The percentage of the population in Folkestone & Hythe district who are overweight or obese is lower than all relevant comparators. Consistently, the percentage of the population in Folkestone & Hythe district who are physically active is higher than all relevant comparators. The percentage of hospital stays for alcohol related conditions in Folkestone & Hythe district is lower than the national average but higher than the county average.

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Table 5.2: Mental health, lifestyle and behavioural risk factors

Indicator	Date	Ward study area	Folkestone & Hythe district	Kent	England
Mental health					
Hospital stays for self-harm (SAR)	2016-17 to 2020-21	153.2	95.1	105.4	100
Suicide rate (per 100,000 population)	2021-23	n/a	11.0	11.7	10.8
Lifestyle and behavioural risk factors					
Prevalence of overweight children, including obesity (Reception) (%)	2017-18 to 2019-20	26.9	24.3	23.8	22.6
Prevalence of obesity, including severe obesity (Reception) (%)	2017-18 to 2019-20	13.9	11	10.1	9.9
Prevalence of overweight children, including obesity (Year 6) (%)	2017-18 to 2019-20	39.5	36	34.2	35.8
Prevalence of obesity, including severe obesity (Year 6) (%)	2017-18 to 2019-20	26.4	22.8	20.1	21.6
Smoking prevalence at 15 years (regular) (%)	2014	5.2	7.3	7.3	5.4
Hospital stays for alcohol-related conditions (narrow) (per 100,000 population)	2016-17 to 2020-21	n/a	435.8	412.0	474.6
Percentage of adults classified as overweight or obese	2022/23	n/a	63.7	67.0	64.0
Percentage of physically active adults	2022/23	n/a	73.8	68.4	67.1
Key:					
	Better than the England average				
	Worse than the England average				

Source: OHID Local Health (OHID, n.d.), OHID Public Health Profiles (OHID, n.d.)

5.5 Local healthcare capacity

- 5.5.1 The site is located within NHS Kent and Medway ICB - 91Q. Within this Sub-ICB there is a total of 47 FTE GPs (per 100,000 population), covering a population of 2,029,010 (NHS Digital, 2024). This equates to an average list size of 2,135 patients per GP, which is higher than the target list size of 2,000 patients per GP defined in NHS England's "Premises Principles of Best Practice Part 1 Procurement & Development".
- 5.5.2 There are five GP facilities within 1.2 miles (or 2km) of site¹, the upper limit of what is considered a walkable distance. Table 5.3 shows these GP facilities, the number of FTE GPs and patients, and the resultant calculated patient to GP ratio. In total, there is capacity for an additional 8,545 patients.

¹ 1.2 miles is equivalent to 2 km (i.e. the upper limit of what is considered a walkable distance between primary facilities and residential areas, with the greatest potential to replace short car trips) (Department for Transport, 2007)

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Table 5.3: Local healthcare facilities within 1.2 miles of the site

Name	Distance (miles)	FTE GPs	Number of patients	Patients per GP	Capacity
Harbour Medical Practice	0.3	0.4	3,556	8,334	0
Guildhall Street Surgery	0.4	3.71	9967	2,689	0
Manor Clinic	0.4	3.9	9,703	2,463	0
The New Surgery	0.8	4.4	10,288	2,335	0
Sandgate Road	1	10.7	12,839	1,201	8,545
Total					8,545

5.6 Health and wellbeing baseline summary

- 5.6.1 Overall, the ward study area generally has a more elderly population than the national average, with some variance between the male and female population.
- 5.6.2 Indicators relating to socio-economic circumstance show that the population living within the ward study area and Folkestone & Hythe district generally show higher levels of deprivation when compared to the Kent and national averages.
- 5.6.3 For the majority of indicators analysed which relate to physical health, the burden of poor health within the population living within the ward study area is considered to be higher than all relevant comparators. The exceptions to this are male HLE, emergency hospital admissions for CHD and stroke, and mortality rate for coronary heart disease and stroke.
- 5.6.4 Mental health indicators show worse circumstance in the ward study area than the national average. The majority of lifestyle and behavioural risk factors relating to the child population are worse than all relevant comparators; the exception to this is smoking prevalence at 15 years. Physical activity and obesity indicators in the adult population are better than all relevant comparators, while substance misuse (alcohol-related conditions) shows a better circumstance than the national average, but worse circumstance than the county average.
- 5.6.5 Analysis of local primary healthcare facilities shows that there is capacity for an additional 8,545 patients within walking distance of the harbour plots area.
- 5.6.6 Overall, it is considered that the population living within the study area are more sensitive to environmental and/or socio-economic changes associated with the harbour plots area. While this is the case, it should be noted that the population would disproportionately benefit from any socio-economic opportunities associated with the construction and operation of the harbour plots area.

6 Assessment

6.1.1 The assessment provided in Table 6.1 to Table 6.11 appraises the potential health and wellbeing impacts of the harbour plots area (and whole masterplan area, where more appropriate). As previously stated, the themes outlined in the HUDU HIA Tool comprise a range of criteria categorised by the following eleven topics or broad determinants:

- housing design and affordability;
- access to health and social care services and other social infrastructure;
- access to open space and nature;
- air quality, noise and neighbourhood amenity;
- accessibility and active travel;
- crime reduction and community safety;
- access to healthy food;
- access to work and training;
- social cohesion and inclusive design;
- minimising the use of resources; and
- climate change.

6.1.2 The criteria outlined within each of the four themes are assessed, whereby the relevancy to the harbour plots area (and whole masterplan area, where more appropriate), any details/evidence and the potential impact on health are determined.

6.1.3 The potential impact on health column is colour coded as follows:

- positive: green;
- negative: orange;
- neutral: blue; and
- uncertain: grey.

6.1.4 The final column presents additional mitigation and/or actions that respond to and address any potentially significant health and wellbeing impact, but also help deliver community support initiatives that would be supportive of public health objectives.

Table 6.1: Housing design and affordability

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Mitigation or enhancement
Does the proposal seek to meet all 16 design criteria of the Lifetime Homes Standard or meet Building Regulation requirement M4 (2)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	As stated in the Harbour Plan DAS, consistent with local planning policy, 20% of residential units (a total of 82) would comply with the requirements of M4(2) accessible and adaptable dwellings (which supersedes the Lifetime Homes Standards). The remainder are to comply with the requirements of M4(1) visitable dwellings.	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No further mitigation or enhancement measures necessary.
Does the proposal address the housing needs of older people, i.e., extra care housing, sheltered housing, lifetime homes and wheelchair accessible homes?		It should be noted that whilst 82 units have been identified as complying with M4(2) others may also be accessible and adaptable due to their design. In addition, the distribution of M4(2) units have been carefully thought through to ensure adequate lift provision (more than one) and appropriate sizing to enable carers/personal assistants are able to stay overnight.		
Does the proposal include homes that can be adapted to support independent living for older and disabled people?		Such provision adequately addresses the needs of older people and disabled people, facilitating healthy independent living for longer.		
Does the proposal promote good design through layout and orientation, meeting internal space standards?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	The layout and orientation of buildings has been established to respond well to the coastal environment, for example to protect against south-westerly winds. In addition, all dwellings would meet the Nationally Described Space Standards (NDSS).	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No further mitigation or enhancement measures necessary.

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Mitigation or enhancement
<p>Does the proposal include a range of housing types and sizes, including affordable housing responding to local housing needs?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>	<p>The harbour plots would deliver 410 residential units and 7,466.8m² of commercial area and spaces spread over 14 buildings connected by a single-storey raised basement containing 582 parking spaces for residents and a further 323 parking spaces for commercial uses, as outlined in the Transport Assessment.</p> <p>The residential typologies vary from 1- to 4-bed units in either townhouses and duplexes or flats.</p> <p>A total of 8% of units will be affordable (shared ownership) in nature; the majority of these will be delivered in the harbour plots area (30 1-bed units and 22 2/3-bed units).</p>	<p><input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain</p>	<p>No further mitigation or enhancement measures necessary.</p>
<p>Does the proposal contain homes that are highly energy efficient (e.g., a high SAP rating)?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>	<p>As stated in the Energy and Sustainability Appraisal submitted as part of the March RMA, an energy hierarchy of lean, clean green to reduce operational energy and carbon emissions. These core principles have not changes from the original planning submission.</p> <p>By incorporating the relevant passive and active design strategies and renewable technologies, the proposed design achieves a 58% improvement in dwelling emission rate (DER) over the target emission rate. This significantly surpasses the original outline planning application target of 25% reduction required against Part L 2010, and also align with Part L 2021 targets. The proposed changes result in a less than 1% impact on the DER.</p>	<p><input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain</p>	<p>No further mitigation or enhancement measures necessary.</p>

Table 6.2: Access to health and social care services and other social infrastructure

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Mitigation or enhancement
Does the proposal retain or reprovide existing social infrastructure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>The existing site was not open to the public until after outline consent was granted. Since then, the site has been developed to include meanwhile uses; these are mainly food and beverage stalls, some cafés and restaurants housed in repurposed shipping containers as well as the Goods Yard with the large screen showing movies, sports events and even state ceremonies. There are also some units in the old waiting rooms on the Harbour Arm and the lighthouse.</p> <p>The proposed redevelopment of the harbour plots area will reprovide this social infrastructure in the Rotunda, providing a permanent, year-round house for these thriving businesses. Additional social infrastructure will be provided in the form of community space, located in Plot G-1 and on Lighthouse Lane.</p>	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No further mitigation or enhancement measures necessary.
Does the proposal assess the impact on health and social care services and has local NHS organisations been contacted regarding existing and planned healthcare capacity?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>The original ES proposed the delivery of 350m² of space for on-site healthcare infrastructure. However, it was agreed with the former Clinical Commissioning Group (CCG) that a financial contribution in the region of £1,008,000 to fund off-site primary care improvements within the town centre area would be more appropriate.</p>	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No further mitigation or enhancement measures necessary.
Does the proposal include the provision, or replacement of a healthcare facility and does the facility meet NHS requirements?		<p>The improvements delivered with the financial contribution would serve occupants of the whole masterplan area (including the harbour plots).</p>		

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Mitigation or enhancement
<p>Does the proposal assess the capacity, location and accessibility of other social infrastructure, e.g., primary, secondary and post 19 education needs and community facilities?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>	<p>ES Chapter 5 assesses the potential impacts on primary and secondary school capacity.</p> <p>Results show that prior to mitigation, there is likely to be a permanent moderate adverse effect on primary schools upon full completion due to the limited availability of spaces in nearby schools (albeit there is capacity within the town itself).</p> <p>Similarly, prior to mitigation there is likely to be a permanent moderate adverse effect on secondary schools. This is on the basis that whilst the project is predicted to support fewer secondary school aged children, the current secondary school provision is more acute.</p> <p>While this is the case, it has been agreed that a financial contribution relating to primary education would be paid upon pre-occupation of the 61st dwelling, every 60th dwelling thereafter and the final dwelling. This is considered to be sufficient to mitigate adverse impacts on education facilities.</p>	<p><input type="checkbox"/> Positive <input type="checkbox"/> Negative <input checked="" type="checkbox"/> Neutral <input type="checkbox"/> Uncertain</p>	<p>No further mitigation or enhancement measures necessary.</p>
<p>Does the proposal explore opportunities for shared community use and co-location of services?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>	<p>The proposed redevelopment of the harbour plots area will include community space, located in Plot G-1 and on Lighthouse Lane.</p>	<p><input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain</p>	<p>No further mitigation or enhancement measures necessary.</p>

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Table 6.3: Access to open space and nature

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Mitigation or enhancement
Does the proposal retain and enhance existing open and natural spaces?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>A range of open space types would be delivered as part of the landscaping proposals for the whole masterplan area. Specifically:</p> <ul style="list-style-type: none"> ▪ squares and public open spaces; ▪ publicly accessible shingle gardens; ▪ residents' shared gardens; and ▪ beach playable space. 	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	<p>No further mitigation or enhancement measures necessary.</p>
In areas of deficiency, does the proposal provide new open or natural space, or improve access to existing spaces?		<p>Specifically, the harbour plots area will be extensively landscaped with tree lined streets, squares and a new seafront park that protects from the wind and gives a new amenity to the town as well as significantly increasing biodiversity.</p>		
Does the proposal provide a range of play spaces for children and young people?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>As stated in the Harbour Plan DAS, the landscape proposals include four play areas across the harbour plots area. These areas measure 5,026 sqm, comprising the harbourside area, seafront park, residential garden, and publicly accessible shingle garden.</p> <p>Each play area responds to the distinct landscape character it sits within and offers a variety of formal and informal play features from natural beach play in the shingle garden through to woodland exploration, and maritime adventure.</p> <p>Specifically, the Residents Garden (between Plot F1 Buildings 1, 2 & 3) features a small play area. In addition, areas of activity and respite are located to the south of the boardwalk including an area dedicated to play. Children can explore, scavenge and discover 'The Shipwreck' with its natural timber elements scattered throughout the dune landscape.</p>	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	<p>No further mitigation or enhancement measures necessary.</p>

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Mitigation or enhancement
Does the proposal provide links between open and natural spaces and the public realm?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	The harbour plots area delivers high-quality public realm throughout and will be extensively landscaped with tree lined streets. Key public spaces include Harbour Station, Maker's Row, Lighthouse Lane, Harbourside, the Amphitheatre and Harbour Arm. The key green spaces include Shingle Garden, the Boardwalk and Seafront Park, which connect to the public realm through consideration of good permeability throughout the site.	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No further mitigation or enhancement measures necessary.
Are the open and natural spaces welcoming and safe and accessible for all?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>As stated in the Harbour Plan DAS, the developer embraces inclusive design and will follow the principles through design by adherence to leading material available to endeavour to provide compliance with the Building Regulations Part M through the guidance of the Approved Document M.</p> <p>Specifically, accessible paths would be integrated throughout and clearly signed. For example a boardwalk is provided in the Shingle Garden, and stepped access to the Residents Garden can be overcome by using internal lifts from Ploy F-1 and Buildings 1, 2 and 3.</p>	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No further mitigation or enhancement measures necessary.
Does the proposal set out how new open space will be managed and maintained?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Consistent with previous phases, a Management and Maintenance Plan would be prepared for the harbour plots area prior to commencement and this will outline how new open space would be managed and maintained.	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No further mitigation or enhancement measures necessary.

Table 6.4: Air quality, noise and neighbourhood amenity

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Mitigation or enhancement
Does the proposal minimise construction impacts such as dust, noise, vibration and odours?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Following the implementation of proposed mitigation measures outlined in a dedicated Construction Environmental Management Plan (CEMP), impacts at nearby receptors from changes in environmental factors such as dust and noise during the construction phase would be managed to an acceptable level. Consistent with previous phases of the whole masterplan area, a CEMP would be secured by an appropriate condition that needs to be discharged before works can start.	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No further mitigation or enhancement measures necessary.
Does the proposal minimise air pollution caused by traffic and energy facilities?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>As stated in ES Chapter 12, the maximum change in annual mean NO₂ and PM₁₀ concentrations associated with the increase in traffic from the whole masterplan area is 0.9 µg/m³ and 0.3 µg/m³, respectively. In all instances, predicted environmental concentrations of NO₂ and PM₁₀ would remain within the relevant air quality objective thresholds, which are set to be protective of the environment and human health.</p> <p>The whole masterplan area would source its energy from air source heat pumps and photovoltaic arrays, which would have a negligible impact on air quality and so has not been assessed.</p>	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No further mitigation or enhancement measures necessary.
Does the proposal minimise noise pollution caused by traffic and commercial uses?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>As stated in ES Chapter 13, in addition to traffic, commercial, retail and leisure uses of the whole masterplan area have the potential to result in changes in noise exposure.</p> <p>It is considered that noise from leisure activities (e.g. jet-skis and power boats) would be appropriately controlled by local authority powers. In addition, on the basis that fixed plant and building services equipment is appropriately located, there would be limited potential for adverse noise impacts from these sources. Worst-case increases in road traffic noise are no higher than approximately 2 dB, which is considered negligible.</p> <p>The Noise Impact Assessment assesses in detail the potential noise impacts from and on the harbour plots area. It is considered that residential units, including on balconies/terraces, would experience appropriate noise levels that meet daytime and night time thresholds which are protective of the environment and health (e.g. from</p>	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No further mitigation or enhancement measures necessary.

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Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Mitigation or enhancement
		<p>external noise and building services noise).</p> <p>In addition, noise from events to be held at the Goods Yard have been assessed. The assessment outlines restrictions to reduce the frequency and duration of external impacts.</p>		

Table 6.5: Accessibility and active travel

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Mitigation or enhancement
Does the proposal address the ten Healthy Streets indicators?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>The ten Healthy Streets indicators and how the harbour plots area supports them are as follows:</p> <ul style="list-style-type: none"> ▪ People choose to walk, cycle and use public transport: the whole masterplan area is well connected to public transport and pedestrians have been given high priority. The Sustrans No. 2 route would be retained, providing cycle access through the site. ▪ Pedestrians from all walks of life: the harbour plots area includes non-residential uses to attract people from all walks of life. In addition, residential uses would be of various sizes and tenures to attract a range of permanent occupants. ▪ Easy to cross: the vast majority of the harbour plots area is pedestrianised and only accessible to maintenance, emergency and service vehicles. ▪ People feel safe: pedestrian routes across the whole masterplan area will be mostly lit at night, with overlooking by neighbouring homes assisting general safety and sense of security. ▪ Things to see and do: the harbour plots area specifically includes several non-residential uses to provide things to see and do. ▪ Places to stop and rest: seating would be provided throughout the public realm for people to stop and rest; these areas have been tested as part of the wind assessment, whereby it is concluded that they are located in areas with appropriate conditions. ▪ People feel relaxed: the harbour plots area has been designed as an attractive destination with landscaped areas so that people feel relaxed. ▪ Not too noisy: noise during construction and operation is anticipated to be appropriately managed by measures in the CEMP and local authority powers (associated with leisure uses). ▪ Clean air: air quality would remain within objective thresholds which are set to be protective of the environment and human health. ▪ Shade and shelter: landscaped areas throughout the harbour plots area would provide shade and shelter. 	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	<p>No further mitigation or enhancement measures necessary.</p>

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Mitigation or enhancement
Does the proposal prioritise and encourage walking, for example through the use of shared spaces?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	As stated in the ES Addendum Chapter 2, pedestrian permeability throughout the whole masterplan area has been given high priority in the masterplanning of the scheme, maximising levels of safety, activity and connectivity. With the exception of Marine Parade, the vehicular routes will be predominantly shared surface with pedestrian priority. Marine Parade will have a pedestrian route separated in parts by planting and seating areas from the parking areas.	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No further mitigation or enhancement measures necessary.
Does the proposal prioritise and encourage cycling, for example by providing secure cycle parking, showers and cycle lanes?		<p>As stated in the Harbour Plan DAS, for the harbour plots area specifically, there is pedestrian access throughout the site, with the vast majority of the site being accessible only to maintenance, emergency and service vehicles.</p> <p>Regarding cycling, the predominant cycle route through the whole masterplan area connects from the town centre via Harbour Approach Road and Marine Parade to the Sustrans No. 2 route into the Lower Leas Coastal Park.</p> <p>For the harbour plots area specifically, there is residential cycle parking provision for 744 bikes. In addition, there is visitor cycle parking provision for 216 bikes (short to medium term) and 118 bikes (medium to long term). There is a 6% overall provision for accessible/family/cargo bikes. All residential and commercial staff bike stores are secure.</p>		
Does the proposal connect public realm and internal routes to local and strategic cycle and walking networks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>As stated in ES Addendum Chapter 2, every opportunity is taken to connect with surrounding areas, enhancing accessibility in this part of Folkestone and connecting the town centre to the beach and Harbour. Both Marine Parade and The Boardwalk continue to Leas Lift Square, and the entrance to the Lower Leas Coastal Park and Marine Walk. To the north of Marine Parade are routes up the cliff to The Leas and The Bayle.</p> <p>A significant improvement to connectivity is the opening up of the Harbour Viaduct to pedestrians. This route forms a link between the town and the sea which leads to the lighthouse at the end of the Harbour Arm, and connects to the Boardwalk which in turn connects to the Lower Leas Coastal Park.</p>	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No further mitigation or enhancement measures necessary.

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Mitigation or enhancement
Does the proposal include traffic management and calming measures to help reduce and minimise road injuries?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>Consistent with previous phases of the whole masterplan area, a Construction Management Traffic Plan (CMTP) would be secured by an appropriate condition that needs to be discharged before works can start. The CMTP would include details of HGV routing, hours of operation, temporary controlled pedestrian crossings on Marine Parade, maintaining safe and convenient pedestrian and cycle links, protection or rerouting of National Cycle Network Route 2, and retention/protection of parking areas along seafront.</p> <p>As stated in the Harbour Plan DAS, the vast majority of the operational site will only be accessible only to maintenance, emergency and service vehicles, negating the need for traffic management and calming measures during operation.</p>	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No further mitigation or enhancement measures necessary.
Is the proposal well connected to public transport, local services and facilities?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>As stated in ES Chapter 6, there are no proposed changes to public transport provision or infrastructure. While this is the case, the whole masterplan area (including harbour plots) is considered to be adequately served by bus and rail services.</p> <p>Specifically, there are currently two bus services offering frequent transport to a variety of destinations (72 – East Cliff to Cheriton and 127 – Holywell to Broadmead) that serve the nearest bus stops to the site. For a westbound journey from the site, the closest bus stop is 330m from the site. For an eastbound journey, the closest stop is 700m from the site. Both are considered to be within acceptable walking distance.</p> <p>With regards to rail, the number of destinations available, the proximity of the station, the facilities and the service frequency, ensure that this mode adequately serves the development site.</p>	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No further mitigation or enhancement measures necessary.

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Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Mitigation or enhancement
Does the proposal seek to reduce car use by reducing car parking provision, supported by the controlled parking zones, car clubs and travel plans measures?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>As stated in the Harbour Plan DAS, a total of 582 car parking spaces are proposed for residents and 328 spaces for visitors. The majority of these would be within a dedicated basement car park, however, some resident and visitor blue badge car parking would be available on ground level outside Plot F-1 and on mezzanine level.</p> <p>Consistent with previous phases, an update to the Travel Plan (considered a live document to be updated with each phase) would be undertaken for the harbour plots area prior to commencement, outlining a long-term travel strategy to encourage residents, visitors and staff to travel by sustainable modes rather than private car.</p>	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No further mitigation or enhancement measures necessary.
Does the proposal allow people with mobility problems or a disability to access buildings and places?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>As stated in the Harbour Plan DAS, the developer embraces inclusive design and will follow the principles through design by adherence to leading material available to endeavour to provide compliance with the Building Regulations Part M through the guidance of the Approved Document M.</p> <p>Specifically, lifts would be provided in residential and non-residential spaces to enable access for all; entrances would be sufficiently wide to ensure access for wheelchair users; blue badge parking is provided throughout; and cycle stores would include spaces for accessible bikes.</p>	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No further mitigation or enhancement measures necessary.

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Table 6.6: Crime reduction and community safety

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Mitigation or enhancement
Does the proposal incorporate elements to help design out crime?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	As stated in ES Addendum Chapter 2, pedestrian routes across the whole masterplan area will mostly be lit at night, with overlooking by neighbouring homes assisting general safety and sense of security. The harbour plots area in particular will benefit from extensive ground floor activation associated with the range of non-residential uses proposed.	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No further mitigation or enhancement measures necessary.
Does the proposal incorporate design techniques to help people feel secure and avoid creating 'gated communities'?				
Does the proposal include attractive, multi-use public spaces and buildings?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	As stated in the Harbour Plan DAS, places thrive when users have a range of reasons to be there. Details of the placemaking strategy for the harbour plots area is provided in the Harbour Plan DAS, whereby it is stated that in close consultation with the local authority and incorporating feedback from local community, the scheme has developed a rich mix of public spaces and amenities that range in scale, use and character.	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No further mitigation or enhancement measures necessary.
Has engagement and consultation been carried out with the local community and voluntary sector?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Extensive community engagement was undertaken in five phases to actively consult with the residents and stakeholders. These are summarised as follows: <ul style="list-style-type: none"> ▪ Phase 0 (Traders Workshop): undertaken in September 2022 with the businesses and traders currently operating on the harbour plot area. ▪ Phase 1: undertaken on 24 February 2023 as an invitation-only event for stakeholder organisations such as Folkestone & Hythe District Council, the Harbour Residents Association and Visit Kent. ▪ Phase 2: a two day public exhibition in May-June 2023 to introduce the public to the proposals. A dedicated website was also developed. ▪ Phase 3: a final public exhibition in July-August 2023 to present the work in progress designs. ▪ Phase 4: a series of talks with local civic groups and district and town councillors. A total of 2,000+ people attended the community engagement events, and over 1,790 feedback forms were received. A full account of stakeholder engagement is detailed in the Statement of Community Involvement.	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No further mitigation or enhancement measures necessary.

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Table 6.7: Access to healthy food

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Mitigation or enhancement
Does the proposal facilitate the supply of local food, for example allotments, community farms and farmers' markets?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	While no allotments or communal food growing opportunities are proposed across the whole masterplan area, as stated in the Harbour Plots DAS, the public realm facing the Inner Harbour and new Goods Yard includes open space for temporary/seasonal markets.	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No further mitigation or enhancement measures necessary.
Is there a range of retail uses, including food stores and smaller affordable shops for social enterprises?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	As stated in the Harbour Plan DAS, the harbour plots area will include a large amount of retail space. Most notably: <ul style="list-style-type: none"> ▪ Harbour Station (Plots F-1 and G-1) will house mainly smaller retail units ▪ Makers Row (Plot G-1) will have some larger, double height retail units intended for light industrial, making and selling ▪ The Walk is a quieter street with mainly duplex residential units, bookended on one side by small commercial spaces 	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No further mitigation or enhancement measures necessary.
Does the proposal avoid contributing towards an over-concentration of hot food takeaways in the local area?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	While it is likely that hot food takeaway vendors will be established as part of the new Goods Yard, the space is more of a leisure destination and the vendors are not necessarily considered to be "fast food outlets" in the typical sense. On this basis, and therefore would not contribute to an over concentration in the local area.	<input type="checkbox"/> Positive <input type="checkbox"/> Negative <input checked="" type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No further mitigation or enhancement measures necessary.

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Table 6.8: Access to work and training

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Mitigation or enhancement
Does the proposal provide access to local employment and training opportunities, including temporary construction and permanent 'end-use' jobs?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>As stated in the Economic Impact Assessment, construction of the harbour plots area would deliver 201 net additional temporary direct, indirect and induced FTE jobs.</p> <p>The regeneration of Folkestone Harbour has already achieved significant impacts, which will be significantly expanded through the redevelopment of the harbour plots area. Once operational, Plots F, G and H account for a significant proportion of the additional economic impact with 762 gross direct, indirect and induced FTE jobs, 492 net additional direct, indirect and induced FTE jobs and £21m of net additional GVA per annum in Folkestone and Hythe.</p> <p>As stated in the Harbour Plots DAS, the Goods Yard and Marketplace meanwhile uses will be relocated temporarily to Plot E-1 while construction takes place; the units on the Harbour Arm will remain in situ. Such an approach would avoid the ceasing of trading and displacement of employment opportunities.</p> <p>Once the development is complete, the businesses that have been incubated on the harbour and seafront will occupy the permanent commercial units as well as the new Goods Yard.</p>	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No further mitigation or enhancement measures necessary.
Does the proposal provide childcare facilities?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	On the basis that non-residential uses within the harbour plots area include Class E, there is potential for the provision of day nurseries and crèches.	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No further mitigation or enhancement measures necessary.
Does the proposal include managed and affordable workspace for local businesses?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Office space of various sizes would be integrated across the harbour plots area, with the potential to include managed and affordable workspace for local businesses. Following discussions with Folkestone and Hythe District Council, it was agreed that there would be discounted rents for locals for the commercial space.	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No further mitigation or enhancement measures necessary.

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Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Mitigation or enhancement
Does the proposal include opportunities for work for local people via local procurement arrangements?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>As outlined in Condition 22 of the s73 permission, there would be active recruitment to employ local workers in relation to the construction phase.</p> <p>In addition, as stated in the Harbour Plots DAS, the intention is that once the development is complete, the businesses that have been incubated on the harbour and seafront during construction of the harbour plots area will occupy the permanent commercial units as well as the new Goods Yard.</p>	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No further mitigation or enhancement measures necessary.

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Table 6.9: Social cohesion and inclusive design

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Mitigation or enhancement
<p>Does the proposal consider health inequalities by addressing local needs through community engagement?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>Extensive community engagement was undertaken in five phases to actively consult with the residents and stakeholders. These are summarised as follows:</p> <ul style="list-style-type: none"> ▪ Phase 0 (Traders Workshop): undertaken in September 2022 with the businesses and traders currently operating on the harbour plot area. ▪ Phase 1: undertaken on 24 February 2023 as an invitation-only event for stakeholder organisations such as Folkestone & Hythe District Council, the Harbour Residents Association and Visit Kent. ▪ Phase 2: a two day public exhibition in May-June 2023 to introduce the public to the proposals. A dedicated website was also developed. ▪ Phase 3: a final public exhibition in July-August 2023 to present the work in progress designs. ▪ Phase 4: a series of talks with local civic groups and district and town councillors. <p>A total of 2,000+ people attended the community engagement events, and over 1,790 feedback forms were received. A full account of stakeholder engagement is detailed in the Statement of Community Involvement.</p>	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	<p>No further mitigation or enhancement measures necessary.</p>
<p>Does the proposal connect with existing communities, i.e., layout and movement which avoids physical barriers and severance and land uses and spaces which encourage social interaction?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>As stated in ES Addendum Chapter 2, every opportunity is taken to connect with surrounding areas, enhancing accessibility in this part of Folkestone and connecting the town centre to the beach and Harbour. Both Marine Parade and The Boardwalk continue to Leas Lift Square, and the entrance to the Lower Leas Coastal Park and Marine Walk. To the north of Marine Parade are routes up the cliff to The Leas and The Bayle.</p> <p>A significant improvement to connectivity is the opening up of the Harbour Viaduct to pedestrians. This route forms a link between the town and the sea which leads to the lighthouse at the end of the Harbour Arm, and connects to the Boardwalk which in turn connects to the Lower Leas Coastal Park.</p>	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	<p>No further mitigation or enhancement measures necessary.</p>

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Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Mitigation or enhancement
Does the proposal include a mix of uses and a range of community facilities?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	The harbour plots area comprises the majority commercial space that makes up the whole masterplan area (7,466.8m ² of the proposed 10,000 m ²).	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No further mitigation or enhancement measures necessary.
Does the proposal provide opportunities for the voluntary and community sectors?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	The proposed redevelopment of the harbour plots area will include community space, located in Plot G-1 and on Lighthouse Lane.	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No further mitigation or enhancement measures necessary.
Does the proposal take into account issues and principles of inclusive and age-friendly design?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>As stated in the Harbour Plan DAS, the developer embraces inclusive design and will follow the principles through design by adherence to leading material available to endeavour to provide compliance with the Building Regulations Part M through the guidance of the Approved Document M.</p> <p>Both residential and non-residential uses (including public realm and areas of open space) would be accessible and have been designed in an inclusive way. Details of this are provided in previous assessment criteria.</p>	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No further mitigation or enhancement measures necessary.

Table 6.10: Minimising the use of resources

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Mitigation or enhancement
Does the proposal make best use of existing land?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>The existing site was not open to the public until after outline consent was granted. Since then, the site has been developed to include meanwhile uses; these are mainly food and beverage stalls, some cafés and restaurants housed in repurposed shipping containers as well as the Goods Yard with the large screen showing movies, sports events and even state ceremonies. There are also some units in the old waiting rooms on the Harbour Arm and the lighthouse.</p> <p>Notwithstanding the improvements to the area and the success of the meanwhile uses, the proposed redevelopment of the harbour plots area will deliver much needed housing in addition to providing a permanent, year-round house for the thriving businesses and include additional sea defences and raised levels to guarantee access to the harbour and beach for the next generations.</p> <p>Considering that the existing site was not previously open to the public, and the meanwhile uses are being re-provided permanently, it is considered that the redevelopment of the harbour plots area makes best use of existing land.</p>	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No further mitigation or enhancement measures necessary.
Does the proposal encourage recycling, including building materials?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>As stated in the Energy and Sustainability Appraisal submitted as part of the March RMA, a Site Waste Management Plan (SWMP) would be required before commencing works with the aim to identify the type of waste materials being removed from the site to promote resource efficiency via the effective management of construction waste. Construction waste materials will be sorted into separate key waste groups, either on-site or off-site and diverted from landfills.</p> <p>As stated in the Harbour Plan DAS, all residential units that make up the operational development within the harbour plots area will incorporate space for the segregation of waste into the four streams currently collected by the council. Within the site, waste collection for residential properties will be undertaken at various pick up points. As it is not be possible for all bin stores to be located within 10m of a vehicle route, an on-site management strategy will be put in place to transfer bins to central collection points as</p>	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No further mitigation or enhancement measures necessary.

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Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Mitigation or enhancement
		<p>required.</p> <p>It is anticipated that waste from each of the individual commercial units will be deposited by occupants into local commercial bin stores provided across the masterplan. The facilities management team will then transfer the waste to a combined commercial bin store for compaction and storage prior to it being removed by a waste collection company.</p>		
Does the proposal incorporate sustainable design and construction techniques?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>As stated in the Energy and Sustainability Appraisal submitted as part of the March RMA, the following specific embodied carbon hierarchy has been adopted where possible: use less; reuse and recycle; specify low carbon; and offset.</p> <p>Emphasis will be put on designers and contractors to source materials locally and specify and procure materials with valid Environmental Product Declarations (EPDs). This will be secured by selecting materials with high sustainability standards such as sustainably sourced wood, recycled steel and low carbon concrete.</p>	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No further mitigation or enhancement measures necessary.

Table 6.11: Climate change

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Mitigation or enhancement
Does the proposal incorporate renewable energy?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	As stated in the Energy and Sustainability Appraisal submitted as part of the March RMA, the following renewable energy technologies are proposed for the harbour plots area: <ul style="list-style-type: none"> air source heat pumps sized to meet the heating and cooling loads; and rooftop mounted photovoltaic array for electricity generation. 	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No further mitigation or enhancement measures necessary.
Does the proposal ensure that buildings and public spaces are designed to respond to winter and summer temperatures, for example ventilation, shading and landscaping?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	As stated in the Harbour Plan DAS, the project has been thoroughly assessed digitally as the design has developed to ensure the design responds well to parameters such as wind, over-shading and overheating. For example, the raised cheeks on the balcony guardrails vary in their position depending on wind exposure and direction and the needs for privacy, while the depth of balconies and size of openings is influenced by daylight and shading requirements. In addition, landscaped areas throughout the harbour plots area will provide shading to help provide respite in summer months.	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No further mitigation or enhancement measures necessary.
Does the proposal maintain or enhance biodiversity?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	As stated in the Harbour Plan DAS, extensive greening is proposed in the harbour plots area, which includes the creation of a new Seafront Park, the Shingle Gardens and a residents podium garden. Overall, such provision would result in a biodiversity net gain of 154.06%.	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No further mitigation or enhancement measures necessary.
Does the proposal incorporate sustainable urban drainage techniques?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	ES Chapter 9 outlines several mitigation measures to reduce the risk of flooding due to surface drainage system capacity. In summary the system will be designed so that the risk of flooding to developments is less than 1 in 200 years including the effects of climate change and also to ensure that no additional pressure is put on existing networks or adjacent sites. Where appropriate, sustainable drainage systems will be incorporated. As the discharge is straight to tidal waters, no attenuation of surface water is necessary.	<input checked="" type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Neutral <input type="checkbox"/> Uncertain	No further mitigation or enhancement measures necessary.

7 Mitigation and Monitoring

- 7.1.1 Public health is by definition preventative in nature. Therefore, mitigation measures adopted as part of the construction and occupation of the project will focus on precursors to health and wellbeing outcomes, thereby providing an opportunity for intervention to prevent any adverse impacts.
- 7.1.2 As outlined in the Section 6 (Assessment), the implementation of mitigation measures outlined in a dedicated CEMP to ensure impacts at nearby receptors from changes in environmental factors such as dust and noise would be managed to an acceptable level. Additionally, a SWMP will be implemented, which includes measures to minimise waste and encourage recycling.
- 7.1.3 During operation, an array of overlapping embedded healthy urban design features set to protect and promote health are provided across the harbour plots area.
- 7.1.4 On the basis that no material adverse impacts are anticipated, and embedded mitigation measures are designed to be protective of health and supportive of wellbeing by targeting precursors to health outcomes, no further health-specific mitigation is considered necessary. Similarly, should any monitoring be required, this should target the determinants of health so as to preclude adverse health and wellbeing impacts. On this basis, no health-specific monitoring is necessary.

8 Conclusions and Recommendations

- 8.1.1 The harbour plots area is made up of 15 new buildings comprising 410 dwellings (apartments and duplexes ranging from 1 bed to 4 beds) and 7,466.8m² commercial floorspace, with high quality landscaping throughout.
- 8.1.2 Healthy placemaking is incorporated within the design of the harbour plots area. Most notably, these include:
- The delivery of key public spaces that activate the ground level and provide passive surveillance that contributes to feelings of safety, encouraging social interaction; and
 - The inclusion of four play areas (the harbourside area, seafront park, residential garden, and publicly accessible shingle garden) totalling 5,026 sqm.
- 8.1.3 The majority of the criteria assessed indicate that the harbour plots area will be supportive of good health and wellbeing, with no material adverse health impacts anticipated.
- 8.1.4 No additional mitigation or enhancement measures have been recommended; this is primarily on the basis that this is a reserved matters application, whereby the masterplan has been extensively developed up to this point, and all remaining detailed matters outlined in relation to the harbour plots area would facilitate a healthy, vibrant and cohesive community.

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