Imperial Gardens
Volume 1: Environmental Statement

Chapter E Cultural Heritage

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E1.0 Introduction

E1.1 This Chapter of the Environmental Statement ('ES') has been prepared by Tetra Tech Consulting Services Limited on behalf of the Applicant, GSE Group ('the Applicant'). It assesses the effects of the Proposed Development described in Chapter C on Cultural Heritage (Built Heritage and Archaeology) receptors.

E1.2 This chapter sets out the baseline situation and then discusses the likely environmental effects of the Proposed Development during its construction and operational phases. Mitigation measures to reduce any negative environmental effects are identified where appropriate, before the residual environmental effects on Cultural Heritage receptors are assessed.

E1.3 This Chapter is supported by the following technical appendices provided at Volume 2 to this ES:-

- Appendix E1: Archaeological Desk Based Assessment, RPS/TetraTech, 2025
- Appendix E2: Built Heritage Statement, RPS/TetraTech, 2025

About the Author

E1.4 This Chapter of the Environmental Statement has been prepared by Edward Hawkins, who is accredited and experienced in assessing the effects of change in the Historic Environment. Edward is a Technical Director in the RPS/TetraTech Heritage Team and has over 9 years experience in Cultural Heritage assessment for EIA. Edward is a full member of the Institute for Historic Buildings Conservation ('IHBC') and a full member of the Chartered Institute for Archaeologists ('CIFA').

E2.0 Policy Context

Legislation

Planning (Listed Buildings and Conservation Areas) Act (1990) [1]

E2.1 The Planning (Listed Buildings and Conservation Areas) Act (1990) provides statutory protection to listed buildings and their settings, and present, measures to designate and preserve the character and appearance of conservation areas.

E2.2 Section 1(5) of the Act notes that 'listed building' means a building which is for the time being included in a list compiled or approved by the Secretary of State under this section; and for the purposes of the Planning (Listed Buildings and Conservation Areas) Act 1990:

'(a) any object or structure fixed to the building;

(b) any object or structure within the curtilage of the building which, although not fixed to the building, forms part of the land and has done so since before 1st July 1948'.

E2.3 Also of relevance to this assessment are the general duties set out in relation to listed buildings and conservation areas in the exercise of planning functions in sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 Act.

E2.4 Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 imposes a general duty in respect of listed buildings in the exercise of planning functions. Subsection (1) of Section 66 states that:

'In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.'

E2.5 The meaning and effect of these duties have been considered by the courts, including the Court of Appeal's decision in relation to Barnwell Manor Wind Energy Ltd v East Northamptonshire District Council [2014] EWCA Civ 137.

E2.6 The Court agreed within the High Court's judgement that Parliament's intention in enacting section 66(1) was that decision makers should give:

'considerable importance and weight' to the desirability of preserving (i.e. keeping from harm) the setting of listed buildings.'

E2.7 Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that '… with respect to any building or other land in a conservation area… (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area…'. This requirement of the Planning (Listed Buildings and Conservation Areas) Act 1990 Act refers explicitly to buildings or land 'in' a Conservation Area, not outside. The Planning (Listed Buildings and Conservation Areas) Act 1990 does not make specific provisions to protect the setting of conservation areas.

Planning Policy Context

National Planning Policy

The National Planning Policy Framework (NPPF)[2]

E2.8 The National Planning Policy Framework ('NPPF') sets out the Government's planning policies for England and how these should be applied. The NPPF has three overarching objectives to achieve its aim of sustainable development. This includes 'an environmental objective – to protect and enhance our natural, built and historic environment' (Chapter 2, paragraph 8).

E2.9 The NPPF Annex 2 Glossary[3] defines a heritage asset as:

'A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing)'.

E2.10 It defines the 'historic environment' as:

'All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora.'

E2.11 It defines the 'setting of a heritage asset' as:

'The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.'

E2.12 It defines 'significance' (for heritage policy) as:

'The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site's Statement of Outstanding Universal Value forms part of its significance.'

E2.13 Heritage assets are subject to national policy set out in Chapter 16 of the NPPF (paragraphs 202-214), which is supported by guidance in the Planning Practice Guidance on Historic Environment[4].

E2.14 NPPF Paragraph 202 states:

'Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life or existing and future generations.'

E2.15 Paragraph 207 provides policy on the level of information required to inform a planning application which affects the historic environment:

'In determining applications, local planning authorities should require an applicant to describe the significance of any heritage asset affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal of their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary'...

E2.16 Paragraph 212 requires that decision makers give great weight to the conservation of designated heritage assets when considering applications that could affect an assets' significance:

'When considering the impact of a Proposed Development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance'.

E2.17 Paragraph 213 states that any harm to the significance of a designated heritage asset must be supported by a clear and convincing justification. It then goes on to differentiate between designated heritage assets, and designated heritage assets of the highest significance while setting policy in relation to substantial harm:

'Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;

b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional'.*

E2.18 Paragraph 214 then states:

'Where a Proposed Development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

the nature of the heritage asset prevents all reasonable uses of the site; and

no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and

conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and

the harm or loss is outweighed by the benefit of bringing the site back into use'.

E2.19 Furthermore, Paragraph 215 specifies how less than substantial harm should be weighed:

'Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use'.

E2.20 Paragraph 216 then goes on to specify how the impact of a Proposed Development on the significance of non-designated heritage assets should be weighed:

'The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset'.

E2.21 Paragraph 218 requires that developers record and advance understanding of the significance of any heritage assets to be lost:

'Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted'.

E2.22 Finally, Paragraph 219 requires local planning authorities to treat favourably planning applications that preserve elements of the setting of heritage assets that contribute positively to its significance, or better reveal or enhance the significance of the heritage assets:

'Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably'.

Planning Practice Guidance[5]

E2.23 The Planning Practice Guidance ('PPG') on Historic Environment provides supporting guidance to enable the methodological interpretation of the NPPF. It reiterates that conservation of heritage assets in a manner appropriate to their significance is a core planning principle.

E2.24 The Planning Practice Guidance on Historic Environment paragraph 006 interprets the different heritage interests in a planning context as follows:

- *'Archaeological interest: As defined in the Glossary to the National Planning Policy Framework, there will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.*
- *Architectural and artistic interest: These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an*

interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skill, like sculpture.

- *Historic interest: An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation's history, but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.'*

E2.25 Key elements of the guidance relate to assessing harm. The PPG states that substantial harm is a high bar that may not arise in many cases. In paragraph 18a-018 it states:

'Whether a proposal causes substantial harm will be a judgment for the decision-maker, having regard to the circumstances of the case and the policy in the National Planning Policy Framework. In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting.

While the impact of total destruction is obvious, partial destruction is likely to have a considerable impact but, depending on the circumstances, it may still be less than substantial harm or conceivably not harmful at all, for example, when removing later additions to historic buildings where those additions are inappropriate and harm the buildings' significance. Similarly, works that are moderate or minor in scale are likely to cause less than substantial harm or no harm at all. However, even minor works have the potential to cause substantial harm, depending on the nature of their impact on the asset and its setting'.

E2.26 With regard to *'How can proposals avoid or minimise harm to the significance of a heritage asset?'* the Planning Practice Guidance on Historic Environment notes that:

'Understanding the significance of a heritage asset and its setting from an early stage in the design process can help to inform the development of proposals which avoid or minimise harm. Analysis of relevant information can generate a clear understanding of the affected asset, the heritage interests represented in it, and their relative importance.'

E2.27 With regard to 'What assessment of the impact of proposals on the significance of affected heritage assets should be included in an application?' the Planning Practice Guidance on Historic Environment notes that:

'Applicants are expected to describe in their application the significance of any heritage assets affected, including any contribution made by their setting (National Planning Policy Framework paragraph 189). In doing so, applicants should include analysis of the significance of the asset and its setting, and, where relevant, how this has informed the development of the proposals. The level of detail should be proportionate to the asset's importance and no more than is sufficient to understand the potential impact of the proposal on its significance.'

Local Planning Policy

Folkstone & Hythe District Local Plan

E2.28 The adopted Development Plan for Folkestone & Hythe District comprises the Core Strategy Review (2022) and the Places and Policies Local Plan (2020), along with The St Mary in the Marsh Neighbourhood Plan (2019); and the Kent Minerals and Waste Local Plan (2020). Only the Places and Policies Local Plan (2020) and the Core Strategy Review (2022) documents are relevant to this ES Chapter.

Core Strategy Review (2022)

E2.29 The Core Strategy Review was adopted on 30th March 2022. It sets out the spatial vision, objectives, development strategy and a series of over-arching strategic policies that will guide the scale, location and type of development in the District until 2037.

E2.30 The Core Strategy Review (2022) contains the following policies relevant to this ES Chapter.

'*Policy SS3 Place-Shaping and Sustainable Settlements Strategy*

Development within the district is directed towards existing sustainable settlements and a new sustainable garden settlement south of the M20 near Westenhanger to protect the open countryside and the coastline, in accordance with policy SS1. Change in settlements will be managed to contribute to their role within the settlement hierarchy (Table 4.4) and local place-shaping objectives, to promote the creation of sustainable, vibrant and distinct communities.

The principle of development is likely to be acceptable on previously developed land within defined settlements, provided it is not of high environmental value. All development must also meet the following requirements:

The Proposed Development should not be of a size, scale and nature that is disproportionate to the level of services which the settlement is capable of providing and should preserve the character of the settlement and maintain its status in the settlement hierarchy.

For development located within zones identified by the Environment Agency (EA) as being at risk from flooding, or at risk of wave over-topping in immediate proximity to the coastline (within 30 metres of the crest of the sea wall or equivalent), site-specific evidence will be required in the form of a detailed flood risk assessment. This will need to demonstrate that the proposal is safe and meets with the sequential approach within the applicable character area (Urban Area, Romney Marsh Area or North Downs Area), and where applicable, the exception tests set out in national policy utilising the current applicable Strategic Flood Risk Assessment (SFRA). A site-specific flood risk assessment may be required for other sources of flood risk as identified within EA surface water flood mapping. Development must also meet the following criteria as applicable:

i) no residential development, other than replacement dwellings, should take place within areas identified at "extreme risk" as shown on the SFRA 2115 climate change hazard maps;

ii) all applications for replacement dwellings, should, via detailed design and the incorporation of flood resilient construction measures, reduce the risk to life of occupants and seek provisions to improve flood risk management; and

iii) strategic-scale development proposals should be sequentially justified against district-wide site alternatives

A design-led and sustainable access approach should be taken to density and layout, ensuring development is suited to the locality and its needs, and transport infrastructure (particularly walking/cycling). Efficient use should be made of central land in town centres or in easy walking distance of rail and bus stations, with appropriate redevelopment of complementary uses above ground floor retail, leisure or other active uses, to directly support the vitality of centres.

Proposals should be designed to contribute to local place-shaping and sustainable development by:

i) preserving and wherever possible enhancing statutory and non-statutory listed buildings, monuments and conservation areas and other key historic features of conservation interest and their setting; and

ii) including sustainable construction measures, measures to optimise water efficiency and (in cases of new-build development), measures to optimise energy usage from renewable and low carbon sources.

Development must address social and economic needs in the neighbourhood and not result in the loss of community, cultural, voluntary or social facilities (unless it has been demonstrated that there is no longer a need or alternative social/community facilities are made available in a suitable location).'

' Policy CSD7 Hythe Strategy

Hythe should develop as the high-quality residential, business, service, retail and tourist centre for the central district in line with the vision in paragraph 3.15. All new development, including that on the former Nickolls Quarry site (identified in Figure 5.6), should respect the historic character of the town and the established grain of the settlement in line with the place-shaping principles set out in policy SS3.

Development should contribute to the priorities for investment in the town which include:

Attracting additional employment to the town, especially in the town centre or in deprived urban communities in west Hythe, including by sustaining demand and labour supply in the local population.

Upgrading the stock of business accommodation and the environment of employment areas, and regenerating the appearance and sense of security of west Hythe.

Developing new/expanded primary and secondary schools to improve educational attainment, and where appropriate, the delivery of improvements in skills/training in nearby deprived areas.

Expanding and upgrading of tourism accommodation and visitor and leisure attractions.

Investing in strategic flood defences to protect residents and the Hythe Ranges.

Delivering public realm improvements in the High Street and town centre

i. improving the setting of historic buildings and the Royal Military Canal;

ii. increasing the ability of shoppers, visitors and residents to access and circulate along the main retail frontage

Aiming for a convenient, flexible and integrated public transport system, with improvements to services to the west and north of the town, better linking in the town centre and coastal bus routes to railway stations or development in western Hythe.'

Places and Policies Local Plan (2020)

E2.31 The Folkestone & Hythe Places and Policies Local Plan was adopted on the 16th September 2020, and includes the following policy relevant to this ES Chapter.

'Policy HE1 Heritage Assets

The Council will grant permission for proposals which promote an appropriate and viable use of heritage assets, consistent with their conservation and their significance, particularly where these bring at risk or under-used heritage assets back into use or improve public accessibility to the asset.'

Guidance

E2.32 Historic England have published a series of documents to advise applicants, owners, decision-takers and other stakeholders on managing change within the historic environment. These include the following Historic Environment Good Practice Advice in Planning documents and Historic England Advice Notes which are relevant to this assessment.

Historic Environment Good Practice Advice in Planning: 1 The Historic Environment in Local Plans (March 2015)

E2.33 *Historic Environment Good Practice Advice in Planning: 1 The Historic Environment in Local Plans* focuses on the importance of identifying heritage policies within Local Plans.

Historic Environment Good Practice Advice in Planning: 2 Managing Significance in Decision-Taking in the Historic Environment (March 2015)

E2.34 *Historic Environment Good Practice Advice in Planning: 2 Managing Significance in Decision Taking in the Historic Environment* provides advice on the numerous ways in which decision making in the historic environment could be undertaken, emphasising that the first step for all applicants is to understand the significance of any affected heritage asset and the contribution of its setting to that significance.

Historic Environment Good Practice Advice in Planning: 3 The Setting of Heritage Assets (Second Edition; December 2017)

E2.35 *Historic Environment Good Practice Advice in Planning: 3 The Setting of Heritage Assets (2nd Edition, Dec. 2017)* focuses on the management of change within the setting of

heritage assets. This document replaces Historic Environment Good Practice Advice in Planning: 3 The Setting of Heritage Assets (1st Edition) (March 2015) and Seeing History in the View: A Method for assessing Heritage Significance within Views (English Heritage, 2011). It gives general advice on understanding setting, and how it may contribute to the significance of heritage assets and allow that significance to be appreciated as well as advice on how views contribute to setting. The guidance has been written for local planning authorities and those proposing change to heritage assets.

E2.36 *Historic Environment Good Practice Advice in Planning: 3 The Setting of Heritage Assets* recommends using a series of detailed steps in order to assess the potential effects of a Proposed Development on significance of a heritage asset. The 5-step process is as follows:

E2.37 Identify which heritage assets and their settings are affected;

1 Assess the degree to which these settings and views make a contribution to the significance of a heritage asset(s) or allow significance to be appreciated;

2 Assess the effects of the Proposed Development, whether beneficial or harmful, on the significance or on the ability to appreciate it;

3 Explore ways to maximise enhancement and avoid or minimise harm; and

4 Make and document the decision and monitor outcomes.

Historic England Advice Note 12: Statements of Heritage Significance: Analysing Significance in Heritage Assets (October 2019)

E2.38 *Historic England Advice Note 12: Statements of Heritage Significance: Analysing Significance in Heritage Assets* provides information on how to assess the significance of a heritage asset. It also explores how this should be used as part of a staged approach to decision-making in which assessing significance precedes designing the proposal(s).

Historic England Advice Note 7: Local Heritage Listing: Identifying and Conserving Local Heritage (Second Edition, January 2021)

E2.39 *Historic England Advice Note 7: Local Heritage Listing: Identifying and Conserving Local Heritage* provides information on local heritage listing of heritage assets such as buildings, monuments, sites, places, areas or parks, gardens and other designed landscapes, to assist community groups, owners, applicants, local authorities, planning and other consultants, and other interested parties in implementing historic environment legislation, the policy in the NPPF and the related guidance given in the Planning Practice Guidance on Historic Environment.

Chartered Institute for Archaeologists, Standard & Guidance for historic environment desk-based assessment 2014, revised 2020

E2.40 The *Chartered Institute for Archaeologists, Standard & Guidance for historic environment desk-based assessment* sets out that a Desk-based assessment will determine, as far as is reasonably possible from existing records, the nature, extent and significance of the historic environment within a specified area. Desk-based assessment will be undertaken using appropriate methods and practices that satisfy the stated aims of the project, and that comply with the Code of conduct and other relevant regulations of CIfA.

E3.0 Assessment Methodology & Significance Criteria

Assessment Methodology

E3.1 This section presents the methodology used to assess the potential effects of the Proposed Development in relation to Cultural Heritage receptors.

Methodology for Identifying Baseline Conditions

E3.2 This assessment is supported by an Archaeological Desk Based Assessment (Appendix E1) and Built Heritage Statement (Appendix E2) which have been prepared to provide information on the Cultural Heritage baseline, including:

- The archaeological potential of the Site;
- The significance of the relevant known Cultural Heritage assets within and outside of the Site;
- The existing extent and character of their settings; and
- The contribution of their settings to their significance.

E3.3 The Archaeological Desk Based Assessment (Appendix E1) and Built Heritage Statement (Appendix E2) were informed by data held by the Kent Historic Environment Record for a 1km radius 'Study Area' around the Application Site boundary and by archival and desk-based research, including a historic map progression exercise.

Methodology for Assessing Effects upon the Historic Environment resulting from the Proposed Development

E3.4 The Archaeological Desk Based Assessment (Appendix E1) Built Heritage Statement (Appendix E2) also provide information to facilitate an understanding of the potential effects to the importance of relevant Cultural Heritage assets in accordance with paragraph 207 of the NPPF and the extent to which the Proposed Development may directly or indirectly affect these receptors. Direct effects occur due to physical change to a Cultural Heritage receptor, while indirect effects occur through the alteration of a Cultural Heritage receptor's setting.

E3.5 The definition of the setting of a Cultural Heritage receptor is a subjective judgment, as is the determining of effects upon the importance of that receptor occurring through change within its setting.

E3.6 *Historic England's Historic Environment Good Practice Advice in Planning: 3: The Setting of Heritage Assets* (Dec. 2017) specifies that 'setting' is neither a heritage asset, nor a designation. Paragraph 8 of that document also sets out that: "*While setting can be mapped in the context of an individual application or proposal, it cannot be definitively and permanently described for all time as a spatially bounded area or as lying within a set distance of a heritage asset. This is because the surroundings of a heritage asset will change over time, and because new information on heritage assets may alter what might previously have been understood to comprise their setting and the values placed on that*

setting and therefore the significance of the heritage asset". Furthermore, the Steer Judgement ([2018] EWCA Civ 1697, July 2018) identifies that a decision maker must concentrate on the "*surroundings in which [the heritage] asset is experienced", keeping in mind that those "surroundings" may change over time, and also that the way in which a heritage asset can be "experienced" is not limited only to the sense of sight. The "surroundings" of the heritage asset are its physical surroundings, and the relevant "experience", whatever it is, will be of the heritage asset itself in that physical place*".

E3.7 It is considered therefore that the extent of an asset's setting should therefore be understood as being limited to those spaces within which it is actually experienced and appreciable in the present, rather than being expansively defined without sufficient regard to the extent of change that has occurred within its surrounds since its construction. It is the present, rather than past, setting of a heritage asset that is the baseline against which change occurring through the Proposed Development may be considered to have an effect on the asset's significance, whether that effect is beneficial or adverse.

Significance Criteria

E3.8 The scale attributed to each effect has been determined based on the sensitivity ('*significance*' in NPPF terminology) of the receptor and magnitude of impact arising as a result of the Proposed Development. Professional judgement and experience have been drawn upon to assess the scale and significance of effect.

Receptor Sensitivity (Significance)

E3.9 The assessment of the significance of heritage assets is a matter of professional judgement, having regard to the available evidence, including research priorities, guidance, as well as any designation the assets may have. However, assessments of significance of heritage assets have followed Historic England's *Historic Environment Good Practice Advice in Planning: 2, Managing Significance in Decision-Taking in the Historic Environment*. This sets out that, when assessing the significance of a heritage asset, the nature, extent and level of the significance should be considered as follows:

- The nature of the significance refers to a heritage asset's archaeological, architectural, historic or artistic interest (NPPF annex 2), and to what extent its significance is derived from one or more of these. For example, a buried archaeological site may have high archaeological interest, but limited artistic interest;
- The extent of the significance refers to the area in which the significance resides, which may include the setting of a heritage asset; and
- The level of significance refers to the heritage asset's importance; for example listed buildings are considered to be significant in a national context.

E3.10 The sensitivity/significance of each receptor is evaluated on a scale of very high, high, medium, low and very low based on a review of the baseline position of each receptor and its performance against benchmark criteria set out in Table E3.1.

Table E3.1 Receptor Sensitivity/Significance

Receptor Value (Sensitivity	Criteria
Very High	Cultural Heritage assets inscribed as being of universal importance as World Heritage Sites. Other Cultural Heritage assets of recognised international importance. Scheduled Monuments of International Importance.
High	Grade I, II* and II listed buildings. Conservation Areas containing Cultural Heritage assets of very high value/sensitivity. Undesignated Cultural Heritage assets that can be shown to have exceptional qualities and are of clear national importance. Ancient Monuments scheduled under the Ancient Monuments and Archaeological Areas Act 1979, or archaeological sites and unscheduled remains of comparable quality, assessed with reference to the Secretary of State's non-statutory criteria.
Medium	Historic (unlisted) buildings that can be shown to have exceptional architectural or historic interest. Most Conservation Areas. Historic townscapes or built-up areas with important historic integrity in their buildings and character. Archaeological sites and remains which, while not of national importance, score well against most of the Secretary of State's criteria.
Low	Historic unlisted buildings of modest architectural and or historic interest. Undesignated historic townscapes or built-up areas of limited integrity in their buildings or character. Archaeological sites that score less well against the Secretary of State's criteria. 'Locally Listed' buildings (or other buildings/structures formally identified by plan makers as non-designated heritage assets). Archaeological evidence/features of local interest only.
Very Low	Buildings/structures that are of a very limited architectural and or historic interest. Archaeological evidence of exceptionally limited interest.

E3.11 In determining the significance of any heritage assets affected, NPPF and the Planning Guidance on the Historic Environment requires the contribution made by their setting to be assessed. Elements of a setting may make a positive or negative contribution to the value of a heritage asset, may affect the ability to appreciate that value, or may be neutral. The key attributes of setting that contribute to the importance of the heritage asset comprise the asset's physical surroundings, the experience of the asset and the asset's associative attributes. The criteria for establishing the contribution of setting to the importance/sensitivity of a heritage asset is given as Table E3.2.

Table E3.2: Criteria for Grading the Contribution of Setting to the Significance of Heritage Assets.

Contribution of Setting to Heritage Importance (Significance)	Criteria
High	A setting which possesses key attributes that make a strong positive contribution to the understanding and/or appreciation of the importance of a Heritage Asset.
Medium	A setting which possesses some key attributes that make a positive contribution to the understanding and/or appreciation of the importance of a Heritage Asset.
Low	A setting which possesses some attributes that make some/or little positive contribution to the understanding and/or appreciation of the importance of a Heritage Asset.

Magnitude of Impact

E3.12 The assessment of effects considers impacts of construction and operation of the Proposed Development on the historic environment. These impacts can be physical or non-physical. Consideration is also given to whether the impacts are temporary or permanent.

E3.13 The assessment of the impacts of the Proposed Development on the significance of heritage assets is evaluated by taking into account both the sensitivity/significance of the heritage asset, and the nature and extent of the predicted impact on that significance. The NPPF uses the term 'harm' when discussing the impacts of a development on the significance of a heritage asset.

E3.14 Harm to a Cultural Heritage asset may occur as a result of a physical impact upon it, or as a result of a change in part of its setting which contributes to its heritage significance. The Planning Practice Guidance on Historic Environment notes under 'How can the possibility of harm to a heritage asset be assessed?' that:

'*What matters in assessing whether a proposal might cause harm is the impact on the significance of the heritage asset. As the National Planning Policy Framework makes clear, significance derives not only from a heritage asset's physical presence, but also from its setting. Proposed development affecting a heritage asset may have no impact on its significance or may enhance its significance and therefore cause no harm to the heritage asset*'.

E3.15 The level of harm which may arise from change will vary and will depend upon the component significances of the heritage asset. The Planning Practice Guidance on Historic Environment's definition of 'substantial harm' has been set out above (paragraph E2.25). Lesser degrees of harm depend upon the extent to which heritage significance or the appreciation of that significance may be reduced.

E3.16 The Planning Practice Guidance on Historic Environment also recognises that beneficial change may include instances where the ability to interpret or appreciate a Cultural Heritage asset is improved, better revealing its heritage significance. It may also include measures which preserve a Cultural Heritage asset into the future.

E3.17 The terms are relative to the receptor affected by the impact (i.e. a particular impact could result in a beneficial effect on one receptor and an adverse effect on another). In these instances, it is necessary to come to an overall understanding of the impact of a Proposed Development, which considers both beneficial and harmful effects. To inform such a judgement, it is not sufficient to understand that an impact is beneficial, instead it is also necessary to understand the scale of the benefit to understand how a harmful impact compares to a beneficial one.

E3.18 Table E3.3 summarises the quantification of the magnitude of impact of development upon the significance heritage assets used for this assessment. The magnitude of an impact is described as high, medium, low and very low adverse or beneficial. The assessment is informed by professional judgement and an understanding of the Cultural Heritage asset's significance and of the effects of the Proposed Development.

E3.19 The magnitude of impact to a receptor has been determined by considering the estimated deviation from baseline conditions both before, and, if required, after mitigation. The scale used for determining the magnitude of an impact is set out in Table E3.3.

Table E3.2 Magnitude of Impact

Impact Magnitude	Description
High Adverse	• Complete destruction of a Cultural Heritage asset. • Change to the setting of a Cultural Heritage asset that substantially affects its significance. • Demolition of a building/structure or elements of a Conservation Area that make a positive contribution to its significance.
Medium Adverse	• Harmful alteration but not total or substantial demolition of a built heritage asset or comparable change to a conservation area. • Changes to the setting of a Cultural Heritage asset such that its significance is considerably affected.
Low Adverse	• Alterations to a Cultural Heritage asset that results in minor harm to its significance. • Change to the setting of a Cultural Heritage asset that noticeably affects its significance.
Very Low Adverse	• Alterations to a Cultural Heritage asset that results in very minor harm to its significance. • Change to the setting of a Cultural Heritage asset that barely but perceptibly affects its significance.
Very Low Beneficial	• Land use change resulting in very slightly improved conditions for the protection of a Cultural Heritage asset. • Physical changes that slightly reveal or conserve some elements of a Cultural Heritage asset's significance, but do not noticeably improve the overall significance of the asset. • Very small scale alterations to the setting of a Cultural Heritage asset that improve the general ability to appreciate it. • Very small decreases in visual, noise or other environmental effects that intrude on the setting of a Cultural Heritage asset.
Low Beneficial	• Land use change resulting in improved conditions for the protection of a Cultural Heritage asset.

Impact Magnitude	Description
	• Physical changes that reveal or conserve some elements of a Cultural Heritage asset's significance, but do not noticeably improve the overall significance of the asset. • Small scale alterations to the setting of a Cultural Heritage asset that improve the general ability to appreciate it. • Decrease in visual, noise or other environmental effects that intrude on the setting of a Cultural Heritage asset.
Medium Beneficial	• Land use change resulting in improved conditions for protection of historic assets and provision of interpretation measures (heritage trails etc). • Improvements to the setting of a Cultural Heritage asset that improve the appreciation of it and of its significance. • Notable improvement to the wider historic landscape, or monument, or historic building. • Notable improvement of the amenity, access, or use of a Cultural Heritage asset.
High beneficial	• Arrest and repair/restoration of physical damage or decay to a Cultural Heritage asset. • Significant enhancement of the setting of a Cultural Heritage asset, its amenity, access and/or use that substantially improves the appreciation of it and its significance.

Significance of Effect

E3.20 The significance of an effect is determined by professional judgement which considers the interaction of heritage sensitivity/significance of an identified receptor and the magnitude and duration of the impact, and whether the impact is adverse or beneficial. In terms of this assessment, a significant effect is one which is Moderate Adverse or Beneficial or above. Where no impacts are predicted upon a receptor, the effect is described as Neutral (Not Significant).

E3.21 Effects are assigned a significance according to the matrix in Table E3.4. For Cultural Heritage, the matrix is not intended to 'mechanise' judgements of the significance of effects but to act as supporting material alongside professional judgement to the detailed assessment provided in Appendices E1 and E2. In some cases, the matrix allows for a choice of significance of effect when a magnitude of impact and a value are combined, to enable professional judgement to be brought to bear.

Table E3.3 Significance of Effect Matrix

Receptor Sensitivity	Magnitude of Impact			
	High	Medium	Low	Very Low
Very High/High	**Major Beneficial / Adverse**	**Major Beneficial / Adverse**	**Moderate Beneficial / Adverse**	Minor Beneficial / Adverse
Medium	**Major Beneficial / Adverse**	**Moderate Beneficial / Adverse**	Minor Beneficial / Adverse	Negligible
Low	**Moderate Beneficial / Adverse**	Minor Beneficial / Adverse	Negligible	Negligible
Very Low	Minor Beneficial / Adverse	Negligible	Negligible	Negligible

Consultation

E3.22 The Proposed Development has been subject to consultation with the Local Planning Authority through the submission of an EIA Scoping Report (November 2023) and the Council's EIA Scoping Opinion (January 2024). A subsequent EIA Scoping Note (July 2025) was submitted, with the Council issuing an EIA Scoping Note Response (November 2025). The Scoping process is described in Chapter B of the ES.

E3.23 A detailed discussion of Historic England's position is provided within sub-Appendix A of Appendix E2 (Built Heritage Statement) . This sub-Appendix to the Built Heritage Statement summarises and discusses the Pre-Application Advice response issued by Historic England (ref. PA01198683, 1st July 2024), in relation to a superseded development proposal for the Site and compares this with the Historic England Consultee response to planning application ref.Y17/1042/SH for largescale redevelopment of land to the immediate east of the Site, which was consented by the Local Planning Authority in 2019.

E3.24 Between January and April 2024, correspondence with Kent County Council Archaeological Services was undertaken to agree possible specifications of archaeological fieldwork. The need for further archaeological investigation is agreed and the scope and timing of any such work will be agreed in advance with the Local Planning Authority and their archaeological advisors at Kent County Council.

Assumptions and Limitations

E3.25 Cultural Heritage assessments are subjective by nature, as professional judgement, together with relevant policy and guidance, is used as the basis for assessment of the likely significance of effects on the relevant Cultural Heritage assets.

E3.26 Access to the private properties, private grounds, commercial spaces and other secure and non-public spaces outside of the Site has not been granted by the owners/tenants. Instead all observations on the settings of Cultural Heritage receptors are made from within the Site or from nearby publicly accessible spaces within the 1km radius study area. These access limitations are not considered to affect the conclusions made in respect of potential Cultural Heritage effects of the Proposed Development.

E3.27 The Archaeological Desk Based Assessment (Appendix E1) and Built Heritage Statement (Appendix E2) are informed by historical research and materials, including historical maps and other documentary sources. All premodern documentary and cartographic sources are subject to a widely varying degree of bias, incompleteness or inaccuracy. It is a factor inherent to historical research that judgements must generally be made on partial, conjectural or otherwise unreliable information. Any conclusion or assertion based on pre-modern sources substantially relies on the exercise of experienced professional judgement.

E3.28 Some of the datasets used to establish the baseline conditions of the are based on national data and may not necessarily be representative of the local level data. Similarly, local data held by the Kent Historic Environment Record is subject to inherent limitations and inaccuracies.

E3.29 Unless otherwise specified, all distances within this ES chapter and its Appendices relate to the shortest distance between two described points. Heritage assets within the 1km study area have been identified from the sources consulted, although there is always a possibility that additional elements of the historic environment are present which are not identified in these sources. However, the sources consulted, and surveys undertaken, comprise a suitable and proportionate level of information.

E4.0 Baseline Conditions

Current Conditions

E4.1 The Site has been in use as a golf course throughout the 20th Century. The Site has been subject to extensive landscaping, and land forming, occurring historically through the drainage and reclamation of the coastal marsh and shingle beach that lay within the Site until the early-mid 19th century and later in that century during the construction of the promenade to the immediate south of the Site.

Archaeology

E4.2 The Site is assessed in Appendix E1 as having a low potential to contain artefactual evidence of Palaeolithic, Mesolithic and Neolithic date. The Site is considered to have a moderate potential for the presence of paleo-environmental evidence relating to the prehistoric coastal environment. The Site is considered to have a low potential for the presence of archaeological evidence relating to the Bronze Age, Iron Age, Roman, Anglo-Saxon and Medieval periods. The Site has a high potential for evidence relating to the Royal Military Canal (RMC) and evidence of post-Medieval drainage and landscaping features. The archaeological potential identified is theoretical in the sense that these conclusions do not account for the effects of past post-depositional impacts.

E4.3 The Site has been subject to land forming, including drainage and the deposition of soil and other material to improve opportunities for pasture cultivation and for later landscaping. It is highly likely that material within the Site has been formed into the embankment along its southern boundary upon which the promenade has been constructed. Post-depositional impacts on any archaeological evidence that had been present within the Site are considered to have been severe, and it is considered that there will be a corresponding low or very level of survival for archaeological evidence predating the construction of the promenade.

E4.4 Any archaeological evidence that now remains present within the Site is most likely to be of low (local) sensitivity/significance. Archaeological evidence relating specifically to the RMC may be of national sensitivity/significance depending on the character and extent of any such evidence that survives. Evidence of the Second World War fortification of the Hythe seafront would be of local or possibly regional sensitivity/significance, also depending on the extent and character of any such evidence.

E4.5 The presently unknown archaeological evidence present within the Site represents a receptor to the Proposed Development.

E4.6 The Proposed Development does not have the potential to affect any below ground evidence that is present outside of the Site.

Built Heritage

E4.7 As set out in Appendix E2, where a Cultural Heritage asset is located outside of the Site, and lacks any visual, experiential or known or legible historical or functional relationship with the Site, the Site is considered not to form part of that asset's setting. This is because the Site is not part of the surroundings in which that asset is experienced or understood.

E4.8 Where the Site has been identified as not forming part of the setting of a Cultural Heritage asset and the Proposed Development has been assessed as having no potential to represent a change to that setting, such assets are not considered to be receptors to the Proposed Development.

E4.9 The majority of Cultural Heritage assets within the study area separated from the Site by extensive intervening distance and modern built development and so have no potential to be affected by the Proposed Development, this is because the Proposed Development will not alter the way in which they are appreciated or understood.

E4.10 Long views are possible across the Site toward the Grade I church of St Leonard (NHLE ref.1068961, Plate 9, Appendix E2) in which this building is appreciable as an important local historic landmark. The Proposed Development will result in a change to views taken over the Site directly toward the church and so this listed building is a receptor to the Proposed Development. The 20th Century golf course character and use of the Site is not considered to contribute to the appreciation or understanding of the church's architectural or historic interest. The Site does however afford many opportunities for long views to the building in which its significance is readily appreciable. There are numerous such views across Hythe and so such views are not unique to the Site. The Site, as an open space from which view opportunities exist, supports the appreciation of the church as a historic landmark, though the modern gold course character of the Site makes no contribution to the building's architectural or historic interest or appreciation thereof. The sensitivity/significance of the church of St Leonard is High.

E4.11 The Site lies to the immediate east of the Hythe Conservation Area. While there is no specific legislative protection for the setting of conservation areas, the Proposed Development has the potential to affect the significance of this conservation area through the alteration of its setting, and so this conservation area is a receptor to the Proposed Development. No individual listed building within the conservation area, with the sole exception of the Grade I church of St Leonard, is considered to have the potential to be affected by the Proposed Development. In terms of the relationship of the Site to the conservation area as an element of its setting, the Site does not form part of the historic built core of Hythe and lies outside of the conservation area boundary. Westward views over the Site take in parts of the hillside historic built core of Hythe, most notably the Grade I Church of St Leonard. The ability to understand and appreciate the general character and appearance of the conservation area is however limited as a result of intervening distance and 20th and 21st Century built development. In return views from the conservation area, including from the elevated hillside position of St Leonard's Church, the Site is largely screened by existing built development (Plates 6 and 12, Appendix E2). The Site is not considered to make any contribution to the significance of the conservation area as it does not form a notable part of the experience of being within its boundaries, nor does it afford any notable opportunities to appreciate its special character. The sensitivity/significance of the Hythe Conservation area is Medium.

E4.12 The RMC lies to the immediate north of the Site. Each section of the RMC is designated individually as a Scheduled Monument. The Twiss Road Bridge to Seabrook Lodge Bridge section (NHLE ref.1003127) lies along the northern boundary of the Site but is outside it (Plate 24, Appendix E2). The Town Bridge to Twiss Road Bridge section (NHLE ref.1005116) lies to the immediate northwest of the Site. The Seabrook Lodge Bridge to

Seabrook Sluice section (NHLE ref. 1003260) lies to the immediate northeast of the Site. These three sections of the RMC are receptors to the Proposed Development, which represents an alteration of their setting. While the Site remains an open space, views over the Site from the canal to the sea, and to the southwest beyond the Imperial Hotel have been lost as a result of the intervening promenade embankment and other built development (Plate 26, Appendix E2). The 'lines of sight' from the section of the canal to the north of the Site have therefore been substantially shortened, eroding the legibility of how this section of the canal was laid out to respond to the early 19th Century character and topography of the Site and vicinity; and to fulfil its function as part of an integrated defence line. In addition to the foreshortening of the formerly long and sweeping views from the canal's defensive positions over the area. The character and use of the Site is wholly that of a modern leisure space, lying at the modern built edge of the town centre to the west and suburban residential areas to the north. The character of the Site and the way in which it is experienced in the present does not enhance the legibility of the canal as a defensive line of early 19th Century date. In views taken across the Site to the canal, the canal appears as an embanked band of dense planting along which are public footpaths. There is a corresponding very limited legibility to the military-defensive function of the built feature. The Site represents a modern leisure character space, differentiated from the proximate areas of built development by its openness, but the present landscaped character of the Site is no less unrelated to the RMC. The Site is considered to make a limited, very low contribution to the significance of the proximate RMC sections, simply as a result of its openness, which contrasts positively with proximate built areas. The sensitivity/significance of the RMC Scheduled Monuments are High.

E4.13 Martello Tower no.9 is listed at Grade II (NHLE ref. 1061167) and subject to a Scheduled Monument designation (NHLE ref. 1017226). This Designated Cultural Heritage asset has been identified in the Local Planning Authority's EIA Scoping Opinion (January 2024) and EIA Scoping Note Response (November 2025) as a receptor to the Proposed Development and so it is assessed in detail in Appendix E.2. This Cultural Heritage asset lies over 1200m to the northeast of the Site and so is outside of the study area used in Appendices E1 and E2. The Site has no experiential, visual or other relationship with Martello Tower no.9 (Plates 37 and 38, Appendix E2). The Site forms no part of the way in which the building, which is set within deep woods, is appreciated or understood, nor does it have any role in the legibility of the historical or functional relationship of this building with other surviving Napoleonic period military heritage assets in the area. The Site is not considered to make any contribution to the significance of Martello Tower no.9. The sensitivity/significance of Martello Tower no.9 is High.

E4.14 The Shorncliffe Redoubt Scheduled Monument (NHLE ref. 1401815, Plate 34, Appendix E2)) comprises a redoubt type fortification, constructed in 1794. The redoubt covers a roughly rectangular area of overgrown and wooded ground measuring approximately 130 square meters. The northern half of the Scheduled Monument consists of a relatively flat area, reflecting the levelling of part of the Redoubts defensive earthworks. The southern half of the Scheduled Monument contains a number of earthworks, surviving in some places to a height of c.4m. This Designated Cultural Heritage Asset has been identified in the Local Planning Authority's EIA Scoping Response as a receptor to the Proposed Development and so it is assessed in detail in Appendix E2. The Site lies just over 1500m southwest of the Shorncliffe Redoubt Scheduled Monument and so the redoubt lies outside

of the study area. Without prior knowledge of the redoubt's location and historical function, it is highly illegible, being experienced simply as a broad area of dense, inaccessible overgrowth that is bound by treelines. There is no public access to this Scheduled Monument. The Site has no experiential, visual or other relationship with the Shorncliffe Redoubt (Plates 35 and 36, Appendix E2). The Site forms no part of the way in which the remaining earthworks of the redoubt are appreciated or understood, nor does it have any role in the legibility of the historical or functional relationship of this building with other surviving Napoleonic period military heritage assets in the area. The Site is not considered to make any contribution to the significance this Scheduled Monument. The sensitivity/significance of the Shorncliffe Redoubt Scheduled Monument is High.

E4.15 The Shorncliffe Battery Wall Scheduled Monument (NHLE ref. 1005117) lies just over 1000m to the east of the Site. This Designated Cultural Heritage Asset has been identified in the Local Planning Authority's EIA Scoping Response as a receptor to the Proposed Development and so it is assessed in detail in Appendix E.2. The Site has no experiential, visual or other relationship with the Shorncliffe Battery Scheduled Monument. The Site forms no part of the way in which the structure is appreciated or understood, nor does it have any role in the legibility of the historical or functional relationship of this structure with other surviving Napoleonic period military heritage assets in the area. The Site is not considered to make any contribution to the significance this Scheduled Monument. The sensitivity/significance of the Shorncliffe Battery Wall Scheduled Monument is High.

E4.16 In terms of relevant non-designated built heritage assets, the Site contains a single structure of Second World War date that is identified by the Kent Historic Environment Record as a probable pillbox crew store/shelter. This building is a receptor to the Proposed Development, which will result in its demolition. Though the Site was in use as a golf course at the time of the Second World War, this function does not relate to the design, construction or use of the building, which was rather positioned in relation to the promenade embankment and other (now lost) Second World War defensive positions along it. The Site is not considered to contribute to the importance of this non-designated heritage asset. The sensitivity/ significance of the Second World War structure within the Site is Very Low.

Future Baseline

E4.17 In the event of the Proposed Development not taking place, the Cultural Heritage baseline would remain unchanged, in the sense that the natural and anthropogenic processes of ongoing change unrelated to the Proposed Development would continue alongside the existing relationship of the Site to the significance and setting of the relevant Cultural Heritage assets.

E4.18 A review of the cumulative schemes suggests that the extent of intervening distance and modern built development between these submitted applications, and the Site will preclude cumulative impacts on any Cultural Heritage receptors. Specifically, this is because the Proposed Development will not have a potential impact on any Cultural Heritage asset relevant to any submitted application. Conversely, no Cultural Heritage asset relevant to the Proposed Development is relevant to any of the submitted cumulative schemes.

E5.0 Potential Effects

E5.1 Impacts on Cultural Heritage receptors may be direct or indirect (physical or non-physical). The effects occurring during the construction phase of the Proposed Development are anticipated to be short to medium term in duration (temporary), while effects during the operation of the Proposed Development are anticipated to be of long term duration (permanent) unless otherwise stated.

Embedded Mitigation

E5.2 During the construction phase an appropriate CEMP will ensure that the construction phase environmental effects of the Proposed Development are appropriately managed. Standard measures for the reduction and management of environmental effects such as noise and dust are considered to be sufficient to manage these potential temporary construction phase effects of the Proposed Development. However, the CEMP will contain specific measures to safeguard the RMC Scheduled Monument/s that lie to the immediate north of the Site. These measures will comprise the erection and maintenance of secure site fencing/hoarding along, but only outside of the neighbouring Scheduled Monument designation. The physical securing of the neighbouring Scheduled Monument/s from the Site will ensure that no direct construction phase impact will occur to the RMC and ensure potential effects relate to the alteration of setting only.

E5.3 The assessment is based on the Proposed Development as described in Chapter C of this ES. The Proposed Development includes various design measures that respond to the Cultural Heritage interest of the Site and its surrounds. These measures represent embedded mitigation for the purposes of this assessment, and include:

- The retention of over 50% of the Site as a naturalised landscaped space, the design of which is informed directly by a study of prehistoric/historic local coastal formation, including the use of LiDAR data to identify and understand the network of shifting paleochannels, creeks and marshes that characterised the Site and vicinity until mid-19th Century reclamation and engineering transformed the character and appearance of the area. This element of the Proposed Development is intended to restore a large character space that reflects the appearance of the shoreline at the time of the construction and military operation of the RMC. This element of the Proposed Development will also raise the legibility of the longer-term historical landscape formulation of the Hythe-Folkestone coast.
- The Proposed Development incorporates diverse Heritage engagement offerings, including a public Heritage trail, public art and interpretation measures. These include measures to reduce the foot traffic that erodes the RMC embankment, raise the public appreciation of the area's natural and military history, and enhance the legibility of the relationships between extant/lost historic features within the Site and those that survive, but are not visible or appreciable from the Site, in its wider surrounds.

Major Hazards and Accidents

E5.4 The potential for major hazards and accidents has been considered in completing this assessment. The potential for such incidents is not considered to be relevant to Cultural Heritage matters.

Phasing

E5.5 The phasing of the Proposed Development is not considered relevant to understanding potential Cultural Heritage effects.

During Construction

Archaeology

E5.6 During the construction phase, ordinary activities such as the movement of plant, excavation of foundations and other below ground impacts such as landscaping have the potential to damage and destroy any archaeological evidence that is present within the Site.

E5.7 The construction phase impacts on any archaeological evidence present within the Site will be adverse, high, direct and permanent.

Built Heritage

E5.8 During the construction phase the Second World War structure non-designated asset within the Site will be demolished, resulting in its total loss. This is a high, direct and permanent adverse impact to this receptor.

E5.9 Ordinary construction phase activities incur environmental as well as visual change to the setting of Cultural Heritage receptors located outside of the Site. In the context of embedded mitigation measures, the construction phase impacts of the Proposed Development will not be greater than low, indirect and temporary in some instances, with no effect in others.

E5.10 The Cultural Heritage impacts and resultant potential effects of the construction phase of the Proposed Development on Cultural Heritage Receptors is set out in table E5.1.

Table E5.1 Construction Phase Impacts

Cultural Heritage Receptor	Sensitivity/ Significance	Construction Phase Impact	Potential Effect
Presently Unknown Archaeological Evidence within the Site.	Most likely low and very low, potentially medium or high.	Physical damage or removal. Direct, high adverse, permanent impact.	Most Likely Minor Adverse (Not Significant) but potentially up to Major Adverse – Significant.
Church of St Leonard listed building (Grade I, NHLE ref.1068961),	High	No impact.	Neutral – Not Significant
Hythe Conservation Area	Medium	Change of setting. Indirect, temporary, very low adverse impact.	Negligible – Not Significant
Twiss Road Bridge to Seabrook Lodge Bridge section of the Royal Military Canal Scheduled Monument (NHLE ref.1003127),	High	Change of setting. Indirect, temporary, very low adverse impact.	Minor Adverse – Not Significant

Cultural Heritage Receptor	Sensitivity/ Significance	Construction Phase Impact	Potential Effect
Royal Military Canal Town Bridge to Twiss Road Bridge section Scheduled Monument (NHLE ref.1005116),	High	Change of setting. Indirect, temporary, very low adverse impact.	Minor Adverse – Not Significant
Royal Military Canal, Seabrook Lodge Bridge to Seabrook Sluice section Scheduled Monument (NHLE ref.1003260),	High	Change of setting. Indirect, temporary, very low adverse impact.	Minor Adverse – Not Significant
Shorncliffe Redoubt Scheduled Monument (NHLE ref. 1401815)	High	No impact.	Neutral – Not Significant
Martello Tower No.9 Scheduled Monument and Grade II listed building (NHLE refs. 1061167 and 1017226)	High	No impact.	Neutral – Not Significant
Shorncliffe Battery Wall Scheduled Monument (NHLE ref.1005117)	High	No impact.	Neutral – Not Significant
Second World War Structure within Site, non-designated built heritage asset.	Low	Demolition. Direct, high adverse, permanent.	Moderate Adverse - Significant

During Operation

Archaeology

E5.11 All potential impacts on below ground archaeology will occur during the construction phase, and no further impacts are identified as occurring during the operational phase of the Proposed Development.

Built Heritage

E5.12 The completed, operational phase of the Proposed Development represents a permanent change to the settings of the relevant Cultural Heritage receptors outside of the Site, though not all will be impacted by this change.

Potential impacts to the Significance of the Grade I Church of St Leonard (p.59, Appendix E2)

E5.13 The Site comprises a 20th Century leisure character space, that prior to the post-Medieval period is likely to have formed part of the shingle beaches and coastal marshes east of Hythe. The Site does not form part of the historic built core of Hythe. The character and use of the Site is not considered to contribute to the appreciation or understanding of the church's architectural or historic interest. The Site does afford opportunities for long views

to the building in which its significance as a historical landmark is readily appreciable, but these views are not unique, and many such views exist across the surrounding area. The Site, as a space from which these view opportunities exist, supports the appreciation of the church as a historic landmark, an important element in its significance.

E5.14 The Proposed Development will not alter the intrinsic architectural or historic interest of the Grade I church of St Leonard. The way in which the building is experienced and understood within its close and immediate setting, where it is best experienced for these qualities, will remain unchanged. Most of the long views to the church from its wider setting will also remain unchanged. It is likely that only views taken directly within and across the Site toward the church will be altered by the Proposed Development. Considering this potential change, the Proposed Development has therefore been deliberately designed to retain long views to the church from the promenade along the Site's southern boundary and from within the Site. The landmark value and architectural and historic interest of the church will remain readily appreciable in these retained views.

E5.15 The Proposed Development represents a high quality, proportionate alteration of part of the largely modern wider setting of the church. The Proposed Development is not considered to result in any harm to the sensitivity/significance of the Grade I church of St Leonard by virtue of its considered design, and by virtue of the fact that many such viewing opportunities exist that are unaffected by the Proposed Development.

Potential impacts to the significance of Hythe Conservation Area (p.59, Appendix E.2)

E5.16 The Site is not considered to make any contribution to the significance of the Hythe Conservation Area as it does not form part of the experience of the conservation area within its boundaries, nor does it afford any notable opportunities to appreciate its overall special character.

E5.17 The Proposed Development is likely only to be partly visible from views taken at the south-easternmost end of the conservation area designation on South Road, south of an area of modern football pitches. The Proposed Development may also be visible from outside the conservation area designation on Twiss Bridge. It is considered that the Proposed Development would not change the experience of being within the conservation area boundary. The Proposed Development would lie within views taken westward toward the conservation area, which extends up the hillside north of the High Street to encompass the area around the church of St Leonard. While the church is highly visible, the particular special character of the conservation area is not readily appreciable these views from, or over, the Site.

E5.18 The Proposed Development is not considered to adversely affect the significance of the conservation area as the legibility of the historical development of Hythe and the way in which this is experienced through the special character of the conservation area will be unaltered. The Proposed Development considered to be proportionate to the proximity of the Site to the conservation area designation and the 20th and 21st Century development that lies close to the designation boundary at Earlsfield Road, Moncrieff Road and Imperial Gardens. The north westernmost end of the Site is retained as a landscaped space.

E5.19 The Proposed Development is not considered to affect the sensitivity/significance of the Hythe Conservation Area.

Potential impacts to the Significance of the Royal Military Canal Scheduled Monuments (p.60, Appendix E2)

E5.20 While the Site remains an open space, views over the Site from the canal toward the sea and to the southwest beyond the Imperial Hotel have been lost as a result of the promenade embankment and other development and change outside of the Site. In addition to the foreshortening of the formerly sweeping views the canal's defensive positions over the area. The Site currently represents a modern leisure character space, differentiated from the proximate areas of built development, but of a character that is no less unrelated to the history and function of the RMC. The Site is considered to make a limited, very low contribution to the significance of the RMC, simply as a result of its openness which contrasts positively with nearby built and substantially topographically altered areas.

E5.21 The Proposed Development retains approximately 50% of the Site as landscaped open space. It is considered that no change will occur to the open setting of the canal and its relationship to the areas of the Site that are retained as landscaped space. The landscaping of the Site area retained as a golf course and/or public open space is informed by historical and archaeological research to re-instate a distinct, naturalised character space that is reflective of the appearance of the Site at the time of the canal's construction.

E5.22 No impact is considered to occur to the RMC sections located to the northwest and northeast of the Site (The Royal Military Canal Town Bridge to Twiss Road Bridge canal section (NHLE ref.1005116) and The Royal Military Canal, Seabrook Lodge Bridge to Seabrook Sluice section (NHLE ref.1003260)). The proposed heights and arrangement of built form within the western end of the Site is considered to be respectful to the relationship of the canal to the seafront with regard to the overall scale and density of built form, but because there is a degree of built infilling of the western end of the Site that currently does not exist, this nevertheless represents a less than substantial degree of harm, at the lower end of the spectrum, to one section of the RMC, that which directly flanks the northern boundary of the Site (The Twiss Road Bridge to Seabrook Lodge Bridge canal section (NHLE ref.1003127)). This represents a Moderate Adverse (Significant) effect on this receptor. This harm/effect occurs through the further foreshortening of views from one part of one section of the canal toward the sea and the introduction of further intervening-built development between the canal and the modernised coastline.

E5.23 Notwithstanding the effects upon the RMC Scheduled Monuments, it is noted that overall, the proposed landscape measures would enhance, and enable a better appreciation of, the significance of the canal section to the north of the Site. They are considered to afford great weight as public benefits in the planning balance as iterated by Paragraph 212 of the NPPF (2024). The case of Kenneth Kay v SSGCLF and Ribble Valley Borough Council, [2020] EWHC2292 (Admin), 21 August 2020, makes clear that any heritage benefits should be expressly included and referred to as public benefits.

Potential impacts to the significance of Second World War Structure Non-Designated Heritage Asset within the Site (p.60 Appendix E2)

E5.24 This structure represents only a much-corroded structural shell, the setting of which has changed to the extent that without prior consultation of the Kent Historic Environment Record, its original use is not readily apparent. Paragraph 216 of the NPPF states that where an application will affect the significance of a non-designated heritage asset, a balanced judgement is required, having regard to the scale of harm or loss and the significance of the heritage asset. This structure will be demolished (and entirely lost) during the construction phase and so no further impacts will occur upon it during the operational phase of the Proposed Development.

Potential impacts to the Significance of the Shorncliffe Redoubt Scheduled Monument, the Martello Tower No.9 Scheduled Monument and Grade II Listed building and the Shorncliffe Battery Wall Scheduled Monument (p.61, Appendix E2)

E5.25 The Proposed Development will not result in any change to the way in which these designated Cultural Heritage assets are appreciated, seen or understood within their settings. No change will occur to the existing legibility of the historical and functional relationships of these Cultural Heritage assets with any other. The Proposed Development therefore is considered not to affect the sensitivity/significance of these receptors, which all lie over 1km from the Site and are separated from it by extensive intervening built development and other experiential barriers.

E5.26 Table E5.2 sets out the operational phase impacts and resultant potential effects of the Proposed Development on Cultural Heritage Receptors.

Table E5.2 Operational Phase Impacts

Cultural Heritage Receptor	Sensitivity/ Significance	Operational Phase Impact	Potential Effect
Presently Unknown Archaeological Evidence within the Site.	Most likely low and very low, potentially medium or high.	N/A	Neutral - Not Significant
Church of St Leonard listed building (Grade I, NHLE ref.1068961),	High	Permanent change of wider setting. No impact.	Neutral - Not Significant
Hythe Conservation Area	Medium	Permanent change of wider setting. No impact.	Neutral - Not Significant
Twiss Road Bridge to Seabrook Lodge Bridge section of the Royal Military Canal Scheduled Monument (NHLE ref.1003127),	High	Change of setting. Indirect, permanent, low adverse impact.	Moderate Adverse - Significant
Royal Military Canal Town Bridge to Twiss Road Bridge section Scheduled Monument (NHLE ref.1005116),	High	Permanent change of setting. No impact.	Neutral - Not Significant
Royal Military Canal, Seabrook Lodge Bridge to Seabrook Sluice section Scheduled Monument (NHLE ref.1003260),	High	Permanent change of setting. No impact.	Neutral - Not Significant

Cultural Heritage Receptor	Sensitivity/ Significance	Operational Phase Impact	Potential Effect
Shorncliffe Redoubt Scheduled Monument (NHLE ref. 1401815)	High	No change of setting. No impact.	Neutral - Not Significant
Martello Tower No.9 Scheduled Monument and Grade II listed building (NHLE refs. 1061167 and 1017226)	High	No change of setting. No impact.	Neutral - Not Significant
Shorncliffe Battery Wall Scheduled Monument (NHLE ref.1005117)	High	No change of setting. No impact.	Neutral - Not Significant
Second World War Structure within Site, non-designated built heritage asset.	Low	N/A	Neutral - Not Significant

E6.0 Mitigation and Monitoring

E6.1 This section sets out additional mitigation measures relevant to Cultural Heritage matters.

During Construction

Archaeology

E6.2 A scope of archaeological investigation and mitigation will be completed in advance of the construction phase. Initial phases of archaeological investigation will most likely comprise a geophysical survey, a geoarchaeological borehole survey and trial trenching. Subsequent phases of investigation and mitigation will be determined by the results of these exercises and may include, area strip map and recording, preservation in situ and formal publication of results. This additional mitigation will address the presence of any archaeological evidence that may be present within the Site and will support its recording prior to removal or preservation in situ as appropriate. The scope and timing of all archaeological investigation and mitigation will be agreed in advance with the Local Planning Authority and their archaeological advisors at Kent County Council. It is anticipated that this requirement will be secured by way of an appropriately worded planning condition.

Built Heritage

E6.3 Prior to demolition, the Second World War structure within the Site will be subject to an appropriate level of Historic Building Recording agreed in advance with the Local Planning Authority. It is anticipated that this requirement will be secured by way of an appropriately worded planning condition.

E6.4 No other additional construction phase built heritage specific mitigation measures are proposed.

During Operation

Archaeology

E6.5 No operational phase additional archaeological mitigation measures are proposed.

Built Heritage

E6.6 It is anticipated that a financial contribution will be made towards the upkeep of the Royal Military Canal, which would be secured by way of a Section 106 Agreement. Whilst this could provide some mitigation to the impacts of the Proposed Development, at this stage the scale of the contribution and the scope of associated upkeep works is not known and therefore it cannot be taken into account as mitigation at this stage.

E6.7 No other operational phase additional built heritage mitigation measures are proposed. Although a Significant adverse effect is predicted upon the Twiss Road Bridge to Seabrook Lodge Bridge section of the Royal Military Canal Scheduled Monument (NHLE ref.1003127) due to changes to its setting, this impact is unavoidable due to the nature and location of the Proposed Development in relation to the receptor, and there are no feasible mitigation measures which could be implemented to reduce this impact.

E7.0 Residual Effects

E7.1 This section sets out the residual effects of the Proposed Development, taking account of embedded and additional mitigation measures set out above.

During Construction

E7.2 With the implementation of an appropriate scheme of archaeological investigation, recording and mitigation the magnitude of impact of construction works on any archaeological evidence within the Site will remain high Adverse but the resultant residual effect will most likely be Minor Adverse (Not Significant). The undertaking of archaeological investigation will ensure the identification and recording of archaeological evidence of low significance/sensitivity prior to its removal by the Construction Phase or will ensure that archaeological evidence of high or very high significance/sensitivity can be preserved in situ where appropriate, preserving it for future generations. The detailed design stage of the outline element may provide an opportunity to accommodate the preservation in situ of high/very sensitivity archaeological remains. While the most likely residual effect on archaeological receptors, with these mitigation measures, is anticipated to be Minor Adverse (not significant), in the worst-case scenario a Major Adverse (significant) effect could arise, because the extent and value/sensitivity of archaeological evidence within the Site cannot be known prior to intrusive investigation.

E7.3 With the implementation of an appropriate scheme of Historic Building recording, the significance of effect of demolishing the Second World War Structure within Site will reduce to Minor Adverse (not significant) from Moderate Adverse. This is because while the building will continue to be physically lost (a high magnitude of impact) its limited architectural and historic interest will be preserved by record.

E7.4 As no other additional mitigation is proposed, all other construction phase residual effects remain as set out in Section E5.0 (Potential Effects).

During Operation

E7.5 As no additional mitigation or monitoring is proposed during the operational phase of the Proposed Development, the residual effects remain as set out in section E5.0 (Potential Effects).

E7.6 The only significant residual effect of the Operational Phase arises from the alteration of the setting of the Twiss Road Bridge to Seabrook Lodge Bridge section of the Royal Military Canal Scheduled Monument (NHLE ref.1003127). This residual effect is Moderate Adverse.

E8.0 Summary & Conclusions

E8.1 This chapter has set out the baseline Cultural Heritage situation and then discussed the likely environmental effects of the Proposed Development during its construction and operational phases on Cultural Heritage receptors. Mitigation measures to reduce any negative environmental effects on Cultural Heritage receptors are identified where appropriate.

E8.2 The residual Cultural Heritage effects associated with the Proposed Development are summarised in Table E8.1.

Table E8.1 Summary of Effects

Receptor	Impact	Potential Effects (taking account of embedded mitigation)	Additional Mitigation and Monitoring	Residual Effects
During Construction				
Presently Unknown Archaeological Evidence within the Site.	Physical damage or removal. Direct, high adverse, permanent impact.	Most likely Minor Adverse and Not Significant, but potentially Major Adverse and Significant.	Pre-commencement scheme of archaeological investigation, recording and mitigation.	Minor Adverse - Major Adverse and Significant
Church of St Leonard listed building (Grade I, NHLE ref.1068961),	No impact.	Neutral, Not Significant	N/A	Neutral, Not Significant
Hythe Conservation Area	Change of setting. Indirect, temporary, very low adverse impact.	Negligible, Not Significant	N/A	Negligible, Not Significant
Twiss Road Bridge to Seabrook Lodge Bridge section of the Royal Military Canal Scheduled Monument (NHLE ref.1003127),	Change of setting. Indirect, temporary, very low adverse impact.	Minor Adverse, Not Significant	N/A	Minor Adverse, Not Significant
Royal Military Canal Town Bridge to Twiss Road Bridge section Scheduled Monument (NHLE ref.1005116),	Change of setting. Indirect, temporary, very low adverse impact.	Negligible, Not Significant	N/A	Negligible, Not Significant
Royal Military Canal, Seabrook Lodge Bridge to Seabrook Sluice section Scheduled Monument (NHLE ref.1003260),	Change of setting. Indirect, temporary, very low adverse impact.	Negligible, Not Significant	N/A	Negligible, Not Significant
Shorncliffe Redoubt Scheduled Monument (NHLE ref. 1401815)	No impact.	Neutral, Not Significant	N/A	Neutral, Not Significant
Martello Tower No.9 Scheduled Monument and Grade II listed building (NHLE refs. 1061167 and 1017226)	No impact.	Neutral, Not Significant	N/A	Neutral, Not Significant
Shorncliffe Battery Wall Scheduled Monument (NHLE ref.1005117)	No impact.	Neutral, Not Significant	N/A	Neutral, Not Significant
Second World War Structure within Site, non-designated built heritage asset.	Demolition. Direct, high adverse, permanent.	Moderate Adverse, Significant	Scheme of Historic Building recording.	Minor Adverse, Not Significant

Receptor	Impact	Potential Effects (taking account of embedded mitigation)	Additional Mitigation and Monitoring	Residual Effects
During Operation				
Presently Unknown Archaeological Evidence within the Site.	N/A	Neutral, Not Significant	N/A.	Neutral, Not Significant
Church of St Leonard listed building (Grade I, NHLE ref.1068961),	Permanent change of wider setting. No impact.	Neutral, Not Significant	N/A	Neutral, Not Significant
Hythe Conservation Area	Permanent change of wider setting. No impact.	Neutral, Not Significant	N/A	Neutral, Not Significant
Twiss Road Bridge to Seabrook Lodge Bridge section of the Royal Military Canal Scheduled Monument (NHLE ref.1003127),	Change of setting. Indirect, permanent, low adverse impact.	Moderate Adverse, Significant	N/A	Moderate Adverse, Significant
Royal Military Canal Town Bridge to Twiss Road Bridge section Scheduled Monument (NHLE ref.1005116),	Permanent change of setting. No impact.	Neutral, Not Significant	N/A	Neutral, Not Significant
Royal Military Canal, Seabrook Lodge Bridge to Seabrook Sluice section Scheduled Monument (NHLE ref.1003260),	Permanent change of setting. No impact.	Neutral, Not Significant	N/A	Neutral, Not Significant
Shorncliffe Redoubt Scheduled Monument (NHLE ref. 1401815)	No change of setting. No impact.	Neutral, Not Significant	N/A	Neutral, Not Significant
Martello Tower No.9 Scheduled Monument and Grade II listed building (NHLE refs. 1061167 and 1017226)	No change of setting. No impact.	Neutral, Not Significant	N/A	Neutral, Not Significant
Shorncliffe Battery Wall Scheduled Monument (NHLE ref.1005117)	No change of setting. No impact.	Neutral, Not Significant	N/A	Neutral, Not Significant
Second World War Structure within Site, non-designated built heritage asset.	N/A	Neutral, Not Significant	N/A	Neutral, Not Significant

E9.0 Abbreviations & Definitions

Abbreviations

1 CEMP - Construction Environmental Management Plan

2 CIFA - Chartered Institute for Archaeologists

3 EIA - Environmental Impact Assessment

4 ES - Environmental Statement

5 IHBC - Institute for Historic Buildings Conservation

6 NHLE - National Heritage List for England

7 NPPF - National Planning Policy Framework

8 PPG - Planning Practice Guidance

9 RMC - Royal Military Canal

10 SFRA - Strategic Flood Risk Assessment

Definitions

- **Scoping Note** - EIA Scoping Note (July 2025) submitted to the Council.
- **Scoping Note Response** - (November 2025) The Council's response to the EIA Scoping Note.
- **Scoping Opinion** - (January 2024) The Council's response to the EIA Scoping Report. A document prepared by the relevant determining authority to confirm its opinion on the scope and level of detail of the information to be provided in the Environmental Statement.
- **Scoping Report** - EIA Scoping Report (November 2023) submitted to the Council.

E10.0 References

[1] https://www.legislation.gov.uk/ukpga/1990/9/contents

[2] Ministry of Housing, Communities and Local Government, Ministry of Housing, Communities & Local Government (2018 to 2021) and Department for Levelling Up, Housing and Communities (December 2024) National Planning Policy Framework

[3] Ministry of Housing, Communities and Local Government, Ministry of Housing, Communities & Local Government (2018 to 2021) and Department for Levelling Up, Housing and Communities (December 2024) National Planning Policy Framework Annex 2: Glossary National Planning Policy Framework - Annex 2: Glossary - Guidance - GOV.UK

[4] Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities & Local Government (July 2019) Planning Practice Guidance: Historic Environment. Available at: https://www.gov.uk/government/collections/planning-practice-guidance [Accessed 8 Jun. 2022].

[5] Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities and Local Government (March 2019) Planning Practice Guidance. https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment

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Imperial Gardens
Volume 1: Environmental Statement

Chapter F Landscape and Views

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F1.0 Introduction

F1.1 This Chapter of the Environmental Statement ('ES') has been prepared by Lloydbore Ltd. on behalf of the applicant, GSE Property Group ('the Applicant'). It assesses the Proposed Development described in Chapter C in relation to landscape and views.

F1.2 The baseline situation is considered before the likely environmental effects of the Proposed Development are identified during its construction and operational phases. Mitigation measures to reduce any negative environmental effects are identified as appropriate, before the residual environmental effects are assessed.

F1.3 This Chapter is supported by the following technical appendices provided at Volume 2 to this ES:

- Appendix F1: LVIA Baseline Conditions - Mapping.
- Appendix F2: Landscape Designations / Policy.
- Appendix F3: Landscape Character.
- Appendix F4: Visual Baseline.
- Appendix F5: Zone of Theoretical Visibility (ZTV).
- Appendix F6: Assessment Views / Accurate Visual Representations (AVRs).
- Appendix F7: AVR 0/1 Methodology.

About the Author

F1.4 This Chapter has been prepared by Paul Whatley (CMLI), Principal Landscape Architect for Lloydbore Ltd. and Chartered Landscape Architect with 15 years post-qualification experience, including working on LVIA for Environmental Statements in the Kent and the south-east during this time-frame.

F2.0 Policy Context

National Policy

National Planning Policy Framework ('NPPF')

F2.1 In respect of 'Conserving and enhancing the natural environment', Chapter 15, Paragraph 187 of the NPPF[1] states that:

"187. Planning policies and decisions should contribute to and enhance the natural and local environment by:

a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services…;

c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;

d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures…;

e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality…; and

f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate."

F2.2 Under Chapter 8 of the NPPF 'Promoting healthy and safe communities', the sub-heading 'Open space and recreation', paragraphs 103-105 read as follows:

"103. Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.

104. Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or

b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or

c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

105. Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails."

National Landscapes

F2.3 A National Landscape is a designated area, previously known as an Area of Outstanding Natural Beauty ('AONB'), recognised for its exceptional beauty and distinctive character, which is protected and enhanced for the benefit of the nation. These landscapes are considered of national importance and are managed to conserve their natural beauty, wildlife, and cultural heritage, while also providing opportunities for recreation and enjoyment.

Local Policy

Folkestone and Hythe District Council: Core Strategy Review 2022

F2.4 The adopted development plan for Folkestone & Hythe District includes the Core Strategy Review (2022)[2] which was adopted on 30 March 2022. It sets out the spatial vision, objectives, development strategy and a series of over-arching strategic policies that will guide the scale, location and type of development in the district until 2037.

F2.5 Figure F14, see Appendix F2 includes an extract of the Interactive Proposals Map for Folkestone and Hythe District. This shows that the following planning policies apply to land within the Site, which are summarised over the following pages of the report:

- Policy C3: Provision of Open Space
- Policy SS1: District Character Areas - Urban Area
- Policy SS1 and SS3: Settlement Boundary Policy.

F2.6 Land at Princes Parade immediately to the east of the Site falls within Policy UA18: Urban Character Area - Princes Parade, Hythe, as set out below:

"The site is allocated for mixed-use redevelopment to include up to 150 residential dwellings, a 2,961sqm leisure centre; approximately 1,500sqm of commercial uses including hotel use (Use Class C1 / A1 / A3); and public open space."

Special / Local Landscape Areas:

F2.7 Figure F15, see Appendix F2 indicates the Special Landscape Area and Local Landscape Areas, present within the study area. The accompanying policy information for these areas is summarised below:

Policy NE3: Protecting the District's Landscapes and Countryside

Kent Downs Area of Outstanding Natural Beauty

F2.8 Policy NE3 states that *"The impact of individual proposals and their cumulative effect on the Kent Downs Area of Outstanding Natural Beauty (AONB) and its setting will be carefully assessed"* and that planning permission will be granted where it can be demonstrated that certain criteria have been met, including conserving and enhancing the locally distinctive features of the AONB, and reinforcing and responding to the distinctive character and special qualities of the area.

Special Landscape Areas

F2.9 The following Special Landscape Areas (SLAs) are defined on the Policies Map

- North Downs (including the scarp and crest);
- Old Romney Shoreline; and
- Dungeness.

F2.10 Proposals should *"protect or enhance the natural beauty of the Special Landscape Area… …unless the need to secure economic and social wellbeing outweighs the need to protect the SLAs' county-wide landscape significance."*

Local Landscape Areas

F2.11 The following Local Landscape Areas are defined on the Policies Map:

- Romney Marsh;
- Sandgate Escarpment and Seabrook Valley;
- Eaton Lands;
- Coolinge Lane and Enbrook Valley; and
- Mill Lease Valley.

F2.12 Proposals should *"protect or enhance the landscape character and functioning of Local Landscape Areas…unless the need to secure economic and social wellbeing outweighs the need to protect the area's local landscape importance."*

Guidance and Best Practice

F2.13 The approach adopted for the assessment in this Chapter has been informed and guided by the following key sources:

- The Landscape Institute and Institute of Environmental Management and Assessment, Third Edition, 2013. Guidelines for Landscape and Visual Impact Assessment[3]
- Technical Guidance Note LITGN-2024-01 (August 2024) - 'Notes and Clarifications on Aspects of Guidelines for Landscape and Visual Impact Assessment Third edition'[4]
- How to carry out and use landscape and seascape character assessments. Natural England and Department for Environment, Food & Rural Affairs, October 2014[5]
- Landscape Institute TGN 06/19 Visual Representation of development proposals, September 2019[6]

F3.0 Assessment Methodology & Significance Criteria

Assessment Methodology

LVIA Study Area

F3.1 The LVIA study area was initially selected as a 2.5km radius concentric circle (see Figure F1, Appendix F1), centred on the Site. In relation to the size and nature of the Proposed Development, this was assessed to be an adequate size study area to establish the overall extent of potential visibility towards the site / proposed development and identify the principal landscape baseline topics that would be relevant for further assessment.

Landscape Resources

F3.2 Baseline mapping has been produced showing the location, extent, and distribution of relevant landscape resources within the LVIA study area. These are accompanied by a written description identifying the key features and characteristics of the resource, along with any existing damage or detracting features, and an assessment of the overall 'Condition', 'Importance' and 'Value' of the resource. These are then be used to establish the baseline 'Sensitivity' of the landscape resource.

Zone of Theoretical Visibility (ZTV)

F3.3 The initial visual baseline studies have been informed by production of several 'Zone of Theoretical Visibility' (ZTV) diagrams, using specialist software and OS-based survey data for landform, woodland and built development. Full details of the ZTV for the Proposed Development are included within Appendix F5, with the general parameters summarised below.

F3.4 The preliminary ZTV exercise is intended to provide an initial broad-based assessment of the potential visibility shed of the Site, to help establish potential publicly accessible locations from where views of parts of the Proposed Development might be gained. It is not intended as an accurate representation of precise areas from where views will be gained.

F3.5 The ZTV diagrams only consider the screening effect of landform, major built up areas and major woodlands (as per the OS data inputted into the software) and do not take into account localised variations in landform, the presence of intervening vegetation cover, or other built structures such as walls or fences that could further affect visibility.

F3.6 The ZTV diagrams have been based upon following parameters:

- Significant areas of development have been given a generic height of 9m.
- Significant areas of woodland have been given a generic height of 10m. There are of course other areas of vegetation in the landscape, such as trees, shelterbelts and hedgerows which are not included in the QGIS data set and these often provide reduced visibility in the landscape.
- Receptor viewing height has been set to 1.63m above ground level.

- Transmitter heights have been placed in representative locations within the area proposed for residential development where the tallest structures would be likely to occur, factoring in the proposed changes to ground levels within the site.

Visual Receptors

F3.7 Based on the physical nature, dimensions of the Proposed Development and precise location of the Site, visual receptor(s) that may be affected have been identified. These could include a wide range of people including those living in the area, those who work there and those passing through on route to a different destination. There may also be people visiting specific attractions and locations, or those engaged in a recreational activity.

F3.8 These receptors will experience the landscape setting in different ways, depending on the context (location, time of day, season, degree of exposure) and the purpose of the activity they are undertaking (recreation, residence, employment or journey).

F3.9 Visual receptors are divided into three categories which reflect their relative sensitivity to changes in the view, derived from the context and purpose of their viewing experience:

- Primary;
- Secondary and
- Tertiary.

Primary Receptors

F3.10 These are views from / by the most sensitive locations and / or receptors and include locations with high visual amenity due to their historic or cultural significance (such as designated landscapes or tourist attractions), or high quality or importance (such as views from public rights of way, areas of passive recreation or residential properties). These also include views from locations in close proximity to the site from where the greatest magnitude of change may be experienced.

Secondary Receptors

F3.11 These are views from locations and / or by receptors where the visual amenity value of the available view may be considered to be low. This might be due to the nature of activity being undertaken at the location, or by the receptor (such as views from, or in close proximity to, areas of active recreation, major transport interchanges, major roads and railway lines and places of work or employment). This may also be due to the nature or quality of the available view and its setting (such as views from locations in close proximity to major detracting visual features, such as damaged or derelict land or buildings). These may also include views from locations where the number of receptors is likely to be low, or the nature of the view is glimpsed, fragmented or gained from within a moving vehicle.

Tertiary Receptors

F3.12 These are views from the least sensitive locations and / or receptors, who will be not usually be considered for further assessment. Tertiary receptor locations have very low, or no existing visual amenity, due to lack of available publicly accessible views, or where the setting or view is damaged or adversely affected by existing detracting visual features within

the landscape. These may also include long distance views where the introduction of new development into the view is unlikely to alter its overall nature, character or emphasis.

Note on Private Residential Visual Receptors

F3.13 Technical Guidance Note LITGN-2024-01, Section 6(1) states that:

"GLVIA3 is clear, that people living in the area of the proposed development have to be considered as receptors and that views from settlements should be considered…

… An LVIA should consider views from local communities focusing on the way that a community currently experiences views from public locations such as streets and open spaces and how those will change…

… Views from houses and individual properties are a matter of private amenity, noting that it is an established planning principle that there is no right to a view".

F3.14 FHDC has agreed that a RVAA (Residential Visual Amenity Assessment)[7] does not need to be carried out, however instead, this LVIA Chapter will provide a general assessment / comment on changes to views that will be experienced from certain groups of properties, in order to explain whether or not these changes are likely to be Significant.

Baseline Sensitivity

F3.15 Baseline 'Sensitivity' is derived by combining a judgement on the 'Value' attached to a resource / receptor and its 'Susceptibility' to the specific change associated with the development proposals, as summarised below:

- The 'Importance' and 'Condition' of a resource or receptor are used to establish 'Value' of that resource / receptor.
- 'Value' and 'Susceptibility' ratings are used to establish the 'Sensitivity' of the resource / receptor.

Assessing Baseline Importance

F3.16 For each identified landscape resource and visual receptor an assessment is made as to the existing 'Importance' of the resource or receptor Using the criteria set out in Table F3.1 below:

Table F3.1 Assessing Baseline Importance.

Importance	Definition
High	- International, or National level designations including World Heritage Sites, Scheduled Monuments and sites recorded on the Scheduled Monuments Register (SMR) or National Monuments Register (NMR), National Parks, National Landscapes (formerly AONB), Areas of Archaeological Importance (AAI).
	- Public views from, or within the immediate setting of any of the above designated areas / features: - Recognised strategic views, or from protected open space. - Views from private residential properties.

Importance	Definition
	- Views from well-known or publicised walks, routes and PRoW or recognised tourist attractions / vantage points which have a well-known or documented importance attached to particular views.
Medium	- Regional or Local level designations including Listed Buildings, Conservation Areas, Tree Preservation Orders, Special Landscape Areas (SPAs), Areas of High Landscape Value (AHLV). Undesignated areas but with identifiable 'Community' valued characteristics, features or use. May include PRoW of a lower importance, i.e. not in the higher category given above, or those generally of local importance.
	- Public views from, or within the immediate setting of any of the above designated areas / features.
Low	Undesignated areas with no identifiable 'Community' valued characteristics, features or use.
	- Public views from, or within the immediate setting of any of the above undesignated areas / features.

F3.17 A review of existing landscape designations provides a sound starting point to help understand the importance allocated to an existing landscape area or feature. However, many areas that may become subject to LVIA assessment will be ordinary, everyday landscapes with no specific recognised value. This does not mean that these areas are all devoid of any value.

F3.18 The European Landscape Convention promotes the need to take account of all landscapes, with less emphasis on the 'special' and more recognition that ordinary landscapes, such as community landscapes also have their own value. The criteria used to assess undesignated (community value) landscapes are set out using Box 5.1 in GLVIA3, and as summarised below in:

- Landscape Quality (Condition).
- Scenic Quality.
- Rarity.
- Representativeness.
- Conservation Interests.
- Recreation Value.
- Perceptual Aspects.
- Associations.

Assessing Baseline Condition

F3.19 An assessment is made as to the existing 'Condition' and quality of the identified resource or receptor, using the criteria set out in Table F3.2 below:

Table F3.2 Assessing Baseline Condition.

Condition	Definition
High	Landscape Condition - Attractive landscape with a unique sense of place, well maintained and with appropriate management for the land use. Widespread use of high-quality materials, with attractive visual detail and distinctive features worthy of conservation and no detracting features. Unified landscape with distinctive structure and pattern, balanced combination of physical characteristics resulting in a diverse, stimulating environment and high level of human comfort.
	Visual Condition – Views of high aesthetic and amenity appeal, of beautiful and culturally valued landscapes and features, recognised as being stimulating and inspiring with no visual detractors and where visible components have a dominant and unified pattern, are well proportioned and balanced in composition and nature, and are of an appropriate scale, arrangement and character to each other and their setting.
Medium	Landscape Condition – Pleasant landscape with a local sense of place. Reasonably maintained with use of good standard materials but with scope for improvement and enhancement and with some minor detracting features. Recognisable structure with characteristic patterns still evident but degraded by unsympathetic development.
	Visual Condition – Views of pleasant landscape and features but with noticeable visual detractors and where visible components have a strong, but interrupted pattern, are reasonably well proportioned and balanced in composition and nature, and are generally of an appropriate scale, arrangement and character to each other and their setting.
Low	Landscape Condition – Typical and unremarkable landscape in poor condition, with dominant damaged or derelict sites, with clear evidence of absence of, or inappropriate maintenance and management. Inappropriate use of materials, or use of materials with frequent dominant detracting features. Lacking in structure, and characteristic patterns masked by dominant mixed and poorly related, or single land use. Poor boundary definition and arbitrary 'disowned' space.
	Visual Condition – Views of damaged and derelict landscapes and features where numerous visual detractors dominate the views, where the visible components have a weak or chaotic pattern, are very poorly proportioned and unbalanced in composition and nature, and are notably of an inappropriate scale, arrangement and character to each other and their setting.

F3.20 This is a subjective assessment as to the physical condition and aesthetic state of the resource, taking account of management and maintenance levels and the presence or absence of detracting features and / or activities, which may influence a user's experience or perception.

Determining Baseline Value

F3.21 Baseline 'Value' is then derived by combining a judgement on the 'Importance' attached to a resource / receptor and its 'Condition', as illustrated by Table F3.3 below:

Table F3.3 Determining Baseline Value.

		Condition		
		High	Medium	Low
Importance	High	High	High	Medium
	Medium	High	Medium	Low
	Low	Medium	Low	Low

Assessing Susceptibility

F3.22 GLVIA3 defines landscape Susceptibility as follows:

"the ability of the landscape receptor (whether it be the overall character or quality / condition of a particular landscape type or area, or an individual element and / or feature, or a particular aesthetic and perceptual aspect) to accommodate the proposed development without undue consequences for the maintenance of the baseline situation and / or the achievement of landscape planning policies or strategies."

F3.23 It should be noted that the Susceptibility of a resource / receptor is not directly linked to its quality or condition. Both high and low quality resources and receptors may have high or low susceptibility to a specific development, depending upon the nature of the development. Susceptibility is a judgement as to how characteristic or not a specific development is to its contextual setting, in terms of scale, massing, nature and appearance.

F3.24 In determining visual Susceptibility the occupation or activity of the visual receptor, and the extent to which their attention will focus on the view of the Proposed Development, also needs to be considered.

Susceptibility of Landscape Receptors

F3.25 In relation to susceptibility of landscape receptors, GLVIA 3 states that:

"There can be complex relationships between the value attached to landscape receptors and their susceptibility to change which are especially important when considering change within or close to designated landscapes. For example:

- An internationally, nationally or locally valued landscape does not automatically, or by definition, have high susceptibility to all types of change.

- It is possible for an internationally, nationally or locally important landscape to have relatively low susceptibility to change resulting from the particular type of development in question, by virtue of both the characteristics of the landscape and the nature of the proposal.

- The particular type of change or development proposed may not compromise the specific basis for the value attached to the landscape."

F3.26 GLVIA Technical Guidance Note LITGN-2024-01, Section 5(4) states that landscape susceptibility will vary with the *type* or *nature* of change. This relates principally to:

- The type of development proposed (e.g. housing, a railway, warehouses, afforestation/deforestation, open storage, a wind farm, a grid connection etc).

- The relative size of the development (e.g. whether the proposal is for 4 or 400 houses).

F3.27 If more detail is known about the development this can also feed into and inform the judgement about how susceptible the site and surrounding landscape are to what is proposed, although care is taken to avoid double counting with 'Magnitude'.

Susceptibility of Visual Receptors

F3.28 In relation to susceptibility of visual receptors, GLVIA 3 states that:

"The susceptibility of different visual receptors to changes in views and visual amenity is mainly a function of:

- the occupation or activity of people experiencing the view at particular locations; and

- the extent to which their attention or interest may therefore be focused on the views and the visual amenity they experience at particular locations.

The visual receptors most susceptible to change are generally likely to include:

- residents at home (however, this is expanded on in GLVIA Paras 6.17 and 6.36, where the decision as to whether or not to include an assessment of private viewpoints in the assessment should be agreed with in the competent authority, as must the approach to identifying representative viewpoints since it is impractical to visit all properties that might be affected).

- people, whether residents or visitors, who are engaged in outdoor recreation, including use of public rights of way, whose attention or interest is likely to be focused on the landscape and on particular views;

- visitors to heritage assets, or to other attractions, where views of the surroundings are an important contributor to the experience;

- communities where views contribute to the landscape setting enjoyed by residents in the area."

F3.29 Susceptibility has been established using the criteria set out in Table F3.4 below:

Table F3.4 Resource/ Receptor Susceptibility.

Susceptibility	Definition
High	A landscape resource or visual receptor with a low ability to accommodate a proposed development, because the key characteristics of the resource or receptor have no or very limited ability to accommodate it without noticeable and measurable effects, taking account of the existing baseline condition and quality.
Medium	A landscape resource or visual receptor with a moderately ability to accommodate a proposed development, because the relevant characteristics of the resource or receptor have some ability to accommodate it without noticeable and measurable effects, taking account of the existing baseline condition and quality.
Low	A landscape resource or visual receptor with a high ability to accommodate a proposed development, because the relevant characteristics of the resource or

Susceptibility	Definition
	receptor are generally able to accommodate it without noticeable and measurable effects, taking account of the existing baseline condition and quality.
Negligible	A landscape resource or visual receptor which has an extremely high ability to accommodate a proposed development, because the relevant characteristics of the resource or receptor would be practically unaffected by it, taking account of the existing baseline condition and quality.

Establishing Baseline Sensitivity

F3.30 Similarly, baseline 'Sensitivity' is then derived by combining a judgement on the 'Value' attached to a resource / receptor and its 'Susceptibility' to the specific change associated with the development proposals, as illustrated by Table F3.5 below:

Table F3.5 Establishing Baseline Sensitivity.

		Value		
		High	Medium	Low
Susceptibility	High	High	High	Medium
	Medium	High	Medium	Low
	Low	Medium	Low	Low
	Negligible	Negligible		

F3.31 Where a Susceptibility of Negligible is concluded, the landscape or visual receptor with be scoped out from further assessment, on the basis that its corresponding Sensitivity to the proposed development will also be extremely Low / Negligible and therefore, Not Significant.

Identification of Effects

F3.32 This section of the assessment is split into the following two stages (which are interconnected):

- Nature of Change.
- Magnitude of Change.

Nature of Change

F3.33 Stage one determines the 'Impacts' that will occur as a result of the development proposals being assessed and describes the overall 'Nature of Change' on the baseline conditions of the individual landscape resources or visual receptors.

F3.34 These are described in terms of:

- Changes to and / or partial, or complete loss of elements, features or aesthetic aspects that contribute to the landscape or visual character;
- Addition of new elements or features that will influence character; and
- The combined effects of the above on overall character.

F3.35 The nature of change is also considered in terms of whether it is:

- Direct / Indirect; and
- Beneficial / Adverse, or Neutral.

Direct / Indirect Effect

F3.36 A 'Direct' effect is an effect that is directly attributable to a proposed development.

F3.37 An 'Indirect' effect is an effect that 'results indirectly from a proposed project as a consequence of the direct effects, often occurring away from the site, or as a result of a sequence of inter-relationships or a complex pathway. They may be separated by distance or in time from the sources of the effects'.

Beneficial, Adverse or Neutral

F3.38 The LVIA Guidelines require attributes of 'Beneficial', 'Adverse' or 'Neutral' to be assigned to an assessed effect. Definitions of these are included in the 'definitions and terminology' section of the methodology.

F3.39 This process is based upon an informed professional judgement, which considers a range of criteria that include:

- The degree to which a proposed development is considered to be characteristic, or uncharacteristic of the receiving landscape or view; and
- The contribution to the landscape that a development may make in its own right, by virtue of good design, the removal of detracting features or repair and restoration of derelict or damaged landscapes.

F3.40 The criteria used to assess the nature of the effect is set out below in Table F3.6 below:

Table F3.6 Assessing 'Nature of Change'.

Nature	Definition
Beneficial	This refers to an identified effect which results in an improvement or enhancement in the baseline condition of a landscape resource or view, which might derive from: • Removal of a detracting feature, component, or view. • Reinstatement or improvement of a key existing beneficial feature, component, or view. • The introduction of a new, characteristic, and beneficial feature or component which reinforces, protects or promotes the existing valued landscape character or visual amenity.
Adverse	This refers to an identified effect which results in the loss or degradation of the baseline condition of a landscape resource or view, which might derive from: • Removal of a beneficial feature, component, or view. • Expansion or enlargement of an existing adverse feature, component, or view.
Neutral*	This refers to an impact that neither contributes to, nor detracts from the baseline condition of a landscape resource or view.

* It is noted that the term Neutral is used elsewhere in this ES to mean no impact or effect; in this regard, the LVIA departs from the methodological approach used in other Chapters of the ES.

F3.41 It is considered that a material change to a landscape resource or visual receptor is not automatically 'Adverse' simply because it results in a change to the baseline condition.

Magnitude of Change

F3.42 Stage two then assess the 'Effect' of these changes on the baseline conditions of the individual landscape resources or visual receptors, in order to establish the 'Magnitude' of change.

F3.43 This process is based upon an informed professional judgement, which considers and attempts to balance the various factors considered.

F3.44 The assessment of 'Magnitude' of effect is based upon a combined assessment of the following factors:

- Size / scale;
- Geographic extent;
- Duration; and
- Reversibility (Permanent/Temporary).

Size / Scale

F3.45 A judgement is made on the size or scale of the change that will occur. It is expressed on a four-point scale of Major, Moderate, Minor or Negligible, and considers:

- The extent of existing landscape elements that would be lost, the proportion of the total extent that these represent and the contribution this makes to the character of the landscape or view.
- The extent of the view that would be occupied by the proposed development (glimpsed, partial or full) and the proportion of the proposed development that would be visible.
- The degree to which the aesthetic or perceptual aspects of the landscape or view would be altered by the removal, or addition of certain features. A judgement is also made as to whether the proposed development would contrast in form or character with its surroundings, and / or whether the development would appear as an extension or addition to the original context of the view.
- Whether or not the impact would change the key characteristics of the receiving landscape.
- The rapidity of the process of change in the landscape or view.

Geographic Extent

F3.46 The area over which the effect would be felt is identified on a four-point scale of:

- Site: Within the site of the development itself.
- Local: Within the immediate setting of the Site.
- District: Within the landscape type / character area in which the proposal lies.

- Regional: Within the immediate landscape type / character area in which the proposal lies, and those immediately adjoining it.

Duration

F3.47 The duration of the period over which the effect will occur is defined using a four-point scale of:

- Very Short-term (less than 1yr).
- Short-term (1-5yrs).
- Medium-term (6-10yrs).
- Long-term (11+ years).

Reversibility

F3.48 Reversibility is defined on a three-point scale:

- Permanent (change cannot be reversed, or there is no intention that it will be reversed).
- Semi – Permanent (change can or is intended to be partially reversed with time).
- Temporary (change has a defined life span and will or can be reversed on cessation).

Other factors which influence Visual Magnitude

F3.49 In relation to visual amenity and when determining size / scale, geographic extent and duration, it is also necessary to consider the following variables, which can influence how a change to a view can be perceived or observed:

- Elevation and distance: The distance and angle of view of the viewpoint from a proposed development, and how this may affect a receptor's ability to identify the development within the view.
- Exposure: The duration and nature of the view (fragmented, glimpsed, intermittent or continuous).
- Prominence: Whether or not the view would focus on a proposed development. For example, where a building would effectively create a landmark, or the view is directed towards a building by the landscape framework, or a development forms one element in a panoramic view.
- Weather conditions / aspect: The effect of the prevailing weather conditions at a given location, the clarity of the atmosphere or the angle and direction of the sun and how these impact upon visibility.
- Seasonal variation: Changes in seasonal weather conditions and vegetation cover may alter the extent of visibility of a development within a given view. This in turn, may influence factors such as the perceived size, scale, exposure, and prominence.

Determining Magnitude of Change

F3.50 The assessments of the nature of the Size / Scale, Geographic extent, Duration and Reversibility of the 'Effect' are combined to define the nature of the 'Magnitude' of change, using a four-point scale of High, Medium, Low or Negligible, as set out in Table F3.7.

F3.51 Given the complex nature of effects it is likely that they will not sit cleanly within any one category, but may share features of several other categories. It is possible for an effect to be of high magnitude for one factor and low for another. For example, an effect may be considered of high magnitude in terms of 'Duration' and 'Reversibility', but of low magnitude in terms of 'Size / Scale and Extent', or vice versa. In these instances, a balanced assessment of the overall 'Magnitude' is conducted based on professional judgement and an explanation as to how this has been arrived at is given.

Table F3.7 Magnitude of Change.

Nature	Definition
High	A change of high magnitude will be generally consistent with the following criteria: • Will be of a Major Scale, resulting in the loss of all or most of the resource or receptor and / or will affect a significant proportion of the resource or receptor. • Will affect and / or will be experienced over a large Regional geographic extent. • Will be long-term in duration, and • Will result in permanent / irreversible changes. • Will result in a visually prominent / dominant change.
Medium	A change of medium magnitude will be generally consistent with the following criteria: • Will be of a Moderate Scale, resulting in the partial loss of resource or receptor and / or will affect only a limited proportion of the resource or receptor. • Will affect and / or will be experienced over a medium District geographic extent. • Will be of a medium duration, and • Will result in semi-permanent / partially reversible changes. • Will result in a visually noticeable change.
Low	A change of Low magnitude will be generally consistent with the following criteria: • Will be of a Minor Scale, resulting in a very small or barely discernible loss of resource or receptor and / or will affect only a very small proportion of the resource or receptor. • Will affect and / or will be experienced over a small Local geographic extent. • Will be of a short duration, and • Will result in temporary / reversible changes. • Will result in a visible but not obvious change.
Negligible	A change of negligible magnitude will be generally consistent with the following criteria: • Will be of a Negligible Scale, resulting in a barely discernible loss of resource or receptor and / or will affect only a very small proportion of the resource or receptor. • Will affect and / or will be experienced at a very small Site extent only. • Will be of a very short or duration, and • Will result in temporary / reversible changes. • Will result in a visually obscure / inconspicuous change.

F3.52 At this point in the process, any impact / effect which has been assessed as having a Magnitude of Change of 'Negligible' (or Nil), or a nature of change of 'Neutral', will not be taken forward to the assessment of Significance, on the basis that it is considered to be 'Not Significant'.

Significance Criteria

F3.53 The purpose of this section of the assessment is to combine the assessed 'Sensitivity' of a landscape resource or visual receptor with the assessed 'Magnitude' of change, to determine the overall 'Significance' of the effect.

F3.54 'Significance' is a measure of the importance or gravity of the environmental effect and is derived by combining the assessed 'Sensitivity' of a landscape resource or receptor, with the assessed 'Magnitude' of change. It is expressed using a sliding scale between 'Major', 'Moderate', 'Minor' or 'Negligible', as illustrated by Table F3.8 below:

Table F3.8 Significance of Effect.

		Value		
		High	Medium	Low
Susceptibility	High	High	High	Medium
	Medium	High	Medium	Low
	Low	Medium	Low	Low
	Negligible	Negligible		

F3.55 In terms of defining 'Significance in EIA terms' the following approach is taken, which is set out in GLVIA Technical Guidance Note LITGN-2024-01, Section 3(5) and highlighted below:

"As indicated at GLVIA paragraph 3.33, it is not necessary to establish thresholds for levels of significance, provided that it is made clear whether effects are, or are not, significant. However, typically effects falling below the middle of the range of overall effect are assessed as not significant. For example, if using a scale or minor / moderate / major, then major effects will be significant and minor effects will not be significant. In this example, moderate effects may or may not be significant and justification would be needed in the methodology or receptor assessment as to whether a moderate effect is significant or not."

F3.56 For clarity, effects which are Major are considered Significant in EIA terms, effects which are Moderate may be considered Significant, and effects which are Minor or Negligible are Not Significant in EIA terms. In terms of the nature of predicted effects, effects which are assessed as Adverse or Beneficial are be considered potentially 'Significant' and Neutral impacts are considered 'Not Significant'.

Consultation

F3.57 The selection of LVIA assessment viewpoints and types of AVR / CGI to be produced has been agreed with FHDC through the informal scoping process as described in Chapter B of this ES. Prior to this, and in relation to a different proposed scheme, the following fed into the approach set out in the Informal EIA Scoping Note (Appendix B1):

- EIA Scoping Report (November 2023), which included proposed assessment viewpoints (included as Appendix 1 to Appendix B1).
- EIA Scoping Opinion (January 2024), where FHDC commented on the proposed assessment viewpoints and format of AVRs (included as Appendix 2 to Appendix B1).

- Online Meeting: Discussion / agreement of LVIA Viewpoints; 16th February 2024 (FHDC, Lichfields, Lloyd Bore in attendance). Lichfield's Letter (Ref: 64670/03/HS/EC/29718346v3), dated 26th February 2024 - Summary of meeting held on 16th February 2024 (provided as Appendix B2)).

F3.58 This discussion helped to confirm the following:

- The size and extent of the LVIA study area;
- The level of Accurate Visual Representation ('AVR') (or use of Computer Generated Image ('CGI') which is appropriate to each viewpoint for the purpose of assessment;
- Assessment Viewpoints to be taken into account, which included those requested by Heritage England, which were agreed with the Heritage Consultant;
- Inclusion of selected landscape receptors (District-Level Landscape Character Areas) as requested by FHDC;
- The LVIA would provide a general qualitative assessment of the effects of lighting / night-time visual effects from locations close to the Site, including the RMC and Princes Parade, and from a representative location within the Kent Downs National Landscape. This would be based on non-technical information provided by a Lighting Specialist;
- A detailed Residential Visual Amenity Assessment (RVAA) would not be required, but a general assessment of views towards the Proposed Development from private properties would be provided in the LVIA, based on a selection of 'representative' assessment views from nearby publicly accessible locations and supporting illustrative photographs; and
- Users (visual receptors) of the English Channel were also agreed to be Scoped Out.

Assumptions and Limitations

Users of the Existing Golf Course

F3.59 The LVIA has been progressed on the basis that that these receptors (Users of the existing Golf Course) can be scoped out of the LVIA. There are approximately 250 members of the Hythe Golf Club, including full time, social and part time members. These were all informed of the Proposed Development at the early stages of the project and that the lease would expire during 2026 and would not be renewed, at which point the golf course would not be available for use.

Recreation users of the RMC by canoe / kayak

F3.60 The LVIA has been progressed on the basis that that these receptors (users of the RMC by canoe / kayak) can be scoped out of the LVIA. These receptors are anticipated to gain a view from close to the water of the RMC which is a low vantage point where views of the Proposed Development would be likely to be restricted by the canal sidings and its vegetation.

F3.61 The vegetation to the north of the proposed residential development (where most built development is proposed to take place) is very dense. The focus of these receptors would be on their activity and the nature of views gained would be transient and sequential, where

the wider visual context is urban in nature as the canal passes through the developed centre of Hythe. It is therefore concluded that impacts on the visual amenity of these receptors would be Negligible (Not Significant), requiring no further assessment.

Illustrative CGIs

F3.62 The viewpoints plan shown in Figure F49 (Appendix F6) shows the location of six viewpoints towards the Proposed Development for which Illustrative CGIs have been prepared by the project Architect (see Views 3, 4, 11, 14, 15 and 17, Appendix F6), with additional illustrative Views A-E also included. The character and appearance of the proposed residential development in these views has been treated as indicative only, as this element of the scheme is submitted to the local authority in outline detail only.

F3.63 For the purposes of this assessment, the architectural appearance of the proposed residential development (which is in outline form in terms of its planning application) is informed by the Architectural Approach set out in the Design Code (Appendix C5) and the Parameters Plans (Appendix C1). Accordingly, it is assumed that the residential development will be of an appropriate style and character for its surroundings and local context (including an appropriate design response to the proximity of the Scheduled Monument (RMC) and the wider heritage character of Hythe). It is anticipated that any grant of planning permission for the Proposed Development, adherence to the Parameter Plans and the Design Code, would be secured by way of an appropriately worded planning condition.

F4.0 Baseline Conditions

Current Conditions

The Site and LVIA Study Area

F4.1 The extent of the Site and LVIA study area is shown on Figure F1, see Appendix F1. This is a 2.5km radius concentric circle, centred on the Site, assessed to be an adequate size study area to establish the overall extent of visibility towards the Site and identify the principal landscape baseline topics that would be relevant for further assessment, in relation to the size and nature of the Proposed Development.

F4.2 Where appropriate, selected maps have been presented at a slightly broader and / or closer size and scale, for example to indicate the origins of illustrative and assessment photography on a Site / local scale, and to confirm the investigations made outside of, or on the outskirts of the broad study area described above.

Land Use and Access

Site Access

F4.3 The majority of the Site is not open to public access, as it is a private golf course. Two footpaths run north / south through the central part of the Site and just beyond the eastern boundary. These are open to public access but are not formally designated public rights of way. The grounds to the Hythe Imperial Hotel and its car parking are private and not open to public or unauthorised access.

Land Use

F4.4 The general land use and vegetation pattern within the LVIA study area is shown on the aerial photo on Figure F2, see Appendix F1. The majority of the Site is given over to a managed golf course landscape, with fairways, greens, areas of rough and bunkers. There are occasional pockets of scrub along the periphery of footpaths and occasional trees amongst the golf course, mainly in the east and central part of the Site.

F4.5 Land to the east of the Site is given over to informal mixed scrub and grassland. The Seapoint Canoe Centre (which consists of several metal shipping containers) occupies part of the eastern end of Princes Parade, together with a public car park and small play area. Further to the east is the eastern terminus of the canal, with its redoubt (stone wall). To the north of this is a small area of public open space overlooking the canal and its wharf. Beyond this is a pocket of residential development and a petrol station, next to the junction between Princes Parade and the A259 where Seabrook Road becomes Sandgate Esplanade.

F4.6 Land to the west, north, north-east and north-west of the Site is occupied mainly by residential land use, with occasional mixed uses including education, retail, office, commercial and medical, located along Seabrook Road and other parts of the A259.

F4.7 Land to the far north and north-west of the LVIA study area is occupied by leisure use, principally the Sene Valley Golf Club. Alongside this are pockets of agricultural land to the north, and to the north-west, land is occupied by the MOD at Shorncliffe Camp.

F4.8 Land within the south-western corner of the Site and immediately to the west is occupied by Hythe Imperial Hotel and residential development at Imperial Park. Further to the west is a variety of leisure uses, including a recreation ground at South Road with tennis, bowls, cricket, squash clubs and a skate park and Hythe Swimming Pool to the south. There is further mixed residential development in the Park Road area to the west.

F4.9 Approximately half of the LVIA study area to the south of the Site is formed by the English Channel. The beaches and coastal promenade are used primarily for sports and leisure uses including walking, cycling and fishing.

Landscape Resources

Topography

F4.10 Topography within the LVIA study area is shown on Figure F3, see Appendix F1 (Volume 2 of this ES). Topography within the Site is captured on the topographical survey.

F4.11 The text adjacent to Figure F3 (Appendix F1) summarises the topography within the study area, and at a Site / Local scale.

F4.12 The baseline Importance of the Topography within the Site is assessed to be Medium. The landform / topography within the Site is undesignated, but some community importance (value) is attached to the fact that it generally allows open views the golf course. Its low-lying nature is connected to the wider landscape setting of the RMC (Scheduled Monument) i.e. open views and firing lines towards the sea were once possible in Napoleonic times, although these have since been disconnected by the sea wall to the south. Condition is assessed to be Low, as the Topography within the Site and its immediate surroundings has been heavily modified over time, most recently for use as a golf course landscape but also on a much larger scale and more permanent nature through the construction of the embankment which forms the northern edge of Princes Parade (part of the man-made sea defence). This prevents views of the English Channel from within the Site and from the RMC.

F4.13 Susceptibility of the Topography within the Site in relation to the Proposed Development is assessed to be Medium. The proposed levels strategy would require levels to be raised in the western part of the Site to achieve an equilibrium of building platforms, access and drainage requirements while responding sensitively to the proximity of the RMC to the north. By its nature, this would need to be a fairly extensive operation, but the Site is assessed to have a moderate ability to accommodate these changes given its baseline condition which is already heavily modified. The levels strategy in the central and eastern parts of the Site is generally to retain existing levels and, in this respect, Susceptibility would be Low. The resulting baseline Sensitivity of Site Topography is assessed to be Low.

Vegetation

F4.14 The principal vegetation groups and their distribution within and close to the Site is shown on Figure F4 (with accompanying text), see Appendix F1 (Volume 2 of this ES).

F4.15 The baseline Importance of Site Vegetation is assessed to be Medium. Apart from the TPO 10 which lies within the western edge of the grounds of the Hythe Imperial Hotel, the vegetation within the Site is undesignated, but the tree cover within the existing golf course

contributes to the landscape and visual amenity of the Site and its surrounding landscape on a local scale. The Condition of the existing Vegetation within the Site is assessed to be Medium. The trees and mature shrubs within the Site a generally in a moderate – good condition (a combination of Category C and B according to the Tree Survey). Category B trees a generally occasional mature trees scattered amongst the western part of the golf course and also those along the Site boundaries which offer some landscape structure and amenity value, however the scrubby vegetation in some parts of the Site (for example along the edges of the golf course and RMC and along parts of the central informal footpath) is typical and unremarkable, lacking a coherent landscape structure and in some areas unappealing in visual terms.

F4.16 Susceptibility of the Vegetation within the Site in relation to the Proposed Development is assessed to be Medium, as there is a moderate capability for partial retention / removal (and replacement), where the overall strategy would be to provide ecological and biodiversity enhancement in the long-term and provide compensatory tree planting where appropriate.

F4.17 A further aim of the landscape strategy is to introduce vegetation which is more responsive to the underlying character of the landscape through the provision of semi-natural habitat and landscape typologies which are appropriate to the coastline, rather than those which are connected to a highly managed and ornamental golf course setting. The baseline Sensitivity of the Vegetation within the Site is assessed to be Medium.

Public Rights of Way

F4.18 Public Rights of Way (PRoW) within the LVIA study area are shown on Figure F5 (with a detailed description provided in the accompanying text), see Appendix F1.

F4.19 The baseline Importance of PRoW within the LVIA study area are generally of High Importance, due to the presence of published routes which range up to national importance. Many of the routes are published or long-distance routes and / or are close to the Scheduled Monument. Their Condition is also High, as the PRoW within the LVIA study area offer a high level of accessibility to a range of features. Their management and upkeep is generally of a high order and a range of accessibility options are offered for a variety of users.

F4.20 Susceptibility of PRoW in the LVIA study area is assessed to be Negligible. The Proposed Development would have no direct impact on the route of any PRoW within the LVIA study area, or require changes to their surfacing. Susceptibility therefore relates to the ability of these PRoW (and informal footpaths running through and immediately adjacent to the Site) to accommodate change in terms of the landscape character and visual amenity experienced from them by other receptors (people and landscape character types). While the informal footpath running through the centre of the Site is not a formal PRoW, it is to be incorporated into an area of public open space with improved access provision and amenity. In this respect Susceptibility is also Negligible.

F4.21 Sensitivity is therefore concluded to be Negligible and therefore, this topic will require no further assessment from a landscape perspective as there is no scope for Significant effects upon PRoW as a landscape resource within the LVIA study area. The visual amenity gained from PRoW within the LVIA study area will be assessed under the respective views from

those locations and considered as part of the assessment of landscape character as appropriate.

Grain of Development

F4.22 The grain of built development within the LVIA study area (based on OS Data) is indicated on Figure F6 (with a detailed description provided in the accompanying text), see Appendix F1.

F4.23 In terms of its baseline Importance, the Grain of Development within the LVIA study area is assessed to be Medium. It is mixed in pattern and nature, reflecting the gradual evolution of the urban and open space land uses in the locality over time. Condition is assessed to be Medium. The reasonably distinctive patterns of built form create a local sense of place in some areas. Value is therefore concluded to be Medium.

F4.24 Susceptibility is assessed to be Medium in the western part of the Site, as it has a moderate capability of accommodating an area of built development that would draw its influenced from the pattern and scale of built development pattern which already exists to the west at Imperial Park, at the Hythe Imperial Hotel and its grounds and from the footprint size and arrangement of other promenade buildings nearby to the west. Nonetheless, there is sensitivity attached to the finer detail of how the size and arrangement of new buildings in this area, where at present the lack of development allows openness.

F4.25 Susceptibility is Low for most of the eastern part of the Site (which would mostly remain free from built development, apart from in its south-western corner). Although much smaller in size, there are some singular golf course outbuildings present in that part of the Site, so there is some precedent for built form in the eastern part of the Site. The siting and orientation of this building would be connected to its intended land-use (golf-course and leisure).

F4.26 The baseline Sensitivity of the Grain of Development area is concluded to be Medium for the western part of the Site and Low for the central and eastern parts of the Site.

Conservation Areas (landscape setting)

F4.27 Conservation Areas within the LVIA study area are shown on Figure F8, see Appendix F1. The Hythe Conservation Area ('CA') lies to the west and north-west of the Site. The easternmost part of the Hythe CA is separated from the Site by the development on both sides of Twiss Road, while the north-western corner of the Site is separated from the CA by Twiss Road and its road bridge over the RMC.

F4.28 To the west of the Site, the main part of the eastern edge of the Hythe CA is approximately 300m distant, separated by residential development at Imperial Gardens and to the west of Twiss Road. The closest parts of the CA to the Site are characterised in the Hythe Conservation Area Appraisal as being within the 'RMC and Open Space' Character Area. This describes three linear spaces along the RMC; Dymchurch and Scanlon's Bridge Road; Stade Street to Dymchurch and; Twiss Road and Stade Street. The latter is closest to the site and summarised below.

F4.29 The Twiss Road and Stade Street part of the RMC is described in the Hythe Conservation Area Appraisal (2006)[8] as follows:

"a steep sided, tree lined 700m section bounded by Stade Street to the west and Twiss Road to the east, each with a traffic bridge. The pedestrian bridge extends across the canal linking Ladies Walk to the south with the War Memorial and The Grove on the north bank. Tarmac footpaths run along the top of both banks. Prospect Road separates the canal from the town.

The former Royal Military Road, now a footpath to the north of the rampart, has recently been identified and its surface upgraded. Entrances to the canal are frequent, connecting open spaces, including the playing fields, cricket club, bowling green, allotment gardens, Oaklands, and The Grove and South Road playing fields. The open gardens of The Grove, with the War Memorial on the north bank and the more enclosed gardens of Oaklands to the south providing a more traditional type of public park. The character area is peaceful and accessible. Further south, the South Road Playing Fields and allotment gardens provide a significant amount of public open space with multiple recreational functions."

F4.30 In the wider LVIA study area there are also Conservation Areas to the north-west (Saltwood) and the east (Sandgate: The Esplanade). It is assessed that these can be scoped out from further detailed assessment, due to the landscape and visual separation between them and the Site, which does not form a significant part of their landscape setting.

Hythe Conservation Area – Baseline Sensitivity

F4.31 The baseline Importance of the Hythe Conservation Area is Medium, due to the designated status of the Hythe Conservation Area and numerous Listed Buildings. The Condition of the wider landscape setting of the CA is strongly influenced by its surrounding developed urban context. This affects the availability of views towards it, as features within the CA are either not visible from the surrounding area or, where they are visible (or glimpsed) they are influenced by surrounding urban features and activities which lack a direct connection to the CA. The Condition of the landscape setting to the Hythe CA is assessed to be Medium, as is its overall Value.

F4.32 The Susceptibility of the Hythe Conservation Area is assessed to be Low / Negligible. The Proposed Development would occur outside of it, and most of its wider landscape setting would be unchanged. The Proposed Development would consist of a small extension of the residential land-use which already exists to the west. The existing development on both sides of Twiss Road forms a separation between the Site and the nearest part of the CA and this area is characterised by urban development, containing mainly of residential land-use.

F4.33 There is a lack of intervisibility towards the Site from within the CA and from publicly accessible locations, this would be limited to a small number of places in the Twiss Road area. In terms of visual setting, the visual connection with the CA from close to the Site is also limited to a distant glimpse from some parts of Princes Parade, made possible by the landmark of the tower of the Church of St. Leaonard, where the intervening landscape is also characterised by an extensive developed urban context.

F4.34 The baseline Sensitivity of the Hythe Conservation Area (Landscape Setting) is assessed to be Low / Negligible.

Listed Buildings (landscape setting)

F4.35 Listed Buildings within the study area are shown on Figure F9, see Appendix F1.

F4.36 There are no Listed Buildings within, or immediately adjacent to the Site. The closest in terms of distance are the small number of Grade II Listed buildings situated on Seabrook Road (Black Cottage is approximately 115m to the north, although separated by the RMC and its open space corridor and residential development and gardens along the southern edge of Seabrook Road).

F4.37 As described in the previous Conservation Area section, the upper parts of The Parish Church of St. Leonard (Grade I Listed) can be glimpsed from some locations along Princes Parade to the south of the Site. There is no historical interest to these views because they are primarily of a modern character, due to the existing golf course use of the Site and intervening modern built development and urban built spaces. The contribution of these views to the historical significance of the church relates to its value as a local landmark and its intrinsic architectural interest. There is a dense cluster of other Grade II and Grade II* Listed Buildings within the Conservation Area which are not readily visible or individually identifiable from the wider landscape setting of the CA.

F4.38 Elsewhere in the study area, there are a small number of Grade II Listed buildings within the Park Road residential area, with three Martello Towers situated along West Parade and the Hythe Ranges to the south-west. These are separated from the Site physically and visually. There are scattered Grade II Listed Buildings in the eastern part of the study area, and a variety of different listed buildings at Saltwood village, both separated physically and visually from the Site.

F4.39 For the majority of Listed Buildings within the study area, baseline Sensitivity is assessed to be Nil / Negligible, because the Site does not form a part of their immediate or wider landscape setting in which for significant impacts to occur. It is concluded that only the wider landscape setting of the Church of St. Leonard needs to be taken considered further, as below.

F4.40 The baseline Importance for Listed Buildings as defined in the Methodology for this assessment is Medium. The wider landscape setting of the Church of St. Leonard is also assessed to be Medium. It is an attractive landmark feature which contributes towards a local sense of place, surrounded by urban development and open spaces which are urban in context and generally of medium quality and condition. Value is assessed to be Medium.

F4.41 Susceptibility of the wider landscape setting to the Proposed Development is assessed to be Low / Negligible, as most of it would remain unchanged. While large residential buildings are proposed, these would be close to existing residential in the south-eastern corner of Hythe which is physically separated from the church by other intervening urban development. Public intervisibility towards the landmark church tower would remain largely unaffected, except for a glimpsed view available from Princes Parade to the south of the western part of the Site. As explained above in the context of the Conservation Area setting, this is a distant and glimpsed view where the intervening landscape is already characterised by an extensive developed urban context.

F4.42 The baseline landscape Sensitivity of Listed Buildings (specifically the wider landscape setting to the Parish Church of St. Leonard) is assessed to be Low / Negligible.

Scheduled Monuments (landscape setting)

F4.43 Scheduled Monuments within the study area are shown on Figure F10, see Appendix F1 and described below.

F4.44 The closest Scheduled Monument to the Site is the RMC. Immediately to the north of the site is the 'Twiss Road to Seabrook Lodge Bridge' section of the RMC. The section of canal to the north-west of the Site is known as the 'Town Bridge to Twiss Road Bridge' section. Further to the west of that, closer to the central part of Hythe is the 'Scanlon's Bridge to Town Bridge' and West Hythe Bridge to Scanlon's Bridge' sections of the scheduled monument. To the east of the Site is the Seabrook Lodge Bridge to Seabrook Sluice' section of the RMC.

F4.45 The RMC is a Scheduled Monument in recognition of its national significance as a major early 19th century fortification against the threat of invasion from France. It was part of an integrated system of defences along the southern coast of England. Its design was developed to exploit the range of the (then) current rifles and cannons through careful positioning of Martello towers, parapets, batteries and redoubts and kinks in the canal alignment. Its defensive role was seen as important during WW2 when the length of the canal was reinforced by a series of pillboxes in case of invasion.

The RMC: Twiss Road to Seabrook Lodge Bridge section – Landscape Setting

F4.46 The landscape setting of the Twiss Road to Seabrook Lodge Bridge section of the RMC is characterised by mature vegetation on both sides. This is generally denser to the north of the western and central parts of the Site and sparser by comparison to the east of the kink in the canal. The vegetation creates an intimate character, particularly along the paths to the north of the RMC and this contributes towards a local sense of tranquillity.

F4.47 The mature vegetation west of the kink in the canal also restricts views from the northern bank of the RMC towards the coast. This runs contrary to the historical ideology of maintaining sight lines from the RMC across the intervening landscape towards the coast for military defence, and in any case, views towards the coast from the RMC are interrupted by the rising landform which supports the sea wall and the highway running along Princes Parade. There is further visual disconnection between the footpath running along the southern bank of the RMC (Public Bridleway HB83) and the canal itself, caused by the dense infrequently managed vegetation.

F4.48 The residential development at Imperial Park has infilled built development to the south of the RMC and the area north of the Hythe Imperial Hotel. This is set back from the canal by 20-30m, with a section of amenity grass and an access road leading to Moncrieff Gardens and Imperial Green from Twiss Road.

F4.49 The above features contribute towards a partial disconnection of the RMC and the coastal landscape setting to the south in the area immediately to the west of the Site. While wayfinding and interpretative features are present in some locations, there is little about the landscape features and landscape setting of this section of the RMC that maintain a strong connection to the historical context of the Scheduled Monument (without the use of supporting literature, personal knowledge, or a guided tour, for instance).

F4.50 Notwithstanding the above, the Hythe Imperial Golf Course offers a sense of openness (in some locations where gaps in vegetation allow) between the RMC and Princes Parade, though the manicured appearance of the golf course is somewhat disparate from the landscape features which might otherwise occur in this location if left to natural processes or managed as a more semi-naturalistic environment.

F4.51 The north / south informal footpaths which connect the RMC to Princes Parade are fairly ordinary in their appearance and there is scope for improvement and enhancement in terms of landscape treatment and management to improve the existing landscape setting of the Scheduled Monument. The vegetation along the canal sides adds to a sense of intimacy and seclusion but is also ordinary in appearance and in some places is untidy, which detracts from local landscape character.

F4.52 The baseline Importance of the Scheduled Monument: RMC – Landscape Setting (Twiss Road to Seabrook Lodge Bridge) is intrinsically High. The landscape setting to the RMC forms a pleasant landscape with a local sense of place, although its quality and condition is fairly poor, with use of standard materials and features present which disconnect the landscape setting from its historical significance and interpretation. There is scope for improvement and enhancement in terms of provision and management. The landscape setting and historical connection with the coast has been eroded over time and the legibility of this connection is obscure. Condition is assessed to be Medium / Low, although taking a precautionary approach a level of Medium Condition is concluded. The resulting Value is concluded to be High, despite its Medium Condition.

F4.53 The setting of the RMC is assessed to have a Medium level Susceptibility to the proposed residential development in the western part of the Site (due to siting it in close proximity to existing residential development to the west) and a Low level Susceptibility in the central and eastern parts of the Site (where open space and golf course land-uses are proposed).

F4.54 The baseline Sensitivity of the landscape setting to the RMC (Twiss Road to Seabrook Lodge section) to the north of the western part of the Site is therefore High and Medium to the north of the central and eastern parts of the Site. Overall, a Sensitivity of High-Medium is concluded.

Hythe Imperial Hotel (landscape setting)

F4.55 The Hythe Imperial Hotel was constructed by the South Eastern Railway and was opened in 1880 as the Seabrook Hotel. Extensions are believed to have been added during the 1920s and in the 1970s a leisure wing including a swimming pool at basement level was added.

F4.56 The current Hythe Golf Course was developed in the 1880s at the same time as the Hotel, to complement its leisure facilities. In 1915 a horse-drawn tramway line was installed in front of the hotel (with the line extending east towards the Sandgate Terminus), but this was later closed by 1921.

F4.57 The Hotel was renamed 'The Hythe Imperial Hotel' in 1990 and was later renovated in 2011. The land to the north of the Hotel contains a formal garden, with land to the east and west developed for residential land-use in two phases in 2010 and 2018.

F4.58 The immediate setting of the Hythe Imperial Hotel features a gated entrance from Twiss Road, with a brick wall and piers. This leads to a covered entrance at its rear which leads

onto a formal crescent-shaped entrance to the formal gardens to the north, beyond car parking. There is further car parking to the western side of the Hotel serving the golf course which is set down approximately one-storey basement height from the level of Princes Parade to the south. A vehicular access road meanders down from the promenade to car park level, adjacent to the existing clubhouse building and grounds maintenance facility.

F4.59 The southern elevation of the Hotel faces onto the western end of Princes Parade, with the contemporary 'modified' formal entrance to the Imperial Ballroom, beyond a low brick wall with evergreen hedging. The hedgerow vegetation is more substantial as it wraps around the south-western corner of the Hotel grounds, giving way to larger shrubbery and groups of mature trees which extend into the wider grounds of the residential development between Twiss Road and Moncrieff Gardens.

F4.60 The leisure building to the west of the Hotel forms a detracting feature locally, representing what now appears as a mundane architectural style typical of the 1970s. The hard and soft landscape within the wider grounds of the Hotel and the adjoining residential development to the north are regularly maintained.

F4.61 The Importance of the Hythe Imperial Hotel and its immediate grounds is assessed to be Medium. It is not a Listed Building, but forms a local landmark and its building and history are connected to the historical land use of the golf course and Princes Parade. Its Condition is assessed to be Medium; its defining architectural characteristics are intact, despite some parts of its immediate surroundings (car parking and some unsympathetic outbuildings) forming detracting features on a local / site scale. Its Value is therefore concluded to be Medium.

F4.62 Susceptibility to the general type and size of the Proposed Development is assessed to be Medium, due to the following consideration:

- There would not be any fundamental changes to its core characteristics, but two buildings of the same use would be added to the east and west of it. As the Hotel building has a strong identity and character, it has a moderate susceptibility (robustness) to the introduction of new contemporary buildings which would provide an extension of the existing Hotel and leisure facilities.
- The Proposed Development would be of a land-use, size and massing which would form a continuation of those already existing to the west (along Twiss Road, Marine and Western Parade) and north (existing residential development at Imperial Park), thereby forming a cohesive urban framework in this part of Hythe which is responsive to local character in terms of land-use and built-form.

F4.63 The combination of a Medium level Value and Medium level Susceptibility, results in a Medium level Sensitivity for the Hythe Imperial Hotel and its immediate landscape setting to the Proposed Development.

Landscape Character

Kent Downs National Landscape

F4.64 The location and extent of the Kent Downs National Landscape in relation to the LVIA study area is shown on Figure F11 and F12[9], see Appendix F2.

F4.65 The Kent Downs AONB is located to the north and north-west of the Site, separated by residential at Seabrook Road and Cliff Road. It is located approximately 320m from the nearest boundary of the Site (the north-eastern corner). The Kent Downs National Landscape boundary also coincides with the majority of Local Policy NE3: 'Protecting the District's Landscapes and Countryside – AONB'.

Kent Downs Landscape Character Area: Postling Scarp and Vale

F4.66 The part of the Kent Downs National Landscape that falls within the study area is defined by the Kent Downs AONB Landscape Character Assessment, as being within the 'Postling Scarp and Vale' Landscape Character Area ('LCA') (Ref. 2C) Figure F11 and F12, see Appendix F2. This is defined as 'Landscape Character Type 2: Chalk Scarps and Vales' and covers the Districts / Boroughs of Ashford and Shepway (now Folkestone and Hythe). The location and context of this LCA is described in Figure F13, along with its character area profile (see Appendix F2).

The Setting of the Kent Downs Escarpment – Susceptibility Assessment

F4.67 The setting to the southern edge of the Kent Downs National Landscape (the Postling Scarp and Vale LCA) is formed by the dominant landform of the Kent Downs escarpment to the north, with a vast belt of urban development formed by Hythe with Saltwood and Dymchurch to the west and Seabrook and Sandgate to the east. Contained within a large area of urban settlement, it makes a Negligible contribution to the wider setting of this part of the Kent Downs National Landscape.

F4.68 When assessing landscape susceptibility in relation to the setting of this designated area, it is necessary to consider the nature and scale of the Proposed Development, as follows:

- In the central part of the Site, an open space land-use is proposed that would offer increased accessibility and enjoyment of landscape by the general public. Susceptibility in relation to this land use type in relation to the wider AONB setting is assessed to be Negligible (and practically Nil).
- In the eastern part of the Site, a golf course landscape is proposed with landscape characteristics which draws reference to the wider naturalised local coastline setting. As above, Susceptibility in relation to this land use type in relation to the wider AONB setting is assessed to be Negligible (and practically Nil).
- In the western part of the Site to the east of the proposed open space land-use, a residential land-use is proposed of a similar size and type to that which exists immediately adjacent to the west (Imperial Park) and promenade buildings of a similar size to the Hythe Imperial Hotel would front the promenade part of the eastern edge of the proposed built development area. Susceptibility in relation to this part of the proposal is assessed to be Negligible, due to its similarities in land-use, size and scale, extent and proximity to existing development to the west – all in context to the size, scale and nature of the setting to the area of Kent Downs National Landscape to the north.

F4.69 Within the LVIA study area, the area occupied by the southern boundary to the Kent Downs National Landscape also coincides with a number of County LCAs (Saltwood: Postling Vale, Stowting: Postling Vale, Hythe Escarpment) and District LCAs (Hythe and Saltwood

Wooded Valleys, Hythe Wooded Hills) and also locally designated areas immediately to the south of the ridgeline (the Eaton Lands and Mill Lease Valley LLAs) and to the east / south-east of the Kent Downs National Landscape (the Sandgate Escarpment and Seabrook Valley LLA). The 'North Downs, including the scarp and crest' SLA also coincides with most of the Kent Downs National Landscape boundary.

F4.70 Based on the above considerations, the landscape susceptibility for all the above areas is assessed to be Nil / Negligible, because:

- The Proposed Development would not occur within any of these areas, so there would be no direct impact within them.
- Visibility from these areas to the Site / Proposed Development is practically Nil.
- The Site makes an extremely low contribution towards the wider setting of the Kent Downs escarpment, relative to the scale of each individual area (County and District LCAs, LLAs and the North Downs SLA) and in the broader context of the wider ridgeline feature, it being located within the extensive urban area formed by Hythe and other neighbouring areas of urban settlement along the coastline, with the sea located to the south.
- The Proposed Development would introduce a small area of residential development immediately adjacent to where it currently exists and share similar characteristics with it. Susceptibility for this is assessed to be Negligible, and Susceptibility for the remainder of the Proposed Development Site is assessed to be Negligible (practically Nil).

F4.71 Based on the above, it is concluded that there is no scope for Significant effects upon the landscape setting of the Kent Downs National Landscape and therefore it is scoped out of further assessment.

F4.72 In addition, the following landscape character and policy areas which fall either within the southern part of the Postling Scarp and Vale National Landscape LCA, or to the south of it can also be scoped out from further assessment, on the basis that there is no scope for Significant landscape and visual effects upon them as a result of the Proposed Development:

- National Landscape: Postling Scape and Vale LCA (also SLA);
- Eaton Lands LLA ;
- Mill Lease Valley LLA;
- Sandgate Escarpment and Seabrook Valley LLA;
- Saltwood: Postling Vale County LCA;
- Hythe Escarpment: Lympne County LCA;
- Stowting: Postling Vale County LCA; and
- Romney Marsh Farmlands County LCA.

National Landscape Character: Wealden Greensand National Character Area ('NCA')

F4.73 The site is located within the 'Wealden Greensand' (NCA 120, Natural England), as shown on Figure F16, with summary character profile information in Figure F17[10], see Appendix F3.

F4.74 On a national scale, the coastline at Hythe is assessed to have a high capacity to accept the proposed changes to the land-use character and quantum of development, without experiencing noticeable and measurable effects. The resulting Sensitivity of the Wealden Greensand NCA is concluded to be Negligible and therefore, there is no scope for Significant effects upon the Wealden Greensand NCA and further assessment in this regard is not required.

County Landscape Character

F4.75 County LCAs (as defined in the Landscape Assessment of Kent (October 2004, KCC / Jacobs Babtie)[11], within and surrounding the study area are shown on Figure F18 and F19, see Appendix F3. The character area profiles for these County LCAs are included in Figures F20-F24, see Appendix F3.

Romney Marsh County LCA

F4.76 The Site is located within the north-eastern corner of 'The Romney Coast' LCA, as defined in the Landscape Assessment of Kent (LAK). Its characteristic features are described as follows:

- *"Sheltered linear 20th century holiday development behind sea wall.*
- *Many temporary structures.* ***Heritage structures such as Martello Towers.***
- ***Dominant sea wall.***
- *Sand dunes and dune grasses. Mudflats and timber groynes on seaward side."*

F4.77 The Landscape Assessment of Kent describes the condition of The Romney Coast LCA as *"Moderate."*

"The coastal landscape is coherent as linear settlements and coastal defences follow the beach and tidal zones, but it is interrupted by restricted views to the sea, and development into the marshland. There are many visual detractors which include a proliferation of overhead cables, general road furniture and fencing, and unsympathetic commercial development. The built form is varied and has a moderate negative impact, in some cases due to the poor repair of buildings. The ecological integrity of the grasslands and tidal zone is mainly undisturbed and remains strong. ***Other heritage features of historic military defences and the major sea defences and drainage outlets have a positive impact on the area."***

F4.78 The Landscape Assessment of Kent describes the sensitivity of The Romney Coast LCA as *"High".*

"This area has some unique and rare features which include the dune, grassland and coastal vegetation, and more notably the individualistic built form, some of which is

recent. The area itself has a recent time depth overall. The sense of place is considered to be moderate. Visibility is very high and this results in the landscape being highly sensitive."

F4.79 The Landscape Actions for The Romney Coast LCA are to *"Conserve and Restore"*.

F4.80 The Proposed Development would occur within a very small part of the Romney Marsh County LCA, , whose key characteristics relate primarily to other parts of the LCA (i.e. the coastline at Romney Marsh and Dungeness, west of Hythe beach where the concrete sea wall ends at the MOD Hythe Ranges), rather than the Princes Parade coastline, except for the physical presence of historic military defences being noted in the character area profile.

F4.81 The physical separation from the remainder of the Romney Marsh County LCA formed by the residential development between Park Road and Twiss Road, and more recently at Imperial Park which post-dates the 2004 Landscape Assessment of Kent, adds further to the ability of the wider Romney Coast LCA to accommodate changes without undue circumstances or alteration to its own intrinsic landscape character.

F4.82 It is concluded that there is no scope for Significant landscape / visual effects upon this LCA to occur and therefore no further assessment is required in this regard.

District Landscape Character

F4.83 The Shepway District High Level Landscape Appraisal ('HLLA') (AECOM, February 2016)[12] was produced to inform a strategic review of the likely relative impacts of strategic level development in various locations, and to inform opportunities and constraints for growth with regards to landscape character and visual amenity, alongside other key evidence based documents, as part of a partial review of the Council's adopted Core Strategy Local Plan.

F4.84 In the HLLA, the Site falls within the Hythe Coast District LCA, as indicated on Figure F25, see Appendix F3. Relevant character area profiles for this LCA and the other District LCAs which have been previously scoped out from further assessment above, are included within Figures F26-F28, see Appendix F3.

F4.85 The following LCAs are on the edges of the LVIA study area. Based on the baseline analysis above on a county to national scale (including the National Landscape designation), it can be readily accepted that Significant landscape impacts would not occur as a result of the Proposed Development, due to distance and separation by the presence of other LCAs, and therefore these LCAs are scoped out of further assessment:

- 12. Greensand Ridge District LCA;
- 13. Greensand Ridge District LCA;
- 15. Folkestone District LCA; and
- 19. Hythe Ranges District LCA.

Hythe Coast District LCA

F4.86 The HLLA describes the Hythe Coast District LCA as follows:

"The LCA comprises part of the flat, low-lying urban area of Hythe between the Royal Military Canal and the English Channel. The LCA includes the Hythe Imperial Golf Club

as well as several recreation grounds. The western end of the LCA opens out onto Romney Marsh to the south of the Greensand Ridge".

F4.87 Key characteristics of the Hythe Coast District LCA are described in the HLLA as:

- ***"Flat, low-lying urban area adjacent to the English Channel;***
- ***Royal Military Canal along the northern boundary;***
- ***Recreation grounds and green space; and***
- ***Urban area."***

F4.88 Landscape Value is assessed by the HLLA as follows:

- *"Quality (Condition): The LCA is in fair condition with some intact elements and signs of good management.*
- *Scenic Quality: The LCA is considered to be of moderate scenic quality, with* ***attractive views out to the English Channel.***
- ***Rarity: The Royal Military Canal is a rare element in the landscape, as are the views out across the English Channel.***
- *Representativeness: The LCA has a number of listed buildings and* ***scheduled monuments. It forms part of the setting of the important Royal Military Canal.***
- *Recreation Value:* ***The LCA has good recreational value with coastal walks as well as the Royal Military Canal Path, a long distance recreation trail.***
- *Perceptual Aspects:* ***The LCA is perceived to have many of the characteristics of a typical urban area.***
- *Associations:* ***The LCA has historical associations evident in remnant features in the landscape today,*** *including a Martello Tower and* ***the Royal Military Canal.***

F4.89 Landscape Susceptibility is addressed as follows:

- *"Subtraction: Dev****elopment in this LCA would not necessarily result in the loss of characteristic elements.***
- *Addition:* ***Development in the LCA would not be an incongruous or prominent feature in the LCA, subject to consideration of setting of the Royal Military Canal".***

F4.90 The baseline Importance of the Hythe Coast District LCA is assessed to be High. The LCA has no landscape designations and majority of it is of Medium importance, due to the presence of part of the Conservation Area, however, the RMC (Scheduled Monument) and the National Trail (Figure F15a[13], see Appendix F2) along the coastline are of High Importance. The HLLA assigns a rating of Medium, which is assessed to remain unchanged for the purposes of this LVIA. The combination of a High Importance and Medium Condition results in a High landscape Value overall.

F4.91 Susceptibility is assessed to be Low in the HHLA for Hythe Coast District LCA. In relation to the Proposed Development and this LVIA, Susceptibility is also considered to be Low in

general (at the district scale) in relation to the proposed built development in the western part of the Site, given the surrounding urban context and characteristics of other built development nearby and the relatively small size of the proposed residential development.

F4.92 The setting of the RMC is a consideration for potential new development within this LCA, but would not necessarily be *"incongruous"* or a *"prominent feature"* in this LCA, according to the character area profile. The general characteristics of land south of the RMC which covers much of the urbanised section of the canal as it runs through Hythe and the Hythe Coast District LCA, are of urban development (including land immediately to the west at Imperial Park), containing some open green spaces.

F4.93 Susceptibility of the central and eastern parts of the Site is assessed to be Negligible. Although the eastern part of the Site would contain a single storey clubhouse building, the Susceptibility of this is considered to remain extremely low (Negligible) given:

- Its low height / level and the fact that its characteristics would be noticeably linked to the existing and continued land-use of the Site as an operational golf course.
- Its proximity to Princes Parade, which is used regularly for various types of sports and recreation. Similarly the provision of open space in the central part of the Site for recreational use and enjoyment of the landscape would not be uncharacteristic of the receiving landscape.
- The extremely limited impact this would be likely to have on the existing baseline characteristics of the wider Hythe Coast District LCA.

F4.94 The baseline Sensitivity of the Hythe Coast District LCA is concluded to be Medium overall, given the urban nature of the area and that there would only be relatively a small extension of existing residential land-use in the western part of the Site, while the Sensitivity of the remainder of the Site would be extremely Low. This is consistent with the findings of the HLLA, subject to the consideration of the setting to the RMC.

Local Landscape Character (Study Area Specific LCAs)

F4.95 A study area specific landscape character area study has been carried out to form part of the baseline section of this report and assess landscape character at a local scale. The study area specific landscape character areas and their descriptions are shown in Figures F29-F42 (Appendix F3). The assessment of Baseline Sensitivity for the LCAs within which the Proposed Development would occur (and therefore has potential to give rise to Significant effects) is summarised below.

LCA A. RMC & Imperial Hythe Coastal Strip – Local LCA

F4.96 The baseline Importance of the RMC & Imperial Coastal Strip Local LCA is High due to the presence of the RMC (Scheduled Monument). It is also important on a local scale due to perceived aspects of rarity (recreation value and relative tranquillity), mainly associated with the canal.

F4.97 The Condition of this LCA is of mixed quality. As mentioned above, the RMC offers a linear greenspace which is quiet and tranquil, formed partly by the vegetation which runs along the canal sides which offers some seclusion and by the golf course and Princes Parade to the south which have limited movements of people and vehicles at most times of the year. In

terms of visual appearance though the vegetation along the RMC and its surrounding informal footpaths is quite overgrown and untidy in places and generic in its overall appearance and distinctiveness.

F4.98 The Golf Course is a man-made, highly managed landscape with a manicured appearance which is uncharacteristic of the underlying landscape. It is also ordinary in appearance and does not contain any particularly rare landscape features. The grassed sea wall is another man-made feature which detracts from landscape character by prohibiting views to the English Channel from most parts of the character area. Conversely, it creates a sense enclosure inland throughout most of the character area. Overall, the Condition of the Imperial Hythe Coastal Strip Local LCA is concluded to be Medium. It is valued on a local scale but contains several features which are ordinary in landscape quality and condition and some detracting features which could be improved.

F4.99 Notwithstanding the above, the baseline Value of the RMC & Imperial Coastal Strip Local LCA is concluded to be High. Despite scope for improvement in the quality and condition of the landscape, the character area is valued highly by the local community in its current baseline condition.

F4.100 Susceptibility is assessed to be Medium in respect of the western part of the site, where residential built development is proposed. While new buildings are proposed where they do not currently exist, they would be of a similar land-use, type and size to those which already nearby and would be located to the south of mature vegetation which runs along both sides of the RMC. The proposed residential buildings do not extend far into the Site due to the proposals for the remainder of the Site being for open space and golf course land-uses. In these areas (the central and eastern parts of the Site), Susceptibility is assessed to be Low, due to there being minimal built development (a single storey building associated with the proposed golf course land-use) and the provision of open space for public use, set amongst an appropriate landscape setting of semi-natural habitats (reed beds, marshland, wetlands) which is connected to the natural characteristics of the underlying landscape.

F4.101 Baseline Sensitivity for the RMC & Imperial Coastal Strip Local LCA is concluded to be High for the western part of the Site and Medium for the central and eastern parts of the Site respectively, but in the remainder of the LCA to the east, Susceptibility and Sensitivity is assessed to be Low. Overall a Sensitivity of Medium is concluded for this character area.

LCA B. Princes Parade Coastline – Local LCA

F4.102 The baseline Importance of the Princes Parade Coastline Local LCA to the Proposed Development is assessed to be Medium. The area is undesignated in terms of landscape (apart from it including part of a National Trail - the England Coastal Path). It is considered important locally due to identifiable community use e.g. recreation value, the views gained out to sea and towards the Romney Marsh coastline to the south-west and perceived remoteness. Landscape Condition is also assessed to be Medium for this LCA. The beach, sea wall and promenade are typical of hard-engineered sea defences in the county / country. Some minor detracting features include infrequently managed hard surfacing and street furniture.

F4.103 The baseline Value of the Princes Parade Coastline Local LCA is concluded to be Medium. The landscape is of local importance and there is scope for improvements to its quality, without compromising its valued characteristics.

F4.104 Susceptibility in relation to this LCA is assessed to be Low at the western end of Princes Parade, reducing progressively to Negligible at the eastern end of the promenade. The western end is closest to existing residential development which would be similar in character and height to the Proposed Development, but changes to the local landscape character of Princes Parade would be more detectible in that location. Changes to visual character would reduce with distance progressively towards the eastern end of Princes Parade, where it is closer to Sandgate Esplanade which is also characterised by urban development.

F4.105 The baseline Sensitivity of the Princes Parade Coastline Local LCA is concluded to be Low, based on a cautious approach of assigning an overall Low-level Susceptibility.

LCA C. South Road Residential – Local LCA

F4.106 The baseline Importance of the South Road Residential Local LCA is assessed to be Medium due to the presence of Hythe Conservation Area, occasional Listed Buildings and locally valued recreational spaces. The Condition of this LCA is assessed to be borderline Medium / Low. It is generally of pleasant landscape quality, but ordinary in terms of its characteristic features and patterns with the presence of some detracting features due to lack of long-term investment and management (some open spaces and leisure facilities are in poor condition and detract from local landscape quality). There are also areas with characteristics of higher value tend to be localised to specific locations (e.g. some formal recreation spaces with regular landscape management) and those in proximity to the setting of part of the RMC which lies just outside of the character area to the north.

F4.107 The size, height and land-use characteristics of the proposed residential development are similar to those at Imperial Park and the Hythe Imperial Hotel and there is 3 and 4 storey development along Twiss Road and Marine Parade which interrupts views westwards towards the Site. The availability of views from this LCA towards the Proposed Development are extremely limited and confined to a very small number of locations which are already urban in character. Susceptibility is therefore assessed to be extremely Low (adopting a precautionary approach) for the South Road Residential Local LCA.

F4.108 The combination of a Medium Value and Low Susceptibility, results in a baseline Sensitivity for the South Road Residential Local LCA of Low.

Other Local LCAs – Scoped Out:

F4.109 After careful consideration of the baseline conditions and Proposed Development information, it is concluded that the following local / study area specific LCAs can be scoped out from further assessment, on the basis that there is no scope for Significant effects on their landscape character and setting to occur.

- Local LCA D. Marine Parade Coastline;
- Local LCA E. Parkwood Road / Hythe Green Residential;
- Local LCA F. Hythe RMC: Urban Section;

- Local LCA G. Hythe Conservation Core;
- Local LCA H. Saltwood Residential;
- Local LCA I Seabrook Road Residential;
- Local LCA J. Cliff Road Residential;
- Local LCA K. Sene Valley Golf Club;
- Local LCA L. Dibgate Upland; and
- Local LCA M. Naildown Road Residential.

F4.110 The Susceptibility and Sensitivity of the majority of these LCAs to the Proposed Development is assessed to be Negligible (LCAs D, F-K inclusive and M) and Nil (LCAs E and L), due to the physical and visual separation between them and the Site.

F4.111 LCAs I and J are assessed to have a Low Susceptibility and Sensitivity, as there would some intervisibility between them, but this would be extremely limited (and primarily restricted to publicly inaccessible locations) such that there would be no scope for their intrinsic character and setting to be altered. This is coupled with the fact that these LCAs are primarily urban / suburban in character already.

Visual Amenity Baseline

F4.112 The arrangement and composition of views within the study area is strongly influenced by the linear landscape compartments running parallel to the coastline, intersected by sub-character areas defined mainly by land use, architectural style and age.

F4.113 The rising physical geography of the steep wooded landform overlooking the coast forms a backdrop to views along the shoreline and allows views out towards the coast. These are filtered in some areas by intervening buildings and trees. By contrast, there are more open views inland to the north across the flatter agricultural landscape south of the M20/A20 corridor, gained from the upper part of the plateau occupied by the Sene Valley Golf Course and the Dibland Upland character areas.

Views - Site and Immediate Surroundings

F4.114 The origins of photos showing the typical views of the Site and its immediate surroundings are shown on Figure F43, supported by illustrative Photos F1 – 44, see Appendix F4.

F4.115 The view towards the westernmost part of the Site from Twiss Road (Photo F1) is mainly occupied by residential development at Imperial Park (Moncrieff Gardens, and Imperial Gardens, Photos F1, F2 and F4 see Appendix F4). The golf course is glimpsed, although obscured by trees along the access road leading to Imperial Gardens. The western corner of the site is given over to mown grass, flanked by mature trees running along the southern side of the canal (Photos F5, F7 and F8, see Appendix F4). A typical view south-east across the golf course from the north-western corner of Imperial Park is shown in Photo F3, see Appendix F4.

F4.116 Views from the southern canal path (Public Bridleway HB83) which runs just to the north of the Site boundary mainly feature the golf course to the south (Photos F8-F10 see Appendix F4), with views to the north towards the canal often interrupted by dense scrub

vegetation and mature tree canopies, except where there are occasional gaps in the canal-side vegetation.

F4.117 Views east and west from Cannongate Footbridge are channelled along the RMC by the vegetation on both sides of the canal, although gaps in this vegetation allow glimpses onto the golf course and Princes Parade coastline beyond, identifiable partly by the raised sea wall and pedestrian and vehicular movements along the coast road (Photos F11 and F12 see Appendix F4). Photo 23B and 23C show the effects of vegetation during leaf-fall from these locations.

F4.118 Along the northern bank of the RMC to the north-west of the Site (west of Cannongate Bridge), views are mainly contained by the surrounding vegetation. There are glimpses into parts of the adjoining residential development (rear of properties along Seabrook Road and Earlsfield Road) to the north and occasional short-duration views through gaps in tree canopies into parts of the golf course to the south (Photos F13 to F17 see Appendix F4). Photos 13A-D show views west / south-west from this area during leaf-fall, when there are occasional fragmented glimpses of parts of the Hythe Imperial Hotel and Imperial Park.

F4.119 Views towards the Site from Earlsfield Road to the north-west of the Site are interrupted by built development, apart from occasional gaps between buildings. Beyond these to the south there are glimpses of the upper canopies of the mature trees running along the RMC and within rear gardens (Photos F18 to F20 see Appendix F4).

F4.120 Seabrook Road further to the north and north-east of Earlsfield Road, runs parallel to the RMC and northern boundary of the Site, separated by intervening residential development. A typical view along Seabrook Road is shown in Photo F21 (see Appendix F4) where typically, views towards the Site and Princes Parade promenade gained from the road and pavement are interrupted by the residential properties and vegetation to the south of Seabrook Road. The gaps between properties to the south of Seabrook Road in a small number of locations offer occasional glimpses towards parts of the existing golf course within the central and eastern parts of the Site, with parts of Princes Parade promenade glimpsed beyond (as illustrated in Photo F22 see Appendix F4), taken opposite Ferguson Close.

F4.121 Travelling south from Seabrook Road, along the lanes which connect with the northern canal paths and Cannongate Footbridge (and Seabrook Lodge Footbridge), views are channelled on both sides by fencing and vegetation of the adjoining residential curtilages. Direct views of Princes Parade are interrupted by the canal-side vegetation, until a closer position is gained alongside the RMC where gaps allow framed or filtered views towards the golf course / Princes Parade (Photos F23 and F24, see Appendix F4). Photo F23A, see Appendix F4 shows the existing vegetation along the RMC from a nearby location to the east of Cannongate Footbridge. To the south of Cannongate Footbridge there is an area of vegetation running along the informal footpath which runs through the centre of the Site (Photo F23D, see Appendix F4) and to the north-east of this is a brick golf course maintenance building.

F4.122 Along the northern bank of the RMC to the north-east of the Site (east of Cannongate Bridge), there are open views into the golf course, with the Princes Parade sea wall in the distance (Photo F26, see Appendix F4), partially framed by low-level canal-side vegetation. The residential properties to the north (those south of Seabrook Road, including Saxon

Close and Ferguson Close) are visible beyond boundary fences and garden vegetation (Photo F27, see Appendix F4). In some places along the canal path they are less visible, where intervening vegetation is more abundant (Photos F28-F29 see Appendix F4). The context of views close to Seabrook Lodge Bridge are shown in Photos F30-F33 see Appendix F4, with the unmanaged scrub vegetation, grassland on the slightly raised landform within the Princes Parade allocation site entering the view along the eastern edge of the footpath which leads south from Seabrook Lodge Bridge to the coastline.

F4.123 From the eastern boundary of the Site and along the central informal footpath, there are open views across the golf course east and west (Photos F33-F41), see Appendix F4), The unmanaged scrub and grassland on the slightly raised and uneven landform within the Princes Parade allocation site partially restricts views across this parcel of land (Illustrative Photos F35 and F36,

F4.124 The view north-west across the Site from the promenade features a distant glimpse of the tower of the Church of St. Leonard, amongst the built-up area of Hythe town centre (Photos F37 and F38 see Appendix F4). The residential development at Imperial Park and the Hythe Imperial Hotel are also visible in these views, with Marine and Western Parade receding into the far distance towards Romney Marsh and Dungeness along the coastline.

F4.125 The south-western corner of the Site offers a broad, panoramic view across the golf course, with Sandgate glimpsed in the far distance (right of the view), beyond Princes Parade which is partially obscured by golf course vegetation. In this view the wooded escarpment to the north, with occasional residential buildings glimpsed amongst it, forms a dominant backdrop which continues to the right of the view (west) at Hospital Hill. From this location, views of the tower of the Church of St. Leonard and much of Hythe town centre are interrupted by Hythe Imperial Hotel and residential development at Imperial Park (Photo F42 see Appendix F4).

F4.126 Views towards the Hythe Imperial Hotel from the west are partially interrupted by small groups of mature trees on both sides of its main entrance from Twiss Road (Photo F43 see Appendix F4). The mature trees along Twiss Road soften and filter views of the residential development at Imperial Park.

F4.127 At the western end of Princes Parade, the Hythe Imperial Hotel is a dominant feature of the view, situated behind mature hedgerow vegetation and a low parapet brick wall (Photo F44, see Appendix F4). The foreground to views is formed by the highway and promenade of Princes Parade, which is pedestrianised at its western end where Twiss Road meets Marine Parade. A further low level concrete wall separates the highway from the promenade and its intermittent timber seating.

Visual Receptors - Summary

F4.128 The principal visual receptors to views considered in this assessment are shown in Figure 49, see Appendix F5 and summarised below. The typical Sensitivity ratings given below are indicative and vary in certain instances, depending on the Susceptibility and context of view gained from particular locations:

- Private Residents (Primary). Typical Sensitivity: High. These are addressed with representative views from publicly accessible locations, rather than specific houses from private properties).

- Local People (Primary / Secondary). Typical Sensitivity: High / Medium. These are anticipated to be local people who are familiar with baseline conditions using local open spaces or footpaths, typically walking at a leisurely pace or occasionally stopping, or with a static activity which is long enough to take in the view for a sustained period of time.
- Interest Groups (Primary / Secondary). Typical Sensitivity: High / Medium. These are anticipated to be visitors to specific attractions with a designated status in close proximity to the Site, for example the RMC (Scheduled Monument), Royal Canal Path or England Coastal Park / National Trail.
- Active Recreation (Secondary / Tertiary). Typical Sensitivity: Medium / Low. These are anticipated to be local people who may be familiar with baseline conditions but are involved in active recreation or sports, such as jogging, cycling, skating or fishing. Cyclists using the National Cycle Route 2 are considered to be of Negligible Sensitivity, due to the overall length of the route, the nature of the view gained by this receptor (transient and glimpsed) and the likelihood of them being affected by the changes brought about by the Proposed Development being Negligible.
- Seasonal Visitors. (Secondary / Tertiary). Typical Sensitivity: Low. These are anticipated to be occasional or single trip visitors to Hythe beach or promenade, typically unfamiliar with the baseline conditions, or less familiar with the local area than the local population or regular visitors. These receptors are anticipated to be primarily using the beach and promenade for passive recreation, socialising or eating (for example).
- General Public (Tertiary). Typical Sensitivity: Low / Negligible. These are anticipated to be members of the general public who are carrying out primarily functional or work-related tasks, where the available view is not the main reason for them visiting or travelling through / past that location. Due to their low Susceptibility and Sensitivity, these receptors are scoped out of further assessment on the basis that effects on their visual amenity would be Not Significant, unless they are members of the general public falling into one of the categories listed above.

F4.129 Where users of PRoW would include Horse riders (Public Bridleway HB63; Views 14, 16, 17), these are addressed under these specific viewpoints.

Assessment Views – Baseline Sensitivity

View 1: South-east from Sunny Banks / Old London Road

F4.130 View 1 is considered broadly representative of residential properties with an elevated view towards the Site from the north-west, e.g. from the Old London Road / Nursery Fields area to the west of the A261.

F4.131 In terms of publicly accessible views south / south-east towards the English Channel from this part of Hythe, View 1 is atypical, as views towards the coastline and the Proposed Development Site from this area are mainly obstructed by intervening development and vegetation. The road network twists and turns in several directions and so this is practically the only clear public vantage point from the north-west which would have a relatively unobstructed view of the Proposed Development.

F4.132 There are three main types of receptors considered for View 1, as follows:

- Private Residents (Old London Road / Nursery Fields area, as explained above). Typically, residential receptors would be considered Primary receptors, however in this case they are considered to be Primary / Secondary (Medium Sensitivity), as explained further under Susceptibility below.
- Local People are considered to be Secondary / Tertiary receptors for View 1. The most sensitive of these are anticipated to be local people occasionally walking south-east through the residential area from Old London Road (Public Byway), which is just beyond the western edge of the LVIA study area.
- General Public carrying out primarily functional tasks in relation to View 1 are assessed to Tertiary receptors to this view and of Negligible Sensitivity, requiring no further consideration or assessment.

F4.133 This is an elevated view over built development within Hythe and the southern edge of Saltwood which slopes away steeply in places towards the coastline in the distance. There is mixed-use development situated at a variety of levels, interspersed by groups of mature trees and open spaces. In the distance is the English Channel, visible beyond taller buildings situated along the coastline, such as those along Marine Parade and the Hythe Imperial Hotel (glimpsed in the single frame photo) and those along Western Parade in the panoramic photo. The upper parts of the tower of the Church of St. Leonard are glimpsed in the centre-left of the single frame photo, with part of the wooded landform of Hospital Hill glimpsed in the far distance beyond.

F4.134 Detracting features in the view include overhead telegraph wires, uneven sidings to the road and haphazard on-street parking, large-scale commercial buildings and parking (Sainsbury's). In the right of the panoramic view there is sprawling industrial development along the western edge of Hythe and recently constructed buildings along the coastline at 'Fishermans Beach'. Further to the western edge of Hythe (right of the panoramic view) is Hythe Football stadium and the Hythe ranges. The mix of architectural styles / materials and land uses on a large-scale detracts from the overall unity and composition of the view.

View 1 – Private Residents (Old London Road / Nursery Fields Area)

F4.135 The assessment of baseline Sensitivity associated with View 1 to the Proposed Development is assessed to be Medium for private residents. The Importance of their view is generically High, while the Condition of the view is assessed to be Medium. This is a pleasant view south towards the English Channel, but with substantial urban development and mixed land-use in the intervening landscape which detracts from visual amenity. It contains noticeable detracting features. The resulting Value of View 1 for these receptors is concluded to be High.

F4.136 Susceptibility of residents at home would generically be High, however for View 1 Susceptibility is assessed to be Low. View 1 is approx. 3km from the Site. These receptors will therefore have a low level of susceptibility, relative to residents who at much closer distances to the Site and are therefore more susceptible to change. The nature of the wider panoramic view draws the attention of the receptor to other parts of it (e.g. the expanse of the English Channel), rather than the focus (activity) of the receptor being focused elsewhere.

View 1 – Local People

F4.137 The assessment of baseline Sensitivity associated with View 1 to the Proposed Development is assessed to be Low for local people. The Importance of this view for these receptors is Medium, because it is undesignated, but with some local importance attached to the available views out over Hythe and towards the English Channel. The Condition of the view is assessed to be Medium, as it contains pleasant features, but also has noticeable visual detractors present (as described above). Value is concluded to be Medium.

F4.138 Susceptibility is assessed to be Low, due to distance away from the Site and the receptors attention which is likely to be dynamic and focused on the wider panoramic view (typically while walking along), rather than being focused on individual components for any sustained period of time.

View 2: South-west from RMC, near Twiss Road Bridge

F4.139 View 2 is taken from an area of open space close to the Site and RMC, within Hythe Conservation Area. The foreground to this view is characterised by a linear parkland setting, focused on the RMC, which has steep grass banks and several paths on both sides of the canal. The canal-side path to the north of the RMC is set at a lower level closer to the water, separated by a grass embankment. Private residential properties (typically mid-19th century onwards) and allotments, overlook the space, separated by fences and hedgerows in some places.

F4.140 The central part of the view has a road bridge with royal blue railings, with glimpses of further open space beyond, mostly populated by dense mature trees situated along both sides of the canal. The northern edge of properties at Imperial Park (Cobay Close) represents more contemporary development and this is glimpsed in the centre-right of the view, partially obscured by mature trees (which further interrupt the view beyond to the south-east, when vegetation is in leaf). There are few detracting features in the view and these are mainly associated with moving and / or parked traffic on Twiss Road.

F4.141 The principal receptors to View 2 are anticipated to be users of the open space and its footpaths along the canal (Primary), likely to be either local people or those from interest groups (visiting the RMC).

F4.142 Secondary / Tertiary receptors to View 2 would be those involved in active recreation or tertiary / primarily functional activities. The Sensitivity of these receptors is assessed to be Negligible, due to the nature of their activity and transient viewpoint in a primarily urban area surrounded by built development. Therefore, there is no scope for Significant visual effects upon these receptors and they are scoped out of further assessment.

View 2 – Local People and Interest Groups

F4.143 The assessment of baseline Sensitivity associated with these receptors to View 2 to the Proposed Development is assessed to be Medium. Importance is assessed to be High, as the view is in close proximity to the RMC (Scheduled Monument and RMC Canal Path). It is also from within a valued local park setting, within the Hythe Conservation Area. The Condition of the view is High, as it is an attractive parkland setting with a high level of maintenance and few detracting features. The Value associated with View 2 is therefore concluded to be High.

F4.144 Susceptibility for View 2 is assessed to be Low. Receptors would be engaged in passive recreation, but most of their attention would be focused on the features and activities within the park rather than the periphery of the view in the distance.

View 3: West / north-east from eastern end of Marine Parade

F4.145 View 3 is representative of the public amenity view from the eastern end of Marine Parade in the vicinity of Hythe Imperial Hotel close to Princes Parade. It also shows the context of distant views towards the Hospital Hill area, with Sandgate in the far distance.

F4.146 The view is dominated in the foreground by the pale red tarmacadam surface which broadens at Marine Parade), before narrowing to form the coastal promenade which recedes into the distance along Princes Parade. The promenade is lined by blue coloured railings which protect the drop to the shingle beach at lower level (right of the photo). A low parapet wall and a grass margin separate the promenade from the main highway and adjacent parking spaces.

F4.147 The immediate focal point is the Imperial Hythe Hotel (left of centre), framed to the left by 3 storey (plus roof height) residential buildings fronting onto the southernmost part of Twiss Road. In between these buildings are glimpses of development at Imperial Park, which is part of the existing Imperial Park residential development.

F4.148 In the distance (to the left and right of the Hythe Imperial Hotel) are glimpses of residential properties on the rising landform north of Seabrook Road, interspersed by mature tree canopies with the woodland forming parts of the southern edge of the Kent Downs escarpments beyond. In the far distance (centre-right / right of the photo) is the wooded landform of Hospital Hill, with development at Sandgate (and the westernmost edge of Folkestone) glimpsed along the coastline.

F4.149 Detracting features in the view include the expanse of hard surfacing in the foreground of the view (cracking and in poor state of repair), the existing building to the west of the Hythe Imperial Hotel and numerous forms of signage and lighting columns.

F4.150 There are several different receptor groups associated with View 3, as summarised below:

- The principal receptors (Primary) to the view are users of Princes Parade, the most sensitive of which are considered likely to be Local People or visitors to the area who are familiar with the baseline conditions and have either a stationary viewpoint, or who are moving at a leisurely pace.
- People from interest groups, who are using the England Coastal Path / Hythe-Folkestone National Trail. These would vary in receptor type (Primary / Secondary) and sensitivity, depending on their knowledge of the existing baseline conditions.
- Those involved in active recreation / sports would be Secondary / Tertiary receptors to this view, such as joggers, cyclists and skaters.
- Seasonal visitors, using the promenade and beach (Secondary / Tertiary).

View 3 – Local People and Interest Groups

F4.151 The assessment of baseline Sensitivity associated with View 3 to the Proposed Development is assessed to be High for local people and interest groups. While the view is from an

undesignated area and it is not a documented strategic view, Importance is assessed to be High as it is a prominent area of public space at the convergence of Twiss Road (which leads from the centre of the town) and the promenade. It is also part of the England Coastal Path / National Trail. The Condition of this view is Medium. It is an attractive view with a local sense of place and reasonably well maintained and good composition, but some noticeable visual detractors are present (as described above), with scope for enhancement. Value is concluded to be High.

F4.152 Susceptibility is assessed to be Medium. These receptors are likely to be visiting this location to appreciate the view out to sea and along the coastline and / or to commence or continue a walk along the coastline, experienced from the promenade. Their activity would be mostly active / transient with a range of features occupying their attention and / or they may be engaged in social activities. When travelling east in the direction of the view, the main focus of attention would be along the coastline, with peripheral or occasional glimpses inland, or out to sea. Notwithstanding the above, Susceptibility for some receptors such as those using the National Trail who are unfamiliar with baseline conditions would be Low (due to an unfamiliarity with baseline conditions), as prior knowledge of these would affect their attention on this particular view and the efficiency of visual processing.

F4.153 The combination of High Importance and Medium Susceptibility, results in a High Sensitivity overall, although for some receptors it would be Medium.

View 3 – Interest Groups

F4.154 Importance, Condition and Value for receptors from interest groups (e.g. users of the England Coast Path / National Trail) are assessed to be unchanged from the description given above for local people, although in instances where Susceptibility is Low (as explained above), their Sensitivity would be Medium.

View 3 – Active Recreation and Seasonal Visitors

F4.155 The Sensitivity of these receptor groups to View 3 is assessed to be Low / Negligible. Those involved in active recreation and seasonal visitors would have a Low / Negligible level of Susceptibility, due to their activity and level of focus on the view. Seasonal visitors would be likely to be unfamiliar with the existing baseline conditions.

View 4: West / north-west from Princes Parade

F4.156 View 4 is representative of the visual amenity gained from Princes Parade promenade at the south-eastern corner of the Site, where an informal footpath leads north to the Seabrook Lodge Footbridge. The context of the nearby beach (at lower level) is visible to the left of the view. There are also distant glimpses towards the tower of the Church of St. Leonard in the centre of Hythe.

F4.157 The foreground to View 4 is occupied by the hard surfacing of the promenade and road of Princes Parade, with a low parapet wall separating the two. There is occasional timber bench seating and signage along the roadside of the promenade and a section of kerb and pavement lies inland of the road, with a timber knee rail separating the pavement from the golf course which forms a narrow band of grass along most of the central / mid part of the view.

F4.158 Inland of the golf course, the landform rises steeply and is populated by groups of mature trees and woodland, interspersed with views of large residential properties at different elevations on the slope. The wooded landform continues into the distance, formed by the woodland to the north-west of Hythe and beyond that, the Hythe escarpment north of Romney Marsh. The upper part and tower of the Church of St. Leonard is narrowly glimpsed in the distance in the central part of the view, above the mature trees which run along the RMC.

F4.159 The Hythe Imperial Hotel is visible at the end of the promenade, with similarly tall buildings to the west (left of the view) along Marine and Western Parade. To the right of the Hythe Imperial Hotel, the eastern edge of the residential development at Imperial Park is glimpsed. Beyond that in the far distance is part of the Dibgate Upland which overlooks the Hythe Ranges.

F4.160 Detracting features in the single-frame view are the cracked hard surfacing along the promenade and road, along with the unkept appearance of the edges to the golf course. The sporadic nature of mixed architectural-style buildings which feature occasionally in the wooded backdrop to the Princes Parade coastal strip form some disunity to the overall composition of the view. In the wider panoramic photo, the site hoarding to the Princes Parade allocation site formed a detracting feature (although this has since been removed), allowing views of unmanaged scrub vegetation and uneven, raised landform). The footpath which runs alongside the eastern boundary of the Site is unsurfaced, so in times of heavy rainfall the mud and temporary standing water also detracts from visual amenity locally.

F4.161 The principal receptors (Primary) to the view are users of Princes Parade, such as local people or those with a particular interest walking the England Coast Path / National Trail. The most sensitive of these are considered likely to be local residents or visitors to the area who are familiar with the baseline conditions and have either a stationary viewpoint, or more likely moving at a leisurely pace (either walking or driving slowly, gaining sequential and transient views).

F4.162 Secondary / tertiary receptors include those involved in active recreation and / or with a transient view at greater speed, where focus on the activity takes precedence over a sustained focus on any particular view, or seasonal visitors to Hythe beach.

View 4 – Local People and Interest Groups

F4.163 The importance of View 3 is assessed to be High, due to it being part of the England Coastal Path / National Trail. Condition is assessed to be Medium. It is an attractive view with a local sense of place, reasonably well maintained and good composition, but some noticeable visual detractors are present and scope for enhancement. Value for these receptors is concluded to be High.

F4.164 The attention of receptors will be on views all around them from this location, as there are a variety of points of interest to view from Princes Parade, e.g. views out to sea, views of the beach, views along the coastline in both directions, views towards the centre of Hythe, views towards the Hythe coast (Hythe Imperial Hotel / Marine and Western Parade), views inland across different parts of the golf course and beyond the rising wooded landform, views north along the informal path leading to the RMC and also towards parts of the

Princes Parade allocation site. Susceptibility is assessed to be Medium, resulting in a High Sensitivity for these receptor groups.

View 4 – Active Recreation and Seasonal Visitors

F4.165 The Susceptibility for those involved in active recreation (e.g. jogging, cycling and skating) and seasonal visitors who are likely to be less familiar with baseline conditions and less focused on the view than the most sensitive receptors, is assessed to be Low / Negligible. The resulting Sensitivity of these receptors is assessed to be Low and Low / Negligible respectively.

View 5: South from Public Footpath HB56

F4.166 View 5 is representative of the views south from the RMC in the direction of the coast across the golf course. This part of Footpath HB56 is to the north of the RMC where vegetation alongside the canal is relatively sparse, compared to land west of the kink in the canal.

F4.167 View 5 is to the north of the eastern part of the Site, where relatively sparse vegetation along the banks of the canal allows a clearer view towards the coastline (illustrative Photos F25-F26 and F28 see Appendix F4), compared to views gained from the PRoW to the north of the western part of the Site, which are interrupted by mature vegetation (illustrative Photos F13-F16 see Appendix F4).

F4.168 The water of the RMC forms the immediate foreground to this view, framed by scrub vegetation and occasional trees. Beyond the RMC is the managed grassland of the Hythe golf course, which has occasional scrubby vegetation / small trees. The horizon to the view is formed by the raised landform which slopes up meet Princes Parade. The promenade itself (along with the sea) is not visible. Its presence is only detectible visually due to glimpses of signage and the upper parts of benches and railings, together with occasional moving pedestrians and / or vehicles.

F4.169 Detracting features in the view include the murky water of the canal and unkempt areas of vegetation (for some) and occasional brick outbuildings within the golf course.

F4.170 The principal receptors (Primary) to the view are users of the PRoW to the north of the RMC, the most sensitive of these are considered likely to be local residents or visitors to the area who are familiar with the baseline conditions and walking at a leisurely pace. By contrast, those with a particular interest in the RMC could have an interest in the view gained from the RMC to the coastline, in terms of its connection with the Napoleonic defences.

F4.171 Secondary / tertiary receptors include those involved in active recreation (such as jogging), gaining a moving view where focus on the activity takes precedence over a sustained focus on the view south towards the coast. Susceptibility and Sensitivity for these receptors is assessed to be Negligible in this location (the focus on the view is east / west).

View 5 – Local People and Interest Groups

F4.172 The assessment of baseline Sensitivity associated with View 5 to the Proposed Development is assessed to be Medium for Local People and Interest Groups using the canal paths north of the RMC. Importance is High, as this is a view in close proximity to the Scheduled

Monument and from the RMC Canal Path. Condition is assessed to be Medium. The view has a medium aesthetic appeal, with some visual detractors present such as unmanaged vegetation and a featureless golf course. Value is concluded to be High.

F4.173 Susceptibility is assessed to be Low because users of the PRoW to the north of the RMC would be primarily focused on the direction of travel (east / west) and of views of the canal and its immediate surroundings, with the view south towards the coast being secondary (i.e. an occasional stop to take in the view south), or glimpses south in the periphery of the view while transient. Existing activities and features within the golf course are unlikely to hold attention for these receptors and the view south is not likely to be sustained due to the landform which interrupts views of the coastline and sea beyond.

View 6: South from Public Bridleway HB65 (Cannongate Footbridge)

F4.174 View 6 demonstrates the view along the lane leading south from Seabrook Road towards Cannongate Footbridge (broadly north-centre of the Site). A similar view is gained along the lane leading from Seabrook Road to Seabrook Lodge Bridge (beyond the north-eastern corner of the Site). Views 6 is also used to consider potential views gained from private properties to north of the site on the southern side of Seabrook Road, which are anticipated to be partially interrupted by intervening vegetation and fencing within gardens and vegetation alongside the canal in places.

F4.175 The view features an informal track in un-made permeable surface, leading towards a bridge which leads over the RMC. The bridge has brick piers and metal railings painted turquoise, and the intervening footpath features an entranceway formed by timber bollards, timber seating and bin, and a carved timber RMC sign.

F4.176 The RMC itself is not visible as the water is situated at lower level from the surrounding footpaths. There is also fairly dense intervening vegetation along both banks of the canal, which interrupts views of the golf course and coastline beyond. The view is channelled on both sides of the footpath which leads to the canal bridge by mature trees and hedgerow vegetation, the latter of which is more apparent in the wider panoramic view. This creates a corridor effect where there is little natural surveillance, which creates a temporary sense of unease, adversely affecting visual amenity.

F4.177 Detracting features in the view / surroundings include the untidy fencing / garden boundary vegetation mentioned above. The footpath also has an untidy appearance, due to its informal surfacing, presence of dogs mess and muddy edges during or after periods of wet weather. While the area along the RMC generally is likely to be valued for its tranquillity and recreational opportunities, the vegetation along the canal sides and the northern edge of the golf course is untidy and unremarkable in terms of its appearance.

F4.178 There are three types of receptors considered for View 6, as follows:

- Private Residents to the south of Seabrook Road, including Saxon Close.
- Users of the informal footpath leading to the RMC at Cannongate Footbridge, from Seabrook Road (Primary). These could include local people and those from interest groups visiting the RMC. The most sensitive of these are likely to be walkers / dog walkers accessing the footpath network along the RMC, or those heading south across the golf course to the coastal promenade.

View 6 – Private Residents (North of the Site, south of Seabrook Road)

F4.179 Importance for views from residential properties is generically High. The Condition of potential views from private residential properties is unknown and therefore assumed to be High. They are likely to feature rear gardens, with views of parts of the Site beyond, partially interrupted in some cases by intervening fences and vegetation.

F4.180 Value is concluded to be High and Susceptibility is assumed to be High for the purposes of general assessment upon this receptor group. The assessment of baseline Sensitivity associated with View 6 to the Proposed Development is assessed to be High for private residents.

View 6 – Local People / Interest Groups

F4.181 The baseline Sensitivity associated with View 6 for these receptors is assessed to be Medium. Importance is High, as the view is in close proximity to the RMC (Scheduled Monument) and RMC Canal Path, with associated signage. Condition is assessed to be Low. The condition of the view from the informal footpath is assessed to be ordinary in appearance. It contains vegetation and surfacing which is not particularly visually unique or of high aesthetic value. The lack of sight lines and enclosure caused by surrounding vegetation makes the location feel unsettling. Some features such as interpretative signage and timber furniture are responsive to the presence of the RMC, but the overall view is not challenging or exciting and views towards the coastline are interrupted by the intervening vegetation of poor visual quality. Value is concluded to be Medium.

F4.182 Susceptibility is assessed to be Medium. Users of the informal footpath in this location are less likely to be focused on the view south as it is terminated by vegetation. While seating is present, it is considered likely that users of the footpath will be travelling to other nearby locations where views of the surrounding landscape are more open and visually appealing.

View 6 – Active Recreation

F4.183 For the reasons described above, the Value of View 5 for this receptor group is also concluded to be Medium. Susceptibility for these receptors is assessed to be Low, due to their moving view and nature of their activity. Sensitivity for these receptors in relation to View 5 is concluded to be Low.

View 7: South-east from North Road (Hythe Conservation Area)

F4.184 View 7 is representative of views from the vicinity of the Church of St. Leonard from North Road, which is within Hythe Conservation Area. It is also used to consider potential views gained from private properties in this area (principally along the southern edge of North Road).

F4.185 The foreground of the panoramic view and along the both sides of North Road which recedes into the distance on the left-side of the photo are dominated by built development of mixed architectural styles. The dramatically sloping landform is evident in both sides of the panoramic view, where buildings are set at different levels / terraces, with retaining walls and sloping driveways.

F4.186 The central focal point in the view is the tower of the Church of St. Leaonard, with the lower parts of the church building interrupted from view by built development and vegetation. The English Channel is glimpsed in the far distance to the right of the church tower, with a fragmented glimpsed possible of the upper parts of built development along part of the coastline.

F4.187 The main detracting feature in the view is the mix of architectural styles and materials which are largely unsympathetic to the wider character of the Conservation Area. The terraced properties running along North Road are of Conservation character, while the view also contains development which is mid-20th century onwards.

F4.188 The principal receptors (Primary) to the view are anticipated to be private residents, some of which may gain a distant view of the upper parts of development situated along the coastline (e.g. The Hythe Imperial Hotel) and parts of Princes Parade.

F4.189 Local people and historical interest groups using North Road are considered to be mainly Secondary receptors to this view. Parts of the view are attractive, i.e. the focal point of the church tower and the glimpses of parts of the coastline and sea beyond intervening buildings and rooftops, however, this is not really a location where people would travel to or visit specifically as a vantage point or spend a large amount of time enjoying the view. There are more attractive views of the church and its tower from closer to the Listed Building, but these do not readily feature the Proposed Development Site or the Princes Parade coastline.

F4.190 Members of the general public undertaking primarily functional activities in this area are considered to be Tertiary receptors and of Negligible Sensitivity in relation to this view, requiring no further consideration or assessment.

View 7 – Private Residents (Southern edge of North Road)

F4.191 The assessment of baseline Sensitivity associated with View 7 to the Proposed Development is assessed to be High for private residents. Importance for views from residential properties is generically High. The Condition of potential views from private residential properties is unknown and therefore assumed to be High. Where available, these views are likely to feature the English Channel and Hythe coastline, with intervening development and vegetation potentially obscuring some viewpoints, while others might be less obstructed, but all with the expanse of intervening-built development of most of Hythe featuring at lower level. Value is concluded to be High.

F4.192 Susceptibility is assessed to be Medium as, while residents will intrinsically be of High Susceptibility, the context of this viewpoint which is in the region of 850km to the north-west of the Proposed Development Site, with substantial intervening urban development and open spaces is such that the focus of views is likely to be on a wide-range of features occurring within a vast panoramic vista. Notwithstanding the above, the baseline Sensitivity associated with View 7 to the Proposed Development is assessed to be High for private residents.

View 7 – Local People and Interest Groups

F4.193 Importance is assessed to be Medium, as the view is from within Hythe Conservation Area and features a Grade I Listed Building. Condition is assessed to be Medium. While there

are detracting features in the view which are generally medium – low quality / uniqueness, there are also glimpses of features which are of higher quality and condition (the church tower and the sea). Value is concluded to be Medium.

F4.194 Susceptibility is assessed to be Low, as visual receptors travelling along North Road are considered likely to be involved in functional and / or day-to-day activities. If pausing to enjoy the view from this location for short time, their attention is likely to be directed towards the church tower, rather than the coastline which is glimpsed in the far distance with substantial intervening-built development. Sensitivity for this receptor group is concluded to be Low in respect of View 7.

F4.195 People from Interest Groups are likely to be interested in the Church of St. Leonard itself and its immediate site, and are considered unlikely to visit this particular location to experience views of it. Susceptibility (and their resulting Sensitivity) is also assessed to be Low.

View 8: South from Cannongate Road

F4.196 View 8 demonstrates the view south / south-east from Cannongate Road. It is also used to consider potential views gained from private properties to the north of Seabrook Road. Similar views are gained from small sections of Seabrook Road when looking south (illustrated in Photo F22 see Appendix F4), while in most cases views south are terminated by built development (illustrated in Photo F21 see Appendix F4).

F4.197 The foreground and mid-ground to View 8 is characterised by residential development, with a local road, fencing and stone walling, mixed garden vegetation and ornamental trees and buildings to the north and south of Seabrook Road. In the wider panoramic view there is a pocket of woodland to left of the photo.

F4.198 In the far distance parts of the English Channel are glimpsed beyond parts of the grassy landform which forms the northern edge of Princes Parade. If stopping to view the coastline in the distance, Princes Parade is mainly identifiable by signage and railings along the road, together with moving traffic and pedestrians.

F4.199 The principal receptors (Primary) to the view are private residents, whose view towards the sea are anticipated to be partially interrupted in some places by intervening built development and / or vegetation. Local people travelling along Cannongate Road are considered mainly Secondary / Tertiary receptors, gaining occasional glimpses of the coastline and sea in the far distance while travelling as a pedestrian or vehicle and / or undertaking day-to-day activities.

F4.200 Members of the general public undertaking primarily functional activities in this area are considered to be Tertiary receptors and of Negligible Sensitivity in relation to this view, requiring no further consideration or assessment.

View 8 – Private Residents (North of Seabrook Road / Elm Gardens Area)

F4.201 Importance for this receptor group is generically High. The Condition of potential views from private residential properties is unknown and therefore assumed to be High. They are likely to feature views out towards the English Channel and Hythe coastline, with intervening development and vegetation potentially obscuring some views, while others

might be clearer. Value is concluded to be High, and Susceptibility is assumed to be High, therefore Sensitivity is also concluded to be High.

View 8 – Local People

F4.202 Importance in relation to View 8 for local people using Cannongate Road is assessed to be Medium. It is undesignated, but local importance attached to views towards coastline / English Channel. While there are detracting features in the view which are generally medium to low quality / uniqueness, there are also glimpses of features which are of higher quality and condition (the church tower and the sea), therefore Condition is assessed to be Medium. Value is concluded to be Medium.

F4.203 Susceptibility is assessed to be Low, as it is considered likely that these visual receptors would be involved in functional and / or day-to-day activities, where the main attention of views is likely to be on the fore and mid-ground. Views of the coastline are considered likely to be infrequent, short duration and transient. Sensitivity is concluded to be Low.

View 9: South from Cliff Road

F4.204 View 9 is representative of views south from short sections of Cliff Road where a clear view of the coastline is possible in between buildings, however, the predominant viewing experience is in an east / west direction or with views south being terminated by built development and / or vegetation (see illustrative ZTV Photo 6.1). View 9 is also used to consider potential views gained from private properties, mainly along the southern edge of Cliff Road, north of Cannongate Road.

F4.205 The view is characterised by a view towards the English Channel, beyond the Princes Parade coastline which mainly consists of grass formed by the golf course and northern banks of the raised sea wall. The northern and eastern elevations of the Hythe Imperial Hotel and those of the residential buildings at Imperial Park are visible to the right of the view, while the foreground to the view is occupied by the rooftops of intervening built development and vegetation along the southern edge of Cliff Road and the upper elevations / rooftops of buildings glimpsed at lower level along Seabrook Road.

F4.206 Detracting features in the view include the mixed styles of residential architecture and garden curtilages (experienced in the wider panoramic photo) which fall away abruptly due to the steep sloping hillside.

F4.207 The principal receptors (Primary) to the view are private residents, whose view towards the sea may be partially interrupted in some cases by intervening built development and / or vegetation, as evidenced by the wider panoramic photo. Local People using Cliff Road are considered mainly Secondary / Tertiary receptors, gaining occasional glimpses of the coastline and sea in the distance while walking or travelling as a pedestrian or vehicle and / or undertaking day-to-day activities.

F4.208 Members of the general public undertaking primarily functional activities in this area are considered to be Tertiary receptors and of Negligible Sensitivity in relation to this view, requiring no further consideration or assessment.

View 9 – Private Residents (Western end of Cliff Road, north of Cannongate Road)

F4.209 The Importance for views from residential properties is generically High. The Condition of potential views from private residential properties is unknown and therefore assumed to be High. Value is concluded to be High, and Susceptibility is assumed to be High, therefore Sensitivity is also concluded to be High.

View 9 – Local People

F4.210 The Importance of this view is assessed to be Medium. It is undesignated, but local importance attached to views towards coastline / English Channel. It is generally an attractive view towards the sea, with glimpses of the coastline, but with visual detractors in the foreground as described above.

F4.211 Susceptibility is assessed to be Low as it is considered likely that these visual receptors would be moving (walking or in a vehicle), gaining a short duration and glimpsed view towards the sea and parts of the coastline in between buildings. The availability of these views is limited and atypical of the viewing experience gained from publicly accessible locations along Cliff Road. Sensitivity is therefore concluded to be Low.

View 10: East from South Road

F4.212 View 10 is considered representative of views gained from the built-up area to the west of the Site, in the South Road area and its adjoining open spaces, which are all within the Hythe Conservation Area. Also considered in connection with this viewpoint, are views anticipated from residential properties (from upper 2-4 storeys) from south / south-west and west facing windows at the southern end of Twiss Road and eastern end of South Road.

F4.213 View 10 is characterised by residential development, open space, local roads and adjoininig features which are generally suburban in nature. Houses to the left of the panoramic photo are 2 storeys plus roof height (Fisher Close, Cobay Close, Sturdy Close) and are located beyond a grass recreation field. Development along Twiss Road (left of the single-frame photo) and Marine Parade to the right of the view are mainly 3 and 4 storeys plus roof height, with a combination of brick and rendered facades with red/brown tiled roofs.

F4.214 South Road has parking on both sides and a pavement to the south (right of the view). Further to the right of the wider panoramic photos, there is a car park area which serves the single-storey local swimming pool.

F4.215 The Hythe Imperial Hotel is visible in the central part of the view during leaf-fall, although the group of mature trees at the western edge of the Hythe Imperial Hotel complex would partially interrupt these views when in leaf. There are also attractive specimen trees and well maintained residential gardens to the left of the single-frame photo.

F4.216 While parts of the surroundings are well maintained (private properties to the left of the panoramic view), the area around the local leisure centre (to the right of the panoramic view) and the rear elevations of the properties along Marine Parade are generally of low visual quality.

F4.217 The Primary receptors to views from this area are considered to be private residents whose views would likely be gained from the upper floor windows of properties along the taller

buildings present along the western edge of Twiss Road. Local people would tend to be Secondary receptors in this location, the most sensitive being members of the local community who are familiar with baseline conditions, although most people would experience a moving view while walking or travelling by vehicle.

F4.218 Those involved in active recreation and members of the general public undertaking primarily functional tasks would be Tertiary receptors, whose Susceptibility and Sensitivity would be Negligible due to their prevailing activity, and therefore these receptors require no further consideration or assessment.

View 10 – Private Residents (Southern end of Twiss Road / Eastern end of South Road)

F4.219 As set out previously for private residential views, the Value, Susceptibility and Sensitivity for these receptors is assumed to be High for the purposes of the general assessment on this receptor group, because the scope of this assessment only allows for the use of representative viewpoints from publicly accessible locations, and does not include specific viewpoints from individual properties.

View 10 – Local People

F4.220 Importance is assessed to be Medium, as the view is from within Hythe Conservation Area. The amenity value of View 10 for local people travelling along South Road is considered to be borderline Medium / Low. It contains fairly ordinary components, with some a combination of attractive elements and detracting features, mainly due to grounds maintenance. Adopting a precautionary approach a Condition of Medium is concluded, which results in a Value of Medium.

F4.221 Susceptibility is assessed to be Low for this receptor group, as they are likely to be in transit, undertaking primarily functional activities, or on route to other nearby areas or destinations (e.g. the park, the leisure centre, or the coastline). Although the view west along South Road is partly channelled by buildings on both sides, there are a variety of other features which could draw the attention of the receptor, in terms of their direction and focus of view (e.g. the destination of the recreation ground / movements south towards the leisure centre, the nearby public toilets, or the beach), where the distance to the nearest Site boundary is around 350m, separated by intervening development. Sensitivity is concluded to be Low.

View 11: West / north-west from Princes Parade (Smuggler's Slipway)

F4.222 View 11 is representative of the view west along Princes Parade towards the Hythe Imperial Hotel and north-west towards the centre of Hythe (the tower of the Church of St. Leonard is glimpsed in the far distance) beyond Imperial Park. The receptor types, visual components and detractors are similar to those described for View 4, with the view being at closer distance to the centre of Hythe and the Hythe Imperial Hotel, parallel with the informal footpath which leads north towards the RMC and Cannongate Footbridge.

View 11 – Local People and Interest Groups

F4.223 As with View 4, Value is assessed overall to be High for these receptor groups. As with View 4, the attention of receptors will be on views all around them from this location due to the

variety of points of interest to view from Princes Parade. These include views out to sea, views of the beach, views along the coastline in both directions, views towards the centre of Hythe, views towards the Hythe coast (Hythe Imperial Hotel / Marine and Western Parade), views inland across different parts of the golf course and beyond the rising wooded landform. Whether walking or exercising (e.g. jogging, cycling) the receptor activity is likely to be transient (perhaps eating or socialising) and therefore gaining a series of varied sequential views along the length of the promenade.

F4.224 Notwithstanding the above, Sensitivity is High due to the combination of High Value and Medium Susceptibility.

View 11 – Active Recreation and Seasonal Visitors

F4.225 The Susceptibility for those involved in active recreation (e.g. jogging, cycling and skating) and seasonal visitors who are likely to be less familiar with baseline conditions and less focused on the view than the most sensitive receptors, is assessed to range from between Low to Negligible. The resulting Sensitivity of these receptors is assessed to be Low and Low / Negligible respectively.

View 12: West from former firing point at 'kink' in canal

F4.226 View 12 has been included in the LVIA primarily for the Heritage Chapter to assess impacts on this location of historic interest (a specific view west from the gun firing point at the kink in the canal). The following LVIA assessment will focus on the general visual amenity from Viewpoint 12 for completeness.

F4.227 The foreground, mid-ground at the edges of the canal and all of the distance of the view are dominated by scrub vegetation and mature trees. The vegetation along the southern edge of the canal and that along the informal footpath leading south from Cannongate Footbridge interrupts views of the golf course, the Hythe Imperial Hotel and Imperial Park beyond in both the single-frame and panoramic photo. While the surrounding vegetation creates a sense of intimacy and seclusion, it is reasonably unattractive in some areas due to relaxed maintenance. Some of the footpaths are informal and muddy at certain times of the year, which in some places detracts from visual amenity.

View 12 – Local People

F4.228 In terms of Importance for receptors to this view who are local people, the view is from within close proximity to the RMC (Scheduled Monument) which would generically be of High Importance, however the importance of this view is specific to its historical significance. Due to its location which is in undergrowth, close to the edge of the canal and not directly on one of the formal canal footpaths, it is assessed that the Importance of the view in terms of general public amenity is Medium. In terms of Condition, this is an attractive view in terms of its composition, but visual overall amenity is reduced due to visual detractors such as dense overgrowth, mud underfoot at certain times of year, dogs mess and litter. Value is therefore concluded to be Medium.

F4.229 In terms of Susceptibility, this is not considered a typical vantage point for the general public, as it is taken from a location which is not on any of the main public footpaths, from within undergrowth close to the water's edge. Receptors to this view who are local people

are considered to be Secondary receptors and most likely to be walkers / dog walkers who have strayed from the path and therefore atypical of receptors gaining a more common-place viewpoints along the footpaths to the north of the canal (refer to illustrative Photos F13-F16 and F24-F30, see Appendix F4). Susceptibility is therefore concluded to be Low / Negligible and the resulting Sensitivity of this receptor group in relation to View 12 are concluded on balance, to be Low.

View 12 – Interest Groups

F4.230 People with a particular historical interest in this view are anticipated to be low in number and frequency (Secondary receptors). The Importance of the view is assessed to be High, due to the designated status of the RMC as a Scheduled Monument. The Condition of the view is assessed to be Medium, due to the presence of the detracting features described above, combined with the fact that the overgrown vegetation around the canal has caused some disconnection with the significance of the view along the canal and across it being open in the times of Napoleonic defence. Nonetheless, Value is concluded to be High for this receptor group.

F4.231 Susceptibility is assessed to be Low, as while this receptor group might be focused on the view, it is taken from a reasonably inaccessible location, where the receptor is unlikely to be focused on the view for a sustained period. The existing view would be experienced in its modern-day context, which is that the lines of sight along / across the canal which have a historical connection are now overgrown by dense vegetation in the immediate foreground and urban development in the wider periphery of the view. Sensitivity is concluded to be Medium for this receptor group.

View 13: West from Seabrook Lodge Footbridge

F4.232 View 13 has been included in the LVIA primarily for the Heritage Chapter to assess impacts on this location of historic interest. It is also a well-used footbridge which offers a panoramic view which features the RMC, the Hythe Golf Course with glimpses of the Princes Parade and the Hythe Imperial Hotel in the far distance. The principal (Primary) receptors to this view are anticipated to be local people using the local footpath network and those with a particular historical interest in the RMC.

F4.233 The wider panoramic view features the RMC, with the golf course to the left of the view glimpses of residential properties on Seabrook Road to the right. The vegetation along the northern side of the canal is quite high and dense, while the vegetation along the southern side of the canal is comparatively sparse and low-level. This allows a distant view of the Hythe Imperial Hotel and part of the Imperial Park development to the left of the canal, although much of these buildings are obstructed from view (in leaf-fall). There is dense vegetation in the foreground of the panoramic view on the southern side of the footbridge and this interrupts views of the eastern edge of the golf course and much of Princes Parade, until the receptor crosses the bridge to meet Viewpoint 17, where views of the golf course and the grassy seawall which rises to meet Princes Parade, are comparatively more open. Unmanaged vegetation forms a minor detractor in the view, which overall is attractive and reasonably well composted.

View 13 – Local People and Interest Groups

F4.234 The Importance of this view is assessed to be High, due to the close proximity to the RMC (Scheduled Monument). The condition and quality of the view is generally High and Value is also assessed to be High. Susceptibility is assessed to be Medium. The attention of the receptor is generally likely to be focusing on views from this location at the centre of the footbridge, albeit the Hythe Imperial Hotel (as a secondary focal point to the canal) is approximately 900m distant. Sensitivity for both of these receptor groups is therefore concluded to be High.

View 14: South-east from southern towpath of RMC, Public Bridleway HB83

F4.235 View 14 is representative of views gained from PRoW HB83 to the south of the RMC, across the western part of the Site, who may be from a variety of different receptor groups, including local people accessing the footpath, those involved in historical interest groups, or horse riders using the Public Bridleway (although the viewing height of horse riders is not anticipated to be important in terms of their baseline Sensitivity). View 14 has also been selected in order consider potential views gained from private properties immediately to the west of the Site (the eastern edge of Imperial Green, which is part of the Imperial Park residential development).

F4.236 The view features an unsurfaced footpath running alongside matures trees and scrub vegetation to the left of the view. A narrow band of herbaceous vegetation / pioneer scrub (including a timber knee rail and low-level restricted access signage onto the golf course) runs along the path to the right and beyond this is the mown grass of the golf course, which consists of mown fairways and areas of rough grass with mixed species trees. The trees allow glimpses of the grassy landform which rises up to meet Princes Parade. When in leaf, the canopies of the trees within the golf course interrupt views of the southern part of the golf course from this particular viewpoint although glimpses of Princes Parade open up from other locations when travelling along the footpath.

F4.237 The RMC is not readily visible from this location and much of the section of PRoW HB83 to the north of the western part of the Site, except for occasional glimpses of the water and opposite side of the canal bank / vegetation which open up between the dense trees and scrub.

F4.238 The houses at Imperial Park which are predominantly 3 storeys with living space in the roof space (3.5 storeys) are visible to the right of the panoramic view, set behind well maintained gardens and hedgerows and beyond an undeveloped margin of mown amenity grass (approximately 25-30m wide).

F4.239 Detracting features in the view are the unmade path surfacing and overgrown vegetation to the canal. Receptors to this view (Primary) are users of the footpath, mainly walkers / dog walkers or joggers and Horse Riders.

View 14 – Private Residents (Eastern edge of Imperial Green)

F4.240 As set out previously for private residential views, the Value, Susceptibility and Sensitivity for these receptors is assumed to be High for the purposes of the general assessment on this receptor group. Views are likely to be open, featuring the golf course to the west of Imperial Park, with glimpses south-east towards Princes Parade and the English Channel.

View 14 – Local People and Interest Groups

F4.241 Importance is assessed to be High, due to the close proximity to the RMC (Scheduled Monument), although this is not readily visible from the footpath. The Condition of the view is Medium, being mainly attractive but with some urban elements, the presence of the golf course and vegetation which restricts views of the canal. Notwithstanding the above, Value is concluded to be High.

F4.242 Susceptibility is assessed to be High, as receptors are likely to be focused on the available views across the golf course from this location. Sensitivity for both receptor groups in relation to View 14 is concluded to be High.

View 14 – Active Recreation

F4.243 The Value of this view is also concluded to be High for these receptors (e.g. joggers / cyclists), but their Susceptibility would be Low due to their activity and nature of view (transient, partially short duration and glimpsed). The resulting Sensitivity for these receptors is concluded to be Medium.

View 15: South from southern towpath of RMC, at junction with Cannongate Footbridge

F4.244 View 15 shows the view south wards the promenade and sea from Cannongate Footbridge and the nearby footpath along the southern edge of the RMC. There are also views south-west across the golf course towards the Hythe Imperial Hotel and parts of Imperial Park available in the wider panoramic photo.

F4.245 The foreground to this view is occupied by the brick-sided footbridge and the footpath immediately adjacent to the RMC. The footpath is largely unsurfaced and the occasional concrete / tarmac surfacing is cracked and uneven, while the footpath is muddy at certain times of year. There is also a large amount of scrubby vegetation and small trees which interrupt the view south towards Princes Parade. These are noticeable features in the view which detract from visual amenity.

F4.246 There are glimpses of Princes Parade through a gap in the scrub vegetation to the left of the informal footpath which runs out of sight towards the coast. Views to the right of the footpath (panoramic photo) are comparatively more open this allows an relatively open vista across the golf course in the western part of the site, terminated by glimpses of Princes Parade, Hythe Imperial Hotel and parts of Imperial Park in the distance beyond occasional trees within the golf course.

F4.247 The principal receptors (Primary) to this view are users of the PRoW network surrounding the RMC, anticipated to be mainly walkers, dog walkers or those visiting the RMC with an historical interest. Secondary / Tertiary receptors would include those involved in active recreation.

View 15 – Local People and Interest Groups

F4.248 The Importance of the view is assessed to be High, due to the close proximity to the RMC (Scheduled Monument). The Condition of the view is assessed to be Low, as it contains noticeable detracting features such as the overgrown and unmanaged vegetation and

footpaths in a poor (and in some places unsafe) condition impact negatively on the existing quality and condition of the view. The vegetation in the central part of the view interrupts the view south towards Princes Parade from the emergence of Cannongate footbridge (an important north / south axis through the landscape in terms of accessibility and permeability across the landscape). Value is concluded to be Medium.

F4.249 While these receptor types would typically be of High Susceptibility, Susceptibility for View 15 is assessed to be Medium, due to the view south being largely interrupted by vegetation and the viewpoint location being of Low Condition – therefore the receptor is less likely at present to stay in this location to enjoy views for a sustained period. It is considered they are likely to be transient, on route to alternative locations nearby where more open views of higher quality are available (for example further south along the informal footpath in the central part of the view, or other parts of the footpath to the south of the canal to the east or west. Notably locations to the east (left of the photo, out of shot) are also of poor visual quality, due to the presence of the golf course outbuilding a short distance away. Sensitivity is concluded to be Medium.

View 15 – Active Recreation

F4.250 Susceptibility for these receptors is assessed to be Low / Negligible, which when combined with a Medium Value is assessed to result in a Sensitivity of Low.

View 16: East from southern towpath of RMC, Public Bridleway HB83

F4.251 View 16 has been included in the LVIA primarily for the Heritage Chapter to assess impacts on the view eastwards, beyond the Site towards Folkestone, so that the context of Shorncliffe Garrison (and its underlying landform) can be considered, including its scheduled Napoleonic redoubt, although these heritage assets are not visible in the photo. The following LVIA assessment will focus on the general visual amenity from Viewpoint 16 for completeness.

F4.252 The view features a grassed footpath alongside the RMC, which is glimpsed in a gap between dense scrubby vegetation. To the right of the path is a shallow embankment containing rough grassland which slopes does to the golf course landscape. The wider panoramic view features the grassy raised landform which rises up to meet Princes Parade (to the right of the view) and glimpses of some of the private residential properties to the north of the RMC, amongst mature garden vegetation, hedgerows and trees.

F4.253 The hoarding (a visual detractor) around the western boundary of the Princes Parade allocation site is visible in the single-frame view beyond the golf course. In the far distance beyond the footpath and RMC are glimpses of the wooded landform at Hospital Hill.

F4.254 The principal receptors (Primary) to this view are users of public bridleway (walkers, dog walkers, joggers, horse riders) and those visiting the canal with a particular historical interest in the view. As with View 14, the slightly higher vantage point of horse riders is not anticipated to affect their baseline sensitivity in relation to this view.

F4.255 The Sensitivity of those involved in active recreation in relation to View 16 is considered to be Negligible, due to their Susceptibility being extremely Low and practically Negligible in this location, travelling east and heading away from the Site, therefore requiring no further consideration / assessment in relation to this particular viewpoint.

View 16 – Local People and Interest Groups

F4.256 The Importance of this view is assessed to be High, due to the close proximity to the RMC (Scheduled Monument). For those with a particular historical interest, the view east in the general direction of the Shorncliffe Garrison would also be important. The Condition of the view is assessed to be Medium. It is a reasonably attractive view, with some visual detractors including some areas of scrub vegetation along the canal and in the distance, site-hoarding. The golf course is appealing due to its openness, but there are few features within it which contribute towards a unique sense of place or offer particular intrigue or complexity to the view.

F4.257 Receptor Susceptibility is assessed to be Low / Negligible for View 16. Most receptors would gain a transient viewpoint when walking away from the majority of the Proposed Development Site, with other components in the view that are likely to draw their attention (the canal, Hospital Hill in the distance and the hoarded development site at Princes Parade to the east of the Site). Due to the extremely low-level Susceptibility described above, Sensitivity is concluded on balance to be Low.

View 17: West / south-west from southern towpath of RMC (Public Bridleway HB83)

F4.258 View 17 is representative of views across the eastern part of the Site from the north-western corner and western edge of the Site. The dominant feature in this view is the golf course which consists mainly of open grass in the eastern part of the Site, with very occasional scattered shrubs. The footpath / bridleway along the southern edge of the canal is grassed and muddy in places, particularly where it extends alongside the Princes Parade allocation site.

F4.259 In the wider panoramic view, there is dense vegetation along the canal, as described in View 13. There is intermittent low-level fencing at the edges to the golf course and a timber bin alongside further bramble and scrub which is quite tall in places, creating a partial corridor effect against the hoarding alongside the informal footpath which leads south towards the coast. The Hythe Imperial Hotel is glimpsed in the far distance, along with glimpses of parts of the houses at Imperial Park The vegetation running along the informal footpath which dissects the centre of the golf course interrupts views of the northern edge of the Imperial Park development.

F4.260 The principal receptors (Primary) to this view are users of public bridleway (walkers, dog walkers, joggers, horse riders) and those visiting the canal with an historical interest. As with Views 14 and 16, the slightly higher vantage point of horse riders is not anticipated to affect their baseline sensitivity in relation to this view.

F4.261 Those involved in active recreation in this location are assessed to be of Low / Negligible Susceptibility and Sensitivity, therefore requiring no further consideration or assessment in relation to this view.

View 17 – Local People and Interest Groups

F4.262 Importance is assessed to be High, due to the relative proximity to the RMC (Scheduled Monument). Condition is assessed to be Medium. It is a pleasant view across the open golf course, but with visual detractors such as unmade, muddy surfacing, unmanaged vegetation

and discordant fencing / street furniture along the edge of the golf course and the Princes Parade allocation site are present. Value is concluded to be High.

F4.263 The attention of the receptor is generally likely to be focused on views from this location at the convergence of several footpaths and the nearby footbridge, albeit the Hythe Imperial Hotel as a focal point is distant and there are a general lack of inspiring features present within the golf course landscape. Coupled with the presence of detracting features (as described above) views are likely to be transient and therefore short duration in nature. Susceptibility is concluded to be Medium, with the resulting Sensitivity concluded to be High.

View 18 and 18A: North from shingle beach

F4.264 View 18 is representative of the views gained north (inland) from the shingle beach to the south of the Site / Princes Parade, as requested by FHDC. The view north from this location was selected by FHDC for assessment at a time when the proposed residential scheme would occupied the central and eastern parts of the Site. In order to assess the visual impact of the proposed buildings in the western part of the Site, View 18A has been added as this faces north-west towards that part of the Site.

F4.265 The foreground of the views gained from this location are occupied by the shingle beach which slopes down from the concrete sea wall to the sea reasonably steeply in places. The view inland is mainly dominated in the midground by man-made features (visual detractors), such as the concrete sea wall, balustrading and signage, a further concrete parapet wall between the promenade and road and occasional parked and moving vehicles beyond that.

F4.266 In the wider panoramic photo, there are glimpses of the Hythe Imperial Hotel to the left of the view. The backdrop to the panoramic view features the upper parts of vegetation along the southern edge of the golf course and in some places, the wooded horizon of the landform beyond Cliff Road to the north. View 18A features the Imperial Hythe Hotel in the central part of the view and the existing buildings at Marine Parade to the left of that, with the buildings at Western Parade receding into the distance further to the left.

F4.267 The principal receptors to this view are assessed to be Secondary / Tertiary receptors such as people fishing or using the beach for recreational purposes.

F4.268 Seasonal visitors to the beach are likely to have come to enjoy views out to sea and along the beach to the east and west (typically gaining distant views towards Sandgate to the east and Romney Marsh / Dungeness to the west), and are therefore considered of Negligible Susceptibility / Sensitivity, requiring no further consideration or assessment in relation to this view.

View 18 and 18A – Local People Active Recreation

F4.269 The Importance of this view is assessed to be Low. It is undesignated and the community characteristics attached to importance from this location are in relation to views out to sea, or along the coastline rather than inland. Condition is also assessed to be Low, as the view consists mainly of detracting features. Views to the south, east and west along the beach and coastline have a higher quality and condition and therefore hold the appeal for receptors visiting Hythe beach. Value is therefore concluded to be Low.

F4.270 Susceptibility is assessed to be Low for Local People using the beach and practically Negligible for those receptors involved in active recreation such as fishing. As above, visual receptors are unlikely to hold sustained views inland, even if they are visiting the beach to engage in passive recreation. Those involved in active recreation such as fishing are also unlikely to be focused on views in land, as they will be looking out to sea or at their immediate surroundings on the shingle beach itself. Sensitivity is concluded to be Low for both receptor groups from this location.

View 19: West from Princes Parade (parallel with Seaview Footbridge to the north)

F4.271 View 19 is representative of the views gained west along Princes Parade from south of the land allocated under Policy UA18: Princes Parade, Hythe.

F4.272 The panoramic view is principally occupied by the promenade and road of Princes Parade, with concrete parapet wall / sea wall, balustrades and various types of street furniture including seating, bins, signage and parking ticket machines. To the right of the panoramic photograph (inland) is the former Princes Parade allocation site, which is occupied by mixed scrub / grassland vegetation on uneven and undulating ground. The landform rises slightly to the west (left) of the former tramway shelter and falls to a lower level to the east (right) of the view where an informal footpath leads north towards Seaview Footbridge (not visible due to intervening scrub vegetation).

F4.273 To the far right (background) of the panoramic view there is mixed residential land in the Naildown Road area which is on elevated ground above Seabrook Road. This is backed by the woodland on the escarpment beyond, which extends towards the centre-right of the photo beyond part of Cliff Road.

F4.274 The single-frame photo contains a glimpsed view of the Hythe Imperial Hotel at the western end of Princes Parade. The landform within the former Princes Parade allocation site prevents views of the existing golf course within the Site, and the central and northern part of the existing residential buildings at Imperial Park. Detracting features in the view include damaged hard surfacing and concrete walls. The uneven landform within former Princes Parade allocation site to the north of the road also forms a detracting feature in the view. While this is colonised by semi-natural vegetation (which in itself is not wholly unattractive), the landform has a dishevelled appearance, understood to be the result of the former use of the site (historic landfill and dumping) and the aborted remediation of the site.

F4.275 The principal receptors (Primary) to the view are users of Princes Parade, predominantly local people walking along the promenade, or those following part of the England Coast Path / Hythe-Folkestone National Trail.

F4.276 Those involved in active recreation (such as joggers or cyclists) and motorists and the general public involved in primarily functional tasks are considered to be of Negligible Susceptibility and Sensitivity, requiring no further consideration or assessment in relation to this view.

View 19 – Local People and Interest Groups

F4.277 The Importance of this view is High, due to Princes Parade forming part of the England Coastal Path / National Trail. Condition is assessed to be Medium, as the view contains noticeable detracting features (as described above) which lower visual amenity along this section of Princes Parade slightly. Notwithstanding the above, Value is concluded to be High.

F4.278 Susceptibility is assessed to be Low. Receptors to the view who are not moving along Princes Parade are likely to be using the seating to gain views out to sea, or generally looking along the beach and coastline. The focus on views inland is peripheral and features such as Hythe Imperial Hotel and the existing buildings at Imperial Green are very small and distant. The detracting features within the view mean that receptors are likely to travel (or continue on) to other nearby locations to gain more appealing views of the surrounding coastline and (where possible) in land. Sensitivity is concluded to be Medium.

View 20: West from Hospital Hill

F4.279 View 20 shows the view west from a short section of Hospital Hill, where receptors to views from the general public would mainly be motorists and infrequent pedestrians (Secondary / Tertiary). The view is also considered broadly representative of potential views from private properties at Temeraire Heights area (also illustrated in ZTV Photo 8.2 from Alexandra Corniche, see Appendix F4).

F4.280 Tertiary receptors who are involved in active recreation or sports and the general public undertaking functional activities. Receptors with a historical interest in the area generally would find a lack of intervisibility between the abandoned Martello Tower No. 9 (located to the north on Hospital Hill, out of shot) and any part of the coastline and its Napoleonic defences and / or the Site, due to the presence of dense woodland. These receptors are assessed to be of Negligible Susceptibility and Sensitivity and therefore further consideration / assessment is not required in relation to this view.

F4.281 This vantage point offers a distant view towards the Princes Parade coastline, with beach receding into the distance towards Romney Marsh and development in the southern part of Hythe identifiable by a glimpse of the eastern side of the Hythe Imperial Hotel and other sea front development along Marine and Western Parade. The eastern edge of the buildings at Imperial Park are also glimpsed, although partially obstructed by intervening vegetation on the steep slopes of Hospital Hill to the right of the photo.

F4.282 Residential development set behind garden fences and hedgerows is visible to the left of the view at Temeraire Heights, which is one of several small pockets of terraced residential development situated on the lower slopes of Hospital Hill above Sandgate Esplanade. The views of the sky and wider channel to the south are dominant in views when descending the road and pavement (due west) along Hospital Hill, with this section of road offering a short duration and transient view towards Princes Parade.

F4.283 Detracting features in the view include the busy road, with fast vehicle movements making the pedestrian experience unsettling. The dense vegetation of Hospital Hill combined with the steeply sloping landform and abrupt juncture with residential development sited immediately adjacent also have an adverse effect on visual amenity, which is in stark contrast to the attractive views gained out to sea and along the coastline.

View 20 – Private Residents (Temeraire Heights area)

F4.284 Importance for views from residential properties is generically High. The Condition of potential views from private residential properties is unknown and therefore assumed to be High. Value is therefore assessed to be High.

F4.285 Susceptibility is assessed in this case to be Low. The private properties in the Hospital Hill / Alexandra Corniche area mostly face south towards the sea and so the direction of most residential views is considered to be west towards Princes Parade for only a small number of receptors in this category. In addition to views towards the Site from this area being at an oblique angle, the nearest Site boundary is approximately 1km distant. Sensitivity is concluded to be Medium.

View 20 – Local People

F4.286 Importance is assessed to be Low for these receptors. The view is on the edge (but not within) the Sandgate Escarpment and Seabrook Valley LLA and so is undesignated. It is a location at the edge of a busy road with infrequent footfall. This is not an important location for the general public to visit to experience or enjoy views. The Condition of the view is also assessed to be Low. Parts of the view are attractive (glimpses of the coastline in the distance), but the proximity to the road and unsettling location for pedestrians mean that the Condition of visual amenity is assessed to be Low overall. Value is concluded to be Low.

F4.287 Susceptibility is assessed to be extremely Low (and practically Negligible), as road users would gain a moving view at speed and the view of a pedestrian is also likely to be transient, due to the nature of the location and their activity. While the view towards the distant coastline is channelled between the vegetated landform and built-form (which focuses the view on the direction of travel to some degree), the view would be short-duration, glimpsed and distant (the Hythe Imperial Hotel as a visual reference point is 2km away). Sensitivity is concluded to be Low.

View 21: South from edge of Kent Downs National Landscape, from Public Bridleway HB17

F4.288 View 21 is considered broadly representative of the views gained from the edge of the Kent Downs National Landscape, on elevated land above the Hythe coastline. It is taken from part of PRoW HB17 on the southern edge of the designated area, on the fringe of residential development at Sene Park (just out of shot to the right of the panoramic photo) and Sene Valley Golf Course, which lies up a steeply sloping wooded footpath to the south (broadly to the left of the panoramic photo and behind its origin).

F4.289 The view is taken from a single width track leading to an unmade section of footpath to the north (left of shot) and small private properties gaining access from the private road (right of shot). Beyond the lane to the south is a rough grass verge with bulbs and low-level scrub which gives way to a mown grass area beyond which forms the westernmost edge of the golf course and one of its tees / fairways. Beyond that this is a field boundary lined with a row of mature trees. In leaf-fall there are glimpses between the ivy-clad trees of the English Channel in the distance and in the closer distance just beyond the trees there are filtered glimpses of the rooftops of some of the houses on the northern side of Cliff Road.

F4.290 The presence of the sea and parts of built development within the southern part of Hythe generally are more evident in the predominant direction of view south-west along the private road (most of the right side of the panoramic view). In this direction there are glimpses of rooftops and built development in the western part of Hythe (generally the Park Road area), with the Hythe ranges glimpsed in the distance beyond.

F4.291 There are few detracting features in the view. The mature trees and vegetation in the mid-ground partially interrupt the availability of what would otherwise be more extensive views out to sea and out over the western part Hythe. Detracting features in the view also include the rear of properties on Cliff Road which are glimpsed beyond a row of ivy-clad trees which are fairly untidy in appearance. These interrupt views of the English Channel beyond and therefore the more appealing part of the wider panoramic view lies to the right of the photo, where more of the sea, coastline and vista over part of Hythe can be appreciated.

F4.292 The principal receptors to this view are a very small number of private residents (Secondary) who gain access from the private road which follows Public Bridleway HB17. It is anticipated that while the view is part of the Elham Valley Way (potentially affecting interest groups completing part of this designated long distance footpath), the predominant receptor to these views would be the local population using the public footpath (Primary / Secondary), most likely to be walkers and dog walkers due to the steeply sloping ground being generally less accessible to cyclists or runners.

F4.293 It is considered that the slightly higher vantage point of horse riders using Public Bridleway HB17 would not affect their baseline sensitivity in relation to this view. In fact, the steeply sloping ground would reduce their Susceptibility to Negligible.

View 21 – Private Residents (North-eastern edge of Sene Park)

F4.294 Importance for views from residential properties is generically High. The Condition of potential views from private residential properties is unknown and therefore assumed to be High. Value is concluded to be High.

F4.295 Susceptibility is generically High for this receptor group, however the availability of views south is extremely limited and the predominant view towards the channel from these properties is south-west (away from the site), which is nearly 700m away with notable mature vegetation, built form and steeply descending landform in between. Susceptibility is therefore assessed to be Low, and Sensitivity is concluded to be Medium.

View 21 – Local People

F4.296 Importance is assessed to be High, as the view is from within the Kent Downs National Landscape and on the edge of the SLA and also from the Elham Valley Way long distance footpath. Condition is assessed to be Medium. The wider panoramic view has attractive parts (views over the sea, coastline and part of Hythe), while views towards the south feature the rear of rooftops in shade amongst an untidy row of trees which interrupt sea views beyond. Value is concluded to be High.

F4.297 Susceptibility is assessed to be Low. The attention of views for users of the public footpath is likely to be focused towards the south-west in the direction of travel, where beyond there are attractive and unrestricted views towards the sea, coastline and parts of Hythe with the

Hythe ranges beyond. The attention and focus of views south is likely to be low and of short duration. Sensitivity is concluded to be Medium.

Future Baseline

F4.298 The existing baseline conditions are considered to represent the future baseline, in that in the event that the Proposed Development does not come forward, it is assumed that the existing Imperial Gardens Hotel and Hythe Golf Course would remain in operation.

F5.0 Potential Effects

Embedded Mitigation

Construction Phase Mitigation

F5.1 A site-specific Construction Environmental Management Plan ('CEMP') has been prepared and is provided at Appendix C4. It is anticipated that a detailed CEMP (or CEMPs) will be developed in accordance with the submitted CEMP, providing further detail on how the measures therein will be delivered. The CEMP includes the following mitigation relevant to this LVIA Chapter, which will be implemented during construction to minimise or reduce potential adverse landscape and visual impacts:

- The various phases of the Proposed Development would overlap where possible, enabling completion of the development sooner and minimising the overall duration of the potential landscape and visual effects caused by the Construction Phase.
- The site office / accommodation units proposed in the eastern part of the Site would be single stacked to minimise their visual impact during the works and security lighting would be designed to minimise potential night-time visual effects upon local residents.
- Active dust suppression would be employed during the construction works in the interests of minimising the visual impact of mud and dust (as relevant to the time of year and prevailing weather conditions). The construction of roads would minimise the amount of mud being transported around the Site to prevent debris being deposited on the local highway during inclement weather. Checks would be put in place to ensure that all vehicles are free from mud and debris prior to leaving the site.
- In terms of cut and fill, levels would be optimised to ensure the requirement to remove spoil from site is kept to a minimum. Any imported material would be done so within operating hours and designated traffic routes.
- Signage and hoarding space enabling community engagement with the scheme would be out in place.

Operational Phase Mitigation

Design

F5.2 The design of the Proposed Development has evolved in response to comments from the Council and consultees as described in Chapter C of this ES. As a result the design incorporates a number of principles and features to minimise adverse landscape and visual impacts as set out below:

1 Retention of the golf course use on the western part of the Site (to the west of the north / south informal footpath which runs south from Cannongate Footbridge) which will keep this part of the Site open in nature and largely free from built development (aside from the Golf Clubhouse);

2 A landscape buffer is proposed between the RMC and residential development and any built development;

3 The build line to the south (i.e. the proposed leisure buildings next to the Hotel and the maximum extent of built development for the residential area as shown on the Land Use Plan (drawing no. 400.01) (Appendix C1)) has been designed to align with the Edwardian / Victorian build line of the Hotel;

4 Provision of open space between the informal footpath and the area proposed for residential development and a arrangement of open space and leisure features along this footpath to enhance their accessibility, while maintaining an open corridor along the central north / south axis between the RMC and the coastline.

F5.3 The provision of north / south landscape and SUDs corridors in between areas of built development within the proposed residential area as shown on the Blue and Green Infrastructure Parameter Plan (drawing no. 400.04) (Appendix C1), to maintain the landscape and visual connection between the RMC and the coastline;

F5.4 The Storey Heights Parameter Plan (drawing no. 400.03) (Appendix C1) demonstrates a reduction of proposed residential building height from the south (next to the promenade) to the north (next to the RMC), separated by landscape treatment detailed on the Landscape Masterplan. The proposed maximum height of the residential buildings adjacent to the RMC is limited to up to 3 storeys to minimise potential adverse visual impacts and to reduce the potential adverse effects upon the landscape setting of the RMC.

F5.5 The exception to the above, is that maximum height of the crescent-shaped part of the proposed residential development is limited to up to 4 storeys, the northern end of which is next to the RMC. This will allow for the creation of an architectural feature of sufficient prominence that would provide a 'book-end' effect to the western edge of the proposed residential development.

F5.6 In terms of proposed architectural character, the continuation of built development of promenade character (as set out in the Design Code, provided at Appendix C5) which is up to 5 storeys in height (as per the Storey Heights Parameter Plan), will allow for a coherent continuation of the larger buildings present along the seafront to the west (Hythe Imperial Hotel and other large residential buildings on Western Parade and at the southern end of Twiss Road), therefore responding to the local architectural context and to assimilate with local townscape character.

F5.7 The delivery of crescent blocks (see Design Code) will ensure that the eastern edge of the residential element of the Proposed Development addresses the proposed open space to the east. The curved form of the crescent blocks would also soften the development grain, instead of introducing extensive linearity in its form.

F5.8 The Landscape Masterplan and Detailed Landscape Masterplan drawings (Appendix C2), the Access and Circulation Parameter Plan (drawing no. 400.02) (Appendix C1) and the Design Code (Appendix C5) ensures that a network of various pedestrian routes will be provided as part of the Proposed Development, enhancing access and permeability in all directions, while also creating visual linkages and openness. These plans and documents also ensure that the road network within the residential element of the Proposed Development will be designed to reduce overall road length and avoid a continuous road around the perimeter of the residential development. This will allow for a landscaped perimeter to the residential development, including to the RMC and along the frontages to the new homes. Parking will be designed to minimise visual presence, with the majority of

residential parking to be provided underneath buildings, and any on street parking must integrate with public realm and associated landscape.

F5.9 A green roof is proposed on the Golf Clubhouse building which, combined with its low level in the landscape and low height, forms mitigation embedded into the design with the purpose of maintaining views over the building towards Princes Parade, to soften views of its roof and integrate with the verdant surroundings of the golf course. Car parking areas will feature tree planting (tolerant of the exposed coastal conditions) to provide landscape structure and soften the visual impact of hard surfaced areas. Green and blue roofs are proposed to the new buildings / building extensions to the east and west of the Hythe Imperial Hotel. Green roofs are also indicated on the some of the proposed residential buildings on the Landscape Masterplan, although these form part of the outline planning application and as such, are not relied upon in terms of the LVIA.

F5.10 The scale and massing of the proposed buildings adjacent to the Hythe Imperial Hotel (comprising the new western wing of the hotel, the new Leisure Building and the residential element which faces onto the Princes Parade) has been informed by the size and prominence of the Hotel. The maximum height of the proposed residential element which faces onto the Princes Parade has been set to a maximum of 5 storeys to be in keeping with the larger buildings on the periphery of the existing Imperial Park residential development to the west (when factoring in the proposed raising of land levels within the residential part of the Site).

F5.11 In terms of architectural style, the proposed new Western Wing and new Leisure Building intentionally introduce a contemporary architecture, to create a juxtaposition between the existing Edwardian architecture of the Hotel and new contemporary architecture, to allow an appreciation and understanding of the Site's history, evolution and chronology. This is intended to achieve a dialogue and balanced contrast, rather than a conflict, by referencing the following features on the existing Hotel:

- Emphasised edges.
- Horizontal and vertical expression.
- Symmetrical glazing.
- A change of architectural rhythm at entrance level.

Landscape Mitigation / Enhancement

Primary Mitigation

F5.12 The following features are included within the proposed landscape design, as shown on the Landscape Masterplan (drawing no. 6312-LLB-XX-XX-DR-L-0012) (Appendix C2), as primary mitigation:

- Provision of a Heritage Trail with information boards along the proposed footpath / cycleway to the north and western edges of the Site, responding to the presence of the nearby RMC and aiming to increase appreciation and knowledge of this Heritage Asset.
- The landscape design scheme features the provision of wetland habitats which respond to the underlying natural condition of the local landscape in-land of the coastline (which also performs an enhancement measure). This aims to have a mitigating effect

on the impact of the proposed development overall, by delivering a development which is responsive to the underlying character of the natural landscape.

- The design of the proposed 9-hole Academy Golf Course ensured that this was set at the existing low ground levels and in some cases, lower than existing ground levels have been used. This would ensure the retention of the existing land use and its character in the western part of the Site and continue allow views across it from the RMC and nearby footpaths.
- The 1.5-2m high embankment along the northern edge of the proposed residential development would be vegetated with native species shrubs and grasses to soften its visual impact and the landscape interface between this part of the Site and the RMC footpath to the north.
- Provision of a new native species woodland buffer along the western boundary of the Site, providing softening and separation between the existing residential properties at Imperial Park and the proposed residential development.
- A shared footpath and cycleway to be provided along the northern, western and eastern parts of the Site, providing alternative leisure routes for a variety of different users.
- Provision of reeds and wetland features will provide naturalistic features to the edges of the development, responding to local landscape character of the wider Romney Coast.
- Provision of a Napoleonic-themed 18-hole Adventure Golf Course to increase leisure opportunities while offering additional Heritage interpretation and learning opportunities connected to the nearby Scheduled Monument (RMC).
- Provision of a 'Central Plaza' formed by a terraced area of public realm to create a gateway feature to the development facing onto Princes Parade. The terraced nature of the space is intended to provide visual connectivity between the Site and the sea, creating a new public seating and viewing experience whilst maintaining views between Princes Parade and the Royal Military Canal.
- Provision of a public 'Splash Park' and play area to the west of the Central Plaza. This would utilise the level difference between the promenade and the adjacent parts of the Site, with the aim of creating an exciting and naturalistic public play and amenity space.
- The southern boundary of the Site would feature a new widened public promenade, comprising high quality linear paving, seating, shelters and other landscape treatment to create an attractive feature along the seafront for visitors.
- Open space pathways would be surfaced in a self-binding gravel material, thereby creating an informal parkland character, appropriate to the wider setting and heritage character of the Scheduled Monument (RMC).
- Proposed trees would be planted within open spaces and car parking areas, compensating for those that would be removed within the existing golf course and enhancing the landscape setting of the new development and its open spaces.
- The landscape design includes provision of a variety of habitats and features of ecological / wildlife value, for example the provision of native species planting and biodiverse wildflower grassland habitats.

Lighting Mitigation (Night-Time Visual Effects)

F5.13 A detailed lighting scheme has not been prepared for the Proposed Development, however an outline indicative lighting scheme, based on a worst-case scenario, is provided in the External Lighting Impact Assessment (Appendix X). It is assumed that the principles established in the indicative lighting scheme will be adhered to, and will be secured by way of an appropriately worded planning condition. The principles are based on the Site's location within an 'E1 Environmental Zone', meaning the area is recognised as an intrinsically dark location where artificial lighting must be kept extremely low. The principles include incorporating the following into the lighting design:

- External illumination is limited to low level bollard lighting which will operate on time or photocell control to ensure that lighting is off during periods of inactivity;
- Use of low-intensity lighting, with a warm colour temperature;
- Use of full cut-off units and downward-directed optics;
- Zero upward light (ULR 0%). Light fittings cast light downwards, with very limited lateral spill and no upward emission; and
- Protection of dark skies, neighbours and ecological receptors.

Major Hazards and Accidents

F5.14 No major environmental hazards or accidents can be reasonably foreseen as a result of the Proposed Development in relation to landscape character and visual amenity.

Phasing

F5.15 As set out in Chapter C of this ES, it is anticipated that the Proposed Development will be constructed over approximately 7 years in accordance with the phasing therein.

F5.16 The principal relevance of phasing the proposed Construction Period to this LVIA is in relation to the duration (and subsequent completion) of the construction works within different parts of the Site. Construction activity in the eastern part of the Site in relation to the proposed golf course, adventure golf course and clubhouse (Phase 2) is anticipated to be completed and operational within 3 years; by the start of Year 4.

F5.17 This means that while the construction site office and parking would remain a relatively small proportion of the eastern part of the Site, the effects of the construction period upon the eastern part of the Site would begin to reduce within the Short-Term (up to 5 years), while the other remaining phases in other parts of the Site are completed. Notwithstanding the above, the remaining phases of construction (Phases 3 to 5) would continue for a further period of 3-4 years, so the overall Construction Phase would be Medium-Term in duration.

During Construction

Landscape Receptors

Topography

F5.18 The proposed levels strategy would require modifications to the topsoil and sub-soil within the Site to create new development platforms for the proposed residential development and new levels for the proposed golf courses, open space areas and attenuation features such as reed beds and swales.

F5.19 This would be a Construction Phase impact until the point of completion of each phase, when the new Site levels within each respective phase would become detectible in the landscape as they are intended to be within the Operational Phase of the Site as a whole (assessed separately).

F5.20 The Size / Scale of the construction works relating to Topography are assessed to would be Moderate, Site in Extent (Negligible) and completed within the Short-Term (Low). They would be carried out as part of a Permanent change (assessed separately), but their effects while ongoing would be Temporary (Negligible), resulting in a Low Magnitude of Change. With the Medium sensitivity of the receptor, the potential effect of the Construction Phase upon Topography would be Minor Adverse (Not Significant).

Vegetation

F5.21 The existing trees, scrub vegetation and grassland within the main part of the golf course would be removed, along with most of the trees / group of scrub running along the central footpath (see Tree Protection Plans submitted with the planning application). The off-Site trees and scrub vegetation (visible in the central part of View 15) between the southern end of Canongate Footbridge and the Site boundary would be retained (with the exception of a small amount of scrub group G44, which lies very close to the Site boundary) and protected during the demolition and construction phase. Existing trees and vegetation around the Hythe Imperial Hotel will be retained and protected.

F5.22 The removal of some of the trees and vegetation within the main part of the existing golf course would represent an Adverse impact initially of Medium Magnitude.

F5.23 Based on the above, and the Medium sensitivity of the receptor, it is assessed that the potential effect upon Vegetation during the Construction Phase would be Moderate Adverse (Not Significant).

Hythe Conservation Area and The Church of St. Leonard (List Building) – Landscape Setting

F5.24 These Heritage Assets are remote from the Site and the link between them in terms of their wider landscape setting only relates to a single viewpoint gained towards them from a highly localised part of Princes Parade to the south of the proposed residential element of the Proposed Development (Views 4 and 11), and a single glimpsed view from North Road (View 7) where a small amount of the proposed residential and Hotel buildings are visible in the distance beyond the church tower.

F5.25 The Magnitude of Change upon the landscape setting of both of these Heritage Assets as a result of the proposed Construction Phase is assessed to be Negligible (and practically Nil) and the resultant effect would therefore be Negligible and Neutral (Not Significant).

Scheduled Monuments - The RMC: Twiss Road to Seabrook Lodge Bridge section – Landscape Setting

F5.26 The construction phase would occur to the south of the southern RMC footpath (Public Bridleway HB83), allowing this footpath to remain open with a separation between the Scheduled Monument and the Site. There would be a Temporary impact on local landscape character to the south of the RMC of Low Magnitude. Notwithstanding the above, there would be a noticeable impact on the landscape setting of this section of the RMC, due to views south across the Site being interrupted by construction hoarding.

F5.27 The combination of Low Magnitude of impact and High to Medium Sensitivity of receptor leads to a potential effect that is Moderate Adverse and Not Significant. The effect is assessed to be Not Significant due to type and format of the construction phase activities (which would be standard for this type of development and phased) and their Temporary nature and Short-Term Duration.

Hythe Imperial Hotel - Landscape Setting

F5.28 While Construction Phases 2 and 3 would be in direct proximity to the Hythe Imperial Hotel, these works are anticipated to be completed within the Short-Term (around 18 months for the Leisure Building and Hotel Extension respectively). Construction work on the residential element of the Proposed Development and the works along Princes Parade would continue into the Medium-Term. These combined are assessed to cause a Low Magnitude of Change, leading to a Minor Adverse effect, which is Not Significant on the landscape setting of the Hythe Imperial Hotel.

Landscape Character

Hythe Coast District LCA

F5.29 While the Construction Phase would occur directly within the Hythe Coast District LCA, the scale of the construction work in terms of its size, extent, nature and duration compared to the size of the character area would be of Negligible Magnitude, Short to Medium-Term in duration and Temporary. This would lead to a potential effect that is Negligible and Neutral - Not Significant.

Local Landscape Character (Study Area Specific LCAs)

LCA A. RMC & Imperial Hythe Coastal Strip

F5.30 The Magnitude of Change during the construction phase in relation to the RMC & Imperial Hythe Coastal Strip LCA is assessed to be Low. It would be of a Moderate Size / Scale overall, as it would convert approximately half of the LCA from its existing character to a hoarded construction site, but this would be mainly experienced on a Site / Local scale. The eastern part of the Site would be completed within the Short-Term (5 years) and the western part of the Site and parts of the highway along Princes Parade would be completed

within the Medium-Term (7 years) in terms of their position relative to the overall construction programme. The works would be Local (Low) in extent and Temporary (Negligible). As the Extent, Duration and Reversibility of these impacts would be of a low-level, this would modify the overall Magnitude of change from Moderate to Low.

F5.31 The combination of Low Magnitude and High to Medium Sensitivity results in a Moderate Adverse effect on the landscape character of LCA A. Due to the construction phase activities being standard for this type of development and phased, in combination with being Temporary and Short-Term in Duration, the Moderate Adverse effect upon the RMC & Imperials Hythe Coastal Strip LCA is assessed to be Not Significant.

LCA B. Princes Parade Coastline

F5.32 There would be a noticeable change to part of the local landscape character experienced within the Princes Parade Coastline LCA, because inland views across the Site would be interrupted by constriction site hoarding, occasional views of construction vehicles and machinery and material stockpiles within the Site. The physical impacts upon the character area would be small and limited to a small geographical area. They would also be Short to Medum-Term in Duration, Temporary and phased, with the majority of the Site (its central and eastern parts) being completed in the Short-Term.

F5.33 The Magnitude of Change is therefore assessed to be Low, resulting in a Minor Adverse effect overall (Not Significant).

LCA C. South Road Residential

F5.34 The construction phase would have a highly localised and temporary impact upon the landscape character of the South Road Residential LCA, mainly affecting the character of views in close proximity to the Hythe Imperial Hotel (e.g. View 3 from the eastern end of Marine Parade, View 10 from part of South Road). The character of views from this area is primarily urban, where temporary glimpses of scaffolding around the Hotel and construction site hoarding / activities in general would be accepted as common place. The vast majority of LCA C would be completely unaffected by the Construction Phase.

F5.35 The Magnitude of Change is assessed to be Negligible, resulting in a Negligible Adverse (and practically Neutral) Significance of Effect on the landscape character of LCA C (Not Significant).

Visual Receptors

F5.36 The effects of the construction phase on the representative assessment viewpoints / visual receptors are summarised below in terms of public visual amenity, using the following categories:

Moderate Adverse (Not Significant):

F5.37 Receptors represented by Views 3, 4, 5, 11, 13, 14 and 17 are mainly Local People and Interest Groups with a High Sensitivity where the views are gained in close proximity to the Site (View 3 for Interest Groups and View 5 for Local People are of Medium Sensitivity and assessed separately below under the Minor Adverse effects heading).

F5.38 View 3 on the periphery of the immediate setting of the Site which would mainly be affected by the construction activities adjoining the Hythe Imperial Hotel (e.g. views of scaffolding and debris netting and machinery close to the Hotel building).

F5.39 Views 4 and 11 from Princes Parade, would be interrupted in the foreground by construction site hoarding on the Site perimeter and would feature occasional glimpses of the upper parts of construction machinery and / or material stockpiles beyond. This would detract from views inland and at the periphery of views along Princes Parade but would not hinder the accessibility of views out to sea or along the beach and coastline.

F5.40 Views 5, 13, 14 and 17 are from the vicinity of the footpaths close to the RMC, where views across the existing golf course would be interrupted by construction site hoarding and occasional glimpses of the upper parts of construction machinery and / or material stockpiles beyond.

F5.41 In terms of Magnitude, the size and scale of the impact upon these views would be Medium to High, but the remaining elements of Magnitude would be Low; Size/Extent would be Site/Local; Duration would be mainly Short-Term with some being Medium-Term; and the works would be Temporary). Magnitude is concluded therefore to be Low overall for these views, resulting in a Moderate Adverse Effect. This rests on the borderline of Significance because of the initial physical change in the view, but due to the overriding factors of Extent, Duration and Reversibility, they are assessed to be Not Significant.

Minor Adverse (Not Significant):

F5.42 The visual receptors (and the views they are represented by) that would experience a Minor Adverse effect on visual amenity are summarised below, with their Sensitivity to change:

- View 3 – Interest Groups (Medium Sensitivity). The Low impact on this view is explained above, under Moderate Adverse effects, where the sensitivity of Local People is assessed to be High).
- View 5 – Local People (Medium Sensitivity). The Low impact on this view is explained above, under Moderate Adverse effects, where the sensitivity of Interest Groups is assessed to be High).
- View 10 – Local People (Low Sensitivity). The impact on this view will be Low, due to the small extent of the construction activities visible. These would be limited mainly to scaffolding and construction activities next to the Hotel, which would be Short-Term and viewed in an urban context.
- View 12 – Interest Groups (Medium Sensitivity). The construction site hoarding and activities would be predominantly screened by existing vegetation.
- View 14 – Active Recreation (Medium Sensitivity) The Low impact on this view is explained above, under Moderate Adverse effects, where the sensitivity of Local People and Interest Groups is assessed to be High).
- View 15 – Local People and Interest Groups (Medium Sensitivity). The existing vegetation to be retained in the central part of the view would partly screened the construction site hoarding and activities (single-frame view) while in the panoramic view, these features would be more noticeable, due to the lack of intervening vegetation.

- View 16 – Local People and Interest Groups (Low Sensitivity). The site hoarding would be visible in the right of the view, but the central part of the view along the footpath and the RMC to the left of the view would remain unaffected.

F5.43 In terms of Magnitude, the size and scale of the impact upon these views would be Medium / High, but as explained above, the remaining elements of Magnitude (Extent, Duration and Reversibility) would be Low, resulting in a Low Magnitude of Change. Combined with the Medium – Low level Sensitivity of these receptors, this results in a Minor Adverse (Not Significant).

Minor/Negligible Adverse (Not Significant):

F5.44 The following visual receptors (and the views they are represented by) are assessed to experience a Minor / Negligible Adverse effect on visual amenity, as summarised below:

- Views 3, 4, 11 and 15 - Active Recreation and Seasonal Visitors (Low / Negligible Sensitivity to Change). While the physical impact on these views would be Medium / High, Magnitude of Change would be Low overall.
- View 12 (Local People – Low Sensitivity), View 5 (Local People and Interest Groups – Medium Sensitivity) and View 19 (Local People and Interest Groups – Low Sensitivity). The Magnitude of Change for these views is assessed to be Low / Negligible.

Negligible/Neutral (Not Significant):

F5.45 For the following visual receptors, and the views they are represented by, the Magnitude of Change is assessed to be Negligible, which combined with a Medium, Low, or Low / Negligible Sensitivity to Change results in a Negligible and Neutral Significance of Effect:

- View 1 (Local People)
- View 2 (Local People and Interest Groups)
- View 6 (Active Recreation)
- View 7 (Local People and Interest Groups)
- View 8 (Local People)
- View 9 (Local People)
- View 18 (Local People / Active Recreation)
- View 20 (Local People).

F5.46 These include views which feature a predominantly urban context where fragmented or glimpsed views of construction activities would have little or no impact. They also include distant views where the extent of construction machinery or site hoarding visible would be limited (Views 1, 2, 7, 9 and 20).

F5.47 Views 6, 8 and 18 would feature intervening built development (including the existing sea wall in the case of View 18) and / or vegetation would interrupt views of the Site / construction phase activities and features. In the case of View 21, Magnitude would be Nil.

Private Residential Receptors

F5.48 The effect on private residential receptors is assessed to be as follows:

- There would be a Major Adverse effect (Significant) upon residential properties which are immediately adjacent to the Site, along the eastern edge of Imperial Green (represented by View 14). These properties would experience views of the construction phase activities from close distance and therefore the impact would be of Medium-High Magnitude (Size and Extent would be Medium-High; modified slightly by being Site in Extent (a small geographical area and low numbers of people); Short to Medium-Term in Duration and Temporary).
- There would be Moderate Adverse effects upon residential properties represented by Views 9 (western end of Cliff Road, north of Cannongate Road) and 10 (southern end of Twiss Road / Eastern end of South Road), where the Magnitude of Change is assessed to be Medium. View 9 shows that the elevated views over part of the proposed residential area from distances of approximately 350-450m. The seasonal effects of vegetation in leaf would partly screen views of the proposed construction activities, which would be at a lower level such that views over the English Channel would remain unimpeded. View 10 and illustrative Photo F42 (see Appendix F4) show that views of the construction phase would relate primarily to the Hotel and its immediate surroundings from close distance, but for a comparatively shorter time period. Both sets of views / receptors would be affected for the Short to Medium-term and works would be phased and Temporary, therefore considered overall to be Not Significant.
- Minor Adverse effects (Not Significant) are predicted for residents represented by Views 6 (north of the Site, south of Seabrook Road) and 8 (north of Seabrook Road / Elm Gardens Area), where the Magnitude of Change is assessed to be Low to Negligible, because there might be glimpses of the upper parts of construction machinery and soil stockpiling, but generally these would be restricted by intervening vegetation, boundary fencing and / or other built development.
- The effect on residents represented by View 20 (Temeraire Heights area) during Construction is assessed to be Negligible Adverse, as the construction activities would be glimpsed from distance during the entire construction period but from a distance where they would be inconspicuous and affect only a small part of a wide panoramic view.
- The effect upon residential receptors represented by View 1 (Old London Road / Nursery Fields area) and View 7 (southern edge of North Road) are assessed to be Negligible and Neutral (Not Significant), due to limited amount of the construction activities that would be visible from these locations, separated by distance and intervening development (View 1) and intervening vegetation and built development (View 7).
- The effect during Construction on residents represented by View 1 (Old London Road / Nursery Fields Area) is assessed to be Negligible and Neutral, due to the reasons described above for public visual amenity. The effect at Construction upon views represented by View 21 would be Nil (north-eastern edge of Sene Park)

During Operation

Landscape Receptors

Topography

F5.49 The physical impacts upon the topography within the Site would occur during the Construction Phase, but they are also assessed during the Operation Phase as it is during this period that they would be experienced by people as a component of landscape character.

F5.50 Ground levels would be modified in the proposed residential element of the Site to create a level platform for development that is compatible with the proposed drainage strategy for the Site. This would occur within the context of a highly modified topographical setting (an engineered sea wall, levels modified historically in the area for military defences and levels modified on a site scale in respect of the existing golf course).

F5.51 Level changes within the eastern part of the Site (new public realm and open space areas and proposed golf courses) have been intentionally kept to a minimum, to retain visual accessibility and openness across the central and eastern parts of the Site, while north/south views would be retained along green corridors proposed within the residential scheme.

F5.52 The proposed changes to topography are not unusual for the type of development proposed given the location and context described above and they would not be the cause of any significant adverse visual impacts or changes to landscape character.

F5.53 The Operational Phase effect of Topography is therefore assessed to be of Low Magnitude and Neutral in nature.

F5.54 The combination of Magnitude and Sensitivity for Topography during Operation is summarised below:

- Topography:
  Year 0 (onwards). Minor Neutral, Direct, Long-Term, Permanent – Not Significant.

Vegetation

F5.55 During the Operational Phase of the Proposed Development, the new trees and other vegetation planted during the Construction Phase would establish and would progress towards maturity during the Short to Medium-Term, reaching early maturity in the Long-Term. The Magnitude of Change would therefore reduce to Low in the Long-Term and the nature of effect would change from Adverse to practically Neutral overall.

- Vegetation:
  Year 0. Minor Adverse, Direct, Short to Medium-Term, Permanent – Not Significant.
  Year 15. Minor Neutral, Direct, Long-Term, Permanent – Not Significant.

Grain of Development

F5.56 The proposed Grain of Development based on the indicative residential masterplan is indicated on Figure F7 (see Appendix F1), purely to show the context of these indicative

proposals in relation to the wider LVIA study area. Due to the outline nature of the proposed residential development, the assessment of the effect upon the Grain of Development is based on broader details which are secured within the Design Code (Appendix C5) and the Parameter Plans (Appendix C1), as follows:

- The Parameter Plans Land Use Plan (drawing ref 400.01) and Blue and Green Infrastructure Plan (drawing ref 400.04) secure the provision of north / south corridors in the central part of the outline area and along its eastern and western boundaries.
- The Access and Circulation Parameter Plan (drawing ref 400.02) indicates that there would be a degree of separation between blocks of buildings and suggests where these might occur. This is reinforced by text and illustrations about the gaps between buildings in the 'Access and Movement' section of the Design Code. The 'Building Typology' section of the Design Code also states that breaks in massing would allow the perimeter and housing blocks to read as a series of smaller buildings.
- The 'Architectural Approach' Section of the Design Code states that the scheme must include; Promenade frontage blocks; Crescent frontage blocks; Canal frontage blocks; Housing thorough the centre of site and indicates how these might be arranged in combination with the Parameter Plans, including the Storey Heights Plan. This section of the Design Code also states that dual aspect homes would be maximised to 60% minimum overall.

F5.57 The arrangement of the areas available for new residential buildings in the central part of the outline area shown on the Building Heights Plan (to the west of the crescent block) are similar to the blocks of residential buildings which already exist at Moncrieff Gardens and Imperial Park, and these are also separated by a north / south open space feature. This creates a connection with the adjoining area of residential development to the west and the formal geometry established by the Hythe Imperial Hotel and its grounds, and the feasibility of this approach is demonstrated in the indicative arrangement of building blocks shown in the Design Code.

F5.58 The north / south gaps within the proposed residential area ensure the retention of a visual connection between the RMC and the coastline and create openness and visual accessibility throughout the residential part of the Proposed Development in terms of landscape character and views. This is demonstrated in the indicative additional viewpoints A-E, see Appendix F6.

F5.59 In addition to the above, there would be a requirement for some east / west gaps between buildings in order to fulfil access and circulation requirements as a minimum, and these would need to be of a certain distance to avoid issues of overlooking (especially where homes could be dual aspect). This part of the residential development is assessed to be an Adverse Impact.

F5.60 The southernmost edge of the proposed residential built form along the promenade would share the same east / west axis and the southernmost build lines established by the Hythe Imperial Hotel and the other promenade buildings along Marine and West Parade to the west (Neutral), however, contrary to this, the Parameter Plans show that the depth of the maximum 5-storey development along this axis could potentially extend further to the north than it already does (Adverse).

F5.61 The requirement for crescent frontage blocks within the Design Code at the curved eastern edge of the outline area would deliver residential development in keeping with the curved form in the built grounds to the north of Hythe Imperial Hotel and in the arrangement of residential buildings at Tanner's Hill in the wider study area. It would create a cohesive architectural feature with a strong form, which would have a spatial relationship to the proposed area of open space to the east, connecting with the central and eastern parts of the Site (Beneficial). However, the parameters show that the crescent built form would extend closer to the RMC than the remainder of the northern edge of the Development (and this would be up to 5 storeys in height), which would be Adverse, though negligible.

F5.62 The proposed new Western Wing and New Leisure building would be introduced immediately adjacent and adjoining the Hythe Imperial Hotel, which currently stands alone in this part of Hythe, although with some noticeable extensions / outbuildings.

F5.63 The frontages of the proposed new Western Wing and Leisure Building would respect the build line formed by the Hotel (Primary Mitigation) and this sets up a connection with the proposed residential units along the promenade. The size and footprint of these proposed buildings is generally sympathetic to the size of the Hotel (Neutral), but they are slightly deeper than the existing east / west wings of the Hotel building (Adverse). Notwithstanding the above, given the proposed contemporary (yet sympathetic) architectural style, the Hotel has a moderate ability to accommodate modern-day extensions of this size and type.

F5.64 The proposed Golf Clubhouse in the western part of the Site would represent a very small change to the built development footprint in this part of the Site. In terms of its use and situation relative to its intended land-use (a small stand-alone building at the edge of a golf course), the nature of change of introducing this building in this location is assessed to be Neutral.

F5.65 In summary, a professional judgement needs to be made to weigh the potential Adverse impacts upon some aspects of the proposed residential and Hotel buildings, with some notable Neutral and Beneficial impacts arising from the principles established in the outline residential scheme parameters and the robustness of the Hotel and its immediate surroundings to change. In addition, the central and eastern parts of the Site would contain practically no built form, apart from the proposed Golf Clubhouse.

F5.66 The Magnitude of Change of potential Adverse impacts described above within the proposed residential development on urban grain is assessed to be Medium, which would occur in part of the Site with a Medium Sensitivity. In isolation, this would result in a Moderate Adverse effect, using professional judgement, the Magnitude of Change is assessed to reduce slightly to Low, when considering the overall balance of the Neutral and Beneficial impacts upon Urban Grain described above, in the remainder of the Site. A Minor Adverse Significance of effect is concluded overall (Not Significant).

F5.67 The assessed effect upon Grain of Development during Operation is summarised below:

- Grain of Development:
  Year 0 (onwards). Minor Adverse, Direct, Long-Term, Permanent – Not Significant.

Hythe Conservation Area and The Church of St. Leonard (List Building) – Landscape Setting

F5.68 These Heritage Assets are remote from the Site and the link between them in terms of their wider landscape setting relates mainly to the visual impact on a small number of views (principally Views 4, 7, 10 and 11). While the visual amenity from these locations would be affected, the changes relative to the landscape setting of these features during Operation would be Negligible in magnitude, given the vast size of the urban area surrounding them which forms their wider setting, most of which would be practically unchanged.

F5.69 The combination of Magnitude and Sensitivity (Low / Negligible) in relation to the landscape setting of Hythe Conservation Area and resultant effect levels is summarised below:

- Hythe Conservation Area – landscape setting:
  Year 0 (onwards). Negligible Neutral, In-Direct, Long-Term, Permanent – Not Significant.
- Church of St. Leonard – landscape setting:
  Year 0 (onwards). Negligible Neutral, In-Direct, Long-Term, Permanent – Not Significant.

The RMC: Twiss Road to Seabrook Lodge Bridge section – Landscape Setting

F5.70 The proposed residential development in the western part of the site would be introduced onto land which is currently occupied by part of the existing golf course. This would have an adverse impact on the setting of the RMC in that part of the Site, but it would be limited to a small geographic area and mitigated as far as possible by locating residential development next to where this land use already exists on the developed edge of this part of Hythe.

F5.71 In relation to the visual landscape character experienced from or close to the immediate setting of the RMC, the proposed residential development would primarily affect views from Public Bridleway HB83 to the south of the canal (represented by View 14). The existing vegetation along the RMC would intercept views and protect the setting experienced along the PRoW to the north of the canal (HB65 and HB56), as these would be restricted to fragmented glimpses during leaf-fall. More distant views along the canal from the north-eastern end of this section of canal (represented by View 13 from Seabrook Lodge Footbridge) would also feature the introduction of parts of the new residential buildings, partly screened and filtered by existing intervening vegetation along the canal.

F5.72 The Primary Mitigation measures to minimise and offset these Adverse effects on the setting of the RMC are to locate the proposed residential development as close as possible to the existing residential land use and enable north / south viewing corridors between Public Bridleway HB83 and the promenade. The parameters for building heights and massing also respond to the presence of the RMC to the north, by ensuring a lower maximum building height of 3 storeys (with the exception of the eastern edge of the residential area). The northern edge of the proposed residential development would be set back from the RMC behind a swathe of SUDs open space with trees and a Heritage Trail, thereby softening the impact of the Proposed Development on the character and setting of the canal corridor and integrating it as a whole with the existing setting of the RMC to the north.

F5.73 The proposed open spaces and public realm areas to the east of the proposed residential development, the proposed golf courses, the proposed Golf Clubhouse and its parking (and associated landscape treatment) have all been designed to minimise impacts upon the landscape setting on the remaining area within the Site to the south of the RMC. Once established and continuing to develop to maturity, the proposed landscape treatment and habitats within these areas would have a Neutral and Beneficial effect on the setting of the RMC, as they would gradually assimilate more closely with the character of the existing canal corridor and existing landscape character to the east of the Site, while connecting with the underlying character of the local coastal landscape, retaining views across it from the PRoW running along the RMC and providing a cohesive landscape setting for the Proposed Development as a whole and thereby softening its initial adverse impact on local character in the Long-Term.

F5.74 The proposed Adventure Golf Course, open space and play areas to the east of the new built residential area would increase the amount of seasonal leisure activity and footfall within the wider vicinity of the landscape to the south of the RMC (potentially having a minor adverse effect on tranquillity compared to the existing baseline), but these features would also represent an enhancement to the public enjoyment of this part of the coastline. These are not uncharacteristic of sport and leisure facilities that are usually located along coastal areas. Leisure has long been a characteristic feature of the area, through its current land-use as a golf course, the Hotel, the historic Tramway Line and use of the promenade for pleasure and recreation. The proposed Heritage Trail and other interpretative features would enhance the appreciation and enjoyment of the landscape surrounding the Scheduled Monument and its setting.

F5.75 The effect of the Proposed Development upon the landscape setting of the Twiss Road to Seabrook Lodge section of the RMC, is assessed to be of Low Magnitude, for the following reasons:

- The principal Adverse change to the landscape south of the RMC would occur in a very small part of the Site, where there is a moderate Susceptibility to development of residential character, as this land-use already exists nearby at Imperial Park immediately to the west. While there would be a noticeable change to the character and setting of the RMC relating to the western part of the Site (where the proposed residential development would occur), the proposed character of the residential development and its proposed landscape surroundings would be compatible with and sympathetic to the nearby RMC and connected to the adjacent land-use pattern established at Imperial Park such that, on balance, Magnitude of change is assessed to be Low in terms of character, even though it would be comparatively higher in relation to the initial visual impact associated with representative View 14, for example.
- The part of the existing golf course that would be converted to residential character with open spaces, forms only a small part of the wider landscape setting to this section of the RMC. A natural buffer of vegetation already exists on both sides of the canal to the north of this area. This would intercept views of the proposed residential buildings and protect the intimate landscape character and tranquillity experienced along the footpaths to the north of the canal, such that these qualities would be practically unaffected in most locations.

- The changes to visual landscape character of introducing the proposed residential development into the western part of the Site (as mentioned above), would be mitigated as far as possible by setting back development from the RMC and providing a new landscape buffer with trees, and a native species woodland buffer to the eastern edge of the Imperial Park development. These new features would be compatible with the character of the vegetation and pathway running along the edge of the Scheduled Monument. The Landscape Masterplan demonstrates that the long-term landscape setting of the Proposed Development would have Neutral and Beneficial effects, as well as providing mitigation for the initial adverse physical changes arising from the proposed residential development.
- The historic relationship of having an open landscape to the south of the RMC which in Napoleonic times would have allowed views towards potential oncoming invasion from the coast has been eroded over time, as the grass sea wall that supports the promenade blocks views of the sea, and trees within the golf course partly interrupting views from PRoW HB83 of the promenade. The north / south green corridors that have been designed into the proposed residential parameters would maintain a level of open and verdant character in views towards the coastline (as demonstrated in the additional illustrative CGI views A-E, see Appendix F6.
- The above are described as Direct impacts, due to the relative proximity to the RMC, although they would have an In-Direct nature in terms of there being no physical change or impact upon the Scheduled Monument itself as a result of the Proposed Development, moreover a change to the surroundings in which it is experienced, as a result of the Proposed Development.

F5.76 Weighing up the localised adverse effects on the landscape setting of the RMC which relate primarily to the initial physical change of siting the proposed residential development in the western part of the Site, close to where it already exists, and balancing the Neutral and Beneficial effects of the proposals in the central and eastern parts of the Site (shown on the Landscape Masterplan), the Magnitude of Change is concluded to be Low.

F5.77 The combination of Magnitude and Sensitivity (High-Medium) and resultant potential effect in relation to the landscape setting of the RMC: Twiss Road to Seabrook Lodge Bridge section is summarised below:

- RMC: Twiss Road to Seabrook Lodge Bridge – Landscape Setting.
  Year 0. Moderate to Minor Adverse, Direct, Long-Term, Permanent – Not Significant.

Hythe Imperial Hotel - Landscape Setting

F5.78 The impacts on the landscape setting of the Hythe Imperial Hotel during Operation would be as follows:

- The proposed new Western Wing to the hotel would be joined to the western side of the Hotel, and the new Leisure Building would be introduced immediately adjacent to the Hotel on its eastern side.
- The Hotel would no longer be a stand-alone building and the new buildings introduced next to it would remove some of its prominence as a landmark feature, however, it would still remain a landmark that would still be appreciated in views gained from the promenade and other locations nearby. The eastern edge of the proposed residential

development would form a cohesive architectural feature in views from the east, so while existing views of the eastern side of the Hotel would be change, this would be Neutral overall.

- There would be a beneficial impact from removing the existing leisure building to the west of the Hotel.
- This proposed contemporary architecture (proposed new Western Wing and new Leisure Buildings) that would be introduced alongside the Hotel would challenge the perception of visual receptors and those familiar with the existing visual baseline (particularly in the Short-Term), but are assessed to be sympathetic, so that in the Long-Term they would be close to Neutral.

F5.79 The Magnitude of Change in relation to the above is assessed to be Low. There would be a notable physical change to the immediate surroundings of the Hotel and this would partially alter the way that it performs the role as a landmark building from some local viewpoints, however, it would in essence retain its fundamental character as a building of stature that reinforces local identity and would therefore be resilient to the introduction of new contemporary buildings introduced alongside it.

F5.80 The combination of Magnitude and Sensitivity (Medium) in relation to the landscape setting of the Hythe Imperial Hotel and the result potential effect upon it is summarised below:

- Hythe Imperial Hotel – Landscape Setting.
  Year 0 (onwards). Minor Adverse, Direct, Long-Term, Permanent – Not Significant.

Landscape Character

Hythe Coast District LCA

F5.81 The Magnitude of Change to the landscape character of this LCA is assessed to be Low / Negligible and Adverse, due to the localised alteration to the character of the Site to the south of the RMC (these are described above/below against the following receptors):

- The RMC: Twiss Road to Seabrook Lodge Bridge section – Landscape Setting (above).
- The Hythe Imperial Hotel – Landscape Setting (above).
- LCA A. RMC & Imperial Hythe Coastal Strip LCA' receptor (see Study Area Specific LCAs below).

F5.82 The majority of the Hythe Coast LCA would be unaffected by the Proposed Development in terms of landscape character (Neutral) and there would Neutral and Long-Term Beneficial effects upon the landscape character within the central and eastern parts of the Site, which would remain in use as open space and golf course landscapes.

F5.83 The combination of Magnitude and Sensitivity (Medium) in relation to the Hythe Coast District LCA and the resultant potential effect upon it during the operational phase of the Proposed Development is summarised below:

- Hythe Coast District LCA.
  Year 0 (onwards). Minor/Negligible Adverse, Direct, Long-Term, Permanent – Not Significant.

Local Landscape Character (Study Area Specific LCAs)

LCA A. RMC & Imperial Hythe Coastal Strip

F5.84 Changes to the local landscape character within this LCA have to some extent, been described above in relation to the effects upon the landscape setting of the Twiss Road to Seabrook Lodge Bridge section of the RMC, which forms the northern edge of the character area.

F5.85 The impacts upon this LCA would primarily relate to:

- The introduction of the proposed residential development and its north / south landscape corridors, green buffers and SUDs areas in the western part of the Site.
- The creation of new open spaces to the east of the proposed residential development and beyond that, the re-provision of the existing golf course landscape with a new Clubhouse Facility (with parking and associated landscape treatment) in the remainder of the Site.

F5.86 This would mainly affect the landscape character of the RMC & Imperial Hythe Coastal Strip LCA on a Site scale, with some corresponding localised impacts on parts of LCAs B (Princes Parade Coastline) and C (South Road Residential). The character of some views from the eastern end of LCA A (primarily from the promenade to the south of the land formerly allocated for new development at Princes Parade) would also be influenced, where residential buildings at Imperial Green, Marine and Western Parade and the Hythe Imperial Hotel already form the backdrop in terms of the visual character to distant views.

F5.87 The visual assessment identifies that there would be Adverse visual effects locally (mainly where closest to the proposed residential development), because of the initial physical change of introducing the proposed residential buildings into part of the existing golf course. These adverse changes to visual landscape character would gradually reduce over time, as visual acclimatisation takes place and the new character of the local landscape is received and progressively enhanced as planting and habitats establish and mature, along with the gradual weathering of building materials. Importantly, visual acclimatisation and appreciation of the changes to local landscape character would be aided by the proposed architectural and land-use character of the proposed residential development, because:

- It would be of an appropriate architectural and style and character, appropriate to its local context close to the Hotel and promenade, and sympathetic to the RMC, as required by the Design Code.
- Its scale and massing building would be largely compatible with the existing built development to the west, as secured by the Storey Height Plan (drawing no. 400.03) (Appendix C1).
- It would improve the character and identity of the eastern edge of built development in this part of Hythe, using a strong layout of Crescent Blocks (referred to in the Design Code) next to the adjoining area of open space and wider Princes Parade coastal strip beyond to the east. By contrast, the current eastern edge of development in this area is formed by a comparatively ad hoc arrangement of buildings at Imperial Park of various heights, whose internal arrangement relates more to the formal geometry of the Hythe Imperial Hotel to the south than the presence of the wider landscape to the east.

- It would be a high-quality and sustainable development terms of its architecture and landscape design (as required the Design Code and Landscape Masterplan), ultimately introducing a different character to this part of Site, but not one which is inherently inappropriate in terms of its character. Once established, the new landscape character of the Site would be freely capable of being valued in the future, once favourable perceptions to the initial changes to the local character and appearance of the local area have been formed by as a result of people using the proposed open spaces and leisure facilities. These would provide an enhancement of the use and enjoyment of the local landscape for a greater number and diversity of people in the Long-term and beyond.

F5.88 In summary, the assessed effect on the landscape character of the RMC & Imperial Hythe Coastal Strip LCA as a result of the Proposed Development overall, has involved weighing up the balance of the following:

- The Adverse change to local landscape character brought about by the introduction of the proposed residential development in the western part of the character area, balanced by the points raised above regarding its character and design, Primary Mitigation and proximity to existing development of a similar residential land-use character to the west.
- Similarly, the Adverse impacts to the wider landscape setting of the RMC would be limited in size / extent and would be mitigated as far as possible by setting the proposed residential development away from the edge of the RMC, integrating landscape and visual permeability across it in a north / south direction and through the considered design of proposed building heights, massing and layout.
- The Long-Term beneficial effects of creating new open spaces and a naturalistic golf course landscape in the majority of the Site, which are sympathetic to the presence of the RMC to the north and responsive to the underlying character of the landscape.
- The predominantly Long-Term Neutral effects upon Topography, Vegetation and Urban Grain which are components of local landscape character. There would be an Adverse effect on Vegetation by removing some trees within the golf course, but this would be compensated for in the longer-term by planting new trees and providing new habitat enhancements.
- The physical impacts would only take place in part (roughly half) of the RMC & Imperial Hythe Coastal Strip LCA. Changes to visual landscape character in the eastern half of this area would be predominantly Neutral in the Long-term, due to the parameters set for the Proposed Development and its Primary Mitigation, including the provision of the character and design of its architecture and landscape treatment, the provision of new open spaces and the new golf course landscape in the central and eastern part of the Site which would form a separation between the proposed residential development and the remainder of RMC, undeveloped Princes Parade parcel of land and its promenade to the east.

F5.89 Overall, the Magnitude of Change upon the landscape character of the RMC & Imperial Hythe Coastal Strip LCA is assessed to be Low, because the principal adverse impact within it (the proposed built residential development) would occur in a small part of the western end of the character area, close to where there is already existing residential development. In the central and eastern parts of the Site there would be Neutral and Beneficial impacts in

the Long-term, and the effect on the remaining part of the RMC and Imperial Coastal Strip LCA to the east is assessed to be Neutral.

F5.90 The combination of weathering of building materials, the maturing of landscape planting and establishment of the proposed naturalised habitats, and the general shift in perception over time (all described above) mean that overall, the changes to local landscape character within this LCA in the Long-term would move closer to Neutral.

F5.91 The combination of Magnitude and Sensitivity (Medium) in relation to the landscape setting of LCA A: RMC & Imperial Hythe Coastal Strip and the resultant potential effect upon itis summarised below:

- LCA A. RMC & Imperial Hythe Coastal Strip:
  Year 0. Minor Adverse, Direct, Short to Medium-Term, Permanent – Not Significant.
  Year 15. Minor Adverse / Neutral, Direct, Long-Term, Permanent – Not Significant.

LCA B. Princes Parade Coastline

F5.92 The changes to local landscape character described above for the RMC & Imperial Hythe Coastal Strip (LCA A) would be largely consistent with those for the Princes Parade Coastline (LCA B), in that the localised Adverse changes brought about by the initial introduction of large residential buildings at the far western end of the existing golf course landscape where previously there were none would have a noticeable physical impact, but the nature of change would gradually move closer to Neutral over time.

F5.93 Elsewhere there would be Neutral and Beneficial effects arising from the creation of new public open spaces, play provision and the Adventure Golf Course in the adjoininig character area immediately to the north, and these would be compatible with the leisure land-use of Princes Parade.

F5.94 Further to the east along Princes Parade towards Sandgate Esplanade, the changes to landscape character within the Site would be predominantly Neutral at Year 0, as the proposed residential development glimpsed in the distance would be largely characteristic of the existing visual baseline (glimpses of large buildings and residential development in the distance, alongside the Hythe Imperial Hotel), and Magnitude would reduce with distance from the Site further to the east towards Sandgate.

F5.95 Overall, the Adverse and Beneficial effects to the intrinsic character of the Princes Parade Coastline LCA are assessed to balance each other out for this LCA. They would also be highly localised and generally of a Low Magnitude of Change in terms of their characteristics relative to the entire stretch of the Princes Parade Coastline LCA.

F5.96 The main valued characteristics of this LCA (fundamentally that is a linear coastal open space which offers leisure opportunities, with open spaces to the north of it and some residential development at its north-western end on the outskirts of Hythe, are robust enough to withstand the Adverse change of a small extension to the existing development around Imperial Park and the Hythe Imperial Hotel, without Significant Long-term Adverse consequences.

F5.97 The combination of Magnitude and Sensitivity (Low) in relation to the landscape setting of LCA B: Princes Parade Coastline and the resultant potential effect upon itis summarised below:

- LCA B. Princes Parade Coastline LCA:
  Year 0 (onwards). Minor Adverse, becoming Neutral, Direct, Long-Term, Permanent.

LCA C. South Road Residential

F5.98 The impact upon the landscape character of the South Road Residential (LCA C) would be highly localised and mainly relate to:

- the introduction of the proposed new Western Wing and new Leisure Building next to the Hythe Imperial Hotel and;
- the introduction of the proposed residential development to the east of the character area.

F5.99 The former would have a localised Adverse effect on views (as described below under View 3 and part of View 10 for private residential receptors) and a Minor Adverse effect upon the local landscape setting of the Hotel, which are both are assessed separately.

F5.100 The latter would also have an Adverse effect on the visual amenity from some residential properties along the eastern edge of the Imperial Park development (assessed separately under View 14), but the effect on the local character and setting of Imperial Park is considered to be low-level Adverse, because it is residential development in a predominantly urban area. The wider character of the South Road Residential LCA would be largely unaffected by the introduction of the Proposed Development, such that the Magnitude and nature of change overall is assessed to be Negligible and Neutral. The impact upon the part of the Hythe Conservation Area that coincides with this LCA would be Neutral.

F5.101 The combination of Magnitude and Sensitivity (Low) and resultant potential effect in respect of the South Road Residential LCA to the operational phase of the Proposed Development is summarised below:

- C. South Road Residential LCA:
  Year 0 (onwards). Negligible Neutral, Direct, Long-Term, Permanent – Not Significant

Visual Receptors

View 1: South-east from Sunny Banks / Old London Road

F5.102 Residential receptors who are familiar with the existing baseline represented by View 1 would experience the adverse impact of introducing new components (the uppermost parts of the proposed residential buildings and proposed new Western Wing and Leisure Building along their north-western elevations, into part of the view where they don't currently exist. These would occupy a very small part of the view and would be perceived as forming part of the urban fabric of Hythe. This adverse change is assessed to be of Negligible magnitude and would relate only to the introduction of a small amount of built form where it did not previously exist in the view, rather than any features of the Proposed Development being dominant or out of character with the surrounding townscape. Views of the English Channel would remain largely unaffected by the introduction of the Proposed Development and this would not have a significant adverse effect on public or private visual amenity.

F5.103 Based on AVRs 0 and 1 for View 1 (Appendix F6) the Magnitude of Change is assessed to be Negligible. The aesthetic / perceptual change to the view would not be fundamentally altered and the Proposed Development would not become a dominating feature that would draw attention away from the main feature of value in the view, which is the English Channel. While this could be initially Adverse for some residential receptors, the long-term effect is assessed to be Neutral overall, as the changes would be so minimal that they would become insignificant in this timeframe.

F5.104 The combination of Magnitude and Sensitivity for each assessed receptor group for View 1, is summarised below:

- View 1 – Private Residents - Old London Road / Nursery Fields Area (Medium Sensitivity):
  Year 0. Negligible Adverse, Direct, Short to Medium-Term, Permanent- Not Significant.
  Year 15. Negligible Neutral, Direct, Long-Term, Permanent – Not Significant.
- View 1 – Local People (Low Sensitivity):
  Year 0 (onwards). Negligible and Neutral, Direct, Long-Term, Permanent – Not Significant.

View 2: South-west from RMC, near Twiss Road Bridge

F5.105 Based on AVRs 0 and 1 for View 2 (Appendix F6) the Magnitude of Change is assessed to be Negligible. The Proposed Development would not be visible due to intervening built development at Imperial Park and along Twiss Road, so its effect on the view would be Nil.

F5.106 The nature of change at Year 0 would be Neutral, as the Proposed Development would have neither a beneficial or an adverse outcome on the view at Year 0. By Year 15, the proposed tree planting to the north of the Imperial Park development would be mature and would have a Beneficial effect on the view, by softening and filtering views of the existing buildings at Imperial Park.

F5.107 The combination of Magnitude and Sensitivity (Medium)for View 2 is summarised below:

- View 2 – Local People and Interest Groups:
  Year 0. Negligible Neutral, Direct, Short to Medium-Term, Permanent – Not Significant.
  Year 15. Negligible Beneficial, Direct, Long-Term, Permanent – Not Significant.

View 3: West / north-east from eastern end of Marine Parade

F5.108 The nature of change upon View 3 would be complex as there would be Adverse changes for sensitive receptors brought about by the introduction of large buildings into the landscape where they did not previously exist, but these need to be considered alongside the Neutral effects that would occur over time and the effects of embedded Primary Mitigation, and the beneficial effect of removing the existing Hotel Leisure Building and replacing it with a well designed and high quality development

F5.109 The Neutral nature of change in upon View 3 would be shaped by the design parameters set for the proposed residential development (building height and massing) and these would be compatible with those of the existing buildings to the west of the Site. The Proposed

Development would introduce a new architectural aesthetic into the view which would reinforce local distinctiveness and sense of place and while this would be contemporary in style, the proposed residential buildings glimpsed would be designed to consider their surroundings and local context and would draw on the distinctive character of the area, including the site's rich history (as secured by the proposed Design Code), and it is assessed that there would be a level of acceptance and understanding by the identified receptors to accommodate this change in the view within the Long-term.

F5.110 The proposed new Western Wing would be prominent in the view and partly softened by the retention of existing boundary vegetation in the foreground and mature trees in the periphery (left) of the view. It would be a slightly lower in height compared with the existing Hotel building and would have complementary architectural references in its appearance (as set out in the Design and Access Statement). It would replace an existing detracting feature in the view, as the existing leisure building would be demolished. The proposed Hotel Leisure Building would be comparatively lower in height and glimpsed beyond the existing Hotel Ballroom entrance.

F5.111 New residential buildings would be introduced along the promenade to the east (right) of the Hythe Imperial Hotel, replacing views of the wooded hillside in the Seabrook Road / Cliff Road area and a small part of Hospital Hill in the distance. This is assessed to be a minor adverse change, as the wooded backdrop to the north of the Site with intermittent built development amongst it forms a secondary and distant inland feature and views of the more dramatic landform of Hospital Hill in the distance (which is more important to the overall context and importance of the view) would remain unimpeded. The Proposed Development would have a localised effect on the view east along the coastline, forming a short continuation of the development which already present in this part of Hythe and it would not detract from views of the Hotel, from the visual enjoyment of the coastline, or from the panoramic views out over the English Channel.

F5.112 The components in the view that would be lost (as described above) through the introduction of buildings along the promenade are distant / peripheral and not critical to the visual enjoyment from this location. A visual connection to the undeveloped golf course landscape in the distance, glimpsed beyond the proposed residential buildings would be retained.

F5.113 The Magnitude of Change is assessed to be borderline Medium / Low overall. The size and scale of the physical impact on the view would be mainly Medium, but it would be Low in terms of the elements lost and their contribution to the contribution these make the view. The geographical extent would be Site/Local (Low), and while the Proposed Development would be Long-term and Permanent, the nature of Adverse change is assessed to be Short to Medium-term and gradually becoming closer to Neutral in the Long-term, as the initial visual change is processed and materials weather over time and become more visually recessive in the landscape.

F5.114 Sensitive receptors (Local People and Interest Groups) with a High Sensitivity, combined with a Medium-Low Magnitude are assessed to experience a Major to Moderate Significance of Effect at Year 0, which is predicted to reduce by the Long-Term to Minor Adverse / Neutral.

F5.115 Receptors involved in Active Recreation and Seasonal Visitors (Low Sensitivity) the nature of change is assessed to be Adverse, becoming Neutral.

F5.116 The combination of Magnitude and Sensitivity for View 3 and resultant potential effects upon visual receptors are summarised below:

- View 3 – Local People / Interest Groups:
  Year 0. Major-Moderate Adverse, Direct, Short to Medium-Term, Permanent – Significant.
  Year 15. Minor Adverse / Neutral, Direct, Long-Term, Permanent – Not Significant.
- View 3 – Active Recreation and Seasonal Visitors:
  Year 0. Minor Adverse, Direct, Short to Medium-Term, Permanent – Not Significant.
  Year 15. Minor Neutral, Direct, Long-Term, Permanent – Not Significant.

View 4: West / north-west from Princes Parade

F5.117 There would be a range of Adverse, Neutral and Beneficial impacts upon View 4 (as summarised below), with reference to the Illustrative CGI in Appendix F6. The buildings within the eastern and southern end of the outline area (proposed residential development) would be introduced into part of the view, occupying part of what is currently occupied by existing residential buildings at Imperial Park and by the Hotel, as well as parts of the sky. These would be minimal adverse changes to the view, due to the Primary Mitigation embedded in the design, which would limit the extent of the proposed residential development overall and site it at the far western end of the Site, in front of where existing residential buildings feature in the view of a similar size.

F5.118 The overall height to the proposed residential buildings would appear consistent with the prevailing ridgeline of development at the Hotel and along Marine and Western Parade towards the left side of the view. The low height and finished floor level of the proposed Golf Clubhouse would also form effective visual mitigation such that its effect on the view would be Neutral. The existing glimpsed view of the tower / upper part of the Church of St. Leonard within the central part of Hythe would be retained.

F5.119 The proposed landscape treatment of the new 9-Hole Golf Course would be visible in the central part and right-side of the view and these would represent beneficial enhancements by introducing a more naturalistic landscape character into views from Princes Parade.

F5.120 The Magnitude of Change in respect of View 4 is assessed to be Low, due to its limited Size/Scale, Geographic Extent and Prominence. The Proposed Development would be Permanent and Long-Term, however the adverse effects on visual amenity would be limited in duration and would reduce in the Long-Term as described for View 3 above (visual processing and familiarity after the initial physical change occurs and the weathering of building and external materials), combined with the effects of new planting and habitats maturing in the foreground to soften and filter views of the proposed residential buildings.

F5.121 For many receptors involved in active recreation and / or seasonal visitors, the nature of changes would be Low / Negligible and Neutral, because of the limited scale of change and the Low degree of perceived change.

F5.122 The combination of Magnitude and Sensitivity for View 4 and resultant potential effects upon visual receptors are summarised below:

- View 4 – Local People / Interest Groups (High Sensitivity):
  Year 0. Moderate Adverse, Direct, Short to Medium-Term, Permanent – Not Significant.
  Year 15. Minor Adverse / Neutral, Direct, Long-Term, Permanent – Not Significant.
- View 4 – Active Recreation and Seasonal Visitors (Low Sensitivity):
  Year 0 (onwards). Minor to Negligible Adverse, becoming Neutral, Direct, Long-Term, Permanent – Not Significant.

View 5: South from Public Footpath HB56

F5.123 The only new building proposed in the eastern part of the Site is the proposed Golf Clubhouse, the design of which is low-level in height and design, incorporating timber cladding, a green roof and local Kentish ragstone, to minimise its visual impact. Its car parking would be appropriately landscaped as shown on the Landscape Masterplan and has its presence in the landscape would be closely connected with the existing land-use, its landscape and visual impact would be predominantly Neutral.

F5.124 Illustrative Photo 45 (see Appendix F6) illustrates the existing view west / south-west from viewpoint location 5 and from this it is assessed that views towards the proposed residential development would be similar to those assessed under View 17, partly screened by the vegetation running along the informal footpath running through the central part of the Site and appearing in front of where parts of the Hythe Imperial Hotel and existing buildings at Imperial Park are currently visible.

F5.125 As a result of the above, AVR 0 and AVR 1 do not feature any new built development. The entirety of the existing golf course would be replaced with the proposed new golf course landscape, and the existing non-designated World War concrete structure would be removed. The new landscape features that would be introduced into this part of the golf course are shown in the Landscape Masterplan, and these are assessed to be beneficial in the Long-term, as once planting and habitats are established and mature, they would enhance visual amenity by creating new landscape features and habitats of greater visual appeal and wildlife interest. This would be coupled with the introduction of beneficial features such as the Heritage Trail and shared pedestrian cycleway, set back from the southern edge of the RMC.

F5.126 The Magnitude of Change for View 5 is assessed to be Low, because the changes to the golf course landscape would be small and would develop over time. The removal of the non-designated World War concrete structure would be Negligible and Neutral.

F5.127 The combination of Magnitude and Sensitivity (High) for View 5 and resultant potential effects upon visual receptors is summarised below:

- View 5 – Local People and Interest Groups:
  Year 0. Minor Neutral, Direct, Short to Medium-Term, Permanent (Not Significant).
  Year 15. Minor Beneficial, Direct, Long-Term, Permanent (Not Significant).

View 6: South from Public Bridleway HB65 (Cannongate Footbridge)

F5.128 Referring to the AVRs 0 and 1 for View 6 (Appendix F6) the Magnitude of Change from publicly accessible locations is assessed to be Negligible. Only very small parts of the

Proposed Development would be visible with fragmented glimpses of part of the south-eastern edge of the proposed residential buildings to the right of the view. The proposed Golf Clubhouse would be hidden by intervening vegetation in the left of the view.

F5.129 The view is also used to broadly represent potential glimpsed views from private residential properties to the north of the proposed residential part of the development (approximately 30-35 properties south of Seabrook Road, from mid-way along Earlsfield Road to the west, to the edge of Saxon Close to the east). Judged by aerial photography and site observations, these views are anticipated to be interrupted by intervening vegetation within gardens, along property boundaries and by the mature trees and shrub vegetation situated on both sides of the RMC. They are also anticipated to be restricted to the uppermost rear (south) facing windows, with intervisibility also restricted seasonally, when vegetation is in leaf.

F5.130 Based on the above analysis, the Magnitude of Change for these receptors is assessed to range between Low for some receptors and Negligible for others, and due to the low number of people anticipated to be affected to a small degree, this is assessed to be Not Significant.

F5.131 The combination of Magnitude and Sensitivity for View 6 and resultant potential effects upon visual receptors are summarised below:

- View 6 – Private Residents - North of the Site, south of Seabrook Road (High Sensitivity):
  Year 0 (onwards). Moderate to Minor Adverse (Negligible for some), Direct, Long-Term, Permanent – Not Significant
- View 6 – Local People and Interest Groups (Medium Sensitivity):
  Year 0 (onwards). Negligible Adverse / Neutral, Direct, Long-Term, Permanent – Not Significant.
- View 6 – Active Recreation (Low Sensitivity):
  Year 0 (onwards). Negligible Neutral, Direct, Long-Term, Permanent – Not Significant.

View 7: South-east from North Road (Hythe Conservation Area)

F5.132 The uppermost parts and rooftops of the north-western façades of the proposed residential buildings and potentially fragments of the rooftops of the southernmost proposed residential buildings would be glimpsed in the distance of the view, in a gap between buildings to the right of the church tower and just beyond the existing development at Imperial Park. This would occupy a small part of the view currently occupied by the sea in the distance, although much of the sea beyond that would remain visible.

F5.133 Similar to View 1, this would be a glimpsed view of part of the Proposed Development from distance, where all receptors would experience the view from (and as part of) a developed urban context.

F5.134 Long-Term mitigation would be provided by the woodland buffer planting which is proposed along the eastern edge of Imperial Park, softening and fragmenting views of the existing edge of the new residential buildings in the western part of the Site. Primary Mitigation embedded within the design also includes keeping the proposed building heights similar to nearby existing buildings (such as the taller buildings at Imperial Park, the Hythe Imperial Hotel, and those at Marine and Western Parade, although these are out of shot in

this particular representative view). The green roofs of the proposed Leisure Building and Hotel Extension (if slightly glimpsed in some residential views) would also soften their visual impact.

F5.135 The Magnitude of Change for View 7 from publicly accessible locations is assessed to be Low, and practically Negligible due to the glimpsed and distant nature of the view. For some Local People / Interest Groups, the nature of change at Year 0 would be Neutral, while for others in these receptor groups it could be Minor-Adverse in the Short to Medium-Term who are familiar with baseline conditions, but given the surrounding urban context viewed in front of the Proposed Development, the limited degree to which it would be occupy part of the view, the Long-Term nature of change is assessed to be Neutral.

F5.136 For Private Residents who would gain a glimpsed view of the Proposed Development, this would be from distance and an oblique angle. The Magnitude of Change is judged to be Low, with the Significance of Effect assessed to be Moderate in the Short to Medium-Term. Considering the effects of Primary Mitigation (described above), and the surrounding prevailing developed urban context in the view which the proposed development would soon become integrated with visually once materials have weathered over time and a degree of visual processing and familiarity with the new visual baseline has taken place, the Long-Term effect upon these receptors is assessed to be Neutral (based on professional judgement).

F5.137 As this is only a general assessment of these receptor groups which is limited to views gained from ground-level site observations and aerial photography, it is impossible to assess the numbers of private residents who might be affected by this view within the scope of this LVIA, but due to the extent of intervening built development and vegetation which is experienced in the locality of Viewpoint 7, the overall numbers of people affected are anticipated to be low, and views would be restricted to a small number of upper floor windows (Not Significant).

F5.138 The combination of Magnitude and Sensitivity for View 7 and resultant potential effects upon visual receptors are summarised below:

- View 7 – Private Residents - Southern edge of North Road (High Sensitivity):
  Year 0. Moderate Adverse, Direct, Short to Medium-Term, Permanent - Not Significant.
  Year 15. Moderate Neutral, Direct, Long -Term, Permanent - Not Significant.
- View 7 – Local People and Interest Groups:
  Year 0. Minor Adverse, Direct, Short to Medium-Term, Permanent – Not Significant.
  Year 15. Minor Neutral, Direct, Long-Term, Permanent – Not Significant.

View 8: South from Cannongate Road

F5.139 Referring to the AVRs 0 and 1 for View 8 (Appendix F6) the Magnitude of Change from publicly accessible locations is assessed to be so Negligible that it would be practically Nil. It is possible that a fragment of the proposed golf course landscape in the western part of the Site would be visible, but this would be barely perceptible. All built development within the Proposed Development (including the proposed Golf Clubhouse, visible in the AVR 0 for View 8) would hidden from view by existing intervening vegetation and built development.

F5.140 The view is primarily used to broadly represent (as far as is possible from publicly accessible locations) potential glimpsed views from private residential properties to the north of the proposed residential part of the development, north of Seabrook Road (approximately 35-40 properties north of Seabrook Road, in the Elm Gardens area). Due to the extent of existing intervening vegetation and built development described above (and for View 6), the Magnitude of Change is assessed to be Low, while for some it would be Negligible. Periodic / seasonal weather conditions such as mist and fog may also reduce Magnitude on some occasions.

F5.141 Based on professional judgement of the elevation of properties affected by representative View 8, probably from upper floor windows rather than main habitable areas, alongside site observations and analysis of aerial photography to determine the likely impact of intervening built development and vegetation in the view, it is assessed that the Moderate Adverse effects for View 8 would be Not Significant.

F5.142 The combination of Magnitude and Sensitivity for View 8 is summarised below:

- View 8 – Private Residents – North of Seabrook Road / Elm Gardens area (High Sensitivity):
  Year 0 (onwards). Moderate Adverse (Negligible for Some), Direct, Long-Term, Permanent – Not Significant.
  View 8 – Local People (Low Sensitivity):
  Year 0 (onwards). Negligible (practically Nil) – Not Significant.

View 9: South from Cliff Road

F5.143 In the AVR and 1 for View 9 (Appendix F6) the proposed residential buildings in the southern, eastern and central part of the Site, and some rooftops of the northern residential buildings would enter the view, replacing existing views of the western part of the golf course, part of the Princes Parade and a small part of the sea beyond. The green roof and upper part of the northern elevation of the proposed new Leisure Building would also be glimpsed. Part of the proposed new Leisure Building and proposed residential buildings would replace the existing Hotel car park and parts of the eastern edge of existing residential buildings at Imperial Park.

F5.144 The view of the majority of the English Channel would remain, due to the design parameters set for proposed residential development.

F5.145 The view for private residents would be experienced within a broad panoramic context where the introduction of the proposed buildings into the view would represent a noticeable but small change when considered against the wider panoramic views available from this location and the existing developed context of the south-eastern and southern edge of Hythe. The Magnitude of change for these receptors would be Medium, with elements of Low, attributed to the fact that views out over the English Channel would be mostly unimpeded and views would be affected seasonally when vegetation that would appear in front of the proposed buildings is in leaf, and occasionally during misty or foggy weather conditions. In the Long-term the green roofs on some of the residential buildings and on the new Leisure Building within the Proposed Development (see Design Code) would soften their visual impact, together with tree planting along the northern edge of the development.

This in combination with the weathering of materials and a degree of visual processing is anticipated to reduce the nature of change slightly to Moderate Adverse.

F5.146 For Local People, the change to the view would be glimpsed from street level, appearing as a small extension to the urban development that already exists, however, in terms of view gained south towards the Site from public vantage points gained from Cliff Road), this is a highly unusual view and glimpsed between buildings. The building parameters and surrounding developed context of Cliff Road (and that in the south-eastern edge of Hythe, glimpsed in the view) would mean the Proposed Development would appear comfortably within the existing visual baseline, such that in the Long-term it would barely be noticed and effects would be Neutral.

F5.147 The combination of Magnitude and Sensitivity for View 9 is summarised below:

- View 9 – Private Residents - Western end of Cliff Road, north of Cannongate Road (High Sensitivity):
  Year 0. Major Adverse, Direct, Short to Medium-Term, Permanent – Significant.
  Year 15. Moderate Adverse, Direct, Long -Term, Permanent – Significant.
- View 9 – Local People (Low Sensitivity):
  Year 0. Minor Adverse, Direct, Short to Medium-Term, Permanent – Not Significant.
  Year 15. Minor Neutral, Direct, Long -Term, Permanent – Not Significant.

View 10: East from South Road

F5.148 The existing view of the western elevation of the Hythe Imperial Hotel (available during leaf fall) would be replaced with the western elevation of the proposed new Western Wing Building (see also View 3), and views of this building would be softened and filtered when vegetation is in leaf by the canopies of the retained tree group to the south of the Hotel entrance on Twiss Road. Some of the proposed residential development in the south / south-western part of the proposed residential area would enter the part of the view in the distance. The Magnitude of change for private residential receptors would be Medium to Low, attributed to the amount of the view that is anticipated to be affected (which would probably vary from properties), balanced by the low receptor numbers that would be affected (estimated to be less than 20 homes at the south-western corner of Imperial Green and at the eastern end of South Road and Marine Parade), see also illustrative Photo 43 (Appendix F6). The view would be seasonally affected by vegetation in leaf, and views out towards the English Channel would not be completely lost.

F5.149 From street level, the western end of the Hotel would be replaced with a view of the new contemporary, yet sympathetically designed new Western Wing Building, but there would not be an overall increase in the amount of built form introduced into this part of the view (a view of part of one building would replace another). The amount of the view occupied by the proposed residential development would be small and these features would be viewed in the background, beyond existing buildings and from within an existing developed and urban area, predominantly screened by the mature tree canopies along Twiss Road and at the edge of the Hotel, when in-leaf. The Magnitude of Change for these views would therefore be Low, and the nature of change is assessed to be Neutral for these receptors.

F5.150 The combination of Magnitude and Sensitivity for View 10 and resultant potential effects upon visual receptors are summarised below:

- View 10 – Private Residents – Southern end of Twiss Road / Eastern end of South Road (High Sensitivity):
  Year 0 (onwards). Major to Moderate Adverse, Direct, Short to Medium-Term, Permanent – Significant.
  View 10 – Local People (Low Sensitivity):
  Year 0 (onwards). Minor Neutral, Direct, Short to Medium-Term, Permanent – Not Significant.

View 11: West / north-west from Princes Parade (Smuggler's Slipway)

F5.151 The nature of change upon View 11 would be varied, with Adverse changes for sensitive receptors brought about by the introduction of large buildings into the landscape where they did not previously exist. These need to be weighed alongside the effects of embedded Primary Mitigation in the design and the Neutral and Beneficial effects of the Proposed Development that would occur in relation to this view.

F5.152 The illustrative CGI for View 11 (Appendix F6) demonstrates that the proposed residential buildings in the eastern (and southern) parts of the Site would replace the following components in the view, thereby having an adverse effect due to the initial large physical change and close proximity to the Site. This would include the loss of the following components in the view:

- Distant / glimpsed views of the rooftops in the centre of Hythe, including the tower / upper part of the Church of St. Leonard.
- Views of the tree canopies and dense scrub vegetation along the RMC and the grass and trees within the western part of the existing golf course. Glimpses of the vegetation beyond that, in the north / north-western part of Hythe would also be replaced by views of the upper parts of the proposed residential development in the north-eastern part of the residential area. Views beyond that, of most of the upper part of the tree canopy which forms the central horizon would remain, glimpsed beyond the central and northern part of the Cresent Blocks (refer to Design Code).
- Views of the edge of the Imperial Park development would be replaced by the proposed residential development, although that part of the view already contains existing residential buildings at Imperial Park, which would be of a similar, but slightly lower size.

F5.153 Other important elements in the wider panoramic view such as the sea, beach, promenade and distant views along the coastline towards Romney Marsh and Dungeness would not be fundamentally affected by the Proposed Development. Views of the southern façade of the landmark Hotel would still be possible.

F5.154 The character and appearance of the proposed residential buildings set out in the Design Code shows that this part of the Proposed Development would have an appropriate response and connection to the surrounding coastal context and of Hythe, meaning that there is scope for the longer-term impact on visual character to be gradually accepted and appreciated over time. This process would be gradually accelerated by the weathering of external materials which would soften visual impact and assimilate this part of the Proposed Development with its surroundings and new landscape setting. The Proposed Development would also introduce into the view new and enhanced open space provision

and create new visual linkages to the open space areas to the east of the proposed residential area and the remainder of the Site to the east.

F5.155 The Magnitude of Change for View 11 is assessed to be Medium-High. The Geographical Extent would be Low as the impact on the view would be Site / Local in extent. The Size / Scale would be Medium to High, but the degree of aesthetic alteration would be Medium, as they would be partly characteristic of the receiving landscape in terms of the pre-existing developed context to the west of the Site.

F5.156 The nature of change for Local People and Interest Groups would be Adverse, but there would be elements of Neutral due to the aesthetic alteration described above. There would also be Neutral and Beneficial effects on the view in the Long-term, brought about by the introduction of new open spaces for public use, which would be visually engaging. In tandem with the gradual weathering and assimilation of building and external hard materials, and the maturing of planting and habitats within the proposed landscape scheme, it is predicted that there would be a slight shift in the nature of change towards Neutral (Major Adverse, becoming Moderate Adverse) for this receptor group.

F5.157 The nature of change for receptors involved in active recreation and seasonal visits would be Adverse initially, due to the large buildings introduced into the view, but this is anticipated to become Neutral in the Short-term, because perception of the adverse changes brought about by introducing the Proposed Development into the view would be less. Some of these receptors would be attracted to the new open spaces and leisure facilities the Proposed Development would offer (Beneficial).

F5.158 The combination of Magnitude and Sensitivity for View 11 and resultant potential effects upon visual receptors are summarised below:

- View 11 – Local People and Interest Groups (High Sensitivity):
  Year 0. Major Adverse, Direct, Short to Medium-Term, Permanent – Significant.
  Year 15. Moderate Adverse, Direct, Long -Term, Permanent – Significant.
- View 11 – Active Recreation and Seasonal Visitors (Low Sensitivity):
  Year 0 (onwards). Minor Adverse, becoming Neutral Direct, Long-Term, Permanent – Not Significant.

View 12: West from former firing point at 'kink' in canal

F5.159 Referring to the AVRs 0 and 1 for View 12 (Appendix F6) the Magnitude of Change is assessed to be Negligible for the single-frame view and Low for the panoramic view. This is because the vegetation along the canal would interrupt views of the proposed residential development, as represented by the single-frame view AVRs for View 12. However, from the wider panoramic photo, and illustrative Photos F24 and F25 (see Appendix F6), it can be judged that the upper parts of some of the proposed residential development would be glimpsed (refer to Minor Adverse effects assessed under representative View 17).

F5.160 In terms of the view along the canal (which is primarily included for the Heritage Assessment), AVR 1 demonstrates that tiny fragment of the part of one of the northernmost proposed residential buildings would be glimpsed to the left of the RMC and small glimpses of part of the crescent-shaped building would be glimpsed in the left of the single-frame view. The majority of the proposed residential development would be hidden by

intervening vegetation in leaf fall and where glimpsed, it would be away from the focused line of sight which follows the canal in the centre of the view.

F5.161 This would represent a Negligible Adverse effect on the view that in the long-term is assessed to be so small as to be Neutral overall.

F5.162 The combination of Magnitude and Sensitivity for View 12 and resultant potential effects upon visual receptors are summarised below:

- View 12 – Local People (Low Sensitivity):
  Year 0 (onwards). Minor to Negligible Adverse, Direct, Short to Medium-Term, Permanent – Not Significant.
- View 12 – Interest Groups (Medium Sensitivity):
  Year 0. Minor to Negligible Adverse, Direct, Short to Medium-Term, Permanent – Not Significant.

View 13: West from Seabrook Lodge Footbridge

F5.163 The eastern edge of the proposed residential development (principally the Crescent Blocks and south-eastern corner of the Promenade Blocks – refer to Design Code) would enter the view, replacing the existing view of the eastern façade of the Hythe Imperial Hotel and part of the existing residential buildings at Imperial Park, along with small parts of the sky to the left and slightly above these features (respectively). The lower part of the central and northern end of the crescent building and most of the northernmost residential buildings would be screened by existing vegetation running along the southern edge of the RMC.

F5.164 The upper part of the north of the residential development would be glimpsed, beyond the vegetation running alongside the canal, although this would be less visible seasonally when the intervening vegetation is in leaf. There would be a perception (in this particular view) that the northernmost part of the residential development extends closer to the RMC than it actually does, due to the slight change in direction at the kink in the canal further along its length, relative to the line of sight along the central axis of the canal from the footbridge. In views nearby (e.g. View 17 for example), this perception would be different, as the space that would exist between the proposed buildings and the RMC would be clearer to see.

F5.165 The Magnitude of Change in the view is assessed to be Medium to Low, as a small part of the proposed residential development would be visible from distance. This would be partly screened from view by existing vegetation (especially when in leaf). The new residential buildings would replace part of the view which is already occupied by buildings of a similar size and height. In this regard, Magnitude is kept Low by the Primary Mitigation embedded in the design, in terms of building size, height and massing parameters and the siting of the proposed residential development in the western part of the Site where it would be close to existing built development at Imperial Park and the Hotel. Part of its northern end would be close to the RMC in this particular view, but the magnitude of this particular impact is assessed to be Low (occupying a small part of the view, partly screened by existing vegetation).

F5.166 The existing glimpse of the landmark Hotel building would be lost, but the proposed Crescent Block next to the proposed eastern open space area and new golf course would form a new architectural feature of a consistent height and integral appearance (see Design

Code), which would sit comfortably within its context, replacing the existing eastern edge of Imperial Park which is comparatively disparate.

F5.167 The illustrative CGI for View 17 (from a nearby location to left, immediately to the south of the footbridge) in tandem with the Landscape Masterplan show that new planting and habitats within the intervening landscape would soften and filter views of the proposed residential development and in the foreground (in the left of the single-frame and wider panoramic view) the new golf course landscape would have a the Beneficial effect on the view of naturalising the appearance of the golf course and create a new landscape setting to the development, and this would gradually become more apparent as the proposed landscape features and habitats in the eastern part of the Site mature. In the Long-Term, this change would occur alongside a degree of visual processing where receptors become more familiar with the initial physical changes to the view, combined with building materials becoming more visually recessive in the landscape. This would have the effect of shifting the nature of change closer to Neutral over time, becoming Minor-Adverse for some and Neutral for others (therefore Not Significant in the Long-term, based on professional judgement).

F5.168 The combination of Magnitude and Sensitivity (High) for View 13 and resultant potential effects upon visual receptors is summarised below:

- View 13 – Local People and Interest Groups:
  Year 0. Major to Moderate Adverse, Direct, Short to Medium-Term, Permanent – Significant.
  Year 15. Minor Adverse and Neutral, Direct, Long -Term, Permanent – Not Significant.

View 14: South-east from southern towpath of RMC, Public Bridleway HB83

F5.169 The nature of change upon View 14 would be varied, with Adverse changes brought about by the introduction of large buildings into the landscape where they did not previously exist. These need to be weighed alongside the effects of embedded Primary Mitigation in the design and the Neutral and Beneficial effects of the Proposed Development that would occur in relation to this view.

F5.170 The illustrative CGI for View 14 (Appendix F6) demonstrates that the proposed residential development in the northern and western parts of the Site would enter the view where currently there is a golf course landscape with trees and glimpsed views of the grass sea wall which supports the promenade beyond, and part of the sky above it.

F5.171 The factors affecting the assessed Magnitude (High / Medium) and nature of change (Adverse, becoming closer to Neutral for some receptors) for Local People and Interest Groups in relation to View 14, are as follows:

- The maximum building height parameters for the proposed residential development along the northern edge of the residential area is limited to 3 storeys, which would be effective in reducing its overall visual impact and assimilating it with the nearby residential development at Imperial Park.
- The residential development would be set back from the RMC and the southern canal path with swathe of SUDs open space with tree planting, a Heritage Trail and landscape scheme which is responsive to the presence of the RMC nearby. The Proposed

Development would introduce new and enhanced open space provision into the view, by allowing new routes through the Site where they did not previously exist (including the Heritage Trail, seating area and SUDs landscape corridor), allowing a new visual amenity to exist of open spaces featuring high quality landscape provision.

- There are green gaps provided in a north / south direction across the development (refer to additional illustrative Views A-E, see Appendix F6), so users of the PRoW would still have some views south towards Princes Parade and the coast as they travel along this section of the footpath to the north of the proposed residential development.
- A woodland buffer would be provided along the edge of the existing Imperial Park development (out of shot in the single frame but can be judged by the existing panoramic view). This would soften and filter views of the western edge of the proposed residential development when viewed from the PRoW and Imperial Park to the west.
- The character of the proposed residential buildings (as set out in the Design Code) and the intervening landscape treatment indicated on the Landscape Masterplan are assessed to be appropriate to their surrounding context, adjacent to the Imperial Park development and the RMC. The proposed residential development would form a continuation of the residential development that exists to the right of the single frame view (out of shot), permeated by the strategic gaps between buildings described above.

F5.172 By the long-term (11 years +), the Adverse effects of introducing new residential buildings where they did not previously exist would be partly offset by the effects of the Primary Mitigation and Beneficial effects of the proposal described above, combined with the effects of weathering / assimilation of building and external materials which would progressively soften the visual impact of buildings and hard surfacing, thereby gradually shifting the nature of change closer to Neutral.

F5.173 The Magnitude of Change for private residential views from the eastern edge of Imperial Green is anticipated to be High, which would result in a Major Adverse effect (Year 0). This would be limited to a small number of residents (principally affecting around 20 homes with a clear view of the Proposed Development) where the views affected are anticipated to be gained primarily from rear, east facing, upstairs windows. In the Long-Term, the woodland buffer would mature to soften and filter views, reducing the overall assessed effect on these receptors to Major to Moderate Adverse (Year 15). This would be Significant.

F5.174 The combination of Magnitude and Sensitivity for View 14 and resultant potential effects upon visual receptors are summarised below:

- View 14 – Private Residents - Eastern edge of Imperial Green (High Sensitivity):
  Year 0. Major Adverse, Direct, Short to Medium-Term, Permanent – Significant.
  Year 15. Major to Moderate Adverse, Direct, Long -Term, Permanent – Significant.
  View 14 – Local People and Interest Groups (High Sensitivity):
  Year 0. Major Adverse, Direct, Short to Medium-Term, Permanent – Significant.
  Year 15. Moderate Adverse, Direct, Long -Term, Permanent – Significant.
- View 14 – Active Recreation (Medium Sensitivity):
  Year 0. Major to Moderate Adverse, Direct, Short to Medium-Term, Permanent – Significant.
  Year 15. Minor Adverse and Neutral, Direct, Long -Term, Permanent – Not Significant.

View 15: South from southern towpath of RMC, at junction with Cannongate Footbridge

F5.175 The illustrative single-frame CGI for View 15 (Appendix F6) would feature the introduction of the southern edge of the Crescent Blocks and glimpses of the proposed open space in the right side of the view, where previously there was no built development and part of the existing golf course with glimpses of the grass see wall beyond. The proposed residential development would not obstruct the north / south axis along the existing footpath which is revealed further to the south, beyond the existing vegetation which currently interrupts views of the promenade in the central part of the view.

F5.176 In the right of the wider panoramic view (beyond the extents of the single-frame illustrative CGI, but supported by additional illustrative CGI C, see Appendix F6), there would be a more open view of the eastern edge of the proposed residential development, with the proposed eastern open space in the foreground. This would include tree and shrub planting, new SUDs areas and the proposed shared cycle/footpath and Heritage Trail. In the panoramic context (or in single frame views towards the south-west) the new residential development would occupy part of the view where built development already exists (Hythe Imperial Hotel and Imperial Park), albeit those existing elements are more distant in the existing view than the proposed residential development would be. As demonstrated in View 14, the northernmost part of the residential development would be set back from the RMC, beyond a swathe of SUDs open space.

F5.177 To the left of the view, parts of the proposed Adventure Golf Course and the 9-Hole Golf Course would be glimpsed, beyond existing vegetation to be retained in the foreground. This would have a predominantly Neutral effect, exchanging one golf-course type landscape for another that would be glimpsed from this vantage point.

F5.178 The illustrative CGI for View 15 shows the retention of the existing vegetation and muddy footpaths in the central part of the view, as these are outside of the site ownership and so these existing features would continue to have detracting effect on the view. The Proposed Development does however offer an opportunity for this vegetation to be managed in the interests of visual amenity and for the un-made pathways to be resurfaced in a material that would be sympathetic to the proximity to the Scheduled Monument, as indicated on the Landscape Masterplan, but this cannot be assessed at this stage and so this vegetation which forms a detracting feature in the view would remain.

F5.179 The Magnitude of Change in respect of View 15 is assessed to be Low for the single frame view and Medium for the wider panoramic view. While in the panoramic context there would be a big change to the view brought about by the introduction of large residential buildings in the landscape, they would appear within an appropriate landscape setting where the embedded Primary Mitigation would be effective in terms of the siting of the proposed residential development (in the western part of the Site and set back from the RMC), its building parameters (building size, height and massing), and architectural character, judged by the illustrative CGIs and Design Code information and additional illustrative CGI C (see Appendix F6).

F5.180 As described in other viewpoints, the maturing of the proposed landscape treatment, the weathering of materials in the landscape and the effects of visual processing over time, coupled by an appreciation of the enhancements and Beneficial effects of providing the new

open space features and new golf course landscape setting would alter the nature of change progressively towards Neutral over time.

F5.181 The combination of Magnitude and Sensitivity for View 15 and resultant potential effects upon visual receptors are summarised below:

- View 15 – Local People and Interest Groups (Medium Sensitivity):
  Year 0. Moderate to Minor Adverse, Direct, Short to Medium-Term, Permanent – Significant.
  Year 15. Minor Adverse / Neutral, Direct, Long -Term, Permanent – Not Significant.
- View 15 – Active Recreation (Low Sensitivity):
  Year 0 (onwards). Minor Adverse becoming Neutral, Short to Medium-Term, Permanent – Not Significant.

View 16: East from southern towpath of RMC, Public Bridleway HB83

F5.182 The change in the view would be that the existing golf course that is currently visible would be replaced with part of the proposed 9-Hole Golf Course, which would contain landscape typologies and habitats which are would appear more naturalistic and responsive to the underlying character of the coastal landscape locally, compared with the existing golf course.

F5.183 The Magnitude of Change in this regard is assessed to be Low / Negligible. The nature of change would be Adverse (but practically Neutral) in the Short to Medium-Term and Beneficial in the Long-Term, once the proposed landscape features described above are fully established and mature. These would create an enhanced visual interest across the part of the site containing the golf course by creating new landscape features and habitats of greater visual appeal and wildlife interest.

F5.184 The combination of Magnitude and Sensitivity (Low) for View 16 and resultant potential effects upon visual receptors is summarised below:

- View 16 – Local People and Interest Groups:
  Year 0. Minor Neutral , Direct, Short to Medium-Term, Permanent – Not Significant.
  Year 15. Minor Beneficial, Direct, Long -Term, Permanent – Not Significant.

View 17: West / south-west from southern towpath of RMC (Public Bridleway HB83)

F5.185 The view of the landmark Hotel would be replaced by the proposed residential development in the southern part of the site. This is assessed to be a low-level Adverse impact, because the Hotel forms an extremely small component of the view (due to distance) and also the new development would create its own landmark feature in the view which is harmonious in terms of the effect it would have on the overall composition of the view, due to the embedded Primary Mitigation in terms of building heights and massing parameters.

F5.186 Views of the proposed residential development would be partly softened by the retained vegetation in the central northern part of the Site and a degree of visual separation between the proposed residential buildings in the northern part of the Site and the RMC would be formed by the existing vegetation along the southern edge of the RMC. By the Long-Term, the proposed tree planting within the open space areas to the east of the proposed

residential development would have become mature, performing a similar visual softening effect upon the eastern elevation of the proposed residential development.

F5.187 The proposed residential development that would be visible in View 17 would replace part of the view where residential development at Imperial Park already exists. Although it would appear to be slightly taller in the view compared to the existing buildings at Imperial Park, the parameters set in terms of building height and massing, combined with the Primary Mitigation in terms of the limiting the extent of the proposed residential built development and locating it at the western end of the Site, would mean that the Adverse effect of introduction the new residential buildings into this view would be Low / Negligible.

F5.188 The main part of the foreground of View 17 would be occupied by the proposed golf course landscape (refer to the Landscape Masterplan for details). While the illustrative CGI is indicative in terms of the proposed landscape treatment in this area, the establishment of this new landscape setting and its habitats is assessed to have a Beneficial effect on the view, because it would introduce naturalistic landscape and ecological features of visual appeal which are characteristic of the local coastal landscape. These would replace the existing golf course which is comparatively low in ecological and biodiversity value and has a corresponding detracting effect upon visual landscape character at present, due to its highly managed appearance.

F5.189 Based on the range of considerations above, the Magnitude of Change in respect of View 17 is assessed to Low / Negligible. This would be Minor Adverse initially, due to the introduction of the proposed residential buildings in the view where there are comparatively fewer at present, , but this would reduce to Minor Adverse, becoming Neutral and Beneficial in the Long-term, due to the softening effects of tree and other planting, combined with the assimilation of these buildings into the view over time, caused by a reduction in visual Susceptibility to the changes of introducing the residential development in the distance.

F5.190 The proposed changes to the view would not have a significant Adverse effect on the view of the RMC or its sidings, as it would appear in the side of the view away from the canal, in front of where buildings of a similar height already exist.

F5.191 The combination of Magnitude and Sensitivity (High) for View 17 and resultant potential effects upon visual receptors is summarised below:

- View 17 – Local People and Interest Groups:
  Year 0. Minor Adverse, Direct, Short to Medium-Term, Permanent – Not Significant.
  Year 15. Minor Neutral and Beneficial, Direct, Long -Term, Permanent – Not Significant.

View 18: North from shingle beach

F5.192 Due to the Primary Mitigation embedded within the design, the impact upon View 18 would Nil. This includes the siting of the proposed residential development in the western part of the Site and the proposed Golf Clubhouse being a low height and low finished floor level (as demonstrated in AVR 0 and AVR 1 for View 18, see Appendix F6.

F5.193 As a result of the above, AVR Level 0 and 1 have been created from viewpoint location 18 (see View 18A, Appendix F6) in a north-western direction towards the proposed residential development. These images demonstrate that the parameters set for the proposed residential buildings and the height and massing of the proposed Hotel Leisure Building would appear consistent with the existing built development along the promenade to the west (left of the view), so that the Magnitude of Change at Year 0 would be Low and the overall Significance of Effect would be Minor Adverse. The new Western Wing Building would be hidden by the existing Hythe Imperial Hotel.

F5.194 In the Long-Term, and the nature of change would become Neutral, because after the initial Minor Adverse physical change in the view has been processed, the new residential buildings would sit comfortably in the view, forming a minor extension to the developed edge of Hythe where residential development, the Hythe Imperial Hotel and promenade buildings of a similar size at Western and Marine Parade already exist.

F5.195 The combination of Magnitude and Sensitivity (Low) for View 18 is summarised below:

- View 18 – Local People and Interest Groups:
  Year 0 (onwards). Nil – Not Significant.
- View 18A – Local People and Interest Groups:
  Year 0 (onwards). Minor Adverse, becoming Neutral, Direct, Long -Term, Permanent – Not Significant.

View 19: West from Princes Parade (parallel with Seaview Footbridge to the north)

F5.196 Referring to the AVRs 0 and 1 for View 19 (Appendix F6) the Magnitude of Change is assessed to be Low / Negligible.

F5.197 The proposed residential development would be glimpsed in the distance, replacing existing glimpses of part of the Hythe Imperial Hotel and buildings at Imperial Green. Some of the lower parts of the central and northern parts of the proposed residential development would be hidden by intervening landform within the Princes Parade allocation site.

F5.198 The replacement of part of the Hotel in the view (a landmark feature) with the proposed new Leisure Building and the southernmost part of the residential development is assessed to be a low-level Adverse impact, because the Hotel forms an extremely small component of the view (due to distance) and also the proposed new residential development which would sit comfortably within the composition of the view residential buildings are already present. . The Magnitude of Change at Year 0 is assessed to be Low, and the nature of change would be Neutral.

F5.199 The combination of Magnitude and Sensitivity (Medium) for View 19 and resultant potential effects upon visual receptors is summarised below:

- View 19 – Local People and Interest Groups:
  Year 0 (onwards). Minor Neutral, Direct, Long-Term, Permanent – Not Significant.

View 20: West from Hospital Hill

F5.200 The proposed residential development would be glimpsed in the distance at the far end of Princes Parade, replacing existing glimpses of the Hythe Imperial Hotel and buildings at Imperial Park (views of existing built development would be replaced with new built development of a slightly larger size).

F5.201 Referring to the AVRs 0 and 1 for View 20 (Appendix F6) the Magnitude of Change is assessed to be Low for Private Residents (n.b. properties which are west facing and elevated enough to have a clear view towards Princes Parade from this area are extremely low in number, potentially limited to a single property at the edge of Temeraire Heights). The Magnitude of change is assessed to be Low-Negligible for Local People (motorists or those walking along the pavement).

F5.202 The nature of the change on View 20 at Year 0 would be Adverse for Private Residents and Adverse, becoming Neutral as building and external materials weather and new planting establishes. For Local People the nature of change is assessed to be Neutral.

F5.203 The combination of Magnitude and Sensitivity for View 20 and resultant potential effects upon visual receptors are summarised below:

- View 20 – Private Residents - Temeraire Heights Area (High Sensitivity):
  Year 0 (onwards). Minor Adverse, becoming Neutral, Direct, Short to Medium-Term, Permanent – Not Significant.
- View 20 – Local People (Low sensitivity):
  Year 0 (onwards). Negligible Neutral, Direct, Long-Term, Permanent – Not Significant.

View 21: South from edge of Kent Downs AONB from Public Bridleway HB17

F5.204 AVRs 0 and 1 for View 21 (Appendix F6) demonstrate that the built form of the proposed residential development, the proposed new Wester Wing building and the proposed new Leisure Building would be hidden by landform.

F5.205 The Magnitude of Change upon View 21 is therefore assessed to be Nil and resultant potential effects upon visual receptors (private residents at the north-eastern edge of Sene Park and local people) is therefore also Nil (Not Significant).

Lighting (Night-time Visual Effects)

F5.206 From previous discussions with FHDC, it has been agreed that the following viewpoints would be considered in terms of potential night-time effects on visual amenity:

- View 4: West / north-west from Princes Parade.
- View 5: South from Public Footpath HB56.
- View 6: South from Public Bridleway HB65 (Cannongate Footbridge).
- ZTV Zone 11: South-east from Public Footpath HE257.

F5.207 The Non-Technical Summary – Lighting Assessment by EPS, see Appendix C6, which also contains the full External Lighting Assessment with further details and numerical results) confirms that light levels were checked at several representative points, including the those along Princes Parade (View 4), along the RMC (Views 5 and 6) and from the Kent Downs

National Landscape at several locations to the north of the Site, which are at a closer distance that ZTV Zone 11.

F5.208 The lighting assessment measurements showed very low levels of light spill for all of these locations, with most results recorded at 0.00-0.05 lux and very few reaching 0.09 lux. These levels are considered Negligible and are well within the expectations for an E1 (Dark Sky) Zone, where lighting should remain minimal and carefully controlled. Residential amenities are not expected to experience any noticeable change in lighting conditions.

F5.209 It is concluded that the night-time effects on visual amenity and landscape character would be Negligible (Not Significant). The lighting assessment has confirmed that the lighting scheme has been designed to meet all of the requirements for an E1 Environmental Zone, where dark-sky protection is a priority, with all of the primary mitigation measures set out in this chapter included, to ensure that there would be:

- No measurable sky glow.
- No noticeable light spill onto nearby public footpaths.
- Negligible effects on nearby residential properties.
- Protection of the dark-sky character around the RMC, the coastal corridor and the wider Kent Downs area of National Landscape.

F6.0 Mitigation and Monitoring

During Construction

F6.1 No additional mitigation or monitoring measures are proposed during the construction phase, as no Significant adverse effects are identified.

During Operation

F6.2 The Landscape Masterplan (Appendix C2) identifies the proposed broad habitat types and of soft landscaping that will be implemented as part of the Proposed Development. In order to ensure that the habitats establish and mature as envisaged that the Council will require the submission and approval of a Landscape and Ecological Management Plan (LEMP).

F6.3 No further additional mitigation or monitoring measures are proposed during the operation phase, as it is not possible / feasible to implement any further mitigation to the embedded mitigation measures set out in Section F5.0 of this chapter.

F7.0 Residual Effects

During Construction

F7.1 As no additional mitigation or monitoring measures are proposed during the construction phase, the residual effects of the Proposed Development are set out in Section F5.0 of this ES chapter.

During Operation

F7.2 The implementation of an approved LEMP will ensure that the proposed landscaping matures as expected. Therefore, it does not change any of the effect levels identified in Section F5.0 (Potential Effects), but increases their certainty.

F7.3 As no other additional mitigation or monitoring measures are proposed during the operation phase, the residual effects of the Proposed Development are as set out in Section F5.0 of this ES chapter.

F8.0 Summary & Conclusions

F8.1 The effects upon landscape and visual receptors are summarised in the following text, and in Table F8.1:

During Construction

F8.2 During Construction there would be Significant effects upon a small number of residential receptors from private properties along the eastern edge of Imperial Park (View 14). All other effects upon landscape character, or public visual amenity during construction are Not Significant.

F8.3 The proposed construction activities would be standard for a project of this type, Temporary and completed mainly within the Short-term on a phased basis, with some of the proposed residential development and works latter works along Princes Parade being completed in the early part of the Medium-Term.

During Operation

RMC (Twiss Road to Seabrook Lodge Bridge Section) – Landscape Setting

F8.4 During Operation the effect on the landscape setting of the RMC (Twiss Road to Seabrook Lodge Bridge section) is assessed to be Moderate to Minor Adverse – Not Significant. The principal Adverse change to the landscape south of the RMC would occur in a very small part of the landscape setting to this part of the RMC, where there is a moderate Susceptibility to development of residential character, as this land-use already exists nearby at Imperial Park immediately to the west. A natural buffer of vegetation exists on both sides of the canal and this would intercept many of the views of the proposed residential development and protect the intimate landscape character and tranquillity experienced along the footpaths to the north of the canal, such that these qualities would be practically unaffected in most locations.

F8.5 While there would be a noticeable change to the character and setting of the RMC relating to the western part of the Site (where the proposed residential development would occur), and this would have some localised Significant visual effects (represented by View 14) and noticeable change represented by View 15, the proposed character of the residential development (as required by the Design Code (Appendix C5)) and its proposed landscape surroundings (see Landscape Masterplan (Appendix C2) would be compatible with and sympathetic to the nearby RMC. The changes to visual landscape character of introducing the proposed residential development into the western part of the Site (as mentioned above), would be mitigated as far as possible by setting back development from the RMC and providing a new landscape buffer with trees.

F8.6 The landscape proposals shown on the Landscape Masterplan are assessed to have a long-term Neutral and Beneficial effect on the character and setting to the south of the RMC in the central and eastern parts of the Site and these include a Heritage Trail and interpretation features. North / south green corridors that have been designed into the proposed residential parameters and these would maintain a level of open and verdant character in views towards the coastline.

Local Landscape Character

F8.7 Effects on landscape character would mainly occur within study area specific: RMC Imperial Hythe and Coastal Strip (LCA A), which includes the RMC and land at Princes Parade to the east of the Site. The effect on this LCA is assessed to be Minor / Adverse (at Year 0), becoming Minor Adverse / Neutral (at Year 15).

Visual Receptors

F8.8 The Proposed Development would have some localised Significant Adverse effects on visual amenity in two locations which are in close proximity to the Site. The visual receptors affected would be Local People and Interest Groups in representative View 11 (from Princes Parade) and View 14 from PRoW HB83 to the south of the RMC (Major Adverse at Year 0, becoming Moderate Adverse at Year 15).

F8.9 There would also be an initial Major to Moderate and Moderate Significant Adverse effect on visual amenity (at Year 0) for the following receptors / representative views:

- View 3: East / north-east from Marine Parade – Loal People and Interest Groups.
- View 4: West / north-west from Princes Parade – Local People and Interest Groups.
- View 13: West from Seabrook Lodge Footbridge – Local People and Interest Groups.
- View 14: South-east from HB83, south of RMC – Active Recreation.

F8.10 The nature of change for these views is assessed to change over time, becoming closer to Neutral in the Long-term (Year 15; Minor Adverse / Neutral – Not Significant). This would be due to a combination of; the effects of building materials weathering in the landscape; proposed planting and habitats maturing to provide a cohesive landscape setting to the development, softening and filtering views and forming new open spaces and a naturalistic golf course; receptors overcoming the initial physical changes to the visual baseline over the course of time, when visual processing has occurred; and as a result of the parameters and design principles of the proposed residential development (set out in the Design Code) and the Hotel Extension and Leisure Buildings being appropriate to their local context.

Private Visual Amenity

F8.11 The LVIA provides a general assessment of the anticipated changes to views that would potentially be experienced from relevant groups of private properties within the study area, based on representative views from selected publicly accessible locations, combined with field observations and the use of desktop aerial photography.

F8.12 This concludes that there would be some Significant (Major and Major to Moderate Adverse) visual effects represented by; View 9 (from some elevated properties in the Cliff Road area); View 10 (from close distances at the southern end of Twiss Road, close to where the proposed new Western Wing Building would be sited and; View 14 (from close distances along the eastern edge of the Imperial Park residential area).

Lighting (Night-time Visual Effects)

F8.13 The assessment of proposed lighting within the Proposed Development has concluded the night-time effects on visual amenity and landscape character would be Negligible (Not

Significant), with; no measurable sky glow; no noticeable light spill onto nearby public footpaths; Negligible effect on residential properties and; protection of the dark-sky character around the RMC, the coastal corridor and the wider Kent Downs area of National Landscape.

TableF8.1: Summary of landscape and visual effects

Receptor	Impact	Potential Effects (taking account of embedded mitigation)	Additional Mitigation and Monitoring	Residual Effects
During Construction				
Landscape Receptors				
Topography	Landscape	Minor Adverse – Not Significant	n/a	Minor Adverse – Not Significant
Vegetation	Landscape	Moderate Adverse – Not Significant	n/a	Moderate Adverse – Not Significant
Heritage Assets – Landscape Setting				
Hythe Conservation Area	Landscape Setting	Negligible Neutral – Not Significant	n/a	Negligible Neutral – Not Significant
Church of St. Leonard (Grade I Listed Building)	Landscape Setting	Negligible Neutral – Not Significant	n/a	Negligible Neutral– Not Significant
RMC: Twiss Road to Seabrook Lodge Bridge section	Landscape Setting	Moderate Adverse – Not Significant	n/a	Moderate Adverse– Not Significant
Hythe Imperial Hotel	Landscape Setting	Minor Adverse – Not Significant	n/a	Minor Adverse – Not Significant
Landscape Character				
Hythe Coast District LCA	Landscape Character	Negligible Neutral – Not Significant	n/a	Negligible Neutral – Not Significant
Local LCA A: RMC & Imperial Hythe Coastal Strip	Landscape Character	Moderate Adverse – Not Significant	n/a	Moderate Adverse – Not Significant
Local LCA B: Princes Parade Coastline	Landscape Character	Minor Adverse – Not Significant	n/a	Minor Adverse – Not Significant
Local LCA C: South Road Residential	Landscape Character	Negligible Adverse / Neutral – Not Significant	n/a	Negligible Adverse / Neutral – Not Significant
Visual Receptors				
Local People	Visual Amenity	Moderate Adverse (Not Significant) – Views 3, 4, 11, 13, 14 and 17. Minor Adverse (Not Significant) –	n/a	Moderate Adverse (Not Significant) – Views 3, 4, 11, 13, 14 and 17. Minor Adverse (Not Significant) –

Receptor	Impact	Potential Effects (taking account of embedded mitigation)	Additional Mitigation and Monitoring	Residual Effects
		Views 5, 10, 15 and 16. Minor/Negligible Adverse (Not Significant) – Views 6, 12 and 19). Negligible Neutral (Not Significant) – Views 1, 2, 7, 8, 9 and 20). Nil (Not Significant) – View 21.		Views 5, 10, 15 and 16. Minor/Negligible Adverse (Not Significant) – Views 6, 12 and 19). Negligible Neutral (Not Significant) – Views 1, 2, 7, 8, 9 and 20). Nil (Not Significant) – View 21.
Interest Groups	Visual Amenity	Moderate Adverse (Not Significant) – Views 4, 5, 11, 13, 14 and 17. Minor Adverse (Not Significant) – Views 3, 12, 15 and 16. Minor/Negligible Adverse (Not Significant) – Views 6 and 19. Negligible Adverse (Not Significant) – View 18/18A. Negligible Neutral (Not Significant) – Views 2 and 7 Nil (Not Significant) – View 21.	n/a	Moderate Adverse (Not Significant) – Views 4, 5, 11, 13, 14 and 17. Minor Adverse (Not Significant) – Views 3, 12, 15 and 16. Minor/Negligible Adverse (Not Significant) – Views 6 and 19. Negligible Neutral (Not Significant) – Views 2 and 7 Nil (Not Significant) – View 21.

Receptor	Impact	Potential Effects (taking account of embedded mitigation)	Additional Mitigation and Monitoring	Residual Effects
Active Recreation	Visual Amenity	Minor Adverse (Not Significant) – View 14. Minor/Negligible Adverse (Not Significant) – Views 3, 4, 11 and 15. Negligible Adverse (Not Significant) – Views 6 and 18.	n/a	Minor Adverse (Not Significant) – View 14. Minor/Negligible Adverse (Not Significant) – Views 3, 4, 11 and 15. Negligible Adverse (Not Significant) – Views 6 and 18.
Seasonal Visitors	Visual Amenity	Minor/Negligible Adverse (Not Significant) – Views 3, 4 and 11.	n/a	Minor/Negligible Adverse (Not Significant) – Views 3, 4 and 11.
Private Residents: View 1 - Old London Road / Nursery Fields Area View 6 - Private Properties north of the Site, south of Seabrook Road View 7 - Southern edge of North Road. View 8 - North of Seabrook Road / Elm Gardens Area View 9 - Western end of Cliff Road, north of Cannongate Road View 10 - Southern end of Twiss Road / Eastern end of South Road. View 14 - Eastern edge of Imperial Green. View 20 - Temeraire Heights Area	Private Visual Amenity	Major Adverse **(Significant)** – View 14. Moderate Adverse (Not Significant) – Views 9 and 10. Minor Adverse (Not Significant) – Views 6 and 8. Negligible Adverse (Not Significant) – View 20. Negligible Neutral (Not Significant) – Views 1 and 7. Nil (Not Significant) – View 21.	n/a	Major Adverse **(Significant)** – View 14. Moderate Adverse (Not Significant) – Views 9 and 10. Minor Adverse (Not Significant) – Views 6 and 8. Negligible Adverse (Not Significant) – View 20. Negligible Neutral (Not Significant) – Views 1 and 7.

Receptor	Impact	Potential Effects (taking account of embedded mitigation)	Additional Mitigation and Monitoring	Residual Effects
View 21 - North-eastern edge of Sene Park				Nil (Not Significant) – View 21.
During Operation				
Landscape Receptors				
Topography	Landscape	Minor-Neutral – Not Significant	n/a	Minor-Neutral – Not Significant
Vegetation	Landscape	Year 0: Minor Adverse – Not Significant	Implementation of agreed LEMP	Year 0: Minor Adverse – Not Significant
		Year 15: Minor Neutral – Not Significant		Year 15: Minor Neutral – Not Significant
Grain of Development	Landscape	Minor-Adverse - Not Significant	n/a	Minor-Adverse - Not Significant
Heritage Assets – Landscape Setting				
Hythe Conservation Area	Landscape Setting	Negligible Neutral – Not Significant	Implementation of agreed LEMP	Negligible Neutral – Not Significant
Church of St. Leonard (Grade I Listed Building)	Landscape Setting	Negligible Neutral – Not Significant	Implementation of agreed LEMP	Negligible Neutral – Not Significant
RMC: Twiss Road to Seabrook Lodge Bridge section	Landscape Setting	Moderate to Minor Adverse – Not Significant	Implementation of agreed LEMP	Moderate to Minor Adverse – Not Significant
Hythe Imperial Hotel	Landscape Setting	Minor Adverse – Not Significant	Implementation of agreed LEMP	Minor Adverse – Not Significant
Landscape Character				
Hythe Coast District LCA	Landscape Character	Year 0: Minor / Negligible Adverse – Not Significant	Implementation of agreed LEMP	Year 0: Minor / Negligible Adverse – Not Significant
Local LCA A: RMC & Imperial Hythe Coastal Strip	Landscape Character	Year 0: Minor Adverse – Not Significant	Implementation of agreed LEMP	Year 0: Minor Adverse – Not Significant
		Year 15: Minor Adverse / Neutral – Not Significant		Year 15: Minor Adverse / Neutral – Not Significant

Receptor	Impact	Potential Effects (taking account of embedded mitigation)	Additional Mitigation and Monitoring	Residual Effects
Local LCA B: Princes Parade Coastline	Landscape Character	Minor Adverse, becoming Neutral – Not Significant	Implementation of agreed LEMP	Minor Adverse, becoming Neutral – Not Significant
Local LCA C: South Road Residential	Landscape Character	Negligible Neutral – Not Significant	Implementation of agreed LEMP	Negligible Neutral – Not Significant
Visual Receptors				
Local People	Public Visual Amenity	Year 0: Major Adverse (**Significant**) Year 15: Moderate Adverse (**Significant**) – Views 11, 14. Year 0: Major to Moderate Adverse (**Significant**) Year 15: Minor Adverse/Neutral (Not Significant) – Views 3, 13. Year 0: Moderate to Minor Adverse (Not Significant) Year 15: Minor Adverse/Neutral (Not Significant) – View 15.	Implementation of agreed LEMP	Year 0: Major Adverse (**Significant**) Year 15: Moderate Adverse (**Significant**) – Views 11, 14. Year 0: Major to Moderate Adverse (**Significant**) Year 15: Minor Adverse/Neutral (Not Significant) – Views 3, 13. Year 0: Moderate to Minor Adverse (Not Significant) Year 15: Minor Adverse/Neutral (Not Significant) – View 15.

Receptor	Impact	Potential Effects (taking account of embedded mitigation)	Additional Mitigation and Monitoring	Residual Effects
		Year 0: Moderate Adverse (Not Significant) Year 15: Minor Adverse/Neutral (Not Significant) – View 4. Year 0: Minor Neutral (Not Significant) Year 15: Minor Beneficial (Not Significant) – Views 5 and 16. Year 0: Minor Adverse (Not Significant) Year 15: Minor Neutral and Beneficial (Not Significant) – View 17. Year 0: Negligible Neutral (Not Significant)		Year 0: Moderate Adverse (Not Significant) Year 15: Minor Adverse/Neutral (Not Significant) – View 4. Year 0: Minor Neutral (Not Significant) Year 15: Minor Beneficial (Not Significant) – Views 5 and 16. Year 0: Minor Adverse (Not Significant) Year 15: Minor Neutral and Beneficial (Not Significant) – View 17. Year 0: Negligible Neutral (Not Significant)

Receptor	Impact	Potential Effects (taking account of embedded mitigation)	Additional Mitigation and Monitoring	Residual Effects
		Year 15: Negligible Beneficial (Not Significant) – View 2. Year 0: Minor Adverse (Not Significant) Year 15: Minor Neutral (Not Significant) – Views 7, 9, 18A Year 0 (onwards): Minor Neutral (Not Significant) Views 10 and 19. Year 0 (onwards): Minor to Negligible Adverse (Not Significant) – View 12. Year 0: Negligible Adverse (Not Significant) Year 15:		Year 15: Negligible Beneficial (Not Significant) – View 2. Year 0: Minor Adverse (Not Significant) Year 15: Minor Neutral (Not Significant) – Views 7, 9, 18A Year 0 (onwards): Minor Neutral (Not Significant) Views 10 and 19. Year 0 (onwards): Minor to Negligible Adverse (Not Significant) – View 12. Year 0: Negligible Adverse (Not Significant) Year 15:

Receptor	Impact	Potential Effects (taking account of embedded mitigation)	Additional Mitigation and Monitoring	Residual Effects
		Negligible Adverse/Neutral (Not Significant) View 6. Year 0 (onwards): Negligible Neutral (Not Significant) – Views 1 and 20. Year 0 (onwards): Negligible / Nil (Not Significant) – View 8. Year 0 (onwards): Nil (Not Significant) – Views 18 and 21.		Negligible Adverse/Neutral (Not Significant) View 6. Year 0 (onwards): Negligible Neutral (Not Significant) – Views 1 and 20. Year 0 (onwards): Negligible / Nil (Not Significant) – View 8. Year 0 (onwards): Nil (Not Significant) – Views 18 and 21.
Interest Groups	Public Visual Amenity	Year 0: Major Adverse (**Significant**) Year 15: Moderate Adverse (**Significant**) – Views 11, 14.	Implementation of agreed LEMP	Year 0: Major Adverse (**Significant**) Year 15: Moderate Adverse (**Significant**) – Views 11, 14.

Receptor	Impact	Potential Effects (taking account of embedded mitigation)	Additional Mitigation and Monitoring	Residual Effects
		Year 0: Major to Moderate Adverse (**Significant**) Year 15: Minor Adverse/Neutral (Not Significant) – Views 3, 13. Year 0: Moderate to Minor Adverse (Not Significant) Year 15: Minor Adverse/Neutral (Not Significant) – View 15. Year 0: Moderate Adverse (Not Significant) Year 15: Minor Adverse/Neutral (Not Significant) – View 4. Year 0: Minor Neutral (Not Significant)		Year 0: Major to Moderate Adverse (**Significant**) Year 15: Minor Adverse/Neutral (Not Significant) – Views 3, 13. Year 0: Moderate to Minor Adverse (Not Significant) Year 15: Minor Adverse/Neutral (Not Significant) – View 15. Year 0: Moderate Adverse (Not Significant) Year 15: Minor Adverse/Neutral (Not Significant) – View 4. Year 0: Minor Neutral (Not Significant)

Receptor	Impact	Potential Effects (taking account of embedded mitigation)	Additional Mitigation and Monitoring	Residual Effects
		Year 15: Minor Beneficial (Not Significant) – Views 5 and 16. Year 0: Minor Adverse (Not Significant) Year 15: Minor Neutral and Beneficial (Not Significant) – View 17. Year 0: Negligible Neutral (Not Significant) Year 15: Negligible Beneficial (Not Significant) – View 2. Year 0: Minor Adverse (Not Significant) Year 15: Minor Neutral (Not Significant) – Views 7.		Year 15: Minor Beneficial (Not Significant) – Views 5 and 16. Year 0: Minor Adverse (Not Significant) Year 15: Minor Neutral and Beneficial (Not Significant) – View 17. Year 0: Negligible Neutral (Not Significant) Year 15: Negligible Beneficial (Not Significant) – View 2. Year 0: Minor Adverse (Not Significant) Year 15: Minor Neutral (Not Significant) – Views 7.

Receptor	Impact	Potential Effects (taking account of embedded mitigation)	Additional Mitigation and Monitoring	Residual Effects
		Year 0 (onwards): Minor Neutral (Not Significant) Views 19. Year 0 (onwards): Minor to Negligible Adverse (Not Significant) – View 12. Year 0: Negligible Adverse (Not Significant) Year 15: Negligible Adverse/Neutral (Not Significant) View 6. Year 0 (onwards): Nil (Not Significant) – Views 21.		Year 0 (onwards): Minor Neutral (Not Significant) Views 19. Year 0 (onwards): Minor to Negligible Adverse (Not Significant) – View 12. Year 0: Negligible Adverse (Not Significant) Year 15: Negligible Adverse/Neutral (Not Significant) View 6. Year 0 (onwards): Nil (Not Significant) – Views 21.
Active Recreation	Public Visual Amenity	Year 0: Major to Moderate Adverse (**Significant**)	Implementation of agreed LEMP	Year 0: Major to Moderate Adverse (**Significant**)

Receptor	Impact	Potential Effects (taking account of embedded mitigation)	Additional Mitigation and Monitoring	Residual Effects
		Year 15: Minor Adverse/Neutral (Not Significant) – View 14. Year 0: Minor Adverse (Not Significant) Year 15: Minor Neutral (Not Significant) – Views 3, 11, 15 and 18A. Year 0: Minor to Negligible Adverse/Neutral (Not Significant). Year 15: Minor to Negligible Neutral (Not Significant). View 4. Year 0 (onwards): Negligible Neutral (Not Significant) – 6.		Year 15: Minor Adverse/Neutral (Not Significant) – View 14. Year 0: Minor Adverse (Not Significant) Year 15: Minor Neutral (Not Significant) – Views 3, 11, 15 and 18A. Year 0: Minor to Negligible Adverse/Neutral (Not Significant). Year 15: Minor to Negligible Neutral (Not Significant). View 4. Year 0 (onwards): Negligible Neutral (Not Significant) – 6.

Receptor	Impact	Potential Effects (taking account of embedded mitigation)	Additional Mitigation and Monitoring	Residual Effects
		Year 0 (onwards): Nil (Not Significant) – Views 18.		Year 0 (onwards): Nil (Not Significant) – Views 18.
Seasonal Visitors	Public Visual Amenity	Year 0: Minor Adverse (Not Significant) Year 15: Minor Neutral (Not Significant) – Views 3 and 11. Year 0: Minor to Negligible Adverse/Neutral (Not Significant). Year 15: Minor to Negligible Neutral (Not Significant). View 4.	Implementation of agreed LEMP	Year 0: Minor Adverse (Not Significant) Year 15: Minor Neutral (Not Significant) – Views 3 and 11. Year 0: Minor to Negligible Adverse/Neutral (Not Significant). Year 15: Minor to Negligible Neutral (Not Significant). View 4.
Private Residents: View 1 - Old London Road / Nursery Fields Area View 6 - Private Properties north of the Site, south of Seabrook Road View 7 - Southern edge of North Road.	Private Visual Amenity	Year 0: Major Adverse (**Significant**). Year 15: Major to Moderate Adverse (**Significant**) – View 14.	Implementation of agreed LEMP	

Receptor	Impact	Potential Effects (taking account of embedded mitigation)	Additional Mitigation and Monitoring	Residual Effects
View 8 - North of Seabrook Road / Elm Gardens Area View 9 - Western end of Cliff Road, north of Cannongate Road View 10 - Southern end of Twiss Road / Eastern end of South Road. View 14 - Eastern edge of Imperial Green. View 20 - Temeraire Heights Area View 21 - North-eastern edge of Sene Park		Year 0 (onwards): Major to Moderate Adverse (**Significant**) – View 10. Year 0: Major Adverse (**Significant**). Year 15: Moderate Adverse (**Significant**) – View 9. Year 8 (onwards): Moderate Adverse / Negligible for Some (Not Significant). View 8. Year 0 (onwards): Moderate to Minor Adverse / Negligible for Some (Not Significant). View 6. Year 0: Moderate Adverse (Not Significant). Year 15: Moderate Neutral (Not Significant) –		

Receptor	Impact	Potential Effects (taking account of embedded mitigation)	Additional Mitigation and Monitoring	Residual Effects
		View 7. Year 0: Minor Adverse (Not Significant). Year 15: Minor Neutral (Not Significant) – View 20. Year 0: Negligible Adverse (Not Significant). Year 15: Negligible Neutral (Not Significant). Year 0 (onwards): Nil (Not Significant).		

F9.0 Abbreviations & Definitions

Abbreviations

- AONB - Area of Outstanding Natural Beauty (Now known as National Landscapes).
- AOD - Above Ordnance Datum.
- AVRs - Accurate Visual Representations.
- CMLI - Chartered Member of the Landscape Institute.
- EIA - Environmental Impact Assessment.
- ES - Environmental Statement.
- FHDC - Folkestone and Hythe District Council.
- GLVIA - Guidelines for Landscape and Visual Impact Assessment.
- KCC - Kent County Council.
- LCA - Landscape Character Area.
- LLA - Local Landscape Character Area (Local Plan Policy).
- SLA - Special Landscape Area (Local Plan Policy).
- OS - Ordnance Survey.
- NCA - National Character Area.
- PRoW - Public Right of Way.
- RMC - Royal Military Canal.
- ZTV - Zone of Theoretical Visibility.

Definitions

- **Landscape** - The definition of the term 'landscape' within this assessment is taken to mean 'an area, as perceived by people, whose character is the result of the action and interaction of natural, cultural and/or human factors. It does not just mean special or designated landscapes nor only the rural countryside, but covers all natural, rural, urban and peri-urban areas including land, inland water and marine areas, and includes areas which are considered outstanding, everyday and degraded in condition.'
- **Landscape Resource (Character)** - Landscape character refers to the interplay of the physical, natural and cultural components of our surroundings. Different combinations of these elements and their spatial distribution create the distinctive character of the landscape, allowing different landscapes to be described and mapped, and enabling the establishment of discrete 'Landscape Character Areas'
- **Visual Amenity** - Refers to the overall pleasantness (or otherwise) of views experienced by people, providing a visual setting for a range of activities being undertaken.
- **Landscape Value** - Refers to the relative value placed upon a resource by society and is arrived at by combining judgements on the importance of the resource with its condition and quality.

- **Landscape Effects** - Landscape effects derive from changes to the physical components of the landscape, which may lead to changes in its character and how it is experienced (and hence may in turn affect its perceived value). Due to the inherently dynamic nature of the landscape, physical changes may not necessarily be significant.
- **Visual Effects** - Visual effects relate to changes that arise in the composition of available views from visual receptors to people's response to these changes, and to overall effects with respect to visual amenity.
- **Receptor** - Refers to the parts of the receiving landscape, and the people able to view the proposal, that may be affected by the change.
- **Susceptibility** - Refers to the ability of a landscape or visual receptor to accommodate change without significant consequences. This is the product of not only intrinsic sensitivity (informed by value, importance and condition), but also the specific characteristics of the development to be assessed.
- **Sensitivity (Nature of Receptor)** - Refers to the combined judgement of the susceptibility of a given landscape resource to a specific development proposal, and the value associated with the resource.
- **Magnitude (Nature of Change)** - Refers to the combined judgement about the size and scale of an effect, the extent of the area affected, the reversibility of the effect and its duration.
- **Mitigation** - Refers to features or components of a proposal which have been specifically added to address an identified impact, in order to either avoid or minimise its effect(s).
- **Enhancement** - Refers to features or components of a proposal which have not been included to address identified impacts but nevertheless, result in the improvement or 'enhancement' of the landscape or visual resource.

F10.0 References

[1] National Planning Policy Framework. Published 27 March 2012, updated 7 February 2025

[2] Folkestone & Hythe District Core Strategy Review, March 2022

[3] The Landscape Institute and Institute of Environmental Management and Assessment, Third Edition, 2013. Guidelines for Landscape and Visual Impact Assessment

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[5] How to carry out and use landscape and seascape character assessments. Natural England and Department for Environment, Food & Rural Affairs. October 2014

[6] Landscape Institute TGN 06/19 Visual Representation of development proposals, September 2019

[7] Residential Visual Amenity Assessment (RVAA), Technical Guidance Note 2/19, March 2019

[8] Hythe Conservation Area Appraisal, 2006

[9] Kent Downs AONB Landscape Character Assessment, 2020 – update revised and published 2023

[10] NCA Profile:120 Wealden Greensand (NE465), July 2013

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[13] Hythe to Folkestone National Trail. Publish date unknown: https://www.nationaltrail.co.uk/en_GB/short-routes/hythe-to-folkestone/

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Imperial Gardens
Volume 1: Environmental Statement

Chapter G Ecology and Biodiversity

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LICHFIELDS

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G1.0 Introduction

G1.1 This Chapter of the Environmental Statement ('ES') has been prepared by Lloydbore Ltd on behalf of the applicant, GSE Group ('the applicant'). It assesses the Proposed Development described in Chapter C in relation to ecology and biodiversity.

G1.2 The baseline situation is considered before the likely environmental effects of the Proposed Development are identified during its construction and operational phases. Mitigation measures to reduce any negative environmental effects are identified as appropriate, before the residual environmental effects are assessed.

G1.3 This Chapter is supported by the following technical appendices provided at Volume 2 to this ES:-

- Appendix G1: Preliminary Ecological Appraisal Report PEAR
- Appendix G2: Reptile Survey Report
- Appendix G3: Breeding Bird Survey Report
- Appendix G4: Bat Survey Reports
- Appendix G5: Riparian Mammal Survey Report
- Appendix G6: Badger Survey Report
- Appendix G7: Ecological Mitigation and Enhancement Strategy

G1.4 This Chapter is supported by the following technical figures provided at Volume 2 to this ES:-

- Figure G1: Location of designated sites
- Figure G2: Habitats prior to development plan 6312-LLB-XX-XX-DR-Ec-0001
- Figure G3: Habitats impacts plan 6312-LLB-XX-XX-DR-Ec-0115
- Figure G4: Habitat post development plan 6312-LLB-XX-XX-DR-Ec-0002

About the Author

G1.5 Philip Ames BSc (Hons) MCIEEM is a full member of CIEEM with over 20 years of ecological consultancy experience from a range of projects including leisure and residential schemes. Philip has seven years' experience of producing ES chapters.

G2.0 Policy Context

G2.1 The policy and legislation which relates to the Proposed Development is summarised below.

Legislation

Environment Act 2021 and Town and Country Planning Act 1990

G2.2 The Environment Act 2021 introduced a requirement for new developments to deliver a measurable 10% net gain in biodiversity, normally measured in 'biodiversity units' under Defra/Natural England methodology. This legal duty came into force for most development projects from 12th February 2024 and for "small sites" from 2nd April 2024, under Schedule 7a of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). The duty is due to subsequently come into force for Nationally Significant Infrastructure Projects within 2025.

G2.3 Additional statutory instruments, published in February 2024, provide further detail of legal duties in relation to biodiversity net gain.

G2.4 Schedule 7a intends to encourage developers to avoid the most important existing habitat and focus habitat creation and enhancement where it will be most ecologically appropriate in helping to halt and reverse biodiversity decline.

G2.5 Schedule 7a also: introduces a new system of strategic Local Nature Recovery Strategies; places a new general duty on public bodies to conserve and enhance biodiversity; introduces Conservation Covenants as a new alternative mechanism to Section 106 Agreements for securing off-site habitat provision and other conservation measures that deliver public good; and introduces a framework for Natural England to develop Protected Site and Species Conservation Strategies.

Wildlife & Countryside Act 1981 (as amended)

G2.6 This Act provides for designation and protection of Sites of Special Scientific Interest ('SSSI'), which are areas that represent the most valuable habitats in the UK for nature conservation. The Act also provides protection for certain rare or threatened species and prohibits or controls releases of non-native invasive species into the natural environment.

G2.7 It also provides a mechanism for making potential wildlife offences legal through the granting of licences by the appropriate authorities (Natural England in England).

Conservation of Habitats and Species Regulation 2017 (as amended)

G2.8 These Regulations are the principal means by which the European Habitats Directive and the Birds Directive were transposed in England and Wales. They provide for the designation and protection of a network of 'European Sites', including Special Areas of Conservation ('SAC') and Special Protection Areas ('SPA'). The Regulations also provide legal protection for certain rare or threatened species of European concern - known as European Protected Species ('EPS'). Potential EPS offences can be made lawful through the granting of licences (EPS mitigation licence) by the appropriate authorities (Natural England in England).

Natural Environment & Rural Communities Act 2006

G2.9 The NERC Act places a duty on public bodies and statutory undertakers to ensure due regard to the conservation of biodiversity. Section 41 of the Act requires the Secretary of State, as respects England, to publish a list of species and habitats which are of 'principal importance for the purpose of conserving biodiversity'. These lists generally reflect the species and habitats previously listed as priorities under the UK Biodiversity Action Plan.

Wild Mammals (Protection) Act 1996

G2.10 The Wild Mammals (Protection) Act 1996 makes it an offence for any person to mutilate, kick, beat, nail, or otherwise impale, stab, burn, stone, crush, drown, drag, or asphyxiate any wild mammal with intent to inflict unnecessary suffering.

Animal Welfare Act 2006

G2.11 This imposes a duty of care on anyone responsible for an animal to take reasonable steps to ensure that the animal's needs are met. With regards to development, this may have implications when capture and translocation of animals is proposed as mitigation.

Policy

National Planning Policy Framework

G2.12 In addition to primary legislation, the government published the updated National Planning Policy Framework ('NPPF') on 12th December 2024. Within the NPPF, Chapter 15 is headed Conserving and enhancing the natural environment (Paragraphs 187 to 195).

G2.13 Of relevance are the following statements:-

'Planning policies and decisions should contribute to and enhance the natural and local environment by… minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures (Paragraph 187d).

G2.14 Paragraph 188 states that:-

'Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.'

G2.15 To protect and enhance biodiversity and geodiversity, plans should:-

'Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including: the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation (Paragraph 192a); and

'promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.' (Paragraph 192b).

When determining planning applications, local planning authorities should apply the following principles (Paragraph 193):-

a *'a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;*

b *b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;*

c *c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and*

d *d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.'*

In addition to the above, Paragraph 194 confirms that the following should be afforded the same protection as sites that are included within the definition at Regulation 8 of the Conservation of Habitats and Species Regulations 2017 (as amended) (Special Areas of Conservation, Sites of Community Importance, Special Protection Areas and any relevant Marine Sites (which are collectively referred to as 'habitats sites' in the NPPF)):-

a potential Special Protection Areas and possible Special Areas of Conservation;

b listed or proposed Ramsar sites; and

c sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.'

G2.16 Paragraph 195 states that:-

'The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.'

Local Planning Policy

G2.17 The existing Folkestone & Hythe District Council Places and Policies Local Plan (2020) contains the following relevant policies relating to ecology:

G2.18 The local plan does not provide specific policies regarding biodiversity net gain. However, Policy NE2 Biodiversity states that:

"Development and the Natural Environment

All new development will be required to conserve and enhance the natural environment, including all sites of biodiversity or geodiversity value (whether or not they have statutory protection) and all legally protected or priority habitats and species. The Council will support development that:

i Enhances, retains and protects existing sites and features of nature conservation value including wildlife corridors, ancient woodland (…);

ii *Incorporates features that enhance biodiversity as part of good design and sustainable development, including the creation of new pollinator habitat suitable to the scale of development. (…)*

Where an impact cannot be avoided or mitigated (including post-development management and monitoring), compensatory measures will be sought. The Council may, in exceptional circumstances, allow for biodiversity offsets, to prevent loss of biodiversity at the district level. Such compensation will be directed to Biodiversity Opportunity Areas (BOAs) within the district or projects identified in the Council's Green Infrastructure Plan."

G2.19 Policy NE5 Light pollution and external illumination states that applications should include a lighting assessment that includes details of:

- Where the light shines;
- When the light shines;
- How much light shines; and
- Possible ecological impact.

G2.20 In addition, the Folkestone & Hythe District Council Core Strategy Review (2022) (Folkestone & Hythe District Council, 2022) also contains the following policies relevant to biodiversity and nature conservation.

G2.21 *Green Infrastructure of Natural Networks, Open Spaces and Recreation states that:*

" 1. The council will require development proposals over their lifetime:

i To provide net gains in biodiversity at least to comply with statutory and/or national policy requirements (assuming no residual loss);

ii To demonstrate that they protect and enhance valued landscapes, sites of biodiversity or geological value (…); "

G2.22 The Kent Nature Partnership Biodiversity Strategy (Kent Nature Partnership, 2020) has selected 17 priority habitats and 13 species on which efforts should be specifically focussed and targets set. Those relevant to the Proposed Development include:

- Ponds;
- Wet woodland;
- Vegetated shingle;
- Hedgerows;
- Swift (*Apus apus*);
- Serotine bat (*Cnephaeus serotinus*); and
- Hedgehog (*Erinaceus europaeus*).

G2.23 Guidance used to conduct the relevant surveys and complete documents are;

- *Bird Census Techniques*- Bibby C.J, Burgess N.D, Hill D.A and Mustoe S. (2000;
- *Bird Survey Guidelines for assessing ecological impacts, v.1.1.1.* Bird Survey & Assessment Steering Group. (2025);
- *Guidelines for Preliminary Ecological Appraisal* CIEEM's (CIEEM, 2017);
- *Guidelines for Ecological Report Writing* (CIEEM, 2018);
- Ecology of the European Otter. Conserving Natura 2000 Rivers Ecology Series No.10 Chanin. P. (2003);
- The Herpetofauna Workers Manual (Gent and Gibson, 2003);
- *Reptile survey: An introduction to planning, conducting and interpreting surveys for snake and lizard conservation. Froglife Advice Sheet 10.* (Froglife, 1999);
- Surveying Badgers (Harris et al.1989);
- Bat Surveys for Professional Ecologists: Good Practice Guidelines. 4th edition, amended 27th March 2024(Collins, J. 2023);
- Water vole conservation handbook. Third edition authored by Strachan, R., Moorhouse, T. & Gelling, M. (2011) was used in relation to water vole surveys;
- Ecology of the European Otter. Conserving Natura 2000 Rivers Ecology Series No.10 was used to provide guidance on otter survey protocols; and
- The beaver survey was limited to presence/absence only, the survey differed from the Campbell-Palmer *et al* methodology and only recorded the location of signs and not the extent of beaver territories (Campbell-Palmer *et al*, 2021).

G3.0 Assessment Methodology & Significance Criteria

Assessment Methodology

G3.1 A biological records search was undertaken by Kent and Medway Biological Record Centre ('KMBRC') in 2023. The results of this data search are relevant to the Proposed Development (given recent date and immediate proximity). The data obtained through this search includes records of:-

- Legally protected species;
- Species of Principal Importance;
- Habitats of Principal Importance; and
- Non-statutory designated sites.

G3.2 Table G3.1 shows the relevant search radii for differing receptors.

Table G3.1: Search radii for different ecological receptors

Receptor	Search radius	Justification
International designated Site	10km	Relevant distance used by the local planning authority to identify potential effects on Internationally designated sites.
National designated site	2km	Relevant distance recognised as industry standard search radius for sites where an effect could be possible
Local designated site	1km	
Habitats of Principal importance; Ancient Woodland sites.	1km	
Protected species: bats, hazel dormouse (Muscardinus avellanarius) and otter (Lutra lutra)	5km	High dispersal rates of species and reliance on interconnected habitats such as rivers ponds, lakes and hedgerows where these are linked to woodland.
Protected species: Great Crested newt (Triturus cristatus)	1km (250m for suitable water bodies)	Proportionate to the scale of the Proposed Development. Accounts for studied movement distances of the species from breeding waterbodies.
Protected species: other Species of principal importance (Biodiversity Action Plan species, species, Red listed species).	1km	Proportionate to the scale of the Proposed Development.

G3.3 Records obtained within the ten-year period prior to the date of the record search are considered 'recent'. Records older than this are considered 'historic'.

G3.4 The Multi Agency Geographic Information for the Countryside ('MAGIC') website was used to obtain information about:-

- Statutory designated sites of international, national and local importance;
- Proposed, possible and potential statutory designated sites of international importance;
- Impact Risk Zones ('IRZ's) associated with Sites of Special Scientific Interest ('SSSI's) and statutory designated sites of international importance;
- Granted European Protected Species ('EPS') licences; and
- Great crested newt Class Survey Licence returns (England) (records of great crested newt, Triturus cristatus presence).

G3.5 The assessment approach used within this report has been informed by guidelines provided within BS 42020:2013: Biodiversity: Code of practice for planning and development (BSI, 2013).

G3.6 In particular, Section 5.5 of this guidance states that:

'The work involved in preparing and implementing all ecological surveys, impact assessments and measures for avoidance, mitigation, compensation and enhancement should be proportionate to the predicted degree of risk to biodiversity and to the nature and scale of the proposed development'.

G3.7 The report structure and content is informed by guidance provided within CIEEM 2017b, and within CIEEM's Guidelines for Ecological Report Writing (CIEEM, 2017a). CIEEM 2017a states that:

'It is important to remember that the structure and content of a report should be proportionate to the predicted degree of risk to biodiversity and to the nature and scale of the proposed development. Authors should only provide information that is relevant, necessary and material to the purpose identified, while at the same time ensuring that adequate details are provided for the intended reader and/or audience e.g. in the case of an EcIA, a local planning authority (LPA).'

G3.8 Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine (CIEEM, 2018) has also been used to inform an assessment method that can be applied to small development schemes where ecological risk/s are low and where no additional ecological survey work is recommended. In particular, the assessment approach has been informed by Paragraphs 1.9, 1.10 and 1.11 of CIEEM 2018, which state that:-

'The level of detail required in an EcIA will inevitably be proportionate to the scale of the development and complexity of its potential impacts. These Guidelines do not prescribe exactly how to undertake an EcIA, but provide guidance to practitioners for refining their own methodologies' (Para. 1.9);

G3.9 Scoping should be proportionate to potential effects on ecological features. Professional ecologists need to use their knowledge and experience to judge the resources required to complete an adequate and effective EcIA' (Para. 1.10); and

G3.10 Emphasis in EcIA is on 'significant effects' rather than all ecological effects (Para. 1.11).

Identification of Important Ecological Features

G3.11 Habitat criteria listed in best practice guidelines for individual species or species groups, such as ARG UK (2010) and BCT (2023), have been used to assess the suitability of habitats to support protected and/or priority species.

G3.12 Where best practice guidelines are unavailable or unclear, experienced ecologists have used their judgement to categorise the suitability of habitats to support protected or priority species.

G3.13 The need and scope for additional protected species surveys has been determined on the basis of the suitability of the habitats to support protected species, the potential impacts of the development proposals and the nature of the legal protection afforded to the species most likely to be present on site.

G3.14 Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 has been used to identify habitats and species considered to be a conservation priority at a national scale. These are also known as Habitats and Species of Principal Importance. The value of these habitats and species are recognised in the NPPF.

G3.15 Although it does not offer any legal protection Birds of Conservation Concern 5 (Stanbury *et al,* 2021) provides guidance on the conservation status of UK bird species. Thus, it can be used to inform judgements on the ecological value of bird populations and the habitats that they rely on, particularly at a local level. Red status species are those species of highest conservation concern and green status species are those of low or no conservation concern. Amber status species are those species of some conservation concern.

G3.16 Zone of Influence

G3.17 The potential impacts of a development are not always limited to the boundaries of the site concerned. The area over which a development may impact ecologically important features is known as the Zone of Influence ('ZoI').

G3.18 The ZoI is determined by the source/type of impact, the presence of any potential pathways for that impact and the location and sensitivity of the ecologically important off-site features.

G3.19 Potential sources of direct impact associated with the Proposed Development include the presence of habitat corridors (hedgerows and tree lines) that link the on-site habitats to off-site habitat areas suitable for the same protected and/or priority species. The presence of these habitat corridors means that any protected and/or priority species that utilise on-site habitats are likely to form part of a wider local population. Therefore, impacts upon on-site habitats suitable for these species may have impacts upon wider local population(s).

G3.20 The following surveys listed below were undertaken to inform the assessment. Second stage surveys were triggered as a result of the findings within the Preliminary Ecological Assessment Report ('PEAR') (Lloydbore Ltd, 2023). The methodologies including guidelines these surveys followed are identified within Section G2.0 of this chapter and detailed within the relevant reports (see Appendix G1 to G5).

- Preliminary Ecological Appraisal Report (April 2023) (Appendix G1);
- Reptile Survey (April to June 2025) (Appendix G2);

- Breeding Bird Survey (2025) (Appendix G3);
- Bat Surveys (April to October 2023) (Appendix G4);
- Riparian Mammal Survey (2025) (Appendix G5); and
- Badger Survey Report (March 2023).

G3.21 The ecological surveys completed as part of the baseline collection of data were completed following the below guidance documents/ guidelines:

1 The Preliminary Ecological Appraisal was in broad accordance with CIEEM's *Guidelines for Preliminary Ecological Appraisal* (CIEEM, 2017) and *Guidelines for Ecological Report Writing* (CIEEM, 2018).

2 The Herpetofauna Workers Manual (Gent and Gibson, 2003), Froglife Reptile Survey Guidance (Froglife, 1999) and other associated guidelines have been used to both assess the suitability of on-site and adjacent habitats for reptiles and inform the scope of survey works required to determine presence/likely absence of reptiles.

3 Breeding bird survey was undertaken based on a standard territory mapping (Common Birds Census (CBC)) methodology for surveying breeding birds, as detailed in Bibby et al (2000) and Gilbert et a (1998) with reference to the Bird Survey Guidelines (Bird Survey & Assessment Steering Group (2025)).

4 Badger survey was informed by principles set out in Mammal Society good practice guidelines for surveying badgers (Harris et al.1989).

5 Bat surveys were completed in accordance with Bat Conservation Trust Guidelines (Collins, J. 2023)

6 The riparian mammal survey was conducted using criteria set out within Strachan *et al.*, (2011) and Dean *et al.,* (2016) (watervoles), and Chanin, 2003 (otter)

7 The beaver survey was limited to presence/absence only, the survey differed from the Campbell-Palmer *et al* methodology and only recorded the location of signs and not the extent of beaver territories (Campbell-Palmer *et al*, 2021)

Assessment criteria

G3.22 Criteria applicable to the assessment of effects upon important ecological features, as referenced within EcIA guidance (CIEEM, 2018) and within this assessment, are described in brief below.

Identification of Important Ecological Features

G3.23 It is impractical and inappropriate for an assessment of the ecological effects of a development proposal to consider every species and habitat that may be affected. Instead, it should focus on ecological features which are considered important. These are species and habitats present within the ZoI that are of sufficiently high value that an effect upon them, as a result of a development proposal, could be considered to be significant.

G3.24 Data received through consultation, desk-based investigations and field-based investigations have been used to identify relevant ecological features (including designated

sites, ecosystems, habitats and species) of importance (or potential importance). The main factors contributing to their importance are described and related to available guidance.

G3.25 The valuation of species populations, assemblages of species and habitats use accepted criteria. Examples include:

- Species populations – The importance of populations was evaluated on the basis of their size, recognised conservation status (e.g. published lists of species of conservation concern, national and local priority species lists) and legal protection status;
- Species assemblages – In some instances a species assemblage may be the feature of importance. Criteria used to evaluate the importance of assemblages include applicable SSSI and LWS (Local Wildlife Site) selection criteria; and
- Habitats – Criteria for the evaluation of habitats and plant communities included in Annex III of the EC Habitats Directive, guidelines for the selection of biological SSSIs and local authority and/or Wildlife Trust criteria for selection of Local Wildlife Sites (also referred to as County Wildlife Sites or Sites of Importance for Nature Conservation).

Determining importance of ecological features

G3.26 The CIEEM (2018) guidelines advocate an approach to the assessment of the importance of ecological features using a geographical framework, where the importance or potential importance of an ecological resource or feature should be determined within a defined geographical context.

G3.27 The guidelines suggest a range of geographical parameters and those used within this assessment are:-

- International (e.g. Europe);
- National (e.g. England);
- Regional (e.g. South East region);
- County (e.g. Kent);
- Local (e.g. Hythe); and
- Negligible (i.e. insignificant in the context of this assessment).

G3.28 The assignment of a geographical framework has been based on available guidance and information, professional judgement and peer review. The evaluation categories used, and example criteria are presented in Table G3.2 below.

Table G3.2: Evaluation Categories (CIEEM 2018) and Example Criteria.

Geographic Importance	Example Criteria
International	Internationally significant populations of European Protected Species (Annexe IV), Annexe II species, or species otherwise formally deemed to be rare and threatened in Europe or globally (e.g. International Union for the Conservation of Nature (IUCN) 'red-listed'), the loss of which would significantly change the species' overall

Geographic Importance	Example Criteria
	conservation status (i.e. range, abundance, population trend) at the European scale. A population that would meet the published selection criteria as a qualifying feature for designation of a SAC. An internationally designated site or candidate site, i.e. a SPA, proposed SPA (pSPA), SAC, candidate SAC (cSAC), Ramsar site, or an area which would meet the published selection criteria for such designation. Other significant areas of Annex I priority habitats listed in the Habitats Directive, the loss of which would significantly change the overall range and area at the European scale in the long term.
National	Nationally significant populations of species identified in the Natural Environment and Rural Communities (NERC) Act 2006 Section 41 as being of principal importance for the conservation of biodiversity in England, or otherwise formally deemed to be nationally rare and threatened (e.g. 'red-listed'), the loss of which would significantly change the species' overall conservation status (i.e. range, abundance, population trend) at the national scale. A population that would meet the published selection criteria as a qualifying feature of a SSSI. A nationally designated site, i.e. SSSI, NNR or discrete area which would meet the published selection criteria for national designation (e.g. SSSI selection guidelines). A significant area of a non-designated habitat type identified in the NERC Act 2006, Section 41 as being of principal importance for the conservation of biodiversity in England, the loss of which would significantly change the overall range and area of that habitat at the national scale in the long term. Such habitat should be a major component of areas that are at near-equivalence to SSSIs, meeting most of the published SSSI selection criteria.
Regional	Regionally significant populations of species identified in the NERC Act 2006 Section 41 as being of principal importance for the conservation of biodiversity in England, or otherwise formally deemed to be nationally rare and threatened (e.g. 'red-listed'), the loss of which would significantly change the species' overall conservation status (i.e. range, abundance, population trend) at the regional scale. A significant area of a non-designated habitat type identified in the NERC Act 2006, Section 41 as being of principal importance for the conservation of biodiversity in England, the loss of which would significantly change the overall range and area of that habitat at the regional level in the long term. Large areas of semi-natural ancient woodland that do not meet the national importance criteria (above) should be considered at this scale due to the irreplaceable nature of such habitat.
County	Significant populations of species identified in the NERC Act 2006 Section 41 as being of principal importance for the conservation of biodiversity in England, or otherwise formally deemed to be nationally rare and threatened (e.g. 'red-listed'), or priority species in the County Biodiversity Action Plan (BAP), the loss of which would significantly change the species' overall conservation status (i.e. range, abundance, population trend) at the County scale. Sites formally recognised by local authorities, e.g. Local Wildlife Site (LWS) or considered to meet published ecological selection criteria for such designation. A significant area of a non-designated habitat type identified in the NERC Act 2006, Section 41 as being of principal importance for the conservation of biodiversity in

Geographic Importance	Example Criteria
	England, the loss of which would significantly change the overall range and area of that habitat at the county scale in the long term. Small areas of semi-natural ancient woodland that do not meet the national or regional importance criteria (above) should be considered at this scale due to the irreplaceable nature of such habitat. A significant area of key habitat identified in the County BAP.
Local	Significant populations of species identified in the NERC Act 2006 Section 41 as being of principal importance for the conservation of biodiversity in England, or otherwise formally deemed to be nationally rare and threatened (e.g. 'red-listed'), or priority species in the County BAP the loss of which would significantly change the species' overall conservation status (i.e. range, abundance, population trend) at the district or borough scale. Sites formally recognised by local authorities, e.g. Sites of Borough Importance for Nature Conservation (Borough/Local SINC), LNRs, or considered to meet published ecological selection criteria for such designation. A significant area of a non-designated habitat type identified in the NERC Act 2006, Section 41 as being of principal importance for the conservation of biodiversity in England, the loss of which would significantly change the overall range and area of that habitat at the district scale in the long term. A significant and viable area of habitat identified in the District BAP.
Negligible	Species populations of limited ecological importance due to their size, composition or lack of threat/rarity. The loss of such features would have no discernible impact on the species'/habitat's overall range and conservation status at any formal administrative scale in the long term. Areas of habitat of limited ecological importance due to their size, species composition or lack of threat/rarity. The loss of such features would have no significant impact on the habitat's overall range and conservation status at any administrative scale in the long term.

G3.29 Only habitats and species considered to be of at least local importance will be fully assessed within this assessment. Features of negligible importance are scoped out of the assessment because it is considered that their loss would not result in a Significant effect in EIA terms.

The only exception to this is where a habitat or species has been afforded a level of legal protection that requires it to be considered more fully, irrespective of that feature's assumed ecological importance (e.g. badger). This has been made clear whenever this occurs.

Significance Criteria

G3.30 Once an ecological feature has been assigned a geographic level of importance, the next stage is to assess the significance of the predicted impact to that feature.

The CIEEM (2018) Guidelines advise that 'the scale of significance of an effect may not be the same as the geographic context in which the feature is considered important… For example, an effect on a species which is on a national list of species of principal importance for biodiversity may not have a significant effect on its national population. Examples of other relevant scales include regional and county. It should be noted that effects may be significant at the local scale, particularly in view of policies for no net loss of biodiversity.'

G3.31 It is therefore sometimes possible that an effect may not be significant at the feature's given level of importance due to its low magnitude, duration, etc., but may be significant at a lower geographic scale. For example, the effects of an impact on a species of county importance may not be discernible or significant at the county scale but may be significant at the local (district) scale. Where this is the case, it is stated in the assessment.

G3.32 Conversely, it is important to note that the level of significance of an effect upon an important ecological feature cannot be greater than the geographic level of importance attributed to that feature. For example, if a protected species population (the important ecological feature) is attributed 'local' level importance, the effect upon this population cannot be of greater than 'local' significance.

G3.33 It is important to note that the CIEEM Guidelines do not recommend assigning any other terms to the impact significance such as 'high', 'moderate' or 'low/minor', such as those found within other aspects of Environmental Impact Assessment (EIA) practice.

G3.34 To determine the likely significance of an impact, the following parameters may be used in reference to impacts:

- Type of impact: direct or indirect, beneficial or adverse;
- Magnitude of impact - the 'amount' or intensity of an impact. This may sometimes be synonymous with 'extent' (see below) for certain impacts, such as habitats loss. For mortality it may be the number of individuals killed. This is described as Major, Moderate, Minor, Negligible and Nil in this Chapter;
- Extent of impact - the area over which the impact will be felt;
- Duration of impact - how long a period it will occur across;
- Timing of impact - when it will occur, taking particular note of seasonality;
- Frequency of impact - how often it will occur; and
- Reversibility of impact - a reversible impact is one from which spontaneous/natural recovery is possible; or for which effective mitigation is both possible and an enforceable commitment to this can be made.

G3.35 CIEEM Guidelines suggest that ecological impact durations should be described in terms of ecological characteristics (e.g. species lifecycles/longevity) rather than human timeframes. Therefore, for this assessment, short-term is up to one (breeding/wintering, etc.) season, medium-term is a typical reproductive lifespan (in the wild), and long-term is over several generations. A permanent impact is one where no reasonable chance of recovery/restoration is evident within the foreseeable future.

G3.36 Mitigation for identified impacts will be based on a 'hierarchy' of mitigation options starting with the most desirable approach, this is to avoid adverse impacts where possible. Where avoidance is not possible, then to minimise (or otherwise reduce) what cannot be avoided; and finally remedy (restore) what cannot be reduced.

G3.37 Note that compensation is regarded as separate from mitigation, with compensation being required when the above measures still result in a significant residual impact. Compensation measures are often employed off site, when on-site mitigation measures are not feasible or successful.

G3.38 The significance of effects is based on the ecological importance of the receptor on a geographic scale. Effects either beneficial or adverse that have been identified as impacting on a receptor of local level is considered to be of minor significance, county level, Moderate significance and national/ international, Major significance. Where the effect has a different level of significance on a specific receptor, such as the status of a protected species, this is stated clearly in the text. Effects that are determined to have a residual effect of Moderate or greater are considered to be Significant. Table G3.3 summarises the relationship between the geographical scale at which effects are considered significant, and the significance of effects in EIA terms.

Table G3.3 Significance of Ecological Effects

Geographic scale at which effects are significant	Effect Significance in EIA terms	
Negligible	Negligible	Not Significant
Local	Minor Adverse/Beneficial	Not Significant
County/Regional	Moderate Adverse/Beneficial	Significant
National/International	Major Adverse/Beneficial	Significant

Consultation

G3.39 There has been no consultation beyond that undertaken in relation to the EIA Scoping process, as described in Chapter B of this ES, with the Council in relation to ecology.

Assumptions and Limitations

G3.40 The Site visit was conducted during the winter period, when identification of individual plant species can be difficult or impossible. The identification of habitats outside of the typical main plant flowering period can lead to inaccuracy or uncertainty when assigning habitat categories.

G3.41 Presence of rare or scarce plant communities and invasive plants can also go undetected during winter surveys.

G3.42 Diagnostic indicators of some invasive non-native plant species can still be detected during winter, provided that these are evident at the time of the site visit. However, the timing of the survey visit remains a minor limitation to the ability of the surveyor to detect invasive flora.

G3.43 The Site supports common and widespread habitat types that are subject to regular intensive management, and is not likely to support any rare or scarce plant communities.

G3.44 An ecological survey provides a summary of the ecological condition of a site. The extent and quality of habitats present, and their suitability for protected and priority species, can change substantially between years, depending on the type of habitat and influencing factors (such as site clearance or management). However, any seasonal limitations to the appraisal are clearly identified in this report, and the *Lifespan of this appraisal* section of this report at least partially addresses the potential for changes between years. Therefore, this standard limitation is addressed as far as is reasonably possible.

G3.45 Based on the updated ecological walkover completed in June 2025, it is assumed that the content of existing reports such as the PEAR remain in date and valid.

G3.46 The June visit found baseline conditions in terms of habitat distribution and condition to be sufficiently similar to those recorded in 2023 to allow for PEA report to reflect the current situation accurately. This included the lack of evidence for badgers other than incidental foraging signs (snuffle holes) with no setts within 30m of the Site.

G4.0 Baseline Conditions

Current Conditions

G4.1 The existing baseline conditions for the ecological receptors identified for the Site are described below. A summary table for the level of importance these features are considered to have, and whether they are scoped in or out of the assessment, is provided in a table at the end of this section.

International Designated sites

G4.2 Three international designated sites are within a relevant distance (10km) from the Site. These are Folkestone to Etchinghill Escarpment Special Area of Conservation (SAC) and Dungeness, Romney Marsh and Rye Bay Ramsar and Special Protection Areas (SPA) Marine components.

G4.3 Folkestone to Etchinghill Escarpment SAC is situated c. 3 km to the north of the Site at its closest point. The sites qualifying features are listed as being a semi-natural dry grassland and scrubland on calcareous substrates which are classed as an important orchid site supporting rare species such as early spider orchid (Ophrys pratensis), late spider orchid (ophrys fuciflora) and burnt orchid (orchis ustulata) amongst other orchid species.

G4.4 Particular threats to this designated site as listed within the standard data form for the site are K02 (succession), H04 (air pollution, air borne pollution) and A04 (grazing), with H04 being listed as an external pressure.

G4.5 The Dungeness, Romney Marsh and Rye Bay SPA Marine components are situated c.3.04 km south west at closest point.

G4.6 The site's qualifying features are listed as being an important bird assemblage site, used regularly by 1% or more of the British populations of 13 Annex 1 species. In addition, the site regularly supports over 20,000 waterbirds over all seasons (important waterbird assemblage site)

G4.7 Relevant external threats and pressures on the designated site are listed as; I01 (Invasive non-native species), M02 (changes in biotic conditions) and K03 (interspecific faunal relations)

G4.8 The third site is Dungeness, Romney Marsh and Rye Bay Ramsar situated 3.04km to the south west of the Site.

G4.9 The most recent data sheet for the site (issued 15th January 2025) cites the selection criteria as qualifying under Criterion 1 for supporting rare or unique examples of near-natural wetlands with types including annual vegetation of drift lines and coastal fringes.

G4.10 Other reasons include:

- the presence of natural shingle wetlands: saline lagoons, freshwater pits and basin fens along with Criterion 2 qualifiers including supporting several protected species of conservation importance such as Warne's thread moss (*Bryum warneum*), water vole (*Arvicola amphibius*), great crested newt (*Triturus cristatus*), medicinal leech

(*Hirundo medicinalis*) *Omophron limbatum* (a species of ground beetle), marsh mallow moth (*Hydraecia osseola*) and De Folin's lagoon snail (*Caecum amoricum*).

- Criterion 5 qualifier for supporting greater than 20,000 waterbirds
- Criterion 6 qualifiers for supporting a significant proportion of a bird species population- 1.1% of British Mute Swan (*Cygnus olor*) and 1.2% of shoveler (*Spatula clypeata*) populations.

G4.11 Threats relevant to the site have been identified as housing and urban areas (low impact), tourism and recreation (medium impact), water regulation including drainage and water abstraction (medium and high impacts), household sewage and urban wastewater, solid waste, airborne pollutants and climate change (stormier winters and rainfall both affecting the formation and maintenance of habitats).

National Designated Sites

G4.12 Two nationally important designated sites are found within a relevant distance (2km) from the Site (within the zone of influence as determined by distance from the Proposed Development). These are Seabrook Stream Site of Special Scientific Interest (SSSI) and Lympe Escarpment SSSI. Both sites are described as being in unfavourable but recovering condition.

G4.13 The Site falls within the outer risk zones for both Seabrook Stream and Lympe Escarpment SSSI's.

G4.14 Seabrook Stream SSSI is located c.1.6 km north of the Site at its closest point.

G4.15 The SSSI site is described supporting both Alder carr (wet woodland) and fen communities. These habitats are cited as supporting an exceptional diversity of cranefly species with 67 species being recorded including nationally scarce species. In addition, a further 14 invertebrate species of national scarcity have also been recorded using the site.

G4.16 Relevant threats or pressures on the designated site are listed as (magic.gov.uk accessed 07/01/2025):

- **Infrastructure:** Pipelines and underground cables, pylons and overhead cables (excluding upgrades and refurbishment of existing network). Any transport proposal including new or extended footways, cycleways, roads/car parks, railways and waterways (excluding routine maintenance). Airports, helipads and other aviation proposals.
- **Residential:** Residential development of 50 units or more.
- **Air Pollution:** Any development that could cause air pollution or dust either in its construction or operation (including: industrial/commercial processes, livestock & poultry units, slurry lagoons/manure stores).
- **Discharge:** Any discharge of water or liquid waste of more than 20m³/day that is discharged to ground (ie to seep away) or to surface water, such as a beck or stream.

G4.17 Lympe Escarpment SSSI is located *c.1.8* km west of the Site at its closest point.

G4.18 The SSSI is described supporting grassland and woodland, including on of the best examples of semi-natural habitats on ragstone in Kent. This includes Lympe Park Wood which is noted as being the largest remaining example of ash coppice woodland on ragstone and thought to be of ancient origin. These habitats are cited as supporting an exceptional diversity of cranefly

G4.19 Relevant threats or pressures on the designated site are listed as per Seabrook Stream SSSI above.

Local Designated Sites

G4.20 Two locally designated sites are found within a relevant distance (1km) to the Site, these are the Royal Military Canal ('RMC') Local Wildlife Site ('LWS') and Paraker Wood and Seabrook Stream, Shorncliffe LWS.

G4.21 The RMC LWS is located directly north, adjacent to the Site.

G4.22 The LWS has been designated for supporting rare plant species, as well as 12 species of *Odonata* (dragonflies and damselflies), its bird assemblage, grass snake (*Natrix helvetica*), common toad *(Bufo bufo*), foraging pipistrelle (*Pipistrelle sp.*) and Daubenton's bat (*Myotis daubentonii*).

G4.23 Paraker Wood and Seabrook Stream, Shorncliffe LWS is located c.0.9 km northeast of the Site at closest point.

G4.24 This LWS has been designated for its ancient woodland and related faunal assemblages.

Ancient Woodland

G4.25 The nearest area of ancient woodland is Parker Wood located 0.8 km to the northeast; this is the only area of ancient woodland found within a 1km radius of the Site.

Habitats

G4.26 The current site comprises *c.* 17.3 ha with a complex of habitats dominated by a combination of modified grassland and other neutral grassland with smaller areas of dense scrub, buildings (the Hythe Imperial Hotel and smaller buildings associated with the adjacent golf course), hedgerow, scrub and scattered trees. More detailed account of the individual habitats are provided below. The PEA and follow-up ecological walkover (Lloydbore, 2023 & 2025- Appendix G1) provide the following descriptions for baseline habitats on site.

Grasslands

G4.27 Grasslands are the dominant habitat type present on Site (1.6ha other neutral grassland, 13.6 ha modified grassland). The areas of modified grassland generally having a low species diversity, supporting few forbs and used continuously by a combination of golfers and dog walkers.

G4.28 Smaller areas of other neutral grassland are present along the edges of the Site and within rough sections of the golf course. These again are mostly grass-dominated habitats with few forbs. However, these areas show a greater floristic diversity especially along the top of the

bank adjacent to Princes Parade noted to have some slight saline influences with plants such as sea thrift (*Armeria maritima*), Danish scurvygrass (*Cochlearia danica*) and rare occurrence of Pyramidal orchid (*Anacamptis pyramidalis*) noted along with the typical terrestrial grassland species. Red fescue (*Festuca rubra*) dominant, creeping bent (*Agrostis stolonifera*), cocks foot (*Dactylus glomerata*) birds foot trefoil (*Lotus corniculatus*), white clover (*Trifolium repens*), black medic (*medicago lupilina*) ribwort plantain (*Plantago laneolata*).

G4.29 The management of the taller, other neutral grassland appears to be a non-interference approach, the sward being kept long and unmown year round. The absence of grazing and/or mowing has helped develop a thatch of dead grasses that are likely to be a factor in the current lack of species diversity throughout the majority of the grassland.

G4.30 As most of the Site is being managed as a golf course, the majority of the grassland areas are regularly managed, involving frequent mowing. The site is also used informally after hours by frequent dog walkers. The areas of other neutral grassland are restricted to the banks to the south and north of the site, with areas to the north formed of a more rank grassland than the south.

G4.31 Grasslands on site are considered to be of Negligible importance. This is due to a combination of low distinctiveness, widespread distribution of the habitat types and low species diversity.

Scrub

G4.32 Discrete areas of scrub totalling 0.2ha are present along the footpath through the Site. This comprises a mix of self-set plant species including elder (*Sambucus nigra*), hawthorn (*Crataegus monogyna*) and blackthorn (*Prunus spinosa*), stinking iris (*Iris foetidissima*), red dead nettle (*Lamium purpureum*), comfrey (*Symphytum officinale*), lords and ladies (*Arum maculatum*), cleavers (*Galium aparine*) and travellers joy (*Clematis vitalba*).

G4.33 Areas of scrub closer to the seafront in the south of the Site are dominated by non-native tamerisk (*Tamerix sp.*) covering approximately 0.3ha.

G4.34 Both scrub habitat types found on Site are considered to be of Negligible importance. This is due to the small amount of habitat present, dominance of a non-native species (tamarisk scrub) widespread distribution of the habitat both locally and nationally (mixed scrub).

Hedgerows

G4.35 One hedgerow 0.095km in length is present along the western boundary between the golf course and the edge of the Site. This is a young planted hedge of uniform height and width comprising hawthorn, field maple (*Acer campestre*), blackthorn and elder. Based on its composition and age, the hedgerow does not qualify as a Habitat of Principal Importance.

G4.36 Based on the extent and condition of the habitat, hedgerow on Site is of Negligible importance.

Buildings

G4.37 Buildings comprise the hotel and related golf course buildings in addition to a small fortification (bunker) from the 1940's. These have no associated flora or fauna.

G4.38 The absence of any intrinsic ecological value gives the built environment a Negligible importance.

Bare ground

G4.39 Bare ground is made up of maintained sand bunkers as part of the golf course. These have no other ecologically notable features and therefore are of Negligible importance.

Species

Amphibians and Reptiles

G4.40 One species of amphibian has been confirmed for the Site. This is common toad (*bufo bufo*) which is likely to use suitable terrestrial habitat such as the scrub and tall grassland for both foraging and cover and the RMC, which is present to the north of the Site, for breeding. Breeding presence of common toad was confirmed during riparian mammal surveys of the RMC (Lloydbore Ltd *pers obs*, Kent & Medway Biological Records Centre, 2023).

G4.41 Common toad are therefore considered to be present on Site. Given the documented declines in the species population combined with its status as a Biodiversity Action Plan species, the population present is considered to be of 'Local' importance.

G4.42 The RMC provides unsuitable habitat for great crested newt due to the presence of fish populations and lack of connectivity to suitable breeding ponds in the wider area. As this is the only standing water within a relevant distance (1km) from the Site (within a distance likely to be travelled by the species), great crested newt are considered likely absent.

G4.43 A Kent and Medway Biological Records Search for 1km around the Site provided no records for reptiles.

G4.44 Previous surveys for areas adjacent to the Site to the east, have previously located additional reptile species, this included 'good' populations of both slow-worm (*Anguis fragilis*) and common lizard (*Zootoca vivipara*) in 2016. Their presence within this adjacent area and not on Site is likely due to the greater extent and interconnectivity of suitable habitat present (grassland, tall ruderal habitat and scrub) when compared to the Site, which is mostly short mown grassland which is unsuitable for reptiles.

G4.45 The linear areas of rough neutral grassland along the southern bank on Site and along parts of the RMC bank to the north of the Site provide suitable habitat for common reptile species. The grassland provides both shelter, basking and foraging opportunities. The regular use of the adjacent areas by the public results in high levels of disturbance reducing suitability.

G4.46 Habitats on Site have some (limited) connectivity to suitable habitat off site along the RMC to the north and mature gardens. The wider RMC corridor to the west of the Site becomes more formal, with short mown grasslands and clear steep artificial canal banks intersected by multiple small roads and footpaths with regular public use providing poor suitability for reptiles. Some connectivity is likely possible through the network of residential gardens with varying unknown levels of suitability.

G4.47 A population assessment comprising 15 survey visits within the suitable habitat identified one reptile species using the site (Lloydbore,2025- Appendix G2). This is grass snake

(*Natrix helvetica*), with individuals found within the taller grassy areas to the south within the Site. Based on the peak count of two, the population is estimated to be 'low'. Grass snake population is therefore categorised as being of 'Negligible' importance.

G4.48 No other reptile species was found during the surveys in 2023 or 2025.

Breeding birds

G4.49 Biological records for 1km radius of the site found 25 bird species of conservation concern recorded as being on Site (reed bunting (*Emberiza schoeniclus*), skylark (*Alauda arvensis*), greenfinch (*Carduelis chloris*), starling (*Sturnus vulgaris*), lapwing (*Vanellus vanellus*), kestrel (*Falco tinnunculus*), mistle thrush (*Turdus viscivorus*), common crossbill (*Loxia curvirostra*), osprey (*Pandion haliaetus*), sandwich tern (*Sterna sandvicensis*), song thrush (*Turdus philomelos*), dunnock (*Prunella modularis*), cuckoo (*Cuculus canorus*), common tern (*Sterna hirundo*), little egret (*Egretta garzetta*), hobby (*Falco subbuteo*), swift (*Apus apus*) and grey partridge (*Perdix perdix*).

G4.50 Breeding bird surveys on the Site identified an assemblage of 37 bird species, all of these species were noted to directly use the Site (Lloydbore, 2025- Appendix G3).

G4.51 Of the 37 species recorded, seven are noted as species of conservation concern under Section 41 of the NERC. These are herring gull, starling, linnet, greenfinch, swift, house sparrow and song thrush. In addition to these, two schedule 1 species (Cetti's warbler (*Cettia cetti*) and kingfisher (*Alcedo atthis*)) were found within the zone of influence along the RMC (adjacent off-site to the north) but not on Site.

G4.52 No schedule 1 species associated with the international designated sites qualifying features were recorded during the surveys.

G4.53 Cumulatively, the bird assemblage using the site is concluded to be of 'Local' importance.

Roosting bats

G4.54 The KMBRC data search returned recent and historic records of eight bat species within 1km of the Site. These are:

- serotine (*Cnephaeus serotinus*);
- Daubenton's bat (*Myotis daubentonii*);
- Natterer's bat (*Myotis nattereri*);
- noctule (*Nyctalus noctula*); and
- common pipistrelle, soprano pipistrelle and Nathusius' pipistrelle (Pipistrellus pipistrellus, P. pygmaeus, P. nathussii).

G4.55 These included recent records of a maternity roost c. 250m to the east of the Site.

G4.56 A search of Natural England's MAGIC website returned six records of granted bat EPS mitigation licences within 4km of the application site. These records relate to non-breeding roosts.

G4.57 The initial assessment of the Site for roosting bats identified three grey poplar (*Populus x canescens*) trees (PRF-I) along the RMC (adjacent off-site), as well as two buildings supporting suitable features for bats (Appendix G1)

G4.58 Building B1 is a small single-storey brick-built wartime storage bunker with a flat cement block roof. The corner of the building has partially collapsed providing access for bats into the wall cavity of the building. The small slot openings also provide suitable access to the interior of the building. Based on the position, age and features present, the building was categorised as being of 'moderate' suitability for hibernating bats. Further survey of the brick bunker found no evidence of use by roosting bats.

G4.59 Building B2 is a single-storey building with a pitched interlocking tile roof. The building was utilised for grounds maintenance at the time of the survey. Suitable potential roosting features (PRF's) include cracks in the brickwork, and lintel and gaps under the tiles provide potential suitable ingress of roosting bats. Based on the position, age and features present, the building was categorised as being of 'high' suitability for roosting bats.

G4.60 Two structures on site were found to support features suitable for roosting bats. Further investigations of these structures including daytime building inspection and emergence surveys between 2023 and 2024 identified no roosts to be present (Appendix G4).

G4.61 The Hythe imperial hotel and adjacent structures were also found to have no suitable features for roosting bats.

G4.62 No roosting bats were found to be using any of the PRF's identified during the PEA. As such, roosting bats do not pose an immediate constraint on the proposed development. Desk study information highlights the locations of roosts close to the Site.

G4.63 None of the trees within the redline boundary of the site were found to have features suitable for roosting bats. Trees adjacent to the redline boundary previously subject to emergence surveys similarly identified no roosts to be present.

G4.64 The absence of bat roosts on Site makes the Site of Negligible importance to roosting bats. Roosting bats are therefore scoped out of further assessment.

Foraging bats

G4.65 With the exception of the hotel in the west of the Site, the Site comprises grassland and scattered trees that provide suitable foraging habitat for bats. Given the composition of these habitats, they are evaluated as being of moderate suitability.

G4.66 These habitats are however situated adjacent to the RMC to the north. The combination of slow-moving eutrophic water, scrub and bankside trees provides foraging habitat of high suitability. The neighbouring land uses (gardens to the north buffered by additional scrub and tall ruderal habitats, and golf course to the south buffer these features from light pollution and provide additional foraging resources).

G4.67 The adjacent off-site RMC LWS and immediate environs provide good foraging habitat for bats.

G4.68 The species of bats identified during the survey include *P.pipistrellus*, *P. pygmaeus*, *Plecotus auratus*, *Nyctalus noctula*, *Cnephaeus serotinus*, *Nyctalus leislerii* and *Myotis daubentonii*.

G4.69 The adjacent RMC LWS was found to be the foci for the presence of foraging bats, with regular constant activity noted from the species recorded on Site over all active seasons (spring, summer and autumn, taken to be between April and September inclusive), although all species were recorded to a lesser extent over the Site (around the northern Site boundary close to the RMC LWS) (Appendix G4).

G4.70 Species such as noctule and serotine were only occasionally encountered. These bats appeared to commute over the Site, with only occasional foraging activity.

G4.71 Based on the number of bat species recorded on the Site, the bat assemblage (more than four species) is considered to be of County importance in Kent.

Riparian mammals

G4.72 Riparian mammal surveys were completed in both 2023 and 2025. Neither survey recorded any indication of use by water vole (*Arvicola amphibius*), otter (*Lutra lutra*) or beaver (*Castor fiber*) (Appendix G5).

G4.73 Due to the likely absence of these species, the Site and immediate surrounds is considered to be of Negligible importance to protected riparian mammal species.

Badger

G4.74 Surveys of the Site for badger found evidence of foraging only (see Badger Survey Report at Appendix G6). The Site both in 2023 and 2025 did not support any badger setts either within the Site or within a 30m buffer. (Appendix G1). It is likely that the openness of the Site combined with regular use by the public for leisure (walking, dog walking and golf) is likely to pose a deterrent to use for a sett when suitable quiet conditions are available nearby to the east of the Site.

G4.75 Previous surveys of land adjacent to the Site (east) provide the locations of a known main sett for the local badger clan, the golf course forming part of the clans wider foraging territory.

G4.76 Given the absence of a sett and the limited foraging activity, the Site is assessed to be of Negligible importance for Badgers.

Table G4.1: Baseline receptor summary table

Identified receptor	Level of importance	Scoped In or Out of assessment
International designated sites: Folkestone to Etchinghill Escarpment SAC Dungeness, Romney Marsh and Rye Bay Ramsar and SPA	International importance	Scoped in
National designated sites: Seabrook Stream SSSI	National importance	Scoped in

Identified receptor	Level of importance	Scoped In or Out of assessment
Lympe Escarpment SSSI		
Local designated sites: RMC LWS Parker Wood and Seabrook Stream, Shorncliffe LWS	County importance	Scoped in
Ancient woodland: Parker Wood	National importance	Scoped in
Onsite Habitats: Other Neutral Grassland Modified Grassland Scrub Hedgerows Built development Bare ground	Negligible importance	Scoped out
Common toad population	Local importance	Scoped in (legal protection)
Grass snake population	Negligible importance	Scoped in (legal protection)
Breeding birds	Local importance	Scoped in
Roosting bats	Negligible importance	Scoped out
Foraging bats	County importance	Scoped in
Riparian mammals: Water Vole Otter Beaver	Negligible importance	Scoped out
Badger population	Negligible importance	Scoped out

Future Baseline

G4.77 In the absence of the Proposed Development, the Site is expected to remain in a similar state as described for the baseline above and in the related reports (Appendices G1 – G5). This would be areas of modified grassland, taller other neutral grassland (with minor saline influences towards the seafront), mixed scrub and non-native tamarisk scrub along with scattered trees managed as part of the golf course.

G4.78 The current management is likely to prevent any significant successional changes on the Site, seeing the distribution and types of habitats remaining the same.

G4.79 Given the types of habitat present and species, which can also be found further south on the continent under warmer conditions, climatic change over the very short term (50 years) is predicted to have no effect on the current character of existing habitats on Site.

G5.0 Potential Effects

Embedded Mitigation

During Construction

G5.1 The project CEMP (Appendix C4) provides standard industry measures to prevent damage to existing habitats and features during construction through the installation of protection fencing, management of materials and working practices to either avoid or minimise harm on existing retained habitats and species both on and off site.

G5.2 Mitigation for the Site preparation and construction phase assumes that a competent contractor will be used who is familiar with, and will adhere to, industry-standard environmental safeguards. In particular, it is assumed that industry-standard measures for reducing or eliminating noise, dust, water pollution, silt run-off, etc. will be implemented as detailed within the CEMP (Appendix C4).

G5.3 Measures to deal with potential dust risks included within the CEMP include wheel washes, water suppression and fences are used to minimise or prevent spreading of dust during the construction phase of the Proposed Development.

G5.4 Measures to avoid harm to animals during construction include covering excavations and/or providing mammal ladders to allow animals to exit any below ground pits left overnight. In addition, vegetation clearance would be completed in a phased manner under suitable seasonal and weather conditions to avoid nesting birds (scrub removal) and allow for the detection of reptiles, amphibians and small mammals and allow them to either disperse or moved to adjacent suitable retained habitats on site.

G5.5 The creation of new habitats within the site has the potential to introduce foreign pathogens and invasive non-native species from either the stock choice or selection of plantings. These are both avoided by design, seeking local native stock for planting and quality assurances from plant stock providers to minimise the risk of new pathogens entering the surrounding environs. This includes avoiding naturalised or species known to aggressively spread but are not listed under schedule 9 of the wildlife and countryside act (1981 as amended) such as non-listed species of *cotoneaster*, firethorn (*Pyracantha* sp.), sycamore, snowberry (*Symphoricarpos* sp.) and similar garden or naturalised non-natives.

During Operation

G5.6 Where possible, ecological consideration has fed into the design of the Proposed Development such that it seeks to avoid, where possible, and otherwise reduce adverse ecological impacts.

G5.7 The landscaping included within the Proposed Development is shown on the Landscape Masterplan (drawing ref. 6312-LLB-XX-XX-DR-L-0012) (Appendix C2), with further detail shown on the Detailed Landscape Masterplans 1 – 7 (Appendix C2) for the detailed parts of the Site. For the outline part of the Site, the Green and Blue Parameter Plan (drawing no. 400.04) secures the minimum and maximum extents of green and blue infrastructure respectively, within which the principles shown on the Landscape Masterplan in terms of approximate location and type of habitat/feature will be adhered to. It is anticipated that

this will be secured by an appropriately worded planning condition. The measures described below are shown on these plans.

G5.8 As part of the water management, a Sustainable Drainage System (SuDs) is included within the landscaping design, and as part of the Drainage Strategy (appended to Chapter D (Water Environment and Flood Risk) as Appendix D1) which will help minimise surface wastewater runoff into the sewerage system. As set out in Chapter D the SuDS features proposed include combined green/blue roofs, permeable surfacing and infiltration basins. The provision of these features will limit waste-water runoff both into the sea, RMC LWS and/or sewer system. The inclusion of wetland buffers supporting reedbeds will also help improve the water quality from run-off.

G5.9 The provision of accessible leisure areas as part of the Proposed Development will reduce visitor pressure on the footpaths adjacent to the RMC LWS by providing alternative walking routes, which will help to decrease disturbance along the RMC LWS margins from dogwalkers and other visitors.

G5.10 In addition, the Proposed Development ensures an offset between built development and the edge of the RMC LWS, incorporating soft landscaping to create a buffer between the Site and the RMC.

G5.11 Soft landscaping as part of the Proposed Development includes habitats and features of benefit to species found both on Site and in the immediate surrounding area including amphibians and reptiles (various grassland and wetland habitats including a pond), foraging birds and bats (all habitat types) and badgers (open grassland). The inclusion of these habitats provides compensation for the loss of existing grassland and scrub and enhancement through the provision of habitats with higher distinctiveness and complexity that will compliment off-site habitats found both inland and along the seafront.

G5.12 A detailed lighting scheme has not been prepared for the Proposed Development, however an outline indicative lighting scheme, based on a worst-case scenario, is provided in the External Lighting Impact Assessment (Appendix C6). It is assumed that the principles established in the indicative lighting scheme will be adhered to, and will be secured by way of an appropriately worded planning condition. The principles are based on the Site's location within an 'E1 Environmental Zone', meaning the area is recognised as an intrinsically dark location where artificial lighting must be kept extremely low. The principles include incorporating the following into the lighting design:

- External illumination is limited to low level bollard lighting which will operate on time or photocell control to ensure that lighting is off during periods of inactivity;
- Use of low-intensity lighting, with a warm colour temperature;
- Use of full cut-off units and downward-directed optics;
- Zero upward light (ULR 0%). Light fittings cast light downwards, with very limited lateral spill and no upward emission; and
- Protection of dark skies, neighbours and ecological receptors

G5.13 Adherence to these principles will ensure that lighting will be designed to minimise light spill onto ecologically sensitive areas such as along the boundary with the RMC and over new and existing habitats in the east of the Site.

Major Hazards and Accidents

G5.14 No major hazard or accident of ecological significance is likely to result from the Proposed Development either during construction or operation.

Phasing

G5.15 Phasing is not relevant to this chapter. Phasing is not likely to introduce any additional impacts specific to phasing on ecological receptors present.

During Construction

Designated Sites

Folkestone to Etchinghill SAC

G5.16 Under the standard datasheet under threats to the Folkestone to Etchinghill SAC, air quality was highlighted due to the impacts of nitrogen deposition and other air borne pollutants associated with new road schemes, airports, waste or power facilities.

G5.17 The transport consultant (DHA Transport) has provided anticipated traffic generation and vehicle movements during the construction phase.

G5.18 Construction vehicle routing is proposed to include access to the Site off the M20 at Junctions 11 and 11a routing via the A261 London Road and Blackhouse Hill, to access the Site via Princes Parade east of the Site.

G5.19 This information on construction vehicle movements is indicative and will be subject to further detail being provided post consent within a detailed construction traffic management plan. Some phases of construction may result in a greater number of goods vehicle movements on a given day, and assumptions have been made relating to deliveries and staff etc on the basis of a typical day. It is therefore predicted on average there will be 30 goods vehicle deliveries a day (60 two-way trips) with construction staff numbers expected to be approximately 60 a day (or 120 two-way movements). These figures have been used to inform part of the air quality assessment that includes traffic movement and related air quality impacts. The air quality assessment for the Proposed Development (provided in Chapter J) uses guidance from the Institute of Air Quality Management ('IAQM') to assessing the impacts of nitrogen deposition on ecological designations which includes criteria set out by the Design Manual for Roads and Bridges (DMRB) and Air Quality Technical Advisory Group (AQTAG). The DMRB criteria states that where annual average daily traffic movements (AADT) resulting from development do not exceed 1000 on affected roads, environmental effects could be regarded as neutral and "scoped" out of any further assessment. Based on the distance of the nearby ecological receptors from the site, and the proposed trip generation (<1000 AADT), nitrogen deposition impacts have been scoped out of the Air Quality assessment. It is further noted that the traffic data includes trips from cumulative schemes, therefore accounting for in-combination effects.'

G5.20 An assessment of a Neutral effect (Not Significant) has been concluded for the Folkestone to Etchinghill SAC on the basis that no air quality impacts have been identified.

Dungeness, Romney Marsh and Rye Bay SPA and Ramsar

G5.21 During the construction phase the building and creation of soft and hard landscaping features would not see the increase of visitor pressure on coastal areas supporting qualifying bird populations or promote, facilitate or otherwise increase the use of areas within the SPA/ Ramsar for leisure activities.

G5.22 Similarly, during the construction phases of the Proposed Development identified threats highlighted on the datasheets for the sites such as wastewater and water abstraction would not be expected.

G5.23 It is therefore assessed that the Proposed Development would have a Neutral effect (Not Significant) on the SPA or Ramsar sites during the construction phase.

National and Local designated sites

G5.24 None of the national or local designated sites have any connectivity with the Site with the exception of the RMC, which is discussed below. As such, impacts upon national and local designated sites during construction stage listed below will be avoided and as such there will be a Neutral, Not Significant effect on the below designated sites:

1 Seabrook Stream SSSI;

2 Lympe Escarpment SSSI;

3 Paraker Wood and Seabrook Stream, Shorncliffe LWS; and

4 Paraker Wood Ancient Woodland.

G5.25 The RMC LWS is the closest designated site to the Site, which is directly adjacent to the north.

G5.26 With regards to construction dust emissions, consideration is given to the effects on the RMC LWS, in Chapter J (Air Quality). Adherence to standard best practice methods as outlined in the CEMP (Appendix C4), excessive dust blowing onto retained adjacent habitats is predicted to be minimal.

G5.27 Providing standard construction safeguards relating to dust and material storage are followed, impacts on the RMC LWS would be avoided. Chapter J concludes that the effect upon the RMC LWS from construction dust is Negligible and Not Significant.

G5.28 A Negligible Adverse effect (Not Significant) is therefore predicted upon the RMC LWS.

Amphibians: Common Toad

G5.29 Removal of suitable terrestrial habitat for common toad would reduce the total area available to the species.

G5.30 Clearance of existing habitat and construction has the potential to inflict physical harm on any toad present within the grassland/ scrub at the time. Given this is likely to be individual animals, the loss of small numbers of toads would be unlikely to change the conservation status of the species locally. As such, the loss of animals in would still have a negligible adverse impact on the common toad population.

G5.31 As the majority of the habitat to be lost is grassland, incidental harm is likely to be avoided through sensitive removal of habitat through a two-stage cut. Once the areas of suitable habitat are made unfavourable for toad, further interactions are unlikely, reducing the risk of harm as far as reasonably practicable.

G5.32 Given the presence of retained on-site and off-site habitats suitable for toad, the medium-term loss of the suitable habitats on site, and the potential for physical harm to toads during habitat removal, is assessed as an overall Negligible Adverse effect (Not Significant) on common toad.

Reptiles: Grass snake

G5.33 Loss of other neutral grassland in the west of the Site would result in the overall loss of reptile habitat on Site. Given the only species found in this area was grass snake, the loss of this habitat would result in negligible loss of habitat. Construction works are unlikely to result in the incidental killing or injuring of individuals due to their high dispersal rates and low numbers which are likely to result in animals moving away from disturbance long before machinery or people are close enough to cause harm. The two-stage habitat removal described above will prevent any residual risk of harm to animals by making the habitat unsuitable during the construction phase.

G5.34 Overall, a Negligible Adverse effect (Not Significant) on grass snake is predicted.

Breeding birds

G5.35 Important habitat for breeding birds is mainly associated with the adjacent RMC LWS, which is outwith the Site and thus is retained and unaltered, limiting the potential for impacts on nesting birds using this LWS.

G5.36 As the Site is currently actively used by people including passing traffic and dog walkers it is considered additional activities from construction would not have an additional disturbance effect on species found nesting within the RMC LWS adjacent to the Site.

G5.37 Some foraging and nesting habitat will be lost as part of Site clearance works and to facilitate construction.

G5.38 Given the small amount of habitat lost and based on the findings of the breeding birds reports (Appendix G3), this loss will lead to a no more than Negligible Adverse (Not Significant) effect on nesting birds only.

Bats

G5.39 Construction phase impacts on bats centre around the loss of foraging habitat. The combination of modified grassland, other neutral grassland and scrub together provide poor quality habitat, with additional exposure to prevailing seafront conditions, and species poor grassland providing little foraging opportunities when compared to the standing water and trees along the RMC off Site to the north which provides a more abundant source of insects in a more sheltered location.

G5.40 Given the small amount of habitat loss and embodied semi-natural habitats being created during the construction phase, overall, the loss of the habitat on Site is predicted to have a Negligible Adverse effect (Not Significant) on foraging bats.

During Operation

Designated sites

G5.41 Threats relevant to the Dungeness, Romney Marsh and Rye Bay Ramsar have been identified as housing and urban areas (low impact), tourism and recreation (medium impact), water regulation including drainage and water abstraction (medium and high impacts), household sewage and urban wastewater and solid waste.

G5.42 The potential for likely significant effects on European sites has been considered in accordance with the Conservation of Habitats and Species Regulations. The following assessment considers each identified impact pathway in turn. Having regard to the characteristics of the Proposed Development, identified impact pathways and separation distances involved, no likely significant effects on European sites are identified. In EIA terms, the effects are therefore considered to be either Neutral (Not Significant) or Negligible (Not Significant).

G5.43 In terms of threats associated with wastewater, this is to be pumped to a Southern Water Wastewater treatment works which discharges treated effluent using the existing waste water network. The impacts from potential ground water pollution and increased surface run-off are deemed to have a Negligible (Not Significant) effect (Chapter D).

G5.44 The water chapter identifies no increase in water demand or other water resource effects capable of affecting the Dungeness, Romney Marsh and Rye Bay Ramsar.

G5.45 Air quality impacts on ecological receptors have been scoped out of further assessment. Therefore, the effects of increased traffic are considered to be Neutral (Not Significant).

G5.46 Due to the types of pressures generated by the Proposed Development, the distance between the Site and designated sites, existing pressures and current connectivity (or lack thereof). the Proposed Development is considered to have no impact on designated sites relating to recreational pressure during its operational phase.

G5.47 Similarly, there is sufficient separation between the Ramsar and the proposed housing that this should not pose additional pressures on the site for space or land use.

G5.48 Overall, changes relating to the Proposed Development during the operational phase is predicted to be Neutral (Not Significant).

G5.49 Relevant threats to Dungeness, Romney Marsh and Rye Bay SPA are water management issues related to water abstraction and recreational use, with visitor pressure and disturbance of key designation criteria (internationally significant bird populations)

G5.50 As the Proposed Development incorporates a small residential scheme with supporting leisure spaces and activities on site, the combination of on-site leisure provision, the limited numbers of proposed dwellings and the separation distance between the Site and the SPA means that no likely significant effects are identified. In EIA terms, the effect is considered to be Neutral (Not Significant).

G5.51 Threats to Folkestone to Etchinghill Escarpment SAC are identified as air pollutants, including those generated through increased traffic. As mentioned above, impacts of air quality have been scoped out of further assessment as not-significant. As such, the

Proposed development is likely to have a Neutral effect on Folkestone to Etchinghill Escarpment SAC.

G5.52 Due to the distance from the Proposed Development and the Seabrook Stream SSSI, the type of development and the lack of functional ecological connectivity, no impact pathways are identified during the operational stage between the Site and the SSSI. Therefore, a Neutral effect (Not Significant) is predicted.

G5.53 Due to the distance from the Proposed Development and the Lympe Escarpment SSSI, the type of development and the lack of functional ecological connectivity, no impact pathways are identified during the operational stage between the Site and the SSSI. Therefore, a Neutral effect (Not Significant) is predicted.

G5.54 Due to the distance from the Proposed Development and Paraker Wood (including the ancient woodland) and Seabrook Stream, Shorncliffe LWS, the type of development and the lack of functional ecological connectivity, no impact pathways are identified during the operational stage between the Site and the LWS. Therefore, a Neutral effect (Not Significant) is predicted.

G5.55 The RMC LWS is the closest of the designated sites to the Proposed Development. Existing residential land use is present adjacent to canal, so no new recreational pressure will be introduced, though numbers of local residents will increase. The provision of amenity open green space including leisure facilities as part of the Proposed Development will reduce pressure on LWSs and other open natural spaces in the area including designated sites, by offering people alternative leisure space to existing spaces.

G5.56 As habitats continue to develop, these will provide similar or complimentary habitats alongside those present within the RMC LWS which will be a beneficial impact, which will give rise to a Minor beneficial effect (Not Significant) on the RMC LWS.

G5.57 Due to the separation between the Site and the other designated sites, the provision of wet woodland, calcareous grasslands and other semi-natural habitats analogous to those found in the designated sites are unlikely to have any impact on these designated sites and therefore a Neutral effect (Not Significant) is predicted.

Common Toad

G5.58 The soft landscaping provided as part of the Proposed Development will include habitats that are suitable for both terrestrial and breeding common toad (combination of grasslands- both wet and dry, scrub, pond and reedbed). These new habitats alongside the retained habitats will increase the amount of favourable suitable habitat on Site, complimenting surrounding habitat to the north and east of the Site.

G5.59 The presence of a breeding population of common toad using the Site leads to potential impacts of increased mortalities due to interactions with new roads and infrastructure. It has been demonstrated that roads are responsible for long-term negative population trends for the species (Petrovan S., Schmidt, B 2016). However, given the scale of the residential development proposed, likely road usage rates are unlikely to pose a significant threat to the toad population.

G5.60 The overall enhancement and provision of habitats will result in a Negligible Beneficial effect (Not Significant) on the common toad population.

Reptile: Grass snake

G5.61 The created habitats will continue to establish and through suitable management, reach a desirable mature state. This will allow the combination of existing retained habitat along with created habitat to provide locations for shelter, thermoregulation and foraging.

G5.62 The combination of habitat retention and provision is likely to result in a Negligible Beneficial effect (Not Significant) on the grass snake population during the operational phase.

Breeding birds

G5.63 The combination of retained and created habitats during the operational phase will provide additional spaces for both nesting and foraging. The habitats included should benefit existing populations by complimenting and expanding existing areas both on and off Site.

G5.64 The existing use of the Site by a combination of the public and patrons of the golf course means the level of disturbance is unlikely to significantly differ from pre-operational levels.

G5.65 In combination, the provision of small additional areas of nesting and foraging habitat in conjunction with minor increase in potential disturbance from human related activities is likely to have an overall Negligible effect (Not Significant) on breeding birds during the operational phase.

Bats

G5.66 During the operational phase of the Proposed Development, some of the habitats would have begun to mature and establish, these alongside the retained habitats will provide additional foraging habitats for bats, the wetland habitats supplementing good quality foraging habitat found along the RMC.

G5.67 The Proposed Development will introduce additional lighting. However, this will be limited to the western end of the Site and constrained to areas where lighting is needed. The lighting assessment (Appendix C6) provides additional details on lighting impacts on the Site and surrounding areas. It is noted in this document that a level of 0.32 lux has been designed for spaces adjacent to sensitive areas such as the corridor adjacent to the RMC LWS to the north of the Site.

G5.68 The lighting impact assessment concludes that as long as the principles set out at paragraph G 5.9 are followed the impact of lighting on bats using the RMC will be negligible.

G5.69 In combination, the provision of additional suitable habitat is predicted to have a Minor Beneficial effect (Not Significant) on foraging bats.

G6.0 Mitigation and Monitoring

During Construction

G6.1 Details of the actions that will be undertaken during the construction stage to avoid impacts on protected species and other animals will be included within the CEMP and the Ecological Mitigation and Enhancement Strategy ('EMES') associated with the Proposed Development. A framework EMES is provided at Appendix G7.

G6.2 As no Significant adverse effects are identified on ecological receptors during construction, no further mitigation is required.

During Operation

G6.3 No species specific mitigation or monitoring is considered to be necessary as no Significant adverse effects are identified.

G7.0 Residual Effects

During Construction

G7.1 As no additional mitigation or monitoring is proposed during the construction phase, the residual effects remain as set out in section G5.0 of this chapter.

During Operation

G7.2 As no additional mitigation or monitoring is proposed during the operation phase, the residual effects are as set out in section G5.0 of this chapter.

G8.0 Summary & Conclusions

G8.1 This Chapter has assessed the potential impacts and resultant effects of the Proposed Development upon ecological receptors during both construction and operation. It first considered the baseline conditions of the Site and relevant surrounding area in line with best practice guidance to establish which ecological receptors could be affected by the Proposed Development.

G8.2 Actions during the construction phase of the Proposed Development, taking into account embodied mitigation, are predicted to result in either Neutral or Minor Adverse effects on the identified receptors, all of which are considered to be Not Significant. Given these effects are predicted to be below the significance threshold, no additional specific mitigation is required to offset these effects.

G8.3 During the operational phase of the Proposed Development, effects are either Neutral or Minor Beneficial effects on identified receptors, either due to a local of impact pathways or to the establishment of habitats. All effects during operation are also considered to be Not Significant and no further mitigation is proposed.

Table G8.1 Summary of Effects

Receptor	Impact	Potential Effects (taking account of embedded mitigation)	Additional Mitigation and Monitoring	Residual Effects
During Construction				
Folkestone to Etchinghill Escarpment Special Area of Conservation (SAC)	Poor air quality, deposition of nitrogenous compounds	Neutral- Not Significant	None required	Neutral- Not Significant
Dungeness, Romney Marsh and Rye Bay Ramsar	residential land use, tourism and recreation, water regulation including sewage and waste water.	Neutral- Not Significant	None required	Neutral- Not Significant
Dungeness, Romney Marsh and Rye Bay SPA	Visitor pressure and water abstraction.	Neutral- Not Significant	None required	Neutral- Not Significant
Seabrook Stream SSSI	No predicted impact pathways	Neutral- Not Significant	None required	Neutral- Not Significant
Lympe Escarpment SSSI	No predicted impact pathways	Neutral- Not Significant	None required	Neutral- Not Significant
RMC LWS	visitor pressure and Construction dust emissions	Negligible Adverse - Not Significant	None required.	Negligible Adverse - Not Significant
Paraker Wood and Seabrook	No predicted impact pathways	Neutral- Not Significant	None required	Neutral - Not Significant

Receptor	Impact	Potential Effects (taking account of embedded mitigation)	Additional Mitigation and Monitoring	Residual Effects
Stream, Shorncliffe LWS				
Habitats of principal importance (Paraker Wood Ancient Woodland)	No impact pathways identified	Neutral - Not Significant	None required.	Neutral- Not Significant
Common toad population	Loss of terrestrial habitat	Negligible Adverse – Not Significant	Precautionary measures to remove habitat and any animals encountered in an ecologically sensitive manner.	Negligible Adverse – Not Significant
Grass snake population	Loss of terrestrial habitat	Negligible Adverse – Not Significant	Precautionary measures to remove habitat and any animals encountered in a ecologically sensitive manner.	Negligible Adverse – Not Significant
Breeding bird assemblage	Loss of foraging habitat Disturbance to nesting birds Destruction of nests during breeding cycle	Negligible Adverse – Not Significant	Working methods to avoid impacts on nesting birds through timing of works.	Negligible Adverse – Not Significant
Foraging bat assemblage	Loss of foraging habitat	Negligible Adverse – Not Significant	None required	Negligible Adverse – Not Significant
During Operation				
Folkestone to Etchinghill Escarpment Special Area of Conservation (SAC)	Air pollution (deposition of nitrogenous compounds)	Neutral- Not Significant	None required	Neutral- Not Significant
Dungeness, Romney Marsh and Rye Bay Ramsar	Waste water pollution, increased visitor pressure	Neutral- Not Significant	None required	Neutral- Not Significant
Dungeness, Romney Marsh and Rye Bay SPA	Waste water pollution, increased water abstraction,	Neutral- Not Significant	None required	Neutral- Not Significant

Receptor	Impact	Potential Effects (taking account of embedded mitigation)	Additional Mitigation and Monitoring	Residual Effects
	increased visitor pressure			
Seabrook Stream SSSI	No predicted impact pathways	Neutral- Not Significant	None required	Neutral- Not Significant
Lympe Escarpment SSSI	No predicted impact pathways	Neutral- Not Significant	None required	Neutral- Not Significant
RMC LWS	Reduced visitor pressure on nearby designated sites through the provision of accessible open green space	Minor Beneficial effect – Not Significant.	None required	Minor Beneficial effect – Not Significant.
Paraker Wood and Seabrook Stream, Shorncliffe LWS	No predicted impact pathways	Neutral- Not Significant	None Required	Neutral- Not Significant
Habitats of principal importance (Paraker Wood Ancient Woodland)	No impact pathways identified	Neutral - Not Significant	None required.	Neutral- Not Significant
Common toad population	Provision of additional terrestrial and aquatic habitats Increased mortality through interaction with traffic	Negligible Beneficial – Not Significant	None required.	Negligible Beneficial – Not Significant
Grass snake population	Provision of additional terrestrial and aquatic habitats	Negligible Beneficial – Not Significant	None required	Negligible Beneficial – Not Significant
Breeding bird assemblage	Provision of additional habitats providing foraging resources and nesting opportunities	Negligible – Not Significant	None required.	Negligible – Not Significant
Foraging bat assemblage	Provision of additional suitable foraging habitat Sensitive lighting scheme	Minor Beneficial – Not Significant	None required.	Minor Beneficial – Not Significant

G9.0 Abbreviations & Definitions

Abbreviations

- **AADT** – Annual Average Daily Traffic.
- **AQTAG** – Air Quality Technical Advisory Group.
- **BAP** – Biodiversity Action Plan.
- **BCT** – Bat Conservation Trust.
- **BNG** – Biodiversity Net Gain.
- **BoCC** – Birds of Conservation Concern.
- **BS** – British Standard.
- **CBC** – Common Birds Census.
- **CEMP** – Construction Environmental Management Plan.
- **CIEEM** – Chartered Institute of Ecology and Environmental Management.
- **Defra** – Department for Environment, Food and Rural Affairs.
- **DMRB** – Design Manual for Roads and Bridges.
- **EcIA** – Ecological Impact Assessment.
- **EIA** – Environmental Impact Assessment.
- **EMES** - Ecological Mitigation and Enhancement Strategy
- **EPS** – European Protected Species.
- **ES** – Environmental Statement.
- **HRA** – Habitats Regulations Assessment.
- **IAQM** – Institute of Air Quality Management.
- **IRZ** – Impact Risk Zone.
- **KMBRC** – Kent and Medway Biological Records Centre.
- **LPA** – Local Planning Authority.
- **LWS** – Local Wildlife Site.
- **MAGIC** – Multi-Agency Geographic Information for the Countryside.
- **NERC** – Natural Environment and Rural Communities Act 2006.
- **NPPF** – National Planning Policy Framework.
- **PEA** – Preliminary Ecological Appraisal.
- **PEAR** – Preliminary Ecological Appraisal Report.
- **PRF** – Potential Roost Feature.
- **RMC** – Royal Military Canal.
- **SAC** – Special Area of Conservation.

- **SPA** – Special Protection Area.
- **SSSI** – Site of Special Scientific Interest.
- **SuDS** – Sustainable Drainage System.
- **ULR** – Upward Light Ratio.
- **ZoI** – Zone of Influence.

Definitions

- **Baseline conditions** – The existing environmental conditions against which potential changes arising from the Proposed Development are assessed.
- **Compensation** – Measures provided to make up for residual adverse effects that cannot be avoided, reduced or mitigated.
- **Construction Environmental Management Plan** – a plan that will manage the environmental effects arising from the construction of the Proposed Development.
- **Ecological feature** – A habitat, species, species assemblage, designated site or other ecological receptor that may be affected by a development.
- **Embedded mitigation** – Measures incorporated into the design or standard construction approach to avoid or reduce environmental effects before additional mitigation is considered.
- **European Protected Species** – Species protected under the Conservation of Habitats and Species Regulations 2017 (as amended).
- **Habitats of Principal Importance** – Habitats listed under Section 41 of the Natural Environment and Rural Communities Act 2006 as being of principal importance for conserving biodiversity in England.
- **Impact pathway** – A route by which a development could affect an ecological receptor, such as through habitat loss, disturbance, pollution, lighting or hydrological change.
- **Impact Risk Zone** – A mapped zone used by Natural England to identify development types that may pose risks to Sites of Special Scientific Interest or other sensitive ecological sites.
- **Local Wildlife Site** – A non-statutory designated site recognised for its nature conservation value at a local or county level.
- **Mitigation hierarchy** – The sequential approach of avoiding adverse ecological effects where possible, then reducing or mitigating effects, and finally compensating for residual effects where necessary.
- **Potential Roost Feature** – A feature in a tree, structure or building that could provide suitable conditions for roosting bats.
- **Priority species** – Species identified as being of conservation concern, including those listed under Section 41 of the Natural Environment and Rural Communities Act 2006 or relevant local biodiversity strategies.

- **Proposed Development - the proposals which are assessed through the Environmental Impact Assessment and for which hybrid planning permission is sought.**
- **The Site** – land within the boundary identified at Appendix A1, Volume 2 to this ES.
- **Ramsar site** – A wetland site designated under the Ramsar Convention for its international importance.
- **Residual effect** – The remaining environmental effect after mitigation and embedded design measures have been taken into account.
- **Special Area of Conservation** – A site designated for habitats or species of European importance.
- **Special Protection Area** – A site designated for bird species and assemblages of European importance.
- **Species assemblage** – A group of species occurring together within a defined area or habitat.
- **Site of Special Scientific Interest** – A statutory designated site of national importance for wildlife, geology or landform features.
- **Zone of Influence** – The area over which ecological receptors may be affected by the Proposed Development.

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Imperial Gardens
Volume 1: Environmental Statement

Chapter H Traffic and Transport

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H1.0 Introduction

H1.1 This Chapter of the Environmental Statement ('ES') has been prepared by DHA on behalf of GSE Group ('the Applicant'). It assesses the Proposed Development described in Chapter C in relation to traffic and transport.

H1.2 The baseline situation is considered before the likely environmental effects of the Proposed Development are identified during its construction and operational phases. Mitigation measures to reduce any negative environmental effects are identified as appropriate, before the residual environmental effects are assessed.

H1.3 This Chapter is supported by the following technical appendices provided at Volume 2 to this ES:-

- Appendix H1: Transport Assessment (TA)
- Appendix H2: Travel Plan

About the Author

H1.4 This Chapter has been produced by Tom Valek (Senior Transport Planner) and Paul Lulham (Director) of DHA. Tom has over 4 years of experience, having begun his career at DHA in February 2022 and has a Masters degree in Transport Planning and Management, obtaining a distinction. Tom is also a Member of the Chartered Institute of Highways & Transportation (MCHIT).

H1.5 Paul has over 17 years' of experience in transport planning across both the public and private sectors, including over 11 years at DHA. He has a Masters degree in Transport Planning and Management and is responsible for DHA's Transport and Infrastructure Planning Teams. Paul is a Fellow of the Chartered Institute of Logistics and Transport (FCILT) and has extensive experience of Environmental Statement preparation across a variety of commercial, residential and mixed-use development proposals.

H2.0 Policy Context

H2.1 A summary of the relevant regulatory and planning policy guidance is included within this section. Further details are provided in Chapter 4 of the accompanying TA, provided at Appendix H1.

National Policy and Guidance

National Planning Policy Framework (NPPF, 2024)

H2.2 The NPPF sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally prepared plans for housing and other developments can be produced. The NPPF is a material consideration in planning decisions. [Ref 1]

H2.3 Paragraph 115 advises that in assessing sites, it should be ensured that sustainable transport modes are prioritised, safe and suitable access can be achieved for all users and any significant impacts from the development on the transport network, or on highway safety can be effectively mitigated.

H2.4 Paragraph 116 states that development should only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. Paragraph 117 of the NPPF requires priority to be given to pedestrian and cycle movements, whilst also facilitating access to high quality public transport.

H2.5 Paragraph 118 of the NPPF requires all developments that will generate significant amounts of movement to provide a Travel Plan.

Institute of Environmental Management and Assessment (IEMA) Guidelines: Environmental Assessment of Traffic and Movement (2023)

H2.6 This publication provides an update and replacement of one of IEMA's first published impact assessment guidance documents from 1993. Please note IEMA was renamed to ISEP in 2025, resulting in ISEP being referenced throughout the report. [Ref 2]

H2.7 The purpose of the guidance document is to provide practitioners with good practice advice on how to carry out the assessment of traffic and movement of people as part of an Environmental Impact Assessment. The document details clear methodologies for screening, scoping and evaluating impacts severance, driver delay, pedestrian delay, amenity, fear and intimidation, road safety, and hazardous loads.

Department for Transport (DfT) Circular 01/2022 – The Strategic Network and the Delivery of Sustainable Development

H2.8 The DfT Circular is the current Department for Transport policy governing how National Highways engages with planning matters that affect the Strategic Road Network**.** The Circular sets out the Secretary of State's policy on how the Strategic Road Network should be protected, managed and enhanced while supporting sustainable development. It

replaces Circular 02/2013 and reflects updated government priorities, including net zero, vision-led planning, and reduced reliance on car travel where possible. [Ref 3]

Local Policy Kent County Council (KCC) Local Transport Plan (LTP5): Striking the Balance (2024-2037)

H2.9 The Local Transport Plan 5 (LTP5) was adopted by KCC in December 2024 and runs from 2024 to 2037. The Plan sets the overall strategy and direction for transport in Kent over the medium-term. [Ref 4]

H2.10 The County Council's stated transport ambition for Kent is:-

"…to improve the health, wellbeing, and economic prosperity of lives in Kent by delivering a safe, reliable, efficient and affordable transport network across the county and as an international gateway. We will plan for growth in Kent in a way that enables us to combat climate change and preserve Kent's environment. We will do this by delivering emission-free travel by getting effective dedicated infrastructure to electrify vehicles, increase public transport use and make walking and cycling attractive. This will be enabled by maintaining our highway network and delivering our Vision Zero road safety strategy. These priorities will ensure our networks are future-proof, resilient and meet user needs."

Folkestone And Hythe District Core Strategy Review (2022)

H2.11 The Folkestone and Hythe District Core Strategy Review replaces the Shepway Core Strategy Local Plan (2013) and sits alongside the adopted Places and Policies Local Plan (2020). [Ref 5]

H2.12 There are a number of key transport-related policies within the Strategy Review that apply to the development proposals, including the following:-

- *"Strategic Need A Aim 2: Improve accessibility and transport infrastructure".*
- *"Strategic Need B Aim 9: Promote choice in means of transport through improving opportunities for walking and cycling, public transport networks and information."*
- *"Policy SS5 3(c): The location, design or management of development provides a choice of means of transport and allows sustainable travel patterns, for pedestrians, cyclists and/or public transport."*

Folkestone And Hythe Places and Policies Local Plan (2020)

H2.13 The Folkestone and Hythe Places and Policies Local Plan was adopted in September 2020. It forms part of the Development Plan for Folkestone and Hythe (along with the Core Strategy) and covers the period 2006 to 2031. The Plan has two functions:- [Ref 6]

- "*To allocate enough land for future development to meet the requirements set out in the Core Strategy for residential, employment, community and other needs; and*
- *To provide development management policies that will be used to assess planning applications and guide future development."*

H2.14 With respect to assessing transport impacts, the Places and Policies Local Plan states:-

"Travel Plans, Transport Assessments and Transport Statements are all ways of assessing and mitigating the negative transport impacts of development in order to ensure that sustainable development is delivered. Transport Statements should be used where development has a limited transport impact. Transport Assessments should be used where a greater impact is expected and mitigation measures are likely to be needed. Travel Plans are required when long term management strategies are needed to deal with significant transport impacts."

KCC Parking Standards (2025)

H2.15 Residential and non-residential parking standards are set out within the KCC Parking Standards (2025). The Folkestone and Hythe Places and Policies Local Plan (2020) details that the *"Kent County Council's (KCC) Interim Guidance Note 3 (IGN3): Residential Parking (2008) provides an appropriate foundation for parking design."* These standards have been superseded by KCC Parking Standards (2025), which have been agreed to be utilised to assess the site against with the local highway authority. [Ref 7]

Building Regulations: Approved Document S (2010)

H2.16 The Building Regulations: Approved Document S outlines the infrastructure required for the charging of Electric Vehicles (EVs). [Ref 8]

H3.0 Assessment Methodology & Significance Criteria

Assessment Methodology

H3.1 This section has been prepared in accordance with the principles and good practice guidance set out by the Institute of Sustainability and Environmental Professionals ('ISEP') and sets out the methodology designed to identify, assess and report the likely significant effects of the Proposed Development on the transport network and transport users during both the construction and operational phases.

H3.2 This section begins with detailing how the baseline conditions for the study area were identified/established. It then provides detail as to how effects within subsequent sections will be assessed, detailing the Rule 1 and Rule 2 ISEP thresholds that will be used. Where the ISEP thresholds are exceeded on particular links within the study area, this section identifies a list of environmental effects that must be considered in more detail. This section moves on to identify criteria for determining the sensitivity of a particular receptor/highway link receiving environmental change whilst also detailing how the magnitude of impact is defined and an assessment matrix to determine the significant of effects on particular receptors.

Establishing Baseline Conditions

H3.3 For consistency and robustness, the local highway network assessed in the TA is used as the study area the assessment presented within this Chapter. This encompasses the following junctions:-

- Site Access (Residential) – priority junction
- A259 Seabrook Road/Princes Parade – priority junction;
- A259 Seabrook Road/Twiss Road – priority junction;
- A25/A261/Dymchurch Road – signalised junction;
- A259 East Street/Prospect Road/Station Road/High Street roundabout junction; and
- A259 Seabrook Road/Horn Street priority junction

H3.4 The junctions listed above are highlighted in Figure H3.1 to H3.3 below.

Figure H3.1: Junctions Assessed

Source: Google Maps

Figure H3.2: Junctions Assessed

Source: Google Maps

Figure H3.3: Junctions Assessed

Source: Google Maps

H3.5 Baseline traffic flow data for the study area has been obtained via the following method:-

- Manual Classified Counts ('MCC's) on 17th May 2023, 29th February 2024 and 18th June 2025 (neutral weekdays).

H3.6 The recorded data includes traffic volumes and vehicle classifications.

H3.7 Utilising the MCC data and Department for Transport ('DfT') Road Traffic Statistics, Annual Average Daily Traffic ('AADT') flows have been established for the highway links surrounding the Site. Traffic growth factors from the DfT's TEMPro v8.1 database have been used to apply an uplift to the baseline traffic flows to create opening year traffic scenarios for 2035.

H3.8 Personal Injury Collision ('PIC') data for the latest available five-year period is analysed within the TA to inform the assessment of impacts on the safety of the highway network. The data includes full non-confidential details, including incident severity and descriptions and details of casualties.

Assessment Modelling

H3.9 The modelling of the traffic impact of the Proposed Development on highway capacity has been undertaken for a range of scenarios based on predicted traffic generation, as detailed in the TA.

H3.10 To assess the trip rates of the existing and proposed uses, TRICS trip rates were used in the forecasting, as is best practice.

H3.11 A trip distribution exercise has been completed utilising 2011 Census data and the Google real-time journey planner, to provide an indication of the routes which would likely be used by future residents, employees and visitors during typical weekday peak period traffic conditions to travel to or from the site.

Committed and Cumulative Developments

H3.12 The Planning Practice Guidance (PPG) defines 'committed development' within Paragraph 14 of the section entitled 'Travel Plans, Transport Assessments and Statements' as:-

> *"…development that is consented or allocated where there is a reasonable degree of certainty it will proceed within the next three years."*

H3.13 Cumulative developments are defined as those which are currently the subject of live planning applications and are awaiting a decision, or those which are allocated in an adopted Local Plan but not currently subject to a live planning application

H3.14 The following local committed and cumulative developments have been considered in accordance with the full list of cumulative schemes agreed with the Council through the EIA Scoping Process (as set out in Chapter B of this ES):-

- Princes Parade Promenade (Y17/1042/SH) – **Permission expired.**
- Land adjacent to Saltwood Care Centre (20/1608/FH) – **Under consultation** – **negligible impact on assessed area.**
- Land Opposite 24, Station Road (21/0553/FH) **– Negligible impact on assessed area.**
- Former Foxwood School (25/2112/FH) – **Live application, impacts have been considered.**
- Shorncliffe Garrison (Y14/0300/SH) – **Condition discharge stage/Reserved Matters applications. Negligible impact on assessed area.**
- Risborough Barracks, Pond Hill Road , Shorncliffe Garrison, Folkestone (21/1618/FH) **Condition discharge stage/Reserved Matters applications. Negligible impact on assessed area.**
- Burgoyne, Phase 2C South, Shorncliffe Garrison (24/0980/FH) **Condition discharge stage/Reserved Matters applications. Negligible impact on assessed area.**

H3.15 The following scenarios represent the existing and future operations of the local highway network:-

- Scenario 1 – 2025 Base;
- Scenario 2 – 2035 'Do Nothing' (with background growth and committed and cumulative development but without Proposed Development traffic); and
- Scenario 3 – 2035 'Do Minimum' (as per the 'Do Nothing' scenario, plus the Proposed Development traffic).

H3.16 The scenarios set out above and assessed in this chapter are consistent with the assessment scenarios within the accompanying Transport Assessment. These assessment years have been agreed with KCC for the purpose of transport modelling assessment.

Assessment of Effects

H3.17 Within the ISEP Guidelines, consideration is given to two rules which are to be applied when assessing the environmental impact of the development on a highway link. These rules are:-

- **Rule 1:** include highway links where traffic flows will increase by more than 30% (or the number of HGVs will increase by more than 30%); and
- **Rule 2:** include any other specifically sensitive areas where the total traffic flows will increase by 10% or more.

H3.18 The above guidance is based upon knowledge and experience of the environmental effects of traffic, whereby any change of less than 30% results in imperceptible changes in environmental effects, while a change of less than 10% results in no discernible environmental effect.

H3.19 Where the above thresholds are exceeded, the ISEP Guidelines outline a list of environmental effects which should be considered with regard to their change in magnitude. These are:-

Noise and Vibration

H3.20 The potential impacts of noise and vibration are considered separately in this ES.

Visual Effects

H3.21 ISEP Guidelines note that visual impacts can take two forms; obstruction and intrusion. The former refers to the 'blocking' of views, (e.g. high-sided vehicles impacting the view of people to the surrounding area). The latter relates to the traffic impact on an area of scenic beauty, which is more subjective in nature.

H3.22 Where necessary, consideration has been given to the visual effects of the traffic impact using professional judgement. The full Landscape and Visual Impact Assessment for the Proposed Development is included at Chapter F.

Severance

H3.23 Severance relates to the perceived division that can occur when a community becomes separated by a major traffic artery. The term describes a complex series of factors that separate people from places. Severance may result from the difficulty of crossing a heavily trafficked road (ISEP, 2023).

H3.24 In terms of quantifying the impacts of severance, ISEP Guidelines assesses this impact in relation to the change in traffic flows, with thresholds of 30%, 60% and 90% regarded as producing 'Low', 'Medium' and 'High' impacts respectively.

H3.25 Where relevant, the impacts of severance are assessed as part of this Chapter.

Driver Delay

H3.26 Where junctions (and as a result, links) are approaching or at capacity, the addition of vehicles can result in increases to driver delay. Consideration of driver delay has been

undertaken as part of this Chapter, using the junction capacity assessment results outlined within the accompanying TA for the weekday AM and PM peak periods. Professional judgement has been utilised to determine the magnitude of the impact.

Pedestrian Delay

H3.27 Roads that are heavily trafficked and where changes in speed and volume of traffic occur can result in pedestrian delay being experienced. Studies have shown that pedestrian delay is perceptible beyond a lower delay threshold of 10 seconds on links where no crossing facilities are provided. A 10 second delay in crossing a road broadly equates to a two-way flow of approximately 1,400 vehicles per hour (IEMA, 1993).

H3.28 Where relevant, the impacts on pedestrian delay are considered as part of this Chapter, using the above guidance and professional judgement.

Pedestrian Amenity

H3.29 This is defined as the relative pleasantness of a journey. It is related to traffic volume, speed and composition of vehicles. Footway width and separation from traffic is also important.

H3.30 At the current time, there are no commonly agreed thresholds for pedestrian amenity; however, ISEP Guidelines suggest a tentative threshold where traffic flow (or HGV component) is halved or doubled.

H3.31 Where relevant, pedestrian amenity is considered as part of this Chapter. The threshold outlined above has been used to consider this impact, as well as professional judgement.

Accidents and Safety

H3.32 The potential effects of increased traffic flow on highway safety can be assessed using existing incident records for the area under consideration, as well as the character of the routes in question.

H3.33 Where relevant, highway safety has been considered within this Chapter using professional judgement.

Hazardous Loads

H3.34 Some developments may involve the transporting of hazardous loads. Where necessary, consideration has been given to this as part of this Chapter using professional judgement and ISEP Guidelines.

Air Pollution and Dust and Dirt

H3.35 The potential impacts of air pollution and the associated impacts of dust and dirt are considered in Chapter J of this ES.

Significance Criteria

H3.36 The assessment of potential effects as a result of the Proposed Development has been considered during both the construction and operational phases. The environmental significance attributed to each effect has been assessed based on the magnitude of change due to the Proposed Development, and the sensitivity of the affected receptor receiving

environmental change. It should be noted, however, that the significance level attributed to the effect on highway capacity has been assessed in an alternative manner, as the impact of the Proposed Development on specific junctions and links is dependent on their existing level of saturation, which can vary significantly.

H3.37 As outlined within the ISEP[1] Guidelines, it is possible to identify groups or locations which may be sensitive to changes in traffic flows. The guidance outlines a number of affected parties which are likely to be sensitive to such changes. These include persons who walk and cycle, those who work at home, particularly sensitive groups such as children, the elderly or the disabled, as well as sensitive locations including hospitals and schools. The full list of affected parties can be found within the ISEP Guidance[2].

H3.38 In line with this guidance, Table H3.1 summarises the criteria for determining receptor sensitivity. Residential receptors, including people at home or people at work are covered within a low sensitivity receptor.

Table H3.1: Definitions of receptor sensitivity

Sensitivity	Typical Receptor
High	Greatest Sensitivity: Schools/colleges/other educational institutions, children's playgrounds, crash hotspots, retirement homes, roads without footways that pedestrians utilise
Medium	Medium Sensitivity: Congested junctions, hospitals/surgeries/clinics, parks/recreation areas, shopping areas, roads with narrow footways that pedestrians utilise, unsegregated cycleways
Low	Low Sensitivity: Open space, tourist/visitor attractions, historical buildings, churches/other places of worship, areas of adequate footway provision
Negligible	Receptors with limited sensitivity to traffic flows or those that are located away from the affected roads

H3.39 The above criteria have been utilised to assess the sensitivity of each of the highway links under consideration.

H3.40 The magnitude of impact is defined as follows:-

- **High** – loss of resource including quality and integrity; severe damage to any key features (adverse). Large scale improvement to resource including quality and integrity (beneficial);
- **Medium** – loss of resource but not adversely affecting either quality or integrity; partial loss to features (adverse). Betterment to or addition of resource including quality and integrity (beneficial);
- **Low** – some change in attributes associated with resource; minor loss or change to a key feature (possibly more) (adverse). Minor benefit to or addition of key features; reduced risk of negative impact occurring (beneficial);

[1] Formerly known as the Institute of Environmental Management and Assessment ('IEMA')
[2] iema-report-environmental-assessment-of-traffic-and-movement-rev07-july-2023.pdf

- **Negligible** – very minor loss or adverse change to one or more key features (adverse). Very minor benefit or addition to one or more key features (beneficial); and
- **No change** – no loss or alteration to key features; no change either for better or worse.

H3.41 On this basis, an assessment matrix, provided in Table H3.2, is used to help determine the significance of the resultant effects:-

Table H3.2: Assessment Matrix

Sensitivity	Magnitude of Impact			
	Negligible	Low	Medium	High
Negligible	Negligible	Negligible or Minor	Negligible or Minor	Minor
Low	Negligible or Minor	Negligible or Minor	Minor	Minor or Moderate
Medium	Negligible or Minor	Minor	Moderate	Moderate to Major
High	Minor	Minor or Moderate	Moderate or Major	Major

H3.42 In accordance with the ISEP Guidelines, the following terms have been used to define the significance (in environmental terms) of the effects identified:-

- **Major:** where the Proposed Development could be expected to have a highly significant environmental effect (either beneficial or adverse) on the principal transport related conditions, during the construction and/or operational phases;
- **Moderate:** where the Proposed Development could be expected to have a significant environmental effect (either beneficial or adverse);
- **Minor:** where the Proposed Development could be expected to result in a small, barely noticeable environmental effect (either beneficial or adverse) that is not significant; and
- **Negligible:** where no discernible environmental effect is expected as a result of the Proposed Development.

H3.43 For the purpose of this assessment, if the degree of effect is Moderate or Major, then the effect is considered to be Significant.

Consultation

H3.44 In addition to the scoping process described in Chapter B of this ES, extensive pre-application engagement in respect of Traffic and Transport has taken place with KCC Highways & Transportation (KCC H&T) and National Highways (NH). The associated correspondence is included at Appendix A of the accompanying TA, which is itself included at **Appendix H.1.**

H3.45 Pre-application with KCC H&T and NH largely focused on the scope of the Transport Assessment. Agreement was found on the following areas:-

- Study area/scope of junction capacity assessments. All junctions/road links that were assessed as part of the Transport Assessment were agreed with KCC H&T during pre-application discussion. A baseline year of 2025 together with a future year of 2030 was also considered acceptable for the junction capacity assessments.
- Crash Data Analysis study area
- Parking strategy
- Proposed traffic calming measures along Princes Parade in principle
- Improvements to Twiss Road junction with A259 Seabrook Road in principle.
- TRICS trip rates.

Assumptions and Limitations

H3.46 The baseline traffic survey data provides an overview of current traffic conditions on the highway network within the study area at a set point in time, and whilst these can be subject to daily/seasonal variations, the data included within this assessment is considered representative of current highway conditions, as agreed with the Local Highway Authority.

H3.47 Development trip generation and attraction forecasts for all elements of the Proposed Development have been completed using data from the national TRICS trip rate database; therefore, there is confidence that they are accurate.

H3.48 Assumptions have been made with respect to trip distribution and assignment, based on analysis using the 2011 Census, the locations of local trip attractors and DHA's extensive experience of similar schemes in the local area. Therefore, the assessor can have confidence in this data.

H3.49 Each of the committed and cumulative developments identified in this chapter are considered in the 'Do Nothing' scenario. An assessment of the committed developments has been undertaken using the information provided as part of their accompanying planning applications.

H3.50 For the junction capacity assessments included within the accompanying Transport Assessment, a future year of 2030 was used which was agreed with KCC H&T during pre-application correspondence. For consistency with other chapters within this ES, an operational year of 2035 has been assumed to assess Do Nothing and Do Minimum scenarios within this Chapter. On this basis junction capacity assessments undertaken for a future year of 2030 have informed assessments on Driver Delay within this Chapter. This is not anticipated to impact the conclusions found within these resulting sections on Driver Delay, where the development proposals and its associated trips impact having a negligible impact on the operation of the surrounding highway network.

H4.0 Baseline Conditions

Current Conditions

H4.1 The Site is located to the north of Princes Parade, approximately 500m (measured from the proposed pedestrian and cycle access point off Imperial Gardens) to the south-east of Hythe town centre.

H4.2 Princes Parade takes a general east to west alignment and is subject to a 40mph speed restriction within the Site vicinity, with on-street parking on its southern side and double-yellow line parking restrictions on its northern side. It has a carriageway width of approximately 6.5m and is subject to street lighting at the Hythe Imperial Hotel.

H4.3 Routing west on Princes Parade provides a route towards the town centre via Twiss Road, which routes over the Royal Military Canal ('RMC') and connects with the A259 Seabrook Road at a priority junction. Continuing west on Seabrook Road provides a connection with the A259 East Street/A259 Prospect Road/Station Road/High Street mini-roundabout junction, from where access to M20 Junction 11A is achievable via Station Road, providing access to the A20 Ashford Road. Continuing west on the A259 Prospect Road provides a connection with Dymchurch Road at the A259/A261/Dymchurch Road signalised junction. The A261 London Road continues north to provide a connection with the M20 at Junction 11.

H4.4 Routing east on Princes Parade from the site provides a further connection with the A259 Seabrook Road, which continues east into Sandgate and Folkestone.

H4.5 A footway is present on the northern side of Princes Parade, measuring approximately 2m in width and connecting with the A259 Seabrook Road to the east and Twiss Road to the west. An approximately 5m wide promenade runs parallel to Princes Parade following the coastline, which takes the form of a shared footway/cycleway. It is noted that there are no formal crossing points of Princes Parade to the promenade, with parking located on the southern side of the carriageway and breaks in the sea wall to allow for informal crossing.

H4.6 Pedestrian connectivity is provided between the Site and Hythe High Street via existing infrastructure on Twiss Road, Seabrook Road and Prospect Road, with an uncontrolled crossing point of Prospect Road provided.

H4.7 A path through the centre of the Site provides a connection between Princes Parade and the bus stops on the A259 Seabrook Road.

H4.8 Within the town centre, the High Street becomes a gated pedestrian zone at its junction with Douglas Avenue between the hours of 11:00 and 15:00 on Monday to Saturday. This zone continues to the High Street junction with Malthouse Hill to the west.

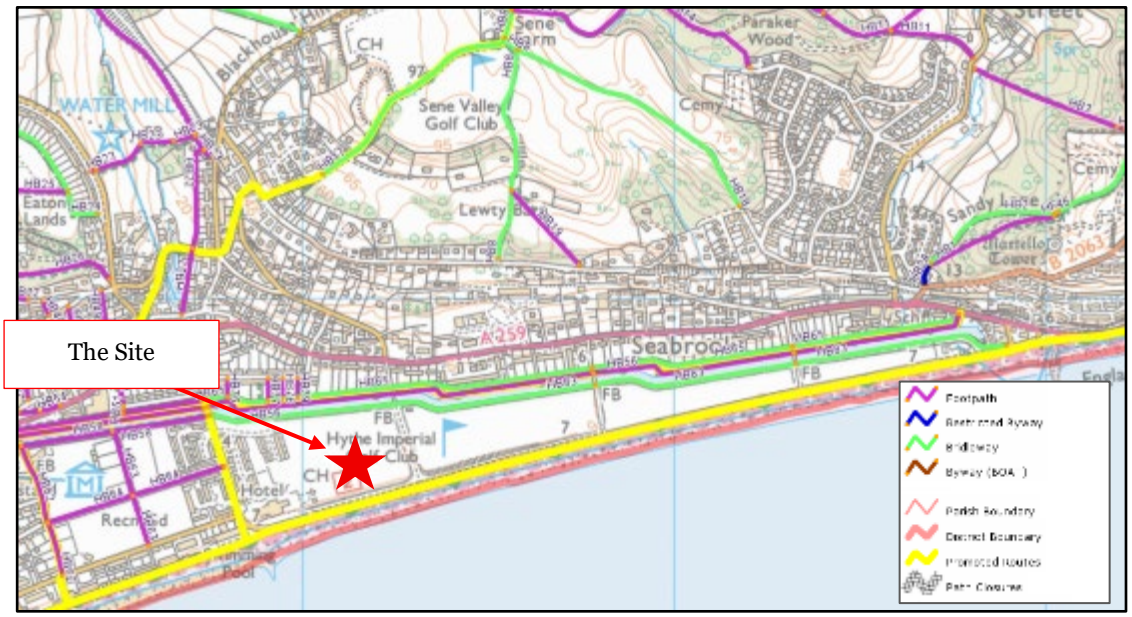
H4.9 The Site is also well located for access to Public Rights of Way ('PRoW'), as demonstrated in Figure H4.1. A number of Promoted Routes (recreational route that follows one or more existing public rights of way which KCC have actively publicised for leisure, health, or tourism purposes) run along the promenade, including the Sandwich to Rye cycle ride (87km) and the England Coast Path, which reflects its status as a popular leisure route for non-motorised users.

H4.10 Bridleway HB83 routes along the northern edge of the Site to the south of the RMC. PRoW HB65 routes along the northern side of the RMC between the A259 Seabrook Road to the east and Twiss Road to the west, becoming PRoW HB56 and continuing through suburban Hythe. This route forms part of the RMC Path (45km) and the Hythe and RMC Promoted Routes, which continue onwards towards Dymchurch and Rye to the west.

H4.11 Station Road at the A259 East Street/Prospect Road/Station Road/High Street mini-roundabout junction forms part of the Elham Valley Way Promoted Route (36.2km).

H4.12 A number of further local residential routes are also identified as PRoW.

Figure H4.1: Public Right of Way Map



Source: KCC

H4.13 The Site further benefits from access to designated cycle routes, which broadly align with the PRoW network and local road network.

H4.14 National Cycle Route 2 routes along the promenade and via Twiss Road, providing a long-distance route along the south coast of England from Dover to St. Austell. There are also a number of local routes within the site vicinity, including that along the northern edge of the RMC (PRoW HB56).

H4.15 A number of bus stops are located within the Site vicinity, which includes the Cannongate Road bus stops located on the A259 Seabrook Road, which are accessible via the path which bisects the Site. These stops are located approximately 400m (or a five-minute walk) to the north of the southern end of this path and are both equipped with clearway markings and a flag and post with timetable information.

H4.16 From Imperial Gardens, the closest bus stops are the Mill Road stops, which are 600m to the north, representing an eight-minute walk, and which provide clearway markings and a flag and post with timetable information.

H4.17 These stops are served by a wide range of services, which are detailed in Table H4.1.

Table H4.1: Bus and Coach Services Local to the Site

Service No.	Route	Weekday Service Frequency	Saturday Service Frequency	Sunday Service Frequency
All Stops				
10	Folkestone – Ashford	Hourly between 08:01 – 18:12	Hourly between 08:16 – 19:12	N/A
10A	Folkestone – Ashford	School Service	N/A	N/A
18	Hythe – Canterbury	Four services between 07:17 and 17:12	Five services between 07:22 and 17:12	N/A
19	Brockhill School – Swingfield Minnis	School Service	N/A	N/A
102	Folkestone – Lydd	Hourly between 07:12 – 22:14	Hourly between 07:12 – 22:14	Hourly between 09:14 – 21:14
103	Folkestone – Lydd	Hourly between 07:42 and 22:38	Hourly between 07:42 and 22:38	Hourly between 07:51 – 22:21
104	Dover – Hythe	Two per hour between 06:42 and 19:27	Two per hour between 06:42 and 19:27	Two per hour between 07:57 and 19:27
971	Harvey Grammer School – Lympne	School Service	N/A	N/A
972	Hawkinge – Brockhill School	School Service	N/A	N/A

H4.18 It is noted that Sandling Railway Station is located approximately 4.5km from the Site, accessible in eight-minutes by car, 21-minutes by cycle and 26-minutes via the Route 18 bus service. The station provides access to regular services to locations including London Charing Cross, Ashford International, Folkestone (Central and West) and Dover Priory. This station also has a seated area, waiting room and passenger information systems

H4.19 Folkestone West Station is located approximately 4.5km from the site, representing a nine-minute drive, 24-minute cycle and 40-minute bus journey (including 29 minutes on foot) via Routes 102/103/104. This station provides access to higher-frequency and High Speed services to London St Pancras International, Ashford International and Dover Priory, with journeys to London St Pancras taking approximately 54 minutes. It is noted that this station is afforded with step-free access to each platform, car parking for up to 215 vehicles (including 12 accessible spaces) and 38 secure and sheltered cycle parking spaces. The station is also provided with a seated waiting area, passenger information systems, a coffee kiosk and a ticket office and machine.

H4.20 Folkestone Central is located on the same South Eastern Main Line as Folkestone West and are served by the same train services. The station is accessible in a 20-minute bus journey, via the Route 102/103/104 bus services, which operate during the weekday commuter peak periods. It is provided with step-free access to all platforms, 70 car parking spaces (including four accessible bays) and 58 secure and sheltered cycle parking spaces. This station has a seated area, heated waiting room and passenger information system. The station also has a ticket machine and ticket office.

H4.21 Folkestone West and Central Stations is accessible via designated cycle routes and by using local bus services. The direct services that call at these stations are shown in Table H4.2.

Table H4.2: Train Services from Sandling, Folkestone West and Folkestone Central Railway Stations

Destination	Service Frequency			
	Weekday Peak	Weekday Off-Peak	Saturday	Sunday
Sandling				
London Terminals (Charing Cross/London Bridge)	2 per hour	1 per hour	1 per hour	1 per hour
Dover Priory	1 per hour	1 per hour	1 per hour	1 per hour
Ashford International	2 per hour	1 per hour	1 per hour	1 per hour
Folkestone West and Central				
London St Pancras International	Up to 4 per hour	1 per hour	1 per hour	1 per hour
Dover Priory	3 per hour	2 per hour	2 per hour	2 per hour
Ramsgate	1 per hour	1 per hour	1 per hour	1 per hour
Ashford International	4 per hour	2 per hour	2 per hour	2 per hour

H4.22 Personal Injury Collision (PIC) data has been obtained for the local highway network in the Site vicinity for the latest five-year period. The incidents recorded were predominantly influenced by human error rather than any inherent fault with the highway layout or condition. It is not considered therefore that the Proposed Development would materially exacerbate the local highway safety record.

Baseline Traffic Conditions

H4.23 The road links considered within this Chapter with respect to traffic conditions are shown in Figure H4.2 and H4.3.

Figure H4.2: Baseline Traffic Locations

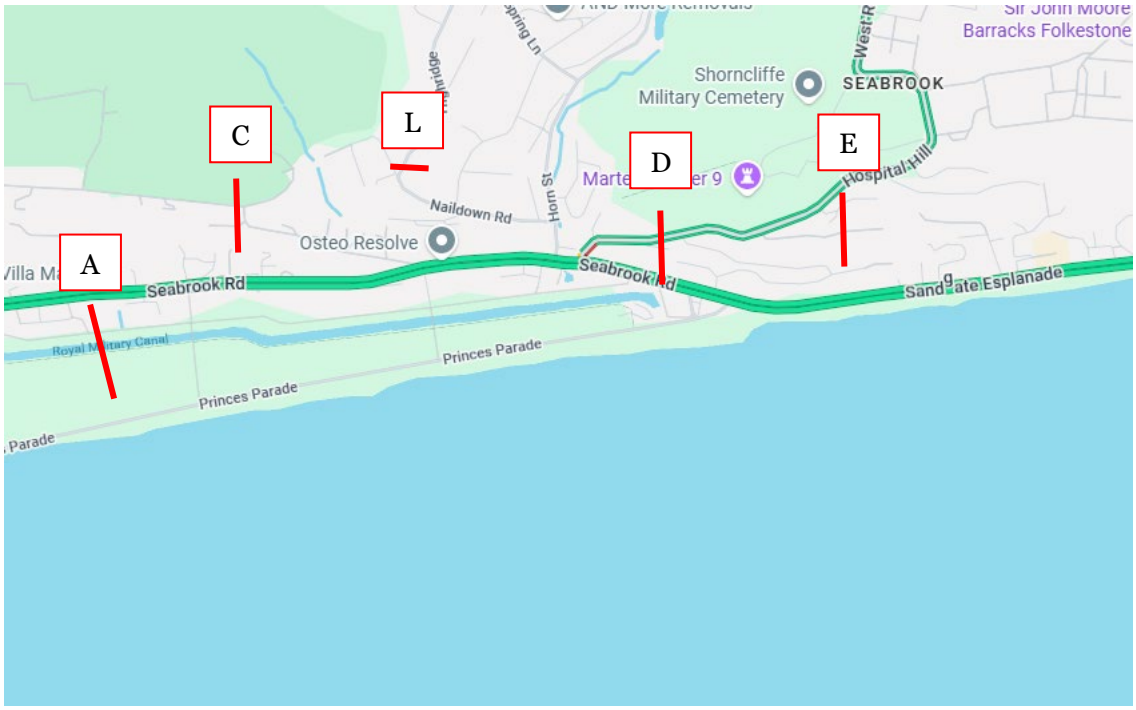
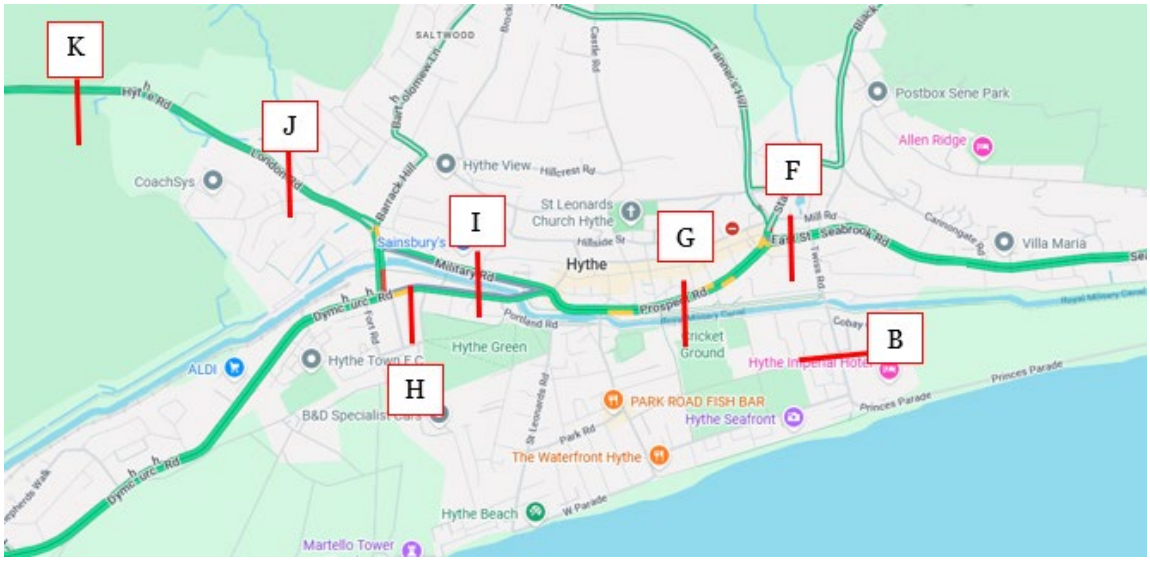


Figure H4.3: Baseline Traffic Locations



H4.24 Table H4.4 below sets out the baseline traffic conditions for the assessed links in the present year before the impacts of the Proposed Development or any committed/cumulative impacts are considered.

Table H4.4: Baseline Traffic Conditions (2026)

ID	Highway Link	AADT
		Vehicles
A	Princes Parade	2,041
B	Twiss Road	3,032
C	A259 Seabrook Road	10,200
D	A259 Sandgate Esplanade	9,924
E	A259 Sandgate High Street	9,924
F	A259 East Street	10,200
G	A259 Prospect Road	14,065
H	A259 Military Road	10,026
I	A259 Dymchurch Road	10,097
J	A261 London Road	7,407
K	A261 Hythe Road	7,407
L	Horn Street	3,315

Sensitive Receptors

H4.25 Using the receptors and criteria outlined earlier within Table H3.1, the links under assessment have been assessed and assigned a sensitivity level. The resulting sensitivity and justification are shown in Table H4.5. As previously defined, where links are classified with a sensitivity of 'Medium' and above, the Rule 2 threshold will be applied. For links classified as 'Low' or 'Negligible', the Rule 1 threshold will apply.

Table H4.5: Sensitivity of road links

Link	Sensitivity	Qualification
Link A	Low	Lies near open space, tourist and visitor attractions, adequate areas of footway and cycleway provision present. Link does not contain any other sensitive receptors as identified by ISEP Guidelines.
Link B	Medium	A continuous footway measuring a minimum of 2.0m in width is provided along its western side The eastern footway continues north over the RMC bridge at a consistent 2.0m width before narrowing to approximately 1.0–1.5m at the junction with the A259 Seabrook Road. Traffic volumes are moderate.
Link C	High	Lies on an A-road that experiences moderate traffic levels. The Seabrook C Of E Primary School is located at its eastern end. A number of retirement homes are also located along its length. Some footway narrowing present in places.
Link D	Medium	Lies on an A-road that experiences moderate traffic levels but has a good level of pedestrian and cycle provision as it is part of National Cycle Route 2 along the promenade.
Link E	Medium	Lies on an A-road that experiences moderate traffic levels but has a good level of pedestrian and cycle provision as it is part of National Cycle Route 2 along the promenade. Shopping areas located along its length.
Link F	High	Lies on an A-road that experiences moderate traffic levels. Some footway narrowing present.

Link	Sensitivity	Qualification
Link G	High	Lies on an A-road that experiences moderate traffic levels; care home located in proximity.
Link H	Medium	Lies on an A-road that experiences moderate traffic levels. Adequate footway provision available, recreation area located nearby
Link I	Medium	Lies on an A-road that experiences moderate traffic levels. Adequate footway provision available, recreation area located nearby
Link J	Low	Does not contain any sensitive receptors as advised by ISEP Guidelines.
Link K	Low	A busy north-south route traffic. Footway provision relatively narrow but suitable for likely level of footfall. Link does not contain any sensitive receptors as identified by ISEP Guidelines.
Link L	Low	Does not contain any sensitive receptors as advised by ISEP Guidelines.

H4.26 On this basis, Links B to I have been considered against Rule 2 and the remainder against Rule 1.

Future Baseline

H4.27 The future baseline represents what would happen to the current conditions described above if the Proposed Development does not come forward. In this case, the uses on Site would continue in their current form, while the likely change to the traffic flows is described below.

'Do Nothing' Traffic Flows

H4.28 The situation for the 'Do Nothing' scenario is considered for the 2035 future year (opening year). This assumes the 'no development' situation, with baseline traffic flows growing in line with background traffic growth forecasts in TEMPro and committed development traffic generation included. The 'Do Nothing' link flows are set out in Table H4.6. From the baseline flows set out in Table H4.4, TEMpro growth factors results in a 6% increase in traffic flows in the 'Do Nothing' Scenario. Of the committed/cumulative development sites detailed above, the development impacts of the proposals Former Foxwood School for a total of 150 dwellings have been considered. Development flows have been obtained from Figure 5 within Appendix D of the submitted Transport Assessment.

Table H4.6: 2035 Do Nothing Link Flows

Link ID	Road Link	2035 DN
		AADT
A	Princes Parade	3,334
B	Twiss Road	2,244
C	A259 Seabrook Road	11,885
D	A259 Sandgate Esplanade	10,899
E	A259 Sandgate High Street	10,899
F	A259 East Street	11,645
G	A259 Prospect Road	15,521
H	A259 Military Road	10,971
I	A259 Dymchurch Road	11,173
J	A261 London Road	8,018
K	A261 Hythe Road	8,018
L	Horn Street	3,746

H5.0 Potential Effects

Embedded Mitigation

H5.1 A number of measures have been embedded into the design of the Proposed Development, or are provided with the planning application for approval to mitigate its transport impacts. They include:-

1 During the construction phase, it is proposed that a condition of planning permission for the Proposed Development would be the preparation of a detailed CEMP in accordance with the CEMP provided at Appendix C4. In line with the CEMP (Appendix C4), the following measures will be implemented:-

   a Staff and construction traffic routing via the strategic and primary highway network;

   b Traffic management at highway works locations;

   c Time restrictions on construction activities and traffic (e.g. avoiding the education peak periods); and

   d On-site management of wheel cleaning, staff facilities, parking etc.

2 The internal site layout within the residential area will be designed (at the reserved matters stage) to accord with Manual for Streets and Kent Design Guide principles to encourage low vehicle speeds and direct, overlooked and pleasant active travel routes. It is anticipated that this requirement will be secured by planning condition.

3 The implementation of the Interim Framework Travel Plan (provided at Appendix H2), and a Travel Information Pack that will be circulated to future residents and employees and will contain initiatives and incentives to increase their uptake of non-car and sustainable travel, as well as securing an ongoing monitoring and reporting strategy;

4 The provision of Electric Vehicle (EV) charging facilities for every dwelling and for the non-residential uses. It is anticipated that this requirement will be secured by planning condition;

5 Provision of public realm improvements including a new public plaza, splash park and heritage trails as shown on the detailed planning drawings; and

6 The provision of secure cycle parking facilities in accordance with the Council's parking standards for the residential element and the for the non-residential uses. It is anticipated that this requirement will be secured by planning condition in relation to the residential uses.

Major Hazards and Accidents

H5.2 The potential for major hazards and accidents associated with the Proposed Development is not considered applicable to this chapter due to the nature of the Proposed Development. It is noted that, in the context of an EIA, major hazards are low-likelihood, high consequence events with the potential for serious environmental and human health effects such as fires, explosions, major chemical spills and structural collapses. Major accidents are events such

as major road traffic accidents or train derailments that could lead to immediate or delayed serious environmental effects to human health, welfare and/or the environment.

Phasing

H5.3 As set out in Chapter C of the ES, it is anticipated that the Proposed Development will be constructed in phases, however, for the purposes of assessment, the Proposed Development has been assessed as coming forward in a single phase. This is to ensure a robust assessment of the impact of the worst-case scenario and provides consistency with the TA report approach agreed with KCC.

During Construction

H5.4 Construction of the Proposed Development is expected to commence in 2028 and finish in 2035; it is anticipated that 2028 would be the year with the peak levels of construction traffic activity due to the nature of the phased delivery, with the leisure/golf facilities delivered first. With reference to deliveries by larger vehicles, it is proposed that these would access the site from the M20 at Junction 11 via the A261 London Road, the A259 Seabrook Road and Princes Parade to the east of the site.

H5.5 The baseline conditions, against which the impacts of the construction period have been assessed, are outlined in Table H5.1. Please note that the HGV volumes are also included as part of the 'all vehicle' figures. Table H5.1 highlights the 2028 Baseline Scenario, plus the forecast construction vehicle trip attraction, and demonstrates the net and percentage impacts of the construction phase for the impacted links.

Table H5.1: 2028 Baseline Vehicle and HGV flows

Link ID	Road Link	AADT 2028 Baseline		AADT 2028 + Plus Construction		Net Difference	
		All Vehicles	HGV	All Vehicles	HGV	All Vehicles	HGV
A	Princes Parade	2,077	13	2,251	21	8%	37%
B	Twiss Road	3,080	25	3,154	27	2%	7%
C	A259 Seabrook Road	10,331	116	10,541	121	2%	4%
D	Sandgate Esplanade	10,072	92	10,194	94	1%	2%
E	Sandgate High Street	10,072	92	10,194	94	1%	2%
F	A259 East Street	10,331	116	10,546	118	2%	2%
G	A259 Prospect Road	14,221	186	14,472	188	2%	1%
H	A259 Military Road	10,151	119	10,335	121	2%	2%
I	A259 Dymchurch Road	10,228	103	10,407	106	2%	2%
J	A261 London Road	7,233	357	7,655	359	6%	1%
K	A261 Hythe Road	7,233	357	7,655	359	6%	1%
L	Horn Street	3,377	19	3,409	22	1%	14%

H5.6 Some phases of construction will result in a greater number of goods vehicle movements on a given day; for instance, when road infrastructure is being constructed, resulting in an increase in asphalt and concrete delivery. However, these peaks would be sporadic; therefore on a typical day it is envisaged that goods vehicle deliveries would number approximately 30 and on days where larger scale infrastructure is being installed, up to 50. These would occur throughout the working day; therefore averaging between three and six movements (loads) per hour.

H5.7 Construction staff are expected to number approximately 60 on a typical day, comprising the various trades working on the Site. There would be an increase associated with certain elements of construction, although again these periods would be short in duration, with numbers of up to 100 at these times.

H5.8 There will also be some disruption to the local highway network during the implementation of any highway improvements proposed as part of the Proposed Development and the implementation of utility works within the highway.

H5.9 In terms of impacts related to construction, the typical daily goods vehicle movements of between three and six per hour would not be expected to have a material impact upon the local highway network. Construction worker trips would occur at the start and end of the working day (typically 07:00 and 16:00, respectively), likely over a 5.5 day working week (Monday to Friday and Saturday morning). Given that these trips would occur outside of the network traffic peaks, this level of movement is anticipated to generate a Negligible impact on the local highway network and on this basis, the impact of construction traffic movements on highway capacity is judged to lead to a Negligible and Not Significant potential effect.

H5.10 Upon review of the net increase in trips expected as a result of the construction phase (assuming the 'worst case' scenario of 180 total arrivals and departures), when considering the context of the link sensitivity and associated Rules, it is noted that the general increase in vehicles on all links barring Link A (Princes Parade) falls well below the 30% threshold.

H5.11 Links B to I are to be assessed against the Rule 1 (10%) threshold, which is not exceeded for either all vehicles or HGVs. Links J and K are to be assessed against the Rule 2 (30%) threshold, which is also not exceeded for either all vehicles or HGVs as well.

H5.12 The HGV increase as a result of the construction phase for Link A (Princes Parade) exceeds the Rule 1 (10%) threshold. Therefore, further consideration of the impacts of HGVs on this link is given in the following sub-sections.

Visual Impacts

H5.13 The ISEP Guidelines set out that high-sided vehicles (HGVs) may have an obstructive/intrusive impact on visual amenity. Whilst a net increase in HGV movements is anticipated, they will all be accommodated on-site, and vehicle routing ensures they avoid the busiest parts of the network. Princes Parade will experience a 37% increase in HGV vehicle movements against the baseline, which notably exceeds the Rule 1 and 2 thresholds, all other links net percentage increase does not exceed any thresholds.

H5.14 Where possible, construction vehicle movements in the network peak hours will be avoided. Ensuring vehicles are accommodated on site means that any impacts to visual amenity will be limited in time.

H5.15 It is therefore considered that the effect upon Princes Parade would be Minor Adverse and Not Significant.

Driver Delay

H5.16 The increase to HGV movements on Link A would be temporary in nature and would be generally restricted to outside of the network peak periods via the CEMP, where driver delay will be much reduced. The magnitude of impact is therefore anticipated to be Low.

H5.17 It is acknowledged that construction activities associated with the Site accesses are likely to result in some delay to local traffic. The delivery of these schemes will be the subject of detailed programming agreements with the Local Highway Authority and will only be allowed to proceed under its supervision.

H5.18 As such, the effects upon driver delay on Princes Parade are likely to be Minor Adverse and Not Significant.

Pedestrian Delay

H5.19 As previously outlined, 1,400 vehicles per hour for two-way traffic flows is categorised as resulting in a delay of 10 seconds for pedestrians. The forecast increase in HGV movements (and construction vehicles generally) is significantly below this threshold, therefore resulting in an imperceptible impact to pedestrian delay.

H5.20 Given the above, it is considered that during construction the Proposed Development will have a Negligible effect on pedestrian delay in relation to all road links assessed that is Not Significant.

Pedestrian Amenity

H5.21 The threshold for noticeable impacts pedestrian amenity is where traffic flows (or their HGV component) is doubled or halved. Whilst overall construction traffic flows are seen to be considerably lower than this threshold, the HGV component is seen to be higher on Link A. It is nevertheless noted that the larger percentage increases experienced on this Link are due to the low existing HGV movements. Therefore, it is considered that construction HGVs will result in a Minor Adverse effect upon pedestrian amenity along Princes Parade which is Not Significant.

Accidents and Safety

H5.22 Personal Injury Collision (PIC) data has been obtained for the local highway network in the Site vicinity for the five-year period between 1st July 2020 and 30th June 2025. The analysis of this data contained in the TA concludes that there are no clusters of incidents with causation factors that indicate an inherent highway safety problem within the vicinity of the Site. The effect upon all road links considered in the assessment is therefore judged to be Negligible and Not Significant.

Hazardous Loads

H5.23 Given the nature of the Proposed Development and the existing Site, it is not anticipated that any hazardous loads would be transported as part of the construction phase. Therefore, there would a Nil impact resulting in a Neutral effect (Not Significant).

During Operation

Do Minimum' Traffic Flows

H5.24 The 'Do Minimum' traffic flow (Scenario 3 as described at Paragraph H3.16) situation shows the scenario whereby the Proposed Development trip generation and attraction is added to the 'Do Nothing' traffic flows presented above. This assumes that the Proposed Development is complete and occupied. The traffic flows under this scenario are shown in Table H5.2, alongside the 'Do Nothing' flows.

Table H5.2: Comparison of 2035 'Do Nothing' and 'Do Minimum' traffic flows

Link ID	Link	AADT 2035 'Do Nothing'	AADT 2035 'Do Minimum'
		All Vehicles	All Vehicles
A	Princes Parade	2,244	3,776
B	Twiss Road	3,334	3,843
C	A259 Seabrook Road	12,008	12,654
D	A259 Sandgate Esplanade	10,996	11,307
E	A259 Sandgate High Street	10,996	11,307
F	A259 East Street	11,768	12,180
G	A259 Prospect Road	15,718	16,058
H	A259 Military Road	11,097	11,507
I	A259 Dymchurch Road	11,283	11,710
J	A261 London Road	8,397	8,555
K	A261 Hythe Road	8,397	8,555
L	Horn Street	3,766	4,104

H5.25 The net difference in vehicle flow on each of the above links is outlined in Table H5.3. Please note that the overall AADT movements for the Site are 1,547 (774 arrivals, 773 departures), with these trips distributed on to the wider network in accordance with the distribution methodology outlined within the TA. The values in bold highlight links that will be impacted by the Proposed Development at a level that is above ISEP guidelines in accordance with Rule 1 or Rule as appropriate (see Paragraph H4.24).

Table H5.3: Net Difference – 'Do Nothing' and 'Do Minimum' Scenarios (Raw Flows and Percentage Impact)

Link ID	Link	AADT 2035 Difference	Percentage Difference
		All Vehicles	%
A	Princes Parade	1,547	69%
B	Twiss Road	535	16%
C	A259 Seabrook Road	770	7%
D	A259 Sandgate Esplanade	408	4%
E	A259 Sandgate High Street	408	4%
F	A259 East Street	535	5%
G	A259 Prospect Road	537	3%
H	A259 Military Road	537	5%

Link ID	Link	AADT 2035 Difference	Percentage Difference
		All Vehicles	%
I	A259 Dymchurch Road	537	5%
J	A261 London Road	537	7%
K	A261 Hythe Road	537	7%
L	Horn Street	358	10%

H5.26 Using the ISEP thresholds outlined earlier in this Chapter, it is found that the majority of links can be screened out of the assessment due to the net impacts of the proposals in accordance with Rules 1 and 2 (ref. Paragraphs H3.18-H3.20) as applied to the road links (ref. Paragraph H4.24) (i.e. less than 10% on links C – I and less than 30% impact on links J - L).

H5.27 Assessment of impacts upon two links is required as the increase in vehicle flows exceed the relevant thresholds:

1 Link B (Twiss Road) as the increase in vehicle flows in this location exceeds the Rule 2 threshold (over 10%); and

2 Link A (Princes Parade) as the increase in vehicle flows in this location exceeds the Rule 1 threshold (over 30%).

H5.28 The below assessment assumes no additional mitigation.

Visual Impacts

H5.29 There is no anticipated material change in the number of operational HGVs as a result of the Proposed Development during operation. Any HGVs that access the Site will already be on the wider highway network, such as refuse and delivery vehicles. Therefore, the anticipated visual obstruction or intrusion as a result of the increased HGV flows on all links is considered to have a Negligible and Not Significant effect.

Severance

H5.30 The percentage increase in vehicle flows forecast along Princes Parade is 69%, which equates to a High magnitude of impact. It is noted in this regard that there are currently no formal non-motorised user crossing points and that traffic speeds can be relatively high. The High impact, together with the Low sensitivity of the road link leads to a Moderate Adverse and **Significant** effect on pedestrian delay without mitigation.

H5.31 The percentage increase at Twiss Road is 16%, which is below the 30% threshold for a 'Low' impact with reference to ISEP guidelines. It is again noted however that there is a lack of safe non-motorised user crossing provision on certain desire lines (e.g. the RMC Path). As Twiss Road is identified as a Medium sensitivity receptor, this Low impact leads to a Minor Adverse effect in respect of severance that is Not Significant.

Driver Delay

H5.32 The impact of the Proposed Development on local junctions in terms of driver delay has been addressed within the junction capacity assessments presented within the TA. Relating to Links A and B, the proposed site access off Princes Parade, the A259 Seabrook Road/Twiss Road priority junction and A259 Seabrook Road/Twiss Road were all assessed.

With the addition of the development traffic, all junctions continued to operate within capacity.

H5.33 Therefore, with reference to both Princes Parade and Twiss Road's junctions with the A259 Seabrook Road, the addition of the Proposed Development traffic flows will have a Negligible impact on their operation that will have a Not Significant effect.

Pedestrian Delay

H5.34 Within the ISEP guidelines, changes to pedestrian delay are outlined in terms of vehicle movements, where it is stated that 1,400 two-way vehicle movements per hour equates to a pedestrian delay of 10 seconds.

H5.35 The forecast 535 additional two-way vehicle movements on Twiss Road falls significantly below this threshold. Therefore, it is considered that the net increase in vehicle movements resulting from the Proposed Development will have a Negligible and Not Significant effect on pedestrian delay.

H5.36 The 1,547 additional movements on Princes Parade slightly exceeds this threshold and is considered to have a High impact, which together with the Low sensitivity of the road link leads to a Moderate Adverse and **Significant** effect on pedestrian delay without mitigation.

Pedestrian Amenity

H5.37 With reference to the tentative ISEP threshold (changes in traffic flows of double or half), it is noted that the projected increase in vehicle flows on Link B (Twiss Road) do not reach this threshold. Although Twiss Road does not meet the threshold, it is evident from review and pre-application correspondence with KCC H&T that there is a lack of non-motorised crossing infrastructure at formal desire lines across Twiss Road at the RMC. On-street parking located along the bridge at the RMC can also obscure sight lines for those crossing.

H5.38 With reference to the tentative ISEP threshold, the projected increase in vehicle flows for Link A (Princes Parade) does reach the threshold (69%). Whilst Princes Parade (Link A) is provided with good footway/cycleway infrastructure along its length, there is a lack of non-motorised crossing infrastructure and vehicle speeds can be high.

H5.39 On this basis, the effects of the Proposed Development in terms of pedestrian amenity are judged to be Minor Adverse and Not Significant on Twiss Road. With regard to Princes Parade, the effects of the Proposed Development is judged to be Moderate Adverse and **Significant.**

Accidents and Safety

H5.40 The increase in traffic generated by the Proposed Development could potentially increase the occurrence of incidents on the local highway network by virtue of the greater traffic volume. However, as outlined within the TA, a review of Personal Injury Collision Data in the site vicinity revealed that incidents were predominantly influenced by human error rather than any inherent fault with the highway layout or condition and the development would be unlikely to materially exacerbate the local highway safety record.

H5.41 A number of incidents were recorded on Princes Parade and Twiss Road. Discussions with the local highway authority and local residents revealed some concerns regarding speeding of vehicles on Princes Parade and the presence of on-street parking impacting highway safety. A modest number of incidents also occurred on Princes Parade/Twiss Road.

H5.42 The effect in these terms is therefore judged to be Minor Adverse and Not Significant on both Princes Parade and Twiss Road.

Hazardous Loads

H5.43 In terms of hazardous loads, the Proposed Development is unlikely to generate the need for transportation of such items and therefore the effects are likely to be Negligible and Not Significant.

Summary of effects

H5.44 As outlined above, it is noted that the Proposed Development, prior to mitigation, will have adverse effects on severance, and pedestrian delay and amenity. Significant effects are identified in relation to all three, which are addressed further within this Chapter.

H6.0 Mitigation and Monitoring

During Construction

H6.1 The assessment of potential effects found that there are not expected to be any Significant effects in relation to traffic and transport arising from the construction of the Proposed Development. No further mitigation measures beyond those identified as embedded mitigation are proposed.

During Operation

H6.2 The assessment of potential effects identified adverse impacts, particularly related to Princes Parade, resulting from the development on Severance, Pedestrian Delay and Pedestrian Amenity.

H6.3 A number of mitigation measures have therefore been identified in response to identified impacts in the previous section. The mitigation measures have been discussed with KCC, are listed below, and are described in further detail within the TA (Appendix H1).

- A comprehensive package of off-site pedestrian and cycle infrastructure improvements to Princes Parade and Twiss Road. This includes raised table pedestrian crossing points of Princes Parade, pedestrian/cycle routes through the site and a public plaza. A new pedestrian crossing point will also be installed on Twiss Road;
- Scheme of highway improvements and traffic calming on Princes Parade to reduce traffic speeds. This includes reducing the speed limit to 30mph at the site frontage, red surfacing, carriageway roundels, dragons teeth markings at the eastern and western gateway points, a series of chicane features and raised table pedestrian crossings;
- A scheme of enhancements to the A259 Seabrook Road/Twiss Road priority junction. Improvements include building out the Twiss Road arm to increase visibility, removing the existing island on the western side of the junction to increase lane width, formalising existing on-street parking and installing an island and reflective bollards on the eastern side of the junction to protect the right-turn lane;
- Introducing restrictions to on-street parking on Twiss Road to enhance non-motorised user visibility.

H7.0 Residual Effects

H7.1 Residual effects are those which are predicted to remain after implementation of the mitigation measures described above. The residual effects are summarised below.

During Construction

H7.2 As no additional mitigation measures are proposed, the residual effects are as set out in Section H5.0.

During Operation

H7.3 This section assesses the impact of the Proposed Development with the proposed mitigation measures identified in Section H6.0.

Severance

H7.4 The percentage increase in vehicle flows forecast along Princes Parade is 69%. Enhancements are proposed to Princes Parade to manage vehicle speeds and prioritise pedestrian and cycle movement. This includes the provision of raised table crossings and other traffic calming features. The impact of the Proposed Development post-mitigation is judged to be beneficial in nature and of Low magnitude, leading to an effect that is Minor Beneficial and Not Significant.

H7.5 The percentage increase in vehicle flows forecast along Twiss Road is 16%, which is below the 30% threshold for a 'Low' impact with reference to ISEP guidelines. Improvements are nevertheless proposed to Twiss Road in the form of increased parking controls and uncontrolled crossing points to facilitate safe vehicular and pedestrian movement on this link. The impact of the Proposed Development with this mitigation in place is judged to be beneficial in nature and of Low magnitude, leading to an effect that is Minor Beneficial and Not Significant.

Driver Delay

H7.6 The impact of the Proposed Development on local junctions in terms of driver delay has been addressed within the junction capacity assessments presented within the TA. As above, enhancements are proposed to Princes Parade to manage vehicle speeds and prioritise pedestrian and cycle movements. The effect of the Proposed Development with these measures in place is considered to be Negligible and Not Significant on the operation of Princes Parade in relation to driver delay.

H7.7 A scheme of enhancements is also proposed at the A259 East Street Twiss Road priority junction, which includes:-

- Removing the existing island on the western side of junction to provide two 3.3m width running lanes and a 3.3m right turn lane on Seabrook Road, which will prevent right-turning vehicles from obstructing eastbound traffic;
- Formalising the existing on-street parking on the northern side of the carriageway;
- Installing an island and reflective bollards on the eastern side of the junction to protect the right-turn lane; and

- Providing an uncontrolled pedestrian crossing of the Twiss Road arm of the junction, equipped with dropped kerbs and tactile paving.

H7.8 On-street parking restrictions are also proposed on Twiss Road in the vicinity of the bridge over the RMC, in order to enhance non-motorised user visibility at the crossing of the RMC path and to smooth traffic flow in this location.

H7.9 These measures will reduce the impact of the Proposed Development on driver delay at this junction although are more focused on improving safety and efficiency, although not to the extent that the effect level will change; it will remain a Negligible and Not Significant effect on driver delay. It will have a Negligible effect on the operation of Twiss Road.

Pedestrian Delay

H7.10 Within the ISEP guidelines, changes to pedestrian delay are outlined in terms of vehicle movements, where it is stated that 1,400 two-way vehicle movements per hour equates to a pedestrian delay of 10 seconds.

H7.11 The forecast 535 additional two-way vehicle movements on Twiss Road falls significantly below this threshold. Implementation of uncontrolled crossing points and increased parking controls on the bridge over the RMC will provide enhanced pedestrian visibility at these locations and more efficient vehicle movements. The Proposed Development will therefore have a Low magnitude impact leading to an effect that is Minor Beneficial and Not Significant on pedestrian delay at Twiss Road.

H7.12 Whilst the 1,547 additional movements on Princes Parade slightly exceed the threshold, the above-referenced traffic calming and public realm enhancements to this link will sufficiently mitigate the associated pedestrian delay effects, providing pedestrian priority measures across Princes Parade. It is therefore considered that the Proposed Development will have a Low magnitude impact leading to an effect that is Minor Beneficial and Not Significant on pedestrian delay on Princes Parade.

Pedestrian Amenity

H7.13 With reference to the tentative ISEP threshold (changes in traffic flows of double or half), it is noted that the projected increase in vehicle flows on Link B (Twiss Road) do not reach this. Regardless, improvements to Twiss Road are proposed to provide a better environment for pedestrians, as described above.

H7.14 It is further noted that Princes Parade (Link A) is provided with good footway/cycleway infrastructure along its length that will be significantly improved by the additional mitigation described in Section H6.0.

H7.15 On this basis, the effects of the Proposed Development in terms of pedestrian amenity are judged to be Minor Beneficial and Not Significant.

Accidents and Safety

H7.16 The increase in traffic generated by the Proposed Development could potentially increase the occurrence of incidents on the local highway network by virtue of the greater traffic volume. However, as outlined within the TA, no inherent highway safety concerns are present within the vicinity of the Site.

H7.17 A programme of highway safety improvements is proposed on Princes Parade, Twiss Road and the A259 East Street/Twiss Road priority junction, as described above. On Princes Parade, this includes a reduced speed limit of 30mph in the site vicinity, facilitated by red surfacing, carriageway roundels and dragons teeth markings at the eastern and western gateway points, a series of chicane features which will narrow the carriageway to 3.7m, the installation of raised table pedestrian crossing points and the relocation of on-street parking bays to the northern side of the carriageway.

H7.18 A scheme of enhancements is also proposed at the A259 Seabrook Road/Twiss Road priority junction, which is detailed above.

H7.19 The effect in these terms is therefore judged to be Negligible and Not Significant.

Hazardous Loads

H7.20 In terms of hazardous loads, the Proposed Development is unlikely to generate the need for transportation of such items and therefore the residual effect will remain as Negligible and Not Significant.

H8.0 Summary & Conclusions

H8.1 This Chapter has assessed the likely significant traffic and transport effects resulting from the Proposed Development. Assessments have been undertaken using current guidance documents; namely the ISEP Guidelines: Environmental Assessment of Traffic and Movement (2023) the Planning Practice Guidance (2014), and best practice, and baseline conditions have been established through industry-standard methods.

H8.2 Adverse and Significant effects were identified in relation to severance, pedestrian delay and amenity. Mitigation has therefore been identified in Section H6.0 to address these effects that includes a package of off-site pedestrian and cycle infrastructure improvements to Princes Parade and Twiss Road, highway improvements and traffic calming on Princes Parade, enhancements to the A259 Seabrook Road/Twiss Road priority junction and restrictions to on-street parking on Twiss Road to enhance non-motorised user visibility.

H8.3 It has been demonstrated that the adverse effects identified on the local highway network would, in the main, be successfully offset by the proposed mitigation measures.

H8.4 A summary table of the impacts during construction and operation is provided below:-

Table H8.1: Summary Table

Receptor	Impact	Potential Effects (taking account of embedded mitigation)	Additional Mitigation and Monitoring	Residual Effects
During Construction				
Link A: Princes Parade	Impact on visual amenity	Minor Adverse and Not Significant	N/A	Minor Adverse and Not Significant
Link A: Princes Parade	Driver Delay caused by increase in vehicle movements	Minor Adverse and Not Significant	N/A	Minor Adverse and Not Significant
All road links assessed	Pedestrian delay	Negligible and Not significant	N/A	Negligible and Not significant
Link A: Princes Parade	Pedestrian amenity	Minor Adverse and Not Significant	N/A	Minor Adverse and Not Significant
All road links assessed	Accidents and safety	Negligible and Not significant	N/A	Negligible and Not significant
All road links assessed	Hazardous loads	Neutral and Not Significant	N/A	Neutral and Not Significant
During Operation				
Link A (Princes Parade) and B (Twiss Road	Impact on visual amenity	Negligible and Not significant	N/A	Negligible and Not significant
Link A (Princes Parade) and B (Twiss Road	Severance	Moderate Adverse and Significant – Link A (Princes Parade) Minor Adverse and Not Significant	A comprehensive package of off-site pedestrian and cycle infrastructure improvements to	Minor Beneficial and Not Significant

Receptor	Impact	Potential Effects (taking account of embedded mitigation)	Additional Mitigation and Monitoring	Residual Effects
		– Link B (Twiss Road).	Princes Parade and Twiss Road	
Link A (Princes Parade) and B (Twiss Road	Driver Delay caused by increase in vehicle movements	Negligible and Not Significant	A scheme of off-site enhancements on Princes Parade and Twiss Road.	Negligible and Not Significant
Link A (Princes Parade) and B (Twiss Road	Pedestrian delay	Moderate Adverse and Significant – Link A (Princes Parade) Negligible and Not Significant – Link B (Twiss Road)	A comprehensive package of off-site pedestrian and cycle infrastructure improvements to Princes Parade and Twiss Road.	Minor Beneficial and Not Significant
Link A (Princes Parade) and B (Twiss Road	Pedestrian amenity	Moderate Adverse and Significant – Link A (Princes Parade) Minor Adverse and Not Significant – Link B (Twiss Road)	A comprehensive package of off-site pedestrian and cycle infrastructure improvements to Princes Parade and Twiss Road.	Minor Beneficial and Not Significant
Link A (Princes Parade) and B (Twiss Road	Accidents and safety	Minor Adverse and Not Significant	A scheme of measures on Twiss Road, its junction with the A259 East Street and Princes Parade	Negligible and Not Significant
Link A (Princes Parade) and B (Twiss Road	Hazardous loads	Negligible and Not Significant	N/A	Negligible and Not Significant

H9.0 Abbreviations & Definitions

Abbreviations

- **AADT** – Annual Average Daily Traffic
- **ATC** – Automatic Traffic Count
- **DfT** – Department for Transport
- **DM** – Do Minimum
- **DN** – Do Nothing
- **EV** – Electric Vehicle
- **IEMA** – Institute of Environmental Management and Assessment
- **ISEP** – Institute of Sustainability and Environmental Professionals
- **KCC H&T** – Kent County Council Highways & Transportation
- **LTP5** – Local Transport Plan 5
- **MCC** – Manual Classified Count
- **NH** – National Highways
- **NPPF** – National Planning Policy Framework
- **PRoW** – Public Right of Way
- **TA** – Transport Assessment
- **TEMpro** – Trip End Model Presentation Program
- **TP** – Travel Plan
- **TRICS** - Trip Rate Information Computer System

Definitions

- **Accident & Safety –** The assessment of existing and future road safety conditions.
- **Assessment Modelling –** The application of transport modelling software to estimate junction performance and network operation under different development scenarios.
- **Baseline Conditions –** Existing transport conditions.
- **Committed/Cumulative Development -** Sites that have a planning permission, are subject to a live planning application or have a local plan allocation.
- **Construction Traffic –** Vehicle movements associated with site preparation and construction activities.
- **Development Traffic –** Vehicle movements associated with the completed development.
- **Driver Delay –** Increased journey times caused by additional traffic or changes to highway operation.

- **Embedded Mitigation -** Measures that have been incorporated into the design and development of the layout of the proposed development to avoid or reduce potential adverse effects.
- **Future Baseline -** The predicted environmental and transport conditions that are expected to occur in the absence of the proposed development, taking account of forecast growth and committed developments.
- **Hazardous Load –** Vehicles transporting substances or materials that have the potential to pose a risk to human health, property, or the environment.
- **Magnitude of Impact –** The degree of change in transport conditions arising from the proposed development.
- **Pedestrian Amenity –** The quality of the walking environment experienced by pedestrians.
- **Pedestrian Delay –** The increase in time required for pedestrians to undertake a journey.
- **Sensitive Receptor –** A receptor is a person, community, transport user, property or location that could be affected by changes arising from the proposed development. A sensitive receptor is a receptor that is particularly susceptible to changes in transport conditions.
- **Severance –** Difficulties experienced by pedestrians crossing or using roads due to traffic levels.
- **Study Area –** Geographic area covered for the assessment of transport impacts.
- **Residual Effect –** Effect remaining after mitigation measures are implemented.
- **Visual Impacts -** Changes to the views or visual character of an area.

H10.0 References

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Volume 1: Environmental Statement
Chapter I Noise and Vibration

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I1.0 Introduction

I1.1 This Chapter of the Environmental Statement ('ES') has been prepared by Hilson Moran on behalf of the applicant, GSE Group ('the Applicant'). It assesses the Proposed Development described in Chapter C in relation to noise and vibration.

I1.2 The baseline conditions are considered before the likely environmental effects of the Proposed Development are identified during its construction and operational phases. Mitigation measures to reduce any negative environmental effects are identified as appropriate, before the residual environmental effects are assessed.

I1.3 This Chapter is supported by the following technical appendices provided at Volume 2 to this ES:

- Appendix I1: Baseline Survey;
- Appendix I2: Construction Noise;
- Appendix I3: Contruction Traffic Noise Assessment;
- Appendix I4: Operational Traffic Noise Assessment;
- Appendix I5: Consultation Details;
- Appendix I6: Outdoor Amenity Noise Assessment;
- Appendix I7: Site Suitability Assessment.

I1.4 This Chapter is supported by the following technical figures provided at Volume 2 to this ES:

- Figure I3 1: Location Plan of the Site, Noise Monitoring and Receptor Position;
- Figure I4 1: Daytime Noise Contour Plot of the Site, dB LAeq,16hr (1.5 m AGL) (source: CadnaA 2018);
- Figure I4 2: Night-time Noise Contour Plot of the Site, dB LAeq,8hr (1.5 m AGL) (source: CadnaA 2018).

About the Author

I1.5 Jacopo Lozupone is an Acoustic Consultant at Hilson Moran where he specialises in acoustics, noise and vibration assessments. Jacopo works as part of the London based acoustics team where he is responsible for the delivery of technical studies and design reports for projects extending across all market sectors.

I1.6 Jacopo holds a BA(Hons) degree in Audio Production and a MSc degree in Architectural and Environmental Acoustics with four years of experience in the industry, specifically, he has two years of experience preparing environmental statements related to noise and vibration. Jacopo is a Member of the Institute of Acoustics (MIOA).

I2.0 Policy Context

I2.1 This section sets out legislation, national and local policy and guidance of relevance to the technical assessment in this Chapter.

Legislation

I2.2 The applicable legislative framework is summarised as follows.

Control of Pollution Act 1974

I2.3 The Control of Pollution Act 1974 (1) gives local authorities special powers for controlling noise and vibration arising from construction and demolition works. These powers may be exercised either before or after works have been started.

I2.4 Section 60 enables the local authority of an area in which works are scheduled or currently underway, to serve a notice of its requirements for the control of construction site noise/vibration on the person who appears to the local authority to be undertaking the works.

I2.5 Section 61 provides a mechanism for the contractor or developer to take the initiative in approaching the local authority to ascertain its noise/vibration requirements before construction work starts.

I2.6 The Act also covers Noise Abatement Zones, Codes of Practice and Best Practicable Means (BPM) regarding noise pollution.

Environmental Protection Act 1990, Part III

I2.7 Section 79 of the Environmental Protection Act 1990 (2) defines statutory nuisances and the requirement for local authorities to inspect their area for statutory nuisances, taking such steps as are reasonably practicable to investigate any complaint of a statutory nuisance.

I2.8 Section 80 of the act gives local authorities the right, where a statutory nuisance exists or is likely to be caused, to serve an abatement notice requiring the abatement, prohibition or restriction of the nuisance.

I2.9 Section 82 of the act allows a person aggrieved by a statutory nuisance to make a complaint to a Magistrates Court in an attempt to seek an abatement notice served on the person responsible for the nuisance.

Planning Policy and Guidance

I2.10 Planning policy at the national, regional, county and local level relevant to the Proposed Development is discussed below.

National Policy

National Planning Policy Framework, 2024 (revised 2025)

I2.11 The National Planning Policy Framework ('NPPF') (3) sets out the Government's planning policies for England and how these are expected to be applied. Planning law requires that applications for planning permission must be determined in accordance with the Development Plan unless material considerations indicate otherwise. The NPPF must be considered in the preparation of Local and Neighbourhood Plans and is a material consideration in planning decisions. The latest update to NPPF was released in February 2025.

I2.12 Regarding noise the NPPF states:

'Planning policies and decisions should contribute to and enhance the natural and local environment by: …

… e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of … noise pollution …'

I2.13 Paragraph 198 states that:

'*Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:*

1 *mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life;*

2 *identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; …'*

I2.14 In March 2014, the Department for Communities and Local Government (DCLG) released its Planning Practice Guidance (PPG) web-based resource to support the NPPF, although it does not explicitly state acceptable noise levels regarding residential amenity.

Noise Policy Statement for England, March 2010

I2.15 The Noise Policy Statement for England ('NPSE') (4) was published in March 2010 by the Department for Environment, Food and Rural Affairs ('DEFRA') and forms the overarching statement of noise policy for England. It sets out the long-term vision of Government noise policy, which is to:

'Promote good health and a good quality of life through the effective management of noise within the context of Government policy on sustainable development.'

I2.16 The policy aims, through the effective management and control of environmental, neighbour and neighbourhood noise within the context of Government policy on sustainable development, to:

1 Avoid significant adverse effects on health and quality of life;

2 Mitigate and minimise adverse effects on health and quality of life; and

3 Where possible, contribute to the improvement of health and quality of life.

4 The NPSE sets out three terms with regard to noise effects:

   a No Observed Effect Level ('NOEL') – the level below which no effect can be detected and below which no detectable effect on health and quality of life due to noise can be established;

   b Lowest Observed Adverse Effect Level ('LOAEL') – the level above which adverse effects on health and quality of life can be detected; and

   c Significant Observed Adverse Effect Level ('SOAEL') – the level above which significant adverse effects on health and quality of life occur.

I2.17 The above terms are not defined numerically in terms of absolute levels within the NPSE which acknowledges that these will change depending on, but not limited to, the noise source, the receiver type and the time of day/day of week.

Local Planning Policy

Core Strategy Review, 2022

I2.18 Folkestone & Hythe District Council's ('FHDC') Core Strategy Review (Folkestone & Hythe Council, 2022) (5) sets out the planning policies for the district. No policies directly relevant to noise are mentioned in this document.

Places and Policies Local Plan, 2020

I2.19 The Places and Policies Local Plan (Folkestone & Hythe District Council, 2020) (6) sets out FHDC's vision for development and contains policies used to consider the suitability of development proposals. Policy HB12 states in regard to noise:

"Planning permission will be granted for the development of new residential institutions, or the conversion of existing properties to this use, subject to the following requirements:

…

3. The proposal is compatible with surrounding land uses, so that the development does not cause substantial disturbance or detrimental impact to neighbours and is not located in an area subject to significant noise or other disturbance, or reasonably likely to be so as a result of the expansion of existing businesses, in accordance with National Planning Policy Framework 2012 paragraph 123;

…".

I2.20 Also, Policy HB13 goes on to state:

"Proposals for Houses in Multiple Occupation (HMOs) will only be permitted where the Proposed Development, taken by itself or in combination with existing HMOs in the vicinity of the site, would not result in an unacceptably harmful impact on:

1. Residential amenity, caused by increased noise and disturbance;

…".

Guidance

I2.21 Where detailed guidance is not contained in the documents described above, the most appropriate Standards and guidance have been adopted in the prediction and assessment of noise and vibration impacts. Guidance relating to the prediction and assessment of demolition and construction phase noise and vibration impacts has been taken from the following documents:

- British Standards (BS) 5228-1+2:2009+A1:2014 'Code of Practice for Noise and Vibration Control on Construction and Open Sites' (7) provide guidance on the assessment of noise and vibration impacts during the redevelopment of a site, including procedures for estimating noise levels from construction activities and vibration attributable to vibrating rolling and piling activities respectively. The guidance does not define acceptable limits. However, it does provide potential methods for assessing the significance of noise and vibration impacts and the methods for assessing the significance of impacts which the guidance indicates should be defined on a site-specific basis. BS 5228 also provides guidance on minimising potential impacts through the use of mitigation and the adoption of Best Practicable Means (BPM).
- Advisory Leaflet 72 'Noise Control on Building Sites' (8) sets out advice on the control and management of construction noise. Appropriate noise limits are also suggested at residential locations during daytime hours (07:00-19:00). The leaflet states that noise outside the nearest occupied room should not exceed: (a) 75 dB(A) in urban areas near to main roads in heavy industrial areas, or, (b) 70 dB(A) in rural, suburban and urban areas away from main roads traffic and industrial noise.
- BS 7385-2:1993 'Evaluation and Measurement for Vibration in Buildings' (9) provides guidance on the measurement of vibration in buildings and the assessment of the potential of cosmetic or structural damage. Table 1 within BS 7385-2:1993 provides the vibration limits above which cosmetic damage could occur.
- National Highways (2020) DMRB LA 111 – Noise and vibration. Revision 2. National Highways (10) This document is used as the standard method for measuring, predicting and reporting highway-related noise and vibration impacts in the UK.
- Department of Transport / Welsh Office 'Memorandum Calculation of Road Traffic Noise' ('CRTN'), 1988 (11) describes procedures for predicting and measuring noise from road traffic noise in terms of the LA10 (the noise level exceeded for 10% of the time) and is suitable for environmental assessments of development proposals where changes in road traffic noise may have a significant effect.

I2.22 The following documents are appropriate to the measurement of baseline noise levels and assessing noise of an industrial nature emanating from existing, new or proposed commercial premises:

- BS 7445-1:2003 'Description and Measurement of Environmental Noise' (12), defines parameters, procedures and instrumentation required for noise measurement and analysis.

- British Standard 4142:2014+ A1:2019 'Methods for Rating and Assessing Industrial and Commercial Sound' (13) describes methods for rating and assessing sound of an industrial and/or commercial nature for the purposes of: (a) investigating complaints, (b) assessing sound from proposed, new, modified or additional sources of sound of an industrial/commercial nature, and, (c) assessing sound at proposed new residential premises, with a view to determining the likelihood and degree of adverse impact, having regard to the context in which the sound occurs.

I2.23 The following documents are appropriate when assessing noise and vibration affecting proposed new and existing development:

- World Health Organisation (1999) 'Guidelines for Community Noise' (14) provides guidance on desirable levels of noise structured according to specific environments to ensure the critical effects of noise on sleep, annoyance and speech interference are guarded against. One of the tenets of the WHO guidelines is the protection of the most vulnerable and sensitive of the population, with the WHO guideline values for environmental noise set at the level of the lowest adverse health effect below which the occurrence rates of particular "effects" can be assumed to be negligible. The WHO recommends specific internal noise levels that will provide an acoustic environment that is conducive to uninterrupted speech and sleep, whilst daytime external noise limits aim to prevent the majority of the population being moderately or seriously annoyed by noise.
- National Planning Practice Guidance ('NPPG') (15) was released in March 2014 by the Department for Communities and Local Government ('DCLG') and is a web-based resource to support the NPPF. NPPG 'Noise' outlines qualitatively when noise could be a concern, stating: 'Noise needs to be considered when new developments may create additional noise and when new developments would be sensitive to the prevailing acoustic environment…'
- British Standard 8233:2014 'Guidance on Sound Insulation and Noise Reduction for Buildings' (16) builds on the WHO guidelines, providing guidance for the control of noise in and around both new and refurbished buildings. The guidelines recommend internal ambient noise criteria for a range of indoor spaces including residential land uses.
- ProPG: Planning & Noise, 2017 (17): It provides guidance on a recommended approach to the management of noise within the planning system in England.

I3.0 Assessment Methodology & Significance Criteria

Assessment Methodology

Defining the Baseline

I3.1 A comprehensive baseline environmental noise survey has been undertaken to establish and quantify the existing noise environment at, and within the vicinity of, the Site (Figure I3.1 maps the survey locations). The results of the survey have been used to inform the assessment of effects during both the construction (including demolition works) and operational phases, and to assess the suitability of the Site for residential use.

I3.2 Noise monitoring comprised continuous long-term monitoring at key locations at the Site, together with supplementary attended short-term noise monitoring at various positions across the Site and in the wider area to allow the spatial variation in noise level to be determined (see Figure I3.1). The monitoring positions were chosen to provide an understanding of noise variation around the site and to be representative of the conditions at the sensitive receptors.

I3.3 Owing to the size of the area under consideration and the complexity of the interaction between the Proposed Development, existing building structures and the array of existing noise sources experienced at the Site, the baseline conditions have been derived by a combination of measurement and computer-aided 3-dimensional modelling using the acoustic software package CadnaA.

I3.4 For detailed information on the noise monitoring locations, survey methodologies and instrumentation used, please refer to Appendix I1.

Figure I3.1 Location Plan of the Site, Noise Monitoring and Receptor Position

Impact Assessment Methodology

Demolition and Construction

Construction Noise

I3.5 The construction phase, which includes demolition works, is anticipated to be undertaken over the course of approximately 7 years as described within Chapter C of this ES. At this stage, planning for enabling, demolition and construction is broad and may be subject to modification with further detailed construction planning. However, reasonable assumptions have been made based on similar developments and the professional judgement of the project team and as such, information on anticipated construction plant and equipment is provided in Appendix I2, which has been used to form the basis of the demolition and construction stage noise assessment. Noise levels associated with these works have been estimated based upon the available information and typical source noise levels contained within BS 5228-1:2009+A1:2014.

I3.6 To assess the potential for likely significant effects of noise from typical demolition and construction works on existing sensitive receptors ('SR's) surrounding the Site, the 'ABC Method' provided in BS 5228-1:2009+A1:2014 has been used. This method defines category 'threshold values' which are determined by the time of day and existing monitored ambient noise levels at SRs. The ABC Method then requires noise likely to be generated by demolition and construction activities (known as the 'site noise level') to be compared with each SR threshold value. If the total noise level exceeds the 'threshold value', a significant effect is deemed likely to occur. The scale and nature of the effect and whether the effects are significant or not are defined in the Significance Criteria section of this ES chapter.

I3.7 Noise levels typical of those likely to be experienced over a 10-hour working day during each stage of the construction phase have been predicted. Predictions have been based upon a situation where the construction works are close to the Site boundary, at a location nearest to each SR and in the absence of mitigation to provide the 'greatest' (or 'worst') environmental effect that might reasonably be expected.

I3.8 Full details of the predictions and assumptions of the assessment of likely noise associated with the demolition and construction works including further details on the ABC Method are contained within Appendix I2.

Construction Vibration

I3.9 Two aspects of demolition and construction vibration require consideration: the potential for construction vibration to cause disturbance to humans and the potential for construction vibration to cause damage to buildings.

I3.10 There are currently no British Standards that provide a methodology for predicting levels of vibration from construction activities other than BS 5228-2:2009+A1:2014, which relates to percussive, or vibratory, rolling and piling only. However, as stated in BS 5228-2 and as generally accepted, the threshold of vibration perception for humans is typically in the peak particle velocity ('PPV') range 0.14 mm/s to 0.3 mm/s at frequencies between 8 Hz and 80 Hz in residential environments, with complaints likely at 1 mm/s.

I3.11 Having regard to the information contained within BS 5228-2, the standard identifies the distances at which vibration from CFA bored piling and rotary bored piling may be just perceptible, namely 15–20 m for CFA bored piling and 20 m for rotary bored piling. These distances have been taken into account in the vibration assessment.

Construction Traffic Noise

I3.12 In addition to noise from construction activity, Heavy Goods Vehicles ('HGV's) and other delivery vehicles will be visiting the Site throughout the construction programme. Assessment of noise level changes arising from construction traffic has been undertaken using the calculation methodology detailed within the CRTN and criteria for short-term changes in road traffic noise defined by the DMRB. This involved the use of estimated construction traffic flow data provided by DHA Planning.

I3.13 The magnitude of impact criteria for construction road traffic noise have been derived by considering how short-term changes in noise levels can be categorised based on key benchmarks that relate to human perception of sound, and the criteria given in Table 3.54a of the DMRB.

I3.14 The changes in traffic noise levels attributable to the peak construction period (2028) has been evaluated as worst case scenario. Further details on the construction traffic impact assessment are provided in Appendix I3.

Operation

Residential Suitability

I3.15 Following the introduction of the NPPF there is no specific guidance within England for the assessment of the suitability of a site for noise sensitive development, such as a residential use. As such, to assess the suitability of the Site for residential development, guidance was sought from ProPG: Planning & Noise, 2017, BS 8233:2014 and the WHO, 1999 guidelines. The monitored and modelled baseline noise levels have been used to assess the Site suitability against the advocated BS 8233 and WHO guideline criteria.

Outdoor Amenity Areas

I3.16 Within the Scoping Opinion (January 2024) from FHDC, the council recommends assessing the noise impact from outdoor amenity areas on the SRs.

I3.17 The limits and the noise impact will be assessed based on WHO guidelines and BS 8233:2024 recommendations.

Building Services Plant Noise

I3.18 The significance of noise of an industrial and/or commercial nature depends upon a number of factors including the margin by which a sound exceeds the background sound level, its absolute level, the time of day and change in the acoustic environment, as well as local attitudes to the source of the sound and the character of the neighbourhood.

I3.19 BS 4142:2014 provides an assessment and rating method to assess adverse effects from a range of industrial and/or commercial noise sources, including fixed building services plant. The measured or predicted noise level from the source in question, the 'specific

noise' level ($L_{Aeq,T}$), immediately outside the SR is compared with the 'background noise' level ($L_{A90,T}$). Where the sound contains certain acoustic features at the assessment location (e.g. tones, impulses, intermittency etc.), then a scaled character correction is added to the specific noise level to obtain the 'rating noise' level ($L_{Ar,Tr}$). The scale of effect is dependent on the context, having consideration to pertinent factors such as the sensitivity of the receptor, the absolute level of sound to the character and level of the residual sound compared to the character and level of the specific sound.

I3.20 At this stage in the design of the Proposed Development specific details of the type, number and configuration of noise generating building services plant (largely the mechanical ventilation plant) are not fixed and would not be until the detailed technical design stages of the development. As a consequence, it is not possible to undertake predictions to determine the scale of the likely noise effect. Instead, and in line with standard planning practice for noise assessments, suitable limits to which plant should adhere have been set based on the results of the baseline noise survey and rated in accordance with BS 4142:2014, the limits are subject to the approval of the FHDC. Noise limits apply at a position 1m from the façade of the nearest SRs and include the total contribution of noise from all plant items associated with the Proposed Development that may run during any particular period.

Road Traffic Noise

I3.21 The assessment methodology for operational road traffic noise will adopt the same approach applied to the construction traffic noise assessment.

I3.22 The changes in traffic noise levels attributable to changes in operational road traffic flows and volumes as a result of the Proposed Development have been calculated using traffic data provided by DHA Planning, the Project Transport Consultants (refer to Appendix I4). Traffic flow data was provided for the 'with' and 'without' development for the completed and fully occupied Proposed Development (2035).

Significance Criteria

Receptors and Receptor Sensitivity

I3.23 Receptors have been classified according to their use and associated sensitivity to noise and vibration. The criteria defined and adopted for classification purposes are set out in Table I3.1.

Table I3.1 Criteria used to Define the Sensitivity of Receptors

Sensitivity	Description	Examples of Receptors
High	Receptors where occupants or activities are particularly susceptible to noise and/or vibration.	- Residential (on & off site) - Hospitals / residential care homes - Educational & research facilities, e.g. schools, libraries, nurseries - Religious institutions, e.g. churches, mosques - Hotels

Sensitivity	Description	Examples of Receptors
Medium	Receptors moderately sensitive to noise and/or vibration, where it may cause some distraction or disturbance.	- Offices - Shops - Restaurants - Community Use - Outdoor Recreational Areas
Low	Receptors where distraction or disturbance from noise and/or vibration is minimal.	- Factories and workshop environments

I3.24 Existing and future SRs on and within the surrounding area of the Site have been identified from review of aerial imagery of the area, scheme design proposals and a site walk-over.

I3.25 The closest SRs are identified in Table I3.2 and illustrated in Figure I3.1. The closest SRs are of residential, or hotel use in nature, although there are also some recreational uses. Where a number of SRs are located close to each other, the nearest SR is given to represent the immediate area. If noise and vibration is suitably controlled at the closest SRs then it will be suitably controlled at all other SRs further away, therefore this approach is considered to represent a reasonable and robust worst-case scenario.

Table I3.2 Existing and Future Sensitive Receptors

Sensitive Receptor	Type of Receptor	Address / Name	Approx. Distance from Site Boundary	Associated Sensitivity
SR A	Hotel	Hythe Imperial Hotel	Within Site	High
SR B	Residential	Existing dwelling houses along Moncrieff Gardens and Imperial Green	10m west	
SR C	Residential	Existing dwelling houses along Cobay Close	13m west	
SR D	Residential	Existing dwelling houses along Sturdy Close	10m west	
SR E	Residential	Existing dwelling houses along Earlsfield Road	72m north	
SR F	Residential	Existing dwelling houses along Seabrook Road	80m north	
SR G	Residential	Existing dwelling houses along Saxon Close	58m east	
SR H	Residential	Existing dwelling houses along Seabrook and Ferguson Close	85m north	
SR I	Residential	Residential property at 11 Ferguson Close, CT21 5QL	51m east	
SR J	Recreational	Royal Military Canal and Royal Military Canal Path	10m north	Medium
SR K	Recreational	Hythe Beach and England Coast Path	10m south	
SR L	Residential	Residential Houses part of the Proposed Development	Within site boundary	High

Magnitude of Impact

I3.26 The assessment of likely effects as a result of the Proposed Development has taken into account both the construction phase (which includes demolition) and the operational phase.

I3.27 The scale and nature attributed to each effect has been assessed based on the magnitude of change (or impact) due to the Proposed Development and the sensitivity of the affected receptor. The magnitude of change (impact) has been assessed on a scale from the most noticeable change from baseline conditions to the least noticeable change from baseline conditions (i.e. no change) as described per potential impact below.

I3.28 All residential SRs have been identified as having 'high' sensitivity to noise and vibration effects and recreational SRs have been identified as medium sensitivity. Table I3.3 shows how the magnitude of change / impact and the sensitivity of receptors combine to determine the scale of effect.

Table I3.3 Magnitude of Change and Effect Scale and Nature

Sensitivity of Receptor	Magnitude of Impact			
	High	Medium	Low	Negligible
High	Major	Moderate	Minor	Negligible
Medium	Moderate	Minor	Negligible	Negligible
Low	Minor	Negligible	Negligible	Negligible

I3.29 For the operational phase, effects assessed as Moderate or Major are considered Significant in EIA terms, while those rated as Minor or Negligible are Not Significant. During the construction phase, however, only Major adverse effects are treated as Significant due to the temporary nature of the effect.

Defining the effect

I3.30 The nature of noise and vibration effects is such that increases in noise and/or vibration, or noise and/or vibration emitted above credited guideline levels, are adverse and decreases are beneficial.

Geographical Extent of Effect

I3.31 Effects can also be classified according to the geographical extent of the effect as follows:

1 Local – the Site and its immediate surroundings;

2 District – the wider area of the borough;

3 Regional – the region, i.e. London; and

4 National – namely England.

I3.32 In respect of noise and vibration effects, they are confined to a local and district level only.

Effect Duration

I3.33 Noise effects can vary in duration and are classified as follows:

1 Short term – the period over which the effect is experienced is temporary and lasts for the period of demolition or construction or less;

2 Medium term – the effect occurs for longer than the full period of construction (such as extended but not permanent changes to road traffic flows and therefore noise); and

3 Long term - the effect remains for a substantial time, perhaps permanently, after construction as a result of the completion and operation of the Proposed Development (such as permanent changes to road traffic flows and therefore noise).

Categorising Likely Significant Effects

Demolition and Construction Noise

I3.34 Based on the guidance provided in BS 5228-1+2:2009+A1:2014, the criterion considered in this ES chapter for the onset of potentially significant construction noise effects at SRs is set in line with the ABC thresholds which enable definition of a magnitude of impact. BS 5228-1 does not provide bandings above the ABC thresholds, and the document recommends applying professional judgement to define these.

I3.35 The bandings provided in Table I3.4 are therefore based on considerations such as the number of receptors, duration, and character of the noise, alongside the ISEP guidelines, which recognise that a +3 dB increase in ambient noise generally represents the minimum perceptible change under typical conditions.

Table I3.4 Criteria for the Assessment of Demolition and Construction Noise Effects

Scale and Nature of Effect	Level of Construction Noise Above Threshold Value, dB(A) (Magnitude of Impact)	Definition
Nil/Neutral	≤ 0.9 (None)	No effect
Negligible	1.0 to 2.9 (Negligible)	The effect is not of concern (Not Significant).
Minor Adverse	3.0 to 4.9 (Low)	The effect is not desirable but of limited concern (Not Significant).
Moderate Adverse	5.0 to 9.9 (Medium)	The effect gives rise to some concern but is likely to be tolerable depending on scale and duration (Not Significant).
Major Adverse	≥ 10.0 (High)	The effect gives rise to serious concern and it should be considered unacceptable – considered to be a Significant effect.

Demolition and Construction Vibration

I3.36 Based on the guidance provided in BS 5228-2:2009 and BS 6472-1:2008, Table I3.5 presents the descriptors of magnitude of vibration impact and the scale of resultant effects for vibration on human receptors. Significant adverse impacts are considered to occur when construction vibration levels increase to the Major Adverse effect threshold (depending on the nature of the activity, its duration and the number of receptors likely to be affected).

Table I3.5 Criteria for the Assessment of Demolition and Construction Vibration Effects

Scale and Nature of Effect	Level of Vibration mm/s (Magnitude of Impact)	Definition
Nil/Neutral	≤ 0.13 (None)	No effect
Negligible	0.14 to 0.9 (Negligible)	The effect is not of concern (Not Significant).
Minor Adverse	1.0 to 3.0 (Low)	The effect is not desirable but of limited concern (Not Significant).
Moderate Adverse	3.0 to 5.0 (Medium)	The effect gives rise to some concern but is likely to be tolerable depending on scale and duration (Not Significant).
Major Adverse	≥5.0 (High)	The effect gives rise to serious concern, and it should be considered unacceptable – considered to be a Significant effect.

Demolition and Construction Traffic Noise

I3.37 The criteria for the assessment of short-term traffic noise changes arising from demolition and construction works have been taken from Table 3.54a of the DMRB and are provided in Table I3.6.

Table I3.6 Criteria for the Assessment of Demolition and Construction Traffic Noise Effects

Scale and Nature of Effect	Level of Traffic Noise Above Threshold Value, dB(A) (Magnitude of Impact)	Definition
Nil/Neutral	0 (None)	No effect
Negligible	0.1 to 0.9 (Negligible)	The effect is not of concern (Not Significant).
Minor Adverse	1 to 2.9 (Low)	The effect is not desirable but of limited concern (Not Significant).
Moderate Adverse	3.0 to 4.9 (Medium)	The effect gives rise to some concern but is likely to be tolerable depending on scale and duration (Not Significant).
Major Adverse	≥ 5 (High)	The effect gives rise to serious concern and it should be considered unacceptable – considered to be a Significant effect.

During Operation

Residential Suitability

I3.38 An assessment of impact significance is not required as part of the residential suitability assessment. This is because the purpose of the residential suitability assessment is not to determine the magnitude or significance of potential noise and vibration effects from the Proposed Development on sensitive receptors, but rather to provide an indicative review of the site's suitability for residential use. Nonetheless, the assessment criteria used to inform this review are outlined below to provide clarity and context regarding the basis of the evaluation.

I3.39 When considering the amenity of future occupants of the Proposed Development, the most relevant and credited guidance covering desirable levels of environmental noise for indoor and outdoor environments is WHO, 1999 and BS 8233:2014. These levels have been adopted for the assessment of the suitability of the Site for residential use. A summary of the guideline noise levels relevant to the Proposed Development are presented in Table I3.7.

Table I3.7 Summary of Recommended Internal and External Noise Levels for Residential Premises

Organisation	Typical Situation	Noise Level, dB	
		Daytime (07:00 – 23:00)	Night-time (23:00 – 07:00)
BS 8233:2014	Living Rooms	LAeq,T, 35	-
	Dining Rooms	LAeq,T 40	-
	Bedrooms	LAeq,T 35	LAeq,T 30
	Outdoor Living Areas	LAeq,T 50 (desirable), LAeq,T 55 (upper limit)1	
WHO, 1999	Indoor Living Areas	LAeq,T 35	LAeq,T 30 & LAFmax,T 452
	Outdoor Living Areas	LAeq,T 50 (desirable), LAeq,T 55 (upper limit)3	

Notes: [1] 50 dB is the BS 8233:2014 desirable noise level for external amenity space while 55 dB is the BS 8233:2014 upper guideline value. [2] For a reasonable standard in bedrooms at night, the WHO, 1999 guidelines recommend that individual noise events (measured with F time-weighting) should be limited to/not normally exceed 45 dB L_{AFmax}. The WHO guidelines refer to research that identifies that 10-15 occurrences per night of the limiting maximum noise level may be considered acceptable. [3] 50 dB is the WHO guidelines limit for protecting the majority of people from moderate annoyance, whilst 55 dB is the WHO guidelines limit for protecting the majority of people from serious annoyance.

I3.40 The residential suitability assessment is provided in Appendix I7.

Outdoor Amenity Areas

I3.41 The proposed outdoor amenity areas should not result in noise levels that exceed the existing external ambient noise conditions at the identified SRs, so that their existing amenity is not adversely affected.

I3.42 The maximum permissible levels are guided by the thresholds set out in the WHO Guidelines and BS 8233:2014, which recommend that outdoor amenity areas should ideally fall within the range of $L_{Aeq,T}$ 50–55 dB. These benchmarks serve as the upper limits to ensure that the sensitive receptors amenity use remains suitable for their intended use and do not contribute to adverse noise impacts.

I3.43 These thresholds have been used as the basis for assessing the scale of impact associated with the outdoor amenity noise emissions, alongside the existing measured noise levels. The appropriate reference level for the assessment is taken as either the recommended ambient noise levels outlined in the WHO Guidelines or BS 8233:2014, or the measured ambient noise level obtained during the site survey from Table I4.1 - whichever of these values is lower. Using the lower of the two benchmarks ensures that the assessment is undertaken against the most stringent and protective criterion, thereby providing a robust basis for evaluating potential noise impacts in relation to the existing acoustic environment.

Table I3.8 Criteria for the Assessment of Outdoor Amenity Noise

Scale and Nature of Effect	Difference from Reference Level (dB)
Negligible	< - 5 (Negligible)
Minor Adverse	- 5 to 0 (Low)
Moderate Adverse	0 to 5 (Medium) – considered to be a Significant effect
Major Adverse	> 5 (High) – considered to be a Significant effect

Building Services Plant Noise

I3.44 When assessing the scale and nature and ultimately the significance of the likely effects of noise from fixed building service plant on nearby SRs, the criteria presented in Table I3.9 have been used. These criteria are based on the likelihood of complaints, as provided in BS 4142:2014 and are complaint with FHDC planning requirements.

Table I3.9 Criteria for the Assessment of Plant Noise Effects

Scale and Nature of Effect	Magnitude of Impact (dB)
Negligible	< - 5 (Negligible)
Minor Adverse	- 5 to 0 (Low)
Moderate Adverse	0 to 5 (Medium) – considered to be a Significant effect
Major Adverse	> 5 (High) – considered to be a Significant effect

Road Traffic Noise

I3.45 Existing SRs are currently exposed to a certain level of road traffic noise. In assessment terms, it is therefore the difference in noise level as a result of the Proposed Development that is important.

I3.46 Operational traffic noise has been assessed by considering the long-term increase in traffic flows as a result of the Proposed Development, following the principles of CRTN and DMRB. The criteria for the assessment of long-term traffic noise changes arising from the operation of the Proposed Development have been taken from Table 3.54b of DMRB and are provided in Table I3.10, A significant effect is considered to have occurred when road traffic noise effects are Moderate and Major in scale.

Table I3.10 Criteria for the Assessment of Operational Road Traffic Noise

Scale and Nature of Effect	Change or Difference in Noise Level (dB)	Definition
Nil/Neutral	0 (None)	No effect
Negligible	0.1 to 2.9 (Negligible)	The effect is not of concern (Not Significant)
Minor Adverse	3.0 to 4.9 (Low)	The effect is not desirable but of limited concern (Not Significant)
Moderate Adverse	5.0 to 9.9 (Medium)	The effect gives rise to some concern but is likely to be tolerable depending on scale and duration – considered to be a Significant effect

Scale and Nature of Effect	Change or Difference in Noise Level (dB)	Definition
Major Adverse	≥ 10.0 (High)	The effect gives rise to serious concern and it should be considered unacceptable – considered to be a Significant effect.

Consultation

I3.47 A Scoping Opinion was received from FHDC on 29 January 2024 in relation to a different form of development on majority of the Site, with full details provided in Appendix I.5. Based on the content of the Scoping Opinion (January 2024), Public Rights of Way (PRoW) and the National Trail have been included within the noise and vibration assessment as sensitive receptors. The Scoping Note Response (November 2025) confirmed that the content of the Scoping Opinion (January 2024) applies to the assessment of the Proposed Development in relation to noise and vibration. The scoping process is described in detail in Chapter B of this ES.

I3.48 HM contacted FHDC in 2023 to request further guidance and comments regarding the proposed noise and vibration assessment methodology. The Environmental Protection Specialist provided no comments on the proposed approach; it has therefore been assumed that the methodology is acceptable and compliant with FHDC requirements.

I3.49 In addition, HM contacted the Council again on 20 March 2024 to clarify the applicable noise limits for any new external plant. The Council's response is included in Appendix I.5. In relation to our enquiry, the Environmental Protection Specialist stated:

"We would advise the combined noise emissions from all plant not to exceed 5 dB (L_{Aeq}) relative to background (L_{A90}) at the nearest residential façade at any time. BS 4142:2014+A1:2019, character corrections to be applied, as necessary."

I3.50 Further consultation was requested on 28 November 2025 to clarify whether the limit should be interpreted as 5 dB above or 5 dB below the background level. The Environmental Protection Specialist responded:

"To clarify we would advise the cumulative noise emission should be below the background (LA90)."

Assumptions and Limitations

I3.51 Certain limitations and assumptions have necessarily been included within this assessment for the reasons set out below.

Construction Noise

I3.52 The BS 5228 calculation methods allow accurate noise levels to be determined for various demolition and construction activities. However, the value of any such predictions is necessarily limited by the number of assumptions that were made regarding the number and type of plant to be utilised, their location and detailed operating arrangements. Some of this information would be clarified as the detailed design progresses and later when resources are mobilised, but other information (such as exactly where the plant operates and for how long) would remain uncertain, even after works have commenced.

I3.53 As a consequence, the available information is considered sufficient to perform a generic yet robust construction phase (including demolition) noise assessment, focussing on key activities operations near the Site boundary, with the aim of identifying whether a significant, albeit temporary, noise effect is likely to arise at the nearest receptors.

Outdoor Amenity Areas

I3.54 The assessment of the outdoor amenity areas has been undertaken on a worst-case basis, assuming that noise is emitted simultaneously from all café seating areas. Noise source locations have been derived from indicative drawings and may be subject to refinement at subsequent design stages; however, any resulting change in predicted impact is considered negligible. Accordingly, the impacts reported in this chapter represent the maximum likely effect.

I3.55 The noise source location has been taken from the illustrative plans. There is no limitation on the use of these plans, as they are indicative only and show building and noise source locations. Building dimensions have been taken from the parameter plans.

Building Services Plant Noise

I3.56 At this stage the number, location, specific type and configuration of fixed building services plant and equipment connected with the Proposed Development are not yet fixed. As a consequence, it is not possible to undertake predictions to determine whether appropriate standards might be met, so instead appropriate plant noise emission limits have been set.

Site Suitability

I3.57 The building location has been taken from the illustrative plans. There is no restriction on the use of these plans, as they are indicative only and show building locations. Building dimensions have been taken from the parameter plans.

I4.0 Baseline Conditions

Current Conditions

Current Noise Climate

I4.1 Due to the size of the Site, the noise environment across the Site varies depending on the position relative to the main noise contributors. Areas located to the south of the Site experience noise contribution from vehicular traffic on the local road network, particularly from Princes Parade. Other noise sources include human and vehicle movement related to the Hythe Imperial Hotel and the Hythe Golf Club and human movement at properties west and north of the site, along the public paths along the northern site boundary and promenade to the south of the site as well as nature related sounds.

Baseline Noise Monitoring Results

I4.2 A summary of the measured daytime (07:00 to 23:00) and night-time (23:00 to 07:00) noise levels at each monitoring location are presented in Table I4.1 and Table I4.2, with the full results displayed graphically in time-history format in Appendix I1.

I4.3 The location of the measurement location is shown in Figure I3.1.

Table I4.1 Summary of Long-term Baseline Noise Measurements

Monitoring Location (Figure I3.1)	Date	Period	Duration	LAeq, T dB	LA10, T dB	LA90, T dB	LAF max, 2min dB
				Ave1	Ave2	10th %ile3	15th highest4
LT1	18/07/2023 - 01/08/2023	Day (07:00-23:00)	16 hr	50	50	38	75
		Night-time (23:00-07:00)	8 hr	43	41	33	71
LT2	18/07/2023 - 01/08/2023	Day (07:00-23:00)	16 hr	49	48	37	73
		Night-time (23:00-07:00)	8 hr	44	40	31	66
LT3	18/07/2023 - 01/08/2023	Day (07:00-23:00)	16 hr	52	49	36	79
		Night-time (23:00-07:00)	8 hr	42	39	27	68
LT4	18/07/2023 - 01/08/2023	Day (07:00-23:00)	16 hr	67	70	42	88
		Night-time (23:00-07:00)	8 hr	57	49	37	83

Notes: 1 Logarithmic average over the day/night survey periods; 2 Arithmetic average over the day/night survey periods; 3 The 10th percentile LA90,5min value is presented, which is considered representative of the typically lowest day/night background levels experienced; 4 Highest LAFmax value that occurs between 10-15 times in a single night-time period. All figures rounded to nearest whole decibel

Table I4.2 Summary of Attended Baseline Noise Measurements

Monitoring Location (Figure I3.1)	Date	Start Time	Duration	LAeq, T dB	LA10, T dB	LA90, T dB	LAF max, 5min dB
				Ave1	Ave2	10th %ile3	Max4
ST1	25/07/2023	13:54	30 mins	65	68	42	95
	01/08/2023	12:25	30 mins	59	63	46	74
ST2	25/07/2023	15:15	30 mins	53	53	44	66
ST3	01/08/2023	13:01	30 mins	62	65	51	85

Notes: [1]Logarithmic average over the day/night survey periods; [2]Arithmetic average over the day/night survey periods; [3]The 10th percentile $L_{A90,5min}$ value is presented, which is considered representative of the typically lowest day/night background levels experienced; [4]Maximum noise level recorded. All figures rounded to nearest whole decibel.

I4.4 The results of the noise modelling of the Site have been used to predict and illustrate the levels of noise that are likely to be experienced at the different building façades and external amenity areas forming part of the Proposed Development. Predicted noise levels have subsequently been used to assess the suitability of the Site for residential use and establishing the sound insulation performance requirements of the different building envelope elements.

I4.5 Modelled noise contour plots showing predicted daytime (07:00-23:00 hour) and night-time (23:00-07:00 hour) ambient (L_{Aeq}) levels of noise across the Site are presented as Figure I4.1 and Figure I4.2, respectively. Note that noise levels at survey locations can differ from the measured levels due to new buildings being introduced as part of the Proposed Development.

Figure I4.1 Daytime Noise Contour Plot of the Site, dB $L_{Aeq,16hr}$ (1.5 m AGL) (source: CadnaA 2018)

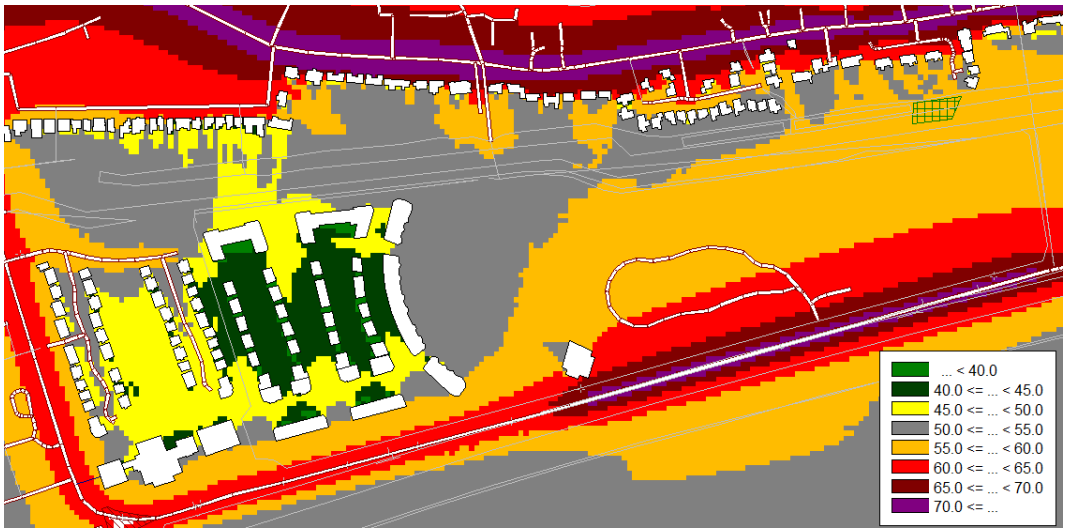
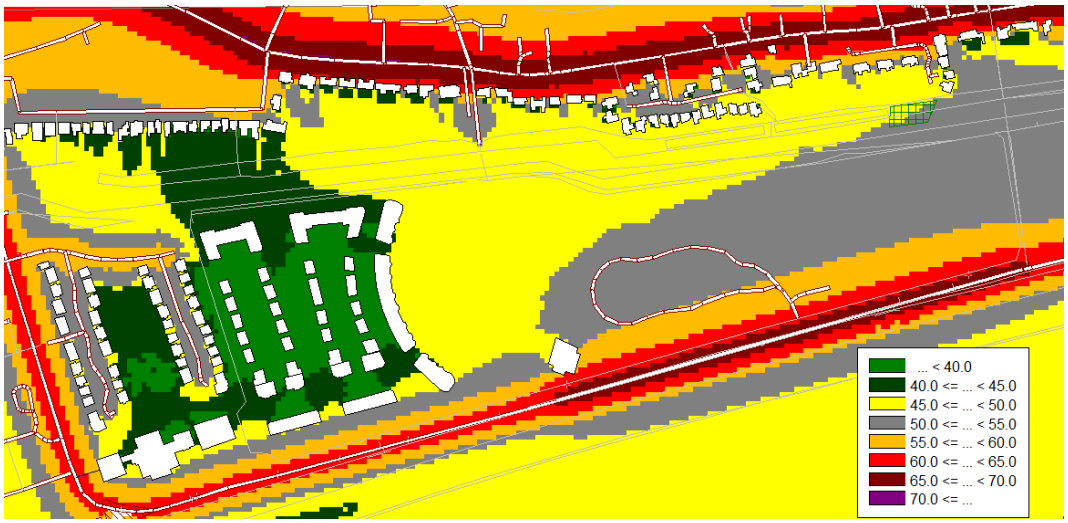


Figure I4.2 Night-time Noise Contour Plot of the Site, dB LAeq,8hr (1.5 m AGL) (source: CadnaA 2018)



Future Baseline

I4.6 The main change in future baseline without the Proposed Development is likely to be attributed to change in traffic flows on surrounding road network. Traffic flows are expected to increase due to natural traffic growth as well as due to effects of cumulative schemes. Based on traffic data provided by DHA planning consultant it is anticipated that the change in traffic flows in when compared to existing baseline will be increase of by less than 5%. This will result < 1dB increase in noise levels at the receptors.

I5.0 Potential Effects

Embedded Mitigation

During Construction

I5.1 A site-specific Construction Environmental Management Plan (CEMP) has been prepared and is provided at Appendix C4. It is anticipated that a detailed CEMP (or CEMPs) will be developed in accordance with the submitted CEMP, providing further detail on how the measures therein will be delivered. The principles and measures included in the CEMP (Appendix C4) that will be implemented during construction and demolition works will ensure that Best Practicable Means are applied to minimise demolition and construction noise and vibration, including:

1 Application of the principle of Best Practicable Means (BPM) at all times by the contractor (and all sub-contractors) as defined in Section 72 of the Control of Pollution Act 1974, carrying out all work in such a manner as to reduce any disturbance from noise and vibration to a minimum;

2 Registration of the Proposed Development with the 'Considerate Constructors Scheme'. The accompanying code of practice will be adhered to;

3 Compliance with the FHDC guidelines on noise from demolition and construction sites;

4 Works audible beyond the Site boundary should be limited to 08:00 to 18:00 hours Monday to Friday and 8:00 to 13:00 hours Saturdays, with no working on Sundays or Bank Holidays;

5 Erection of solid hoarding, 2.4 m high, along all the external site boundaries before works commence;

6 Identification and use of low noise and vibration techniques. For example, equipment that breaks concrete by munching or similar, rather than by percussion. Where construction plant which is known to generate significant levels of noise and/or vibration then it is to be used sparingly and the construction activity closely monitored to minimise noise and vibration emissions;

7 Where feasible, all stationary plant should be located so that noise at all SRs is minimised and, if practicable, every item of static plant when in operation should be sound attenuated using methods based on the guidance and advice given in BS 5228 (e.g. local screening);

8 All vehicles and mechanical plant used for the purpose of the works shall be fitted with effective exhaust silencers, maintained in good and efficient working order and operated in such a manner as to minimise noise and vibration emissions. The contractor shall ensure that all plant complies with the relevant statutory requirements;

9 Plant in intermittent use shall be shut down or throttled down to a minimum when not in use;

10 Use of local acoustic screens of appropriate height and mass to the noise sensitivity of the closest SRs;

11 Adoption of a monitoring regime and the establishment of 'Action Levels' in consultation with FHDC, above which consideration would be given to the use of alternative techniques and / or other means of controlling noise and vibration levels;

12 The CTMP should include measures to pre-plan and manage traffic and unloading operations. Deliveries by prior pre-booking arrangement during daytime hours only in order to minimise noise disturbance to local residents and businesses. Strict control to prevent vehicles from waiting within or near the Site with their engines running;

13 Careful programming to ensure activities which may generate significant noise are planned well in advance and SRs are notified of the works, and agreement of a schedule of noisy and quiet working hours to provide some periods of respite if necessary;

14 All plant brought on to Site should comply with the relevant EC/UK noise limits applicable to that equipment or should be no noisier than would be expected based on the noise levels quoted in BS 5228-1:2014. Plant should be properly maintained and operated in accordance with manufacturers' recommendations; and

15 Construction noise levels at the nearest SRs can be mitigated by careful phasing of the construction works as well as controlling the operation time and duration of each activity to reduce the noise impact at the receptor. For example, restricting works from a particular activity to 2 hours out of a 10-hour day would typically reduce overall 10-hour noise levels from that activity.

I5.2 Accounting for the mitigation measures outlined above, noise levels at SRs would be reduced by up to 10 dB depending on the specific plant and its relative location thereby mitigating the potential Significant Adverse effects. Reduction in on-times, changes to the method of working and plant substitution may also be employed to further reduce noise levels.

Major Hazards and Accidents

I5.3 No major hazards or accidents are relevant to the noise and vibration assessment.

Phasing

I5.4 As set out in Chapter C of this ES, it is anticipated that the construction of the Proposed Development will be undertaken over a series of sub-phases as follows:

1 **Phase 0**: The discharge of any pre-commencement conditions and implementation of measures to ensure the protection of the ecological value of the Site, which may include creation of wildlife corridors and enhancements of existing habitats, implementation of on and off site species protection measures. Expected duration: 6 months, but commencement will be dependent upon seasonal restrictions related to ecological receptors.

2 **Phase 1**: With an expected duration of 24 months, this phase comprises the enabling works which include:

   a Creation of site compound at the eastern end of the Site to provide parking (for site operatives, staff and visitors), material storage areas, offices and welfare facilities, and implementation of wheel washing facilities;

b Construction of main vehicular accesses at the eastern and western end of the Site, construction of a temporary haul road through the middle of the Site to provide a connection between western and eastern phases and to make a one way system for construction traffic;

c Site clearance and engineering and ground works, including any earthworks required to create required Site levels and installation of capping layer and sub-base for detailed roads across the Site, where applicable, along with the associated drainage and service trenches.

3 **Phase 2**: The delivery of the new leisure building at the Hythe Imperial Hotel and construction of the new Golf Clubhouse. Remodelling works to the existing golf course to create golf academy and adventure golf, and surrounding open space. Expected duration: 18 months. Can take place simultaneously with Phase 1.

4 **Phase 3**: The demolition of the western wing of the Hythe Imperial Hotel and the existing Golf Clubhouse, and construction of the spa and hotel extension. Expected duration: 18 months. Phase 2 must be completed before Phase 3 can begin.

5 **Phase 4**: The delivery of the residential development (up to 291 homes). It is anticipated that reserved matters will be applied for during Phase 1, as well as the discharge of relevant planning conditions. The construction of Phase 4 can proceed in parallel with Phases 2 and 3. Expected duration: 4 years.

6 **Phase 5**: The completion of hard and soft landscaping and alterations to public roads and accesses as required with final surfacing to roads. Expected duration: 2 years. May overlap with Phase 4.

I5.5 The indicative phasing programme is presented below, which illustrates that the sub-phases of construction will overlap and occur concurrently with the operation of parts of the Proposed Development.

Table I5.1 Indicative Phasing Programme

Year	1	2	3	4	5	6	7
Phase 0							
Phase 1							
Phase 2							
Phase 3							
Phase 4							
Phase 5							

During Construction

Construction (including demolition) Noise

I5.6 The calculated reasonable 'worst-case' noise predictions in dB $L_{Aeq,1ohr}$ for the principal demolition and construction works at the nearest affected existing and future SRs are presented in Table I5 2. The predictions have been made assuming the embedded mitigation only, to understand a reasonable 'worst case' scenario. All construction phases

were considered, and the 'worst case' effect is presented in the table. Full details of the demolition and construction noise assessment are provided within Appendix I2.

Table I5.2 Summary of Predicted Construction Noise Levels and Resultant Effects

Receptor	Assessment Parameter	Construction sub-phase				
		Phase 1	Phase 2	Phase 3	Phase 4	Phase 5
SR A Hythe Imperial Hotel	Predicted Noise Level	54	63	74	65	64
	Effect Nature, Scale, Duration and Geographic Extent	Negligible, Short Term, Local	Negligible, Short Term, Local	Moderate Adverse, Short Term, Local	Negligible, Short Term, Local	Negligible, Short Term, Local
SR B Residents at Moncrieff Gardens and Imperial Gardens	Predicted Noise Level	54	63	67	65	64
	Effect Nature, Scale, Duration and Geographic Extent	Negligible, Short Term, Local	Negligible, Short Term, Local	Negligible, Short Term, Local	Negligible, Short Term, Local	Negligible, Short Term, Local
SR C Residents at Cobay Close	Predicted Noise Level	54	63	67	65	64
	Effect Nature, Scale, Duration and Geographic Extent	Negligible, Short Term, Local	Negligible, Short Term, Local	Negligible, Short Term, Local	Negligible, Short Term, Local	Negligible, Short Term, Local
SR D Residents at Sturdy Close	Predicted Noise Level	54	63	67	65	64
	Effect Nature, Scale, Duration and Geographic Extent	Negligible, Short Term, Local	Negligible, Short Term, Local	Negligible, Short Term, Local	Negligible, Short Term, Local	Negligible, Short Term, Local
SR E Residents at Earlsfield Road	Predicted Noise Level	41	50	53	52	50
	Effect Nature, Scale, Duration and Geographic Extent	Negligible, Short Term, Local	Negligible, Short Term, Local	Negligible, Short Term, Local	Negligible, Short Term, Local	Negligible, Short Term, Local
SR F Residents at Seabrook Road	Predicted Noise Level	40	49	52	51	49
	Effect Nature, Scale, Duration and Geographic Extent	Negligible, Short Term, Local	Negligible, Short Term, Local	Negligible, Short Term, Local	Negligible, Short Term, Local	Negligible, Short Term, Local

Receptor	Assessment Parameter	Construction sub-phase				
		Phase 1	Phase 2	Phase 3	Phase 4	Phase 5
SR G Residents at Saxon Close	Predicted Noise Level	43	52	55	54	52
	Effect Nature, Scale, Duration and Geographic Extent	Negligible, Short Term, Local	Negligible, Short Term, Local	Negligible, Short Term, Local	Negligible, Short Term, Local	Negligible, Short Term, Local
SR H Residents at Seabrook and Ferguson Close	Predicted Noise Level	39	53	56	55	53
	Effect Nature, Scale, Duration and Geographic Extent	Negligible, Short Term, Local	Negligible, Short Term, Local	Negligible, Short Term, Local	Negligible, Short Term, Local	Negligible, Short Term, Local
SR I Residents at 11 Ferguson Close	Predicted Noise Level	49	59	62	61	59
	Effect Nature, Scale, Duration and Geographic Extent	Negligible, Short Term, Local	Negligible, Short Term, Local	Negligible, Short Term, Local	Negligible, Short Term, Local	Negligible, Short Term, Local
SR J Users of RMC	Predicted Noise Level	54	63	49	65	64
	Effect Nature, Scale, Duration and Geographic Extent	Negligible, Short Term, Local	Negligible, Short Term, Local	Negligible, Short Term, Local	Negligible, Short Term, Local	Negligible, Short Term, Local
SR K Users of Hythe Beach and England Coast Path	Predicted Noise Level	54	63	67	65	64
	Effect Nature, Scale, Duration and Geographic Extent	Negligible, Short Term, Local	Negligible, Short Term, Local	Negligible, Short Term, Local	Negligible, Short Term, Local	Negligible, Short Term, Local
SR L Residents at the Proposed Developmen t	Predicted Noise Level	54	63	67	65	64
	Effect Nature, Scale, Duration and Geographic Extent	Negligible, Short Term, Local	Negligible, Short Term, Local	Negligible, Short Term, Local	Negligible, Short Term, Local	Negligible, Short Term, Local

I5.7 The potential effects of demolition and construction noise generated by the Proposed Development are considered to be Negligible, Short-term, Local and Not Significant at all receptors, with the exception of the following:

- Moderate Adverse, Short-Term, Local effects are expected during Phases 3 at receptor SR A (Hythe Imperial Hotel), and these effects are therefore considered Not Significant.

Construction (including demolition) Vibration

I5.8 The new western wing of the hotel , the new leisure building and any blocks of flats delivered as part of the proposed residential development are expected to be a traditionally piled solution (CFA or similar), whilst any individual houses are expected to be vibro-piled with a concrete ring beam.

I5.9 Based on the above information, an assessment has been carried out for the SRs closest to the Site boundary – specifically SRs A, B, C, D, J, and K (Hythe Imperial Hotel; residents at Moncrieff Gardens and Imperial Gardens, Corbay Close and Sturdy Close; users of RMC, Hythe Beach and England Coast Path) – all located within 20 m of the Site boundary. Receptors SR E, F, G, H and I (residents at Earlsfield Road, Seabrook Road, Saxon Close and Seabrook, Ferguson Close and 11 Ferguson Close) are situated more than 20 m away from the Site; therefore, demolition and construction related vibration at these locations is considered, by default, to be Negligible and Not Significant as set out in Paragraph I3.11. The vibration impact assessment results are shown in Table I5.3.

Table I5.3 Predicted Vibration Level mm/s

Sensitive Receptor	Rotary Bored Piling (i.e. traditional piling solution)		Vibratory Bored Piling	
	Predicted Vibration Level mm/s	Scale of Effect	Predicted Vibration Level mm/s	Scale of Effect
SR A Hythe Imperial Hotel	0.59	Minor Adverse	3.63	Moderate Adverse
SR B Residents at Moncrieff Gardens and Imperial Gardens	0.59	Minor Adverse	3.63	Moderate Adverse
SR C Residents at Cobay Close	0.59	Minor Adverse	3.63	Moderate Adverse
SR D Residents at Sturdy Close	0.59	Minor Adverse	3.63	Moderate Adverse
SR J Users of RMC	0.59	Negligible	3.63	Minor Adverse
SR K Users of Hythe Beach and England Coast Path	0.59	Negligible	3.63	Minor Adverse

I5.10 According to the vibration impact assessment at the nearest SRs, the predicted vibration level is 0.59 mm/s, indicating the potential for short-term Minor Adverse (Not Significant) at SR A-D meanwhile Negligible (Not Significant) at SR J and K effects from rotary bored piling. For vibro-piling, the predicted level is 3.63 mm/s, indicating the potential for short-term Moderate Adverse (Not Significant) effects at SR A-D meanwhile Minor Adverse (Not Significant) at SR J and K.

I5.11 Regarding potential building damage, the effects are expected to be Negligible (not significant) across all sensitive receptors. This is because vibration levels would need to be significantly higher than those detectable by humans to cause any structural damage, even just cosmetic damage.

Construction (including demolition) Traffic Noise

I5.12 Based upon traffic data provided by DHA Planning, the likely change in road traffic noise on the road network in during the construction traffic peak (2028) is presented in Table I5.4.

I5.13 Full details of the assessment are shown in Appendix I3.

Table I5.4 Differences in Road Traffic Basic Noise Level (BNL), dB LA10,18hr – Interim Baseline 2028 and Interim Baseline 2028 + Construction Peak

Road Link	Affected SRs	Difference in dB $L_{A10,18hr}$ BNL[1]			
		2028 – Interim Baseline without Development	Construction Peak + Interim Baseline 2028	Change	Scale of Effect
Twiss Road	SR A, B, C, D, J and K (Hythe Imperial Hotel; residents at Moncrieff Gardens and Imperial Gardens, Cobay Close, Sturdy Close; users of Users of RMC, Users of Hythe Beach and England Coast Path)	57.7	57.8	0.1	Negligible
Princes Parade	SR A and K (Hythe Imperial Hotel and Users of Hythe Beach and England Coast Path)	55.1	57.5	2.4	Minor Adverse
Seabrook Road	SR E, F, G, H, I and J (residents at Earlsfield Road, Seabrook Road, Saxon Close, Seabrook and Ferguson Close, 11 Ferguson Close and Users of RMC)	63.5	64.0	0.5	Negligible
Sandgate Esplanade	SR K (Users of Hythe Beach and England Coast Path)	63.2	63.2	0.0	Negligible
Sandgate High Street	SR J (Users of RMC)	63.2	63.2	0.0	Negligible
East Street	SR D, E and J (Residents at Sturdy Close and Earlsfield Road and users of RMC)	63.5	64.0	0.5	Negligible
Rampart Road	SR D, E and J (Residents at Sturdy Close and Earlsfield Road and users of RMC)	65.0	65.2	0.2	Negligible
Military Road	SR D, E and J (Residents at Sturdy Close and Earlsfield Road and users of RMC)	63.4	63.7	0.3	Negligible

I5.14 Analysis of the traffic data for the surrounding roads indicates that the anticipated change in road traffic noise during the construction peak is expected to result in a Negligible effect, with the exception of Princes Parade, with Minor Adverse effect. Therefore, the overall significance of the effect is assessed as Not Significant.

During Operation

Outdoor Amenity Areas

I5.15 The assessment of the outside seating areas part of the hotel and golf club areas have been assessed. The noise source locations have been based on the drawing 25.0035.200.002 - Proposed Site Plan - Roof Plan.

I5.16 The sound power levels of the noise sources have been derived from the Hilson Moran noise data library. The octave-band sound power levels for the source – representing raised human voices – are presented in Table I5.5. In total, 44 point sources have been allocated to the hotel's outdoor seating area, and 10 point sources to the golf club's outdoor seating area, with all sources at 0.5 m above ground level.

Table I5.5 Outdoor Amenity Source Noise Levels

Source ID	1/1 Octave Band Sound Power Level L_w, dB							
	63 Hz	125 Hz	250 Hz	500 Hz	1k Hz	2k Hz	4k Hz	8k Hz
Raised Human Voice	48	59	70	75	72	64	57	48

I5.17 Table I5.6 presents a summary of the outdoor amenity noise emission impact assessment. The impact on SR A (Hythe Imperial Hotel) and SR L (future residents) has not been assessed as these SRs are part of the Proposed Development. Based on the results, the impact of the noise emissions from the outdoor amenity areas is predicted to be Negligible (Not Significant) at all SRs. Images from the noise model are shown in Appendix I6.

Table I5.6 Outdoor Amenity Noise Emissions Impact Assessment

Sensitive Receptor	External Ambient Noise Level Limit L_{Aeq}	Predicted Noise Level L_{Aeq}	Predicted – Limit	Magnitude of Impact
SR B Residents at Moncrieff Gardens and Imperial Gardens	50	42	-8	Negligible
SR C Residents at Cobay Close	50	32	-18	Negligible
SR D Residents at Sturdy Close	50	30	-20	Negligible
SR E Residents at Earlsfield Road	50	20	-30	Negligible
SR F Residents at Seabrook Road	50	20	-30	Negligible

Sensitive Receptor	External Ambient Noise Level Limit L_{Aeq}	Predicted Noise Level L_{Aeq}	Predicted – Limit	Magnitude of Impact
SR G Residents at Saxon Close	49	24	-25	Negligible
SR H Residents at Seabrook and Ferguson Close	49	20	-29	Negligible
SR I Residents at 11 Ferguson Close	49	20	-29	Negligible
SR J Users of RMC	49	30	-19	Negligible
SR K Users of Hythe Beach and England Coast Path	50	44	-6	Negligible

Building Services Plant Noise

I5.18 Any items of fixed plant associated with the operation of the Proposed Development would have the potential to generate noise. Consequently, suitable plant noise emission limits to which plant should adhere have been set based on surveyed background noise levels ($L_{A90,T}$) and the plant noise requirements of FHDC and are presented in Table I5.7. SR A and SR L (Hythe Imperial Hotel and future residents at the Proposed Development) are not included as these receptors are part of the Proposed Development, and their assessment will be considered in the design process together with all other buildings forming the Proposed Development.

Table I5.7 Building Services Plant Noise Emission Limits at Nearest Sensitive Receptors

Sensitive Receptor	Period	Survey Reference Position	Background Noise Level dB $L_{A90,T}$[1]	Plant Noise Limit dB L_{ArTr}[2,3]
SR B Residents at Moncrieff Gardens and Imperial Gardens	Daytime (07:00 to 23:00)	LT1	38	33
	Night-time (23:00 to 07:00)		33	28
SR C Residents at Cobay Close	Daytime (07:00 to 23:00)	LT3	36	31
	Night-time (23:00 to 07:00)		27	22
SR D Residents at Sturdy Close	Daytime (07:00 to 23:00)	LT3	36	31
	Night-time (23:00 to 07:00)		27	22
SR E Residents at Earlsfield Road	Daytime (07:00 to 23:00)	LT3	36	31
	Night-time (23:00 to 07:00)		27	22
SR F Residents at Seabrook Road	Daytime (07:00 to 23:00)	LT3	36	31

Sensitive Receptor	Period	Survey Reference Position	Background Noise Level dB $L_{A90,T}$[1]	Plant Noise Limit dB L_{ArTr}[2,3]
	Night-time (23:00 to 07:00)		27	22
SR G Residents at Saxon Close	Daytime (07:00 to 23:00)	LT2	37	32
	Night-time (23:00 to 07:00)		31	26
SR H Residents at Seabrook and Ferguson Close	Daytime (07:00 to 23:00)	LT2	37	32
	Night-time (23:00 to 07:00)		31	26
SR I Residents at 11 Ferguson Close	Daytime (07:00 to 23:00)	LT2	37	32
	Night-time (23:00 to 07:00)		31	26
SR J Users of RMC	Daytime (07:00 to 23:00)	LT2	37	32
	Night-time (23:00 to 07:00)		31	26
SR K Users of Hythe Beach and England Coast Path	Daytime (07:00 to 23:00)	LT4	42	37
	Night-time (23:00 to 07:00)		37	32

Notes: [1] Representative background noise level characterised by the 10th percentile of all $L_{A90,5min}$ values over the given period; [2] Expressed as a plant Rating Level in accordance with BS 4142:2014+A1:2019, with acoustic character corrections to be applied, where necessary; [4] Noise limits apply at a position 1 m from the façade of the nearest noise sensitive properties and include the total contribution of noise from all noise generating plant that may run during any particular period.

I5.19 Based on the noise emission limits in Table I5 .7 for new services building plant being achieved (and potentially being controlled by a standard planning condition), noise generated from new building services plant would have a Negligible effect (Not Significant) on all SRs.

I5.20 The representative background levels and the limits presented in Table I5.7 are low, reflecting a quiet environment. To ensure compliance, the design will prioritise minimising building noise emissions as much as practicable. In cases where the specified limits cannot be achieved through practical measures, a relaxation request will be submitted to FHDC, aiming to cap plant noise at 35 dB during both daytime (07:00–23:00) and night-time (23:00–07:00) at residential receptors.

I5.21 This relaxation is based on the guidance and professional experience. In fact, as per BS 4142, background noise levels below approximately 30 dBA and rating levels under 35 dBA are categorised as very low, a classification further supported by the Association of Noise Consultants ('ANC') in their document 'BS 4142:2014+A1:2019 Technical Note.'[1]

[1] Association of Noise Consultants (ANC) (2019) BS 4142:2014+A1:2019 Technical Note. Association of Noise Consultants.

Operational Road Traffic Noise

I5.22 Based upon traffic data provided by DHA Planning, the likely change in road traffic noise on the road network in during the operational phase is presented in Table I5.8. The calculations are based on the opening year of the Proposed Development, both with and without the Proposed Development in place. The assumed opening year is 2035.

I5.23 Full details of the assessment are shown in Appendix I4.

Table I5.8 Differences in Road Traffic Basic Noise Level (BNL), dB LA10,18hr – Interim Baseline 2035 + Cumulative Schemes and Interim Baseline 35 + Cumulative Schemes + Proposed Development

Road Link	Affected SR	Difference in dB $L_{A10,18hr}$ BNL[1]			
		2035 – Interim Baseline without Development + Cumulative Schemes	2035 - Interim Baseline with Proposed Development + Cumulative Schemes	Change	Scale of Effect
Twiss Road	SR A, B, C, D, J and K (Hythe Imperial Hotel; residents at Moncrieff Gardens and Imperial Gardens, Cobay Close, Sturdy Close; users of Users of RMC, Users of Hythe Beach and England Coast Path)	57.9	58.7	0.7	Negligible
Princes Parade	SR A and K (Hythe Imperial Hotel and Users of Hythe Beach and England Coast Path)	56.7	58.5	1.8	Minor Adverse
Seabrook Road	SR E, F, G, H, I and J (Residents at Earlsfield Road, Seabrook Road, Saxon Close, Seabrook and Ferguson Close, 11 Ferguson Close and Users of RMC)	64.0	64.4	0.4	Negligible
Sandgate Esplanade	SR K (Users of Hythe Beach and England Coast Path)	63.5	63.6	0.1	Negligible
Sandgate High Street	SR J (Users of RMC)	63.5	63.6	0.1	Negligible
East Street	SR D, E and J (Residents at Sturdy Close and Earlsfield	63.9	64.2	0.3	Negligible

Road Link	Affected SR	Difference in dB $L_{A10,18hr}$ BNL[1]			
		2035 – Interim Baseline without Development + Cumulative Schemes	2035 - Interim Baseline with Proposed Development + Cumulative Schemes	Change	Scale of Effect
	Road and users of RMC)				
Rampart Road	SR D, E and J (Residents at Sturdy Close and Earlsfield Road and users of RMC)	65.3	65.4	0.1	Negligible
Military Road	SR D, E and J (Residents at Sturdy Close and Earlsfield Road and users of RMC)	63.7	63.8	0.1	Negligible
London Road	None of the identified SRs	63.7	63.8	0.2	Negligible
Hythe Road	None of the identified SRs	64.6	64.8	0.2	Negligible
Horn Street	None of the identified SRs	64.6	64.8	0.2	Negligible

I5.24 Analysis of the traffic data for the surrounding roads indicates that the anticipated change in road traffic noise during the operational phase is expected to result in a Negligible (Not Significant) effect in relation to all road links with the exception of Princes Parade, which is expected to result in a Minor Adverse effect. Therefore, the overall significance of the effect for all receptors is assessed as Not Significant.

I6.0 Mitigation and Monitoring

During Construction

Demolition and Construction Noise

I6.1 No additional mitigation measures are necessary as the potential effects of demolition and construction noise generated by the Proposed Development are considered to be **Not Significant** at all receptors.

I6.2 It is important to note that the demolition and construction noise impact assessment has been undertaken based on the distance from the Site boundary to the nearest sensitive receptors. In practice, the main construction activities are expected to occur primarily within the central area of the Site, away from the Site boundary. This will provide additional attenuation of construction noise at the nearest sensitive receptors and is expected to considerably reduce the resulting noise impact.

Demolition and Construction Vibration

I6.3 As the likely effects from demolition and construction vibration are predicted to be Minor to Moderate adverse (Not Significant) depending on piling methods used, no additional mitigation measures are necessary.

Demolition and Construction Traffic Noise

I6.4 Given that demolition and construction traffic noise is predicted to result in Negligible effects across the network – apart from Princess Parade, where a minor adverse effect is anticipated – no specific additional mitigation measures are required.

During Operation

Outdoor Amenity Areas

I6.5 No significant outdoor amenity areas noise impacts are predicted at key receptors surrounding the Site necessitating mitigation.

Building Services Plant Noise

I6.6 To meet the proposed plant noise emission limits set out in Table I5.7, a number of different noise control principles will need to be incorporated into the inherent design of the Proposed Development. Measures may include but are not limited to:

- zoning of building services plant areas away from more noise sensitive external and internal spaces, significantly decreasing the need for costly measures having to be designed and built in to the scheme;
- careful plant layout to exploit plant directivity and the attenuation of sound with distance;
- selection of suitably quiet non-tonal plant, including plant with night set-back modes;
- use of appropriately sized atmospheric induct silencers;

- application of acoustic lagging; and,
- use of acoustic louvres and local screening.

I6.7 Measures focus on controlling noise at source and from the dominant plant items in order to practically and cost-effectively achieve the desired result.

I6.8 During design, once final plant selections have been made, allowance will need to be given to the cumulative total level of noise generated by all building services plant.

Road Traffic Noise

I6.9 No significant development generated road traffic noise impacts are predicted at key receptors surrounding the Site necessitating mitigation.

I7.0 Residual Effects

During Construction

Demolition and Construction Noise

I7.1 As no additional mitigation measures are proposed the likely residual effects from demolition and construction noise are as set out in Section I5.0 (Potential Effects), i.e. Negligible to Moderate Adverse (Not Significant).

Demolition and Construction Vibration

As no additional mitigation measures are proposed the likely residual effects from demolition and construction vibration are as set out in Section I5.0 (Potential Effects), i.e. Minor to Moderate Adverse (Not Significant).

Demolition and Construction Traffic Noise

I7.2 As no additional mitigation measures are proposed, the likely residual effect from demolition and construction traffic noise would remain as set out in Section i5.0 (Potential Effects), i.e. Negligible and Not Significant for all receptors, with the exception of SRs A and K (Hythe Imperial Hotel and Users of Hythe Beach and England Coast Path) where effects will be Minor Adverse and Not Significant.

Summary

I7.3 All of the residual effects resulting from construction of the Proposed Development, are presented in Table I7.1, identifying whether the effect is significant or not.

Table I7.1 Residual Effects During Construction

Receptor	Description of the Residual Effect	Scale and Nature	Significant/ Not Significant	Geo	D I	P T	St Mt Lt
SR A Hythe Imperial Hotel	Noise from Demolition and Construction Works during Phase 3	Moderate Adverse	Not Significant	L	D	T	St
	Noise from Demolition and Construction Works during Phase 1, 2, 4 and 5	Negligible	Not Significant	L	D	T	St
SR B-L Residents at Moncrieff Gardens and Imperial Gardens, Cobay Close, Sturdy Close, Earlsfield Road, Seabrook Road, Saxon	Noise from Demolition and Construction Works during Phase 1, 2, 3, 4 and 5	Negligible	Not Significant	L	D	T	St

Receptor	Description of the Residual Effect	Scale and Nature	Significant/ Not Significant	Geo	D I	P T	St Mt Lt
Close, Seabrook and Ferguson Close and 11 Ferguson Close; users of RMC and Hythe Beach and England Coast Path; Residents at the Proposed Development							
SR A, B, C and D Hythe Imperial Hotel; residents at Moncrieff Gardens and Imperial Gardens, Cobay Close and Sturdy Close	Vibration from Demolition and Construction Works during Phase 1, 2, 3, 4 and 5 with Rotary Bored Piling	Minor Adverse	Not Significant	L	D	T	St
	Vibration from Demolition and Construction Works during Phase 1, 2, 3, 4 and 5 with Impact Bored Piling	Moderate Adverse	Not Significant	L	D	T	St
SR J and K Users of RMC, Hythe Beach and England Coast Path	Vibration from Demolition and Construction Works during Phase 1, 2, 3, 4 and 5 with Rotary Bored Piling	Negligible	Not Significant	L	D	T	St
	Vibration from Demolition and Construction Works during Phase 1, 2, 3, 4 and 5 with Impact Bored Piling	Minor Adverse	Not Significant	L	D	T	St
SR E, F, G and H Residents at Earlsfield Road, Seabrook Road, Saxon Close, Seabrook and Ferguson Close	Vibration from Demolition and Construction Works during Phase 1, 2, 3, 4 and 5	Negligible	Not Significant	L	D	T	St
SR A and K Hythe Imperial Hotel and Users of Hythe Beach and England Coast Path	Traffic from Demolition and Construction Works	Minor Adverse	Not Significant	L	D	T	St
SR B – J Residents at Moncrieff Gardens	Traffic from Demolition and Construction Works	Negligible	Not Significant	L	D	T	St

Receptor	Description of the Residual Effect	Scale and Nature	Significant/ Not Significant	Geo	D I	P T	St Mt Lt
and Imperial Gardens, Cobay Close, Sturdy Close, Earlsfield Road, Seabrook Road, Saxon Close, Seabrook and Ferguson Close and 11 Ferguson Close; users of RMC							
Notes: Residual Effect Scale = Negligible / Minor / Moderate / Major Nature = Beneficial or Adverse Geo (Geographic Extent) = Local (L), Borough (B), Regional (R), National (N) D = Direct / I = Indirect P = Permanent / T = Temporary St = Short Term / Mt = Medium Term / Lt = Long Term N/A = not applicable / not assessed							

During Operation

Outdoor Amenity Areas

I7.4 In the absence of additional mitigation measures, the residual effects from outdoor amenity areas remain as set out in Section I5.0 (Potential Effects), i.e. Negligible and Not Significant at all SRs.

Building Services Plant Noise

I7.5 Subject to further assessment at subsequent design stages, based on achieving the plant noise emission limits set out in Table I5.7, and the implementation, where required, of the mitigation measures described in paragraph I6.0, the operational building services noise impact during the operational phase is considered to be Negligible and Not Significant.

Road Traffic Noise

I7.6 As no additional mitigation measures are proposed, the likely residual effect from operational road traffic noise would remain as set out in Section I5.0 (Potential Effects), i.e. Negligible and Not Significant for all receptors, with the exception of SRs A and K where effects will be Minor Adverse and Not Significant.

Summary

I7.7 All of the residual effects resulting from operation of the Proposed Development, are presented in Table I7.2, identifying whether the effect is significant or not.

Table I7.2 Residual Effects During Operation

Receptor	Description of the Residual Effect	Scale and Nature	Significant / Not Significant	Geo	D I	P T	St Mt Lt
SR A-L All Sensitive Receptors	Building Services Noise	Negligible	Not Significant	L	D	P	Lt
SR A and K Hythe Imperial Hotel and Users of Hythe Beach and England Coast Path	Operational Traffic Noise	Minor Adverse	Not Significant	L	D	P	Lt
SR B – J Residents at Moncrieff Gardens and Imperial Gardens, Cobay Close, Sturdy Close, Earlsfield Road, Seabrook Road, Saxon Close, Seabrook and Ferguson Close and 11 Ferguson Close; users of RMC, Users of Hythe Beach and England Coast Path, Residents at the Proposed Development	Operational Traffic Noise	Negligible	Not Significant	L	D	P	Lt
	Outdoor Amenity Areas	Negligible	Not Significant	L	D	P	Lt
Notes: Residual Effect Scale = Negligible / Minor / Moderate / Major Nature = Beneficial or Adverse Geo (Geographic Extent) = Local (L), Borough (B), Regional (R), National (N) D = Direct / I = Indirect P = Permanent / T = Temporary St = Short Term / Mt = Medium Term / Lt = Long Term N/A = not applicable / not assessed							

I8.0 Summary & Conclusions

I8.1 The noise impact assessment has been undertaken during the demolition and construction and operation phase and vibration impact assessment for the demolition and construction phase.

I8.2 With respect to demolition and construction noise, Moderate Adverse (Not Significant) residual effects are expected at SR A during Phase 3. Negligible effects are anticipated at all other receptors. With respect to demolition and construction traffic noise and demolition and construction vibration there are no anticipated Significant effects at any potential SR.

I8.3 With respect to fixed building services plant, appropriate noise emission limits have been specified, based on representative background noise levels and the requirements of FHDC. Providing that the limits are met, with careful attention paid to plant selection, installation and noise attenuation as appropriate, then disturbance to future occupants of the Proposed Development as well as surrounding SRs would be avoided. Meanwhile for operation traffic and outdoor amenity noise there are no anticipated significant effects at any potential SR.

I8.4 Table I8.1 shows a summary of the effects during the demolition, construction and operational phases of the Proposed Development.

I8.5 The residential assessment has not been included in Table I8.1 as this assessment provides an indicative review of the site's suitability for residential use, rather than evaluating the impact of any new or introduced noise or vibration source by the Proposed Development.

Table I8.1 Summary of Effects

Receptor	Impact	Potential Effects (taking account of embedded mitigation)	Additional Mitigation and Monitoring	Residual Effects
During Construction				
SR A Hythe Imperial Hotel	Noise from Construction Works during Phase 3	Moderate and Not Significant	N/A	Moderate and Not Significant
	Noise from Construction Works during Phases 1, 2, 4 and 5	Negligible and Not Significant	N/A	Negligible and Not Significant
SR B – K Residents at Moncrieff Gardens and Imperial Gardens, Cobay Close, Sturdy Close, Earlsfield Road, Seabrook Road, Saxon Close,	Noise from Construction Works during Phases 1, 2, 3, 4 and 5	Negligible and Not Significant	N/A	Negligible and Not Significant

Receptor	Impact	Potential Effects (taking account of embedded mitigation)	Additional Mitigation and Monitoring	Residual Effects
Seabrook and Ferguson Close and 11 Ferguson Close; users of RMC, Users of Hythe Beach and England Coast Path)				
SR A, B, C and D (Hythe Imperial Hotel, residents at Moncrieff Gardens and Imperial Gardens, Cobay Close, Sturdy Close)	Vibration from Construction Works with Rotary Bored Piling	Minor Adverse and Not Significant	N/A	Minor Adverse and Not Significant
	Vibration from Construction Works with Vibratory Bored Piling	Moderate Adverse and Not Significant	N/A	Moderate Adverse and Not Significant
SR J and K (users of the RMC and of Hythe Beach and England Coast Path)	Vibration Construction Works with Rotary Bored Piling	Negligible and Not Significant	N/A	Negligible and Not Significant
	Vibration from Construction Works with Vibratory Bored Piling	Minor Adverse and Not Significant	N/A	Minor Adverse and Not Significant
SR E, F, G, H and I (residents of Earlsfield Road, Seabrook Road, Saxon Close, Seabrook, Ferguson Close and 11 Ferguson Close)	Vibration from Construction Works	Negligible and Not Significant	N/A	Negligible and Not Significant
SR A and K (Hythe Imperial Hotel and Users of Hythe Beach and England Coast Path)	Noise from construction traffic	Minor Adverse and Not Significant	N/A	Minor Adverse and Not Significant
SR B – J (residents at Moncrieff Gardens and Imperial Gardens, Cobay Close, Sturdy Close, Earlsfield Road, Seabrook Road, Saxon Close, Seabrook and	Noise from construction traffic	Negligible and Not Significant	N/A	Negligible and Not Significant

Receptor	Impact	Potential Effects (taking account of embedded mitigation)	Additional Mitigation and Monitoring	Residual Effects
Ferguson Close and 11 Ferguson Close and users of RMC)				
During Operation				
All Sensitive receptors	Building Services Noise	Negligible and Not Significant	N/A	Negligible and Not Significant
SR A and K (Hythe Imperial Hotel, and Users of Hythe Beach and England Coast Path)	Operational Traffic Noise	Minor Adverse and Not Significant	N/A	Minor Adverse and Not Significant
SR B-J (residents at Moncrieff Gardens and Imperial Gardens, Cobay Close, Sturdy Close, Earlsfield Road, Seabrook Road, Saxon Close, Seabrook and Ferguson Close and 11 Ferguson Close; users of RMC)	Operational Traffic Noise	Negligible and Not Significant	N/A	Negligible and Not Significant
	Outdoor Amenity Area	Negligible and Not Significant	N/A	Negligible and Not Significant

I9.0 Abbreviations & Definitions

Abbreviations

- AAWT - Annual Average Weekday Traffic
- BPM - Best Practicable Means
- BS - British Standard
- BNL - Basic Noise Level
- CEMP - Construction Environmental Management Plan
- CLP - Construction Logistics Plan
- CRTN - Calculation of Road Traffic Noise
- DCLG - Department for Communities and Local Government
- DEFRA - Department for Environment, Food and Rural Affairs
- DMRB - The Design Manual for Roads and Bridges
- ES - Environmental Statement
- FHDC - Folkestone & Hythe District Council
- HGV - Heavy Goods Vehicle
- ISEP - The Institute of Sustainability and Environmental Professionals
- LOAEL - Lowest Observed Adverse Effect Level
- NOEL - No Observed Effect Level
- NPPF - The National Planning Policy Framework
- NPPG - National Planning Practice Guidance
- NPSE - The Noise Policy Statement for England
- PPG - Planning Practice Guidance
- PPV - Peak Particle Velocity
- SBN - Structureborne Noise
- SEL - Sound Exposure Level
- SOAEL - Significant Observed Adverse Effect Level
- SR - Sensitive Receptor
- WHO - World Health Organization
- VDV - Vibration Does Value

Definitions

- **Absorption Coefficient, α** - The fraction of reverberant sound energy absorbed by a material. It is expressed as a value between 1.0 which equates to perfect absorption and which equates to zero absorption.

- **Absorption, A** - The acoustic absorption derived from the multiplication of the absorption coefficient by the surface area of a given material.
- **Acoustic Class, A – E** - Classification of sound absorbers into Sound Absorption Classes A-E, according to BS EN ISO 11654, including frequencies 200-5000 Hz
- **Ambient Noise Level** - The noise level in a given environment whilst it is subject to all of its normal sources of noise.
- **A-weighted sound pressure level, Lp_A** - The sound pressure level with the A-weighting applied. The A-weighting is used for most environmental noise measurements and is used to weight a spectrum of sound to match the sensitivity of the human ear.
- **Background Sound Level, L_{A90}** - These are amongst the lowest noise levels measured over a given period of time and exclude short term, intermittent noise sources. The background noise level is quantified by the L_{A90} descriptor and is therefore the level which is exceeded for 90% of a given period of time.
- **Cross-talk** - Noise transmission between one room and another room or space via a duct or other path.
- **Ctr** - A correction term applied to the sound insulation single-number values (R_w, D_w, and $D_{nT,w}$). Applying the Ctr penalises a construction's performance if its low frequency performance is poor in relation its performance at higher frequencies.
- **Decibel, dB** - The decibel is a logarithmic unit of measurement used for quantifying sound. It is derived from the logarithm to base 10 of the ratio of two quantities. Use of a logarithmic scale has the advantage that it compresses the very wide range of sound pressures to which the ear may typically be exposed to a more manageable range of numbers.
- **DIN plate** - A means of mounting vibration sensors in accordance with DIN 45669-2:2005 for measurements on hard surfaces. Comprises a 2.5 kg stainless steel plate with supporting feet.
- **Dynamic Insertion Loss, IL** - The reduction of noise level due to the presence of a noise control device such as an attenuator, including any regeneration noise created by its presence.
- **Equivalent continuous A-weighted sound pressure level, $L_{Aeq,T}$** - The L_{Aeq} is an energy average and defined as the level of sound which, over a given period of time, would equate to the same A-weighted sound energy as the actual fluctuating sound.
- **eVDV** - The estimated vibration dose value based on short duration measurements of transients with known durations and occurrences.
- **Frequency Weightings** - Weightings can be applied to a spectrum of sound and act as a filter to account for different sensitivities and conditions.
- **Frequency, Hz** - In sound, the number of cycles per second of a pressure fluctuation and frequency in sound is proportional to its pitch. Different frequencies are divided into octave and one third octave bands.

- **Ground-borne Noise** - Audible noise caused by the vibration of elements of a structure, for which the vibration propagation path from the source is partially or wholly through the ground
- **Impact Sound** - The noise generated by an impact on a structure. This is normally used to describe the noise created by people walking on a floor structure.
- **Insertion Loss, IL**: The reduction of noise level due to the presence of a noise control device such as an attenuator, excluding any regeneration noise created by its presence.
- **Maximum noise Level, L_{AFmax}** - The maximum instantaneous noise level measured during a given period of time. The time weighting to which the meter is set for this measurement parameter is always indicated by either an F or S.
- **Minimum Noise level, L_{AFmin}** - The minimum instantaneous noise level measured during a given period of time. The time weighting to which the meter is set for this measurement parameter is always indicated by either an F or S.
- **Normalised Element Level Difference, D_{ne}** - The normalised difference in sound level between a pair of rooms via a small element such as a trickle ventilator. The level difference in octave bands is normalized to a reference amount of absorption.
- **NR** - The Noise Rating level. This is a single figure value derived by plotting a noise spectrum against a set of curves. The curve under which the spectrum fits is the resulting NR level.
- **NRC** - A single-number rating system used to compare the sound-absorbing characteristics of building materials. A measurement of the acoustical absorption performance of a material, calculated by averaging its Sound Absorption Coefficients at 250, 500, 1000 and 2000 Hz
- **Octave Bands** - A band of frequencies in which the upper limit of the band is twice the frequency of the lower limit.
- **Percentile level, $L_{AN,T}$** - A-weighted sound pressure level obtained using time-weighting F, which is exceeded for N% of a specified time interval. An example of this is background noise which is quantified with the L_{A90} descriptor, which is the A-weighted level which is exceeded for 90% of the measurement period.
- **Rating Level, $L_{Ar,Tr}$** - The equivalent continuous A-weighted sound pressure level of the noise, plus any adjustment for the characteristic features of the noise.
- **Reverberation Time, T** - The time that would be required for the sound pressure level to decrease by 60 dB after the sound source has stopped. The descriptor T often includes other nomenclature to describe the type of reverberation time measurement or if the reverberation time is an average taken for specific frequencies. For example, a Tmf is the mid-frequency reverberation time.
- **Sound exposure level, L_{AE}** - A level of a sound, of 1 s duration, that has the same sound energy as the actual noise event considered.
- **Sound Power Level, L_W** - This is the total sound energy radiated from a given source. The sound power Level is 10 times the logarithm to base 10 of the ratio of the reference sound power level ($1x10^{-12}$) and the measured power.

- **Sound Pressure Level, Lp** - This is the unweighted or linear level which is measured prior to any weightings being applied. The sound pressure level is 20 times the logarithm to base 10 of the ratio of the reference sound pressure ($2x10^{-5}$) and the measured sound pressure.
- **Sound Reduction Index, R** - The laboratory measured sound insulation properties of a material or building element in octave or third octave bands.
- **Standardized Weighted Level Difference, $D_{nT,w}$** - The standardized, weighted difference in sound level between a pair of rooms, stated as a single figure. The level difference in octave bands is first normalized to a reference reverberation time and then plotted against a set of reference curves to establish a single figure value.
- **Structure-borne Noise** - Audible noise caused by the vibration of elements of a structure, the source of which is within a building or structure with common elements.
- **Tactile Vibration** - Tactile vibration is that which is perceived as mechanical motion (vibration you can feel).
- **Time Weightings** - A time weighting to denote the response of the sound level meter. For most measurements the Fast time weighting is selected (F) however, a slow time weighting (S) is often used to for the measurement train noise and vibration.
- **V.D.V** - The VDV is the Vibration Dose a person is expected to be exposed to over the course of the day or night. The VDV is given by the fourth root of the time integral of the fourth power of the acceleration after it has been frequency-weighted.
- **Vibration** - The vibratory motion of a surface can be characterised by:

  (a) displacement (m),

  (b) velocity (m/s), or

  (c) acceleration (m/s^2).

  The magnitude of the vibration can be quantified in several ways:

  (a) Peak to Peak - The total excursion of the oscillation about the zero datum.

  (b) Peak - This value gives the maximum excursion of the oscillation above or below the zero datum.

  (c) r.m.s. - This value gives the root mean square of the time history over a specific time interval (time constant).

  (d) dB - Vibration levels can be expressed in dB. A reference level of 10-6 m/s^2 r.m.s. is usually used for acceleration.
- **Weighted Level Difference, D_w** - The weighted level difference between a pair of rooms, stated as a single figure.
- **Weighted Sound Reduction Index, R_w** - A single number which represents the sound reduction of a material. It is derived by plotting the sound reduction index against a set of reference curves. The curves are shifted until a best-fit is established and the curve which best fits the sound reduction spectrum is used to represent the single figure value.

- **Weighted standardized impact sound pressure level, $L_{nT,w}$** - A single-number quantity used to characterize the impact sound insulation of floors over a range of frequencies.
- **Weighted, Normalised Element Level Difference, D_{new}** - The normalised, weighted difference in sound level between a pair of rooms via a small element such as a trickle ventilator, stated as a single figure. The level difference in octave bands is normalized to a reference amount of absorption and then plotted against a set of reference curves to establish a single figure value.
- **Weighted, Normalised Flanking Level Difference, D_{nFw}** - The normalised, weighted difference in sound level between a pair of rooms via a flanking element, such as mullion or ceiling detail. The level difference in octave bands is first normalized to a reference amount of absorption and then plotted against a set of reference curves to establish a single figure value.

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Imperial Gardens
Volume 1: Environmental Statement
Chapter J Air Quality

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J1.0 Introduction

J1.1 The Chapter of the Environmental Statement ('ES') has been prepared by Hilson Moran on behalf of the applicant, GSE Group ('the Applicant'). It assesses the Proposed Development described in Chapter C in relation to air quality.

J1.2 The baseline situation is considered before the likely environmental effects of the Proposed Development are identified during its construction and operational phases. Mitigation measures to reduce any negative environmental effects are identified as appropriate, before the residual environmental effects are assessed.

J1.3 This Chapter is supported by the following technical appendices provided at Volume 2 to this ES:

- Appendix J1: Traffic Data
- Appendix J2: Background Concentrations and Modelled Receptors
- Appendix J3: Model Verification
- Appendix J4: Wind Rose
- Appendix J5: Modelled Results

About the Author

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J2.0 Policy Context

Legislation

J2.1 A summary of the relevant air quality legislation is provided below.

Air Quality Strategy for England, Scotland, Wales and Northern Ireland

J2.2 The Government's policy on air quality within the UK is set out in the Air Quality Strategy ('AQS') for England, Scotland, Wales and Northern Ireland1, most recently updated in 2023. The AQS sets out a framework for reducing hazards to health from air pollution and ensuring that the European Union and International agreements are met in the UK.

J2.3 The AQS covers the following air pollutants: ammonia (NH_3), benzene (C_6H_6), 1,3 butadiene (C_4H_6), carbon monoxide (CO), lead (Pb), oxides of nitrogen (NOX) (including nitrogen dioxide (NO_2)), particulate matter (PM_{10} and $PM_{2.5}$), sulphur dioxide (SO_2), ozone (O_3) and polycyclic aromatic hydrocarbons ('PAH's).

J2.4 The AQS sets standards and objectives for the listed pollutants for the protection of human health, vegetation, and ecosystems. The standards are based on recommendations by the Expert Panel on Air Quality Standards ('EPAQS') and the World Health Organisation ('WHO') based on current understanding and scientific knowledge about the effects of air pollution on health and the environment. The air quality objectives are policy-based targets set by the UK Government that are often expressed as maximum concentrations not to be exceeded either without exception or with a limited number of exceedances within a specified timescale.

J2.5 For the pollutants considered in this assessment, there are both a long-term (e.g., annual mean) and short-term (e.g., one hour mean) standard. In the case of NO_2, the short-term standard is for a 1-hour averaging period (no more than 18 exceedances of 200 μg/m3 per year), whereas for PM_{10} it is a 24-hour averaging period (no more than 35 exceedances of 50 $\mu g/m^3$ per year). The variation in time reflects the varying impacts on health of differing exposures to pollutants.

J2.6 In the 2023 update to the targets an annual mean $PM_{2.5}$ target of 10 $\mu g/m^3$ to be achieved by 2040 and an average population exposure reduction of 35% in 2040 compared to a 2018 baseline.

Air Quality Standards Regulations

J2.7 The air quality objectives in the AQS are statutory in England with the Air Quality (England) Regulations 2000[2] and the Air Quality (England) (Amendment) Regulations 2002[3] for the purpose of Local Air Quality Management ('LAQM').

The Regulations require likely exceedances of the AQS objectives to be assessed in relation to:

'…the quality of air at locations which are situated outside of buildings or other natural or man-made structures, above or below ground, and where members of the public are regularly present…'

J2.8 The Air Quality Standards (Amendment) Regulations 2016[4] transpose the European Union Ambient Air Quality Directive (2008/50/EC) into law in England, with the Air Quality (Amendment of Domestic Regulations) (EU Exit) Regulations 2019 ensuring continuation of the transposition of the Directive. This Directive sets legally binding limit values for concentrations in outdoor air of major air pollutants that impact public health such as NO_2, PM_{10} and $PM_{2.5}$. The limit values for NO_2 and PM_{10} are the same concentration levels as the relevant AQS objectives and the limit value for $PM_{2.5}$ is a concentration of 20 µg/m^3. The relevant air quality objectives are presented in Table J2.1.

Table J2.1 Air Quality Objectives for Relevant Pollutants

Pollutant	Concentration	Measured as
NO_2	200 µg/m^3	1-hour mean, not to be exceeded more than 18 times a year (99.79 %ile)
	40 µg/m^3	Annual mean
PM_{10}	50 µg/m^3	24-hour mean, not to be exceeded more than 35 times a year (90.41 %ile)
	40 µg/m^3	Annual mean
$PM_{2.5}$	20 µg/m^3	Annual mean

Environment Act 1995

J2.9 Part IV of the Environment Act 1995[5] requires local authorities to periodically review and assess the quality of air within their administrative area. The reviews must consider both the air quality at the time of review and likely future air quality during the 'relevant period' and whether any air quality objectives prescribed in regulations are being achieved or are likely to be achieved in the future. Where the objectives are not likely to be achieved, an authority is required to designate an Air Quality Management Area ('AQMA'). For each designated AQMA the local authority is required to produce an Air Quality Action Plan ('AQAP') that works to ensure compliance with the objectives by implementing a number of air quality improvement measures.

Environment Act 2021

J2.10 Schedule 11 in Part VI of the Environment Act 2021[6] sets out the amendments made from the Environment Act 1995. The principles remain consistent in that the Environment Act 2021 requires local authorities to periodically review and assess the quality of air within their administrative area. Where the objectives are not likely to be achieved, an authority is required to designate an AQMA. For each designated AQMA the local authority is required to produce an 'AQAP that works to ensure compliance with the objectives by implementing several air quality improvements measures.

Environmental Protection Act 1990

J2.11 Section 79 of the Environmental Protection Act 1990 (as amended)[7] makes provision for the identification and control of statutory nuisances. The Act identifies statutory nuisance, in relation to air quality, as:

'Any dust, steam, smell or other effluvia arising on industrial, trade or business premises and being prejudicial to health or a nuisance'; and,

'Any accumulation or deposit which is prejudicial to health or a nuisance'.

J2.12 As a result, the level at which a nuisance occurs is highly variable and dependent on perception, with effects influenced by existing conditions and the degree of change that has occurred.

J2.13 Where a statutory nuisance has been demonstrated the local authority must serve an abatement notice, non-compliance with which would constitute a legal offence. The abatement notice may prevent or restrict occurrence or re-occurrence of the nuisance, or the local authority may, itself, undertake action to abate the nuisance and recover any associated expenses.

WHO Guidelines

J2.14 Table J2-2 states the World Health Organisation ('WHO') Air Quality Guidelines[8] for NO_2, PM_{10} and $PM_{2.5}$. Whilst these guidelines are not targeted in the UK there is a push to meet the guidelines and be more stringent with air quality control.

Table J2.2 WHO Air Quality Guidelines

Pollutant	Concentration	Measured as
NO_2	25 µg/m^3	24 hour mean, not to be exceeded more than 3-4 times a year (99.79 %ile)
	200 µg/m^3	1 hour mean, not to be exceeded more than 3-4 times a year (99.79 %ile)
	10 µg/m^3	Annual mean
PM_{10}	45 µg/m^3	24-hour mean, not to be exceeded more than 35 times a year (90.41 %ile) for UK, not to be exceeded more than 3-4 times a year (99th %ile) under WHO
	15 µg/m^3	Annual mean
$PM_{2.5}$	15 µg/m^3	24-hour mean, not to exceeded more than 3 to 4 times a year (99th %ile)
	5 µg/m^3	Annual mean

Planning Policy

A summary of the national and local planning policy relevant to air quality and the Proposed Development is detailed below.

National

National Planning Policy Framework

J2.15 The National Planning Policy Framework ('NPPF')[9] sets out policies, which apply to the preparation of local plans and to development management decisions. This framework sets out the Government's economic, environmental, and social planning policies for England. Taken together, these policies articulate the Government's vision of sustainable development, which should be interpreted and applied locally to meet local aspirations.

J2.16 The NPPF sets out the Government's planning policies on the conservation and enhancement of the natural environment, with the following paragraphs relating to air quality:

J2.17 Paragraph 8c, which states '*to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy*';

J2.18 Paragraph 56, which states '*Local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition*';

J2.19 Paragraph 110, which states '*The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making'*;

J2.20 Paragraph 187e, which states *'preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans'*;

J2.21 Paragraph 199, which states '*Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, considering the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan*';

J2.22 Paragraph 201, which states '*The focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). Planning decisions should assume that these regimes will operate effectively. Equally, where a planning decision has been made on a particular development, the planning issues should not be revisited through the permitting regimes operated by pollution control authorities.*'; and,

J2.23 Paragraph 224c, which states '*ensure that any unavoidable noise, dust and particle emissions and any blasting vibrations are controlled, mitigated or removed at source 72,*

and establish appropriate noise limits for extraction in proximity to noise sensitive properties.'

Clean Air Strategy

J2.24 The Clean Air Strategy[10] sets out a wide range of actions by which the UK Government will seek to reduce pollutant emissions and improve air quality. Actions are targeted at four main sources of emissions: Transport, Domestic, Farming and Industry. At this stage, there is no straightforward way to take account of the expected future benefits to air quality within this assessment.

Reducing Emissions from Road Transport: Road to Zero Strategy

J2.25 The Office for Low Emission Vehicles ('OLEV') and DfT published a Policy Paper[11] in July 2018 outlining how the government will support the transition to zero tailpipe emission road transport and reduce tailpipe emissions from conventional vehicles during the transition. This paper affirms the Government's pledge to end the sale of new conventional petrol and diesel cars and vans by 2040, and states that the Government expects most new cars and vans sold to be 100% zero tailpipe emission and all new cars and vans to have significant zero tailpipe emission capability by this year, and that by 2050 almost every car and van should have zero tailpipe emissions. It states that the Government wants to see at least 50%, and as many as 70%, of new car sales, and up to 40% of new van sales, being ultra-low emission by 2030.

J2.26 The paper sets out a number of measures by which Government will support this transition but is clear that Government expects this transition to be industry and consumer led. The Government has since announced that the phase-out date for the sale of new petrol and diesel cars and vans will be brought forward to 2030 and that all new cars and vans must be fully zero emission at the tailpipe from 2035. If these ambitions are realised then road traffic-related nitrogen oxide (NO_X) emissions can be expected to reduce significantly over the coming decades, likely beyond the scale of reductions forecast in the tools utilised in carrying out this air quality assessment.

National Air Quality Plan

J2.27 Defra has produced an Air Quality Plan to tackle roadside NO_2 concentrations in the UK[12]; a supplement to the 2017 Plan[13] was published in October 2018 and sets out the steps Government is taking in relation to a further 33 local authorities where shorter-term exceedances of the limit value were identified. Alongside a package of national measures, the 2017 Plan and the 2018 Supplement require those identified English Local Authorities (or the Greater London Authority (GLA) in the case of London Authorities) to produce local action plans and/or feasibility studies. These plans and feasibility studies must have regard to measures to achieve the statutory limit values within the shortest possible time, which may include the implementation of a Clean Air Zone ('CAZ').

J2.28 There is currently no straightforward way to take account of the effects of the 2017 Plan or 2018 Supplement in this assessment; however, consideration has been given to whether there is currently, or is likely to be in the future, a limit value exceedance in the vicinity of the Proposed Development. This assessment has principally been carried out in relation to

the air quality objectives, rather than the EU limit values that are the focus of the Air Quality Plan.

Local

Adopted Development Plan for Folkestone & Hythe District

J2.29 The adopted development plan for FHDC comprises the Core Strategy Review (2022)[14], the Places and Policies Local Plan (2020)[15], the St Mary in the Marsh Neighbourhood Plan (2019)[16] and the Kent Minerals and Waste Local Plan (2016)[17]. A summary of these planning policies relating to air quality and the Proposed Development is detailed below.

Core Strategy Review (2022)

J2.30 The Core Strategy Review ('CSR'), adopted in 2022, sets out the Council's long-term vision and growth needs to 2036/37, with the intention of guiding planning and leading the coordination of long-term development. The CSR sets out 4 strategic needs, with broader aims arising under these for the sustainable development of the district. Strategic Need B, 'The challenge to enhance management and maintenance of natural and historic assets' highlights the aim that is targeting air quality improvements (B2), which strives to 'Minimise local carbon emissions, maintain and manage air quality (particularly nitrogen emissions (NO_X) from vehicles along the A20), control pollutants and promote sustainable waste management'. The CSR identifies a need to monitor NO_X emissions, with the Council placing targets in place to 'monitor roadside NO_X at regular intervals over the plan period in order to identify any improving or deteriorating trends'.

Places and Policies Local Plan (2020)

J2.31 The Places and Policies Local Plan ('PPLP'), which covers the period from 2006 to 2031, sits below the CSR sets out the Council's vision for future development across the district. The PPLP aims to provide development management policies to guide and assess future developments and planning applications. The policies in this plan aim to 'ensure that new developments are sustainable, the natural and historic environment is maintained, and that people's quality of life is improved, and healthy lifestyles are encouraged'. The PPLP is split into two key sections: Places and Development Management Policies. There are 9 Development Management Policies, the one relating to Transport discusses air quality from vehicle emissions. Policy T4 'Parking for Heavy Goods Vehicles (HGVs) highlights the policy relating to air quality affected by new developments, which states 'Proposals for the mitigation of noise and air quality impacts from lorry movements and any associated commercial operations will need to be specifically addressed as part of any application'.

J2.32 The Proposed Development is mentioned under Places, Policy UA18 'Princes Parade, Hythe'. This policy focuses on aligning the site with high environmental and heritage standards while delivering a comprehensive mixed-use scheme. The site proposal must be guided by addressing and minimising harm to heritage and key features such as the Royal Military Canal ('RMC'). Additionally, the policy states 'traffic flow and parking provision is assessed to ensure that the development does not put undue pressure on the local highway network', highlighting the consideration of potential impacts on local air quality.

Guidance

National Planning Practice Guidance

J2.33 The NPPF is supported by Planning Practice Guidance[18], which outlines how the planning process can address potential air quality impacts associated with new development. It provides guidance on the level of detail required, how impacts can be mitigated and provides information on how local authorities may take air quality as a specific consideration in a planning decision.

Local Air Quality Management Review and Assessment Technical Guidance

J2.34 The Department for Environment, Food and Rural Affairs (Defra) has published technical guidance for use by local authorities. This technical guidance, identified as LAQM.TG(22)[19], is for use by local authorities for their review and assessment work and has been applied where appropriate to this assessment.

Land-Use Planning and Development Control: Planning for Air Quality

J2.35 Environmental Protection UK ('EPUK') and the Institute of Air Quality Management ('IAQM') have published guidance[20], which offers advice as to when an air quality assessment may or not be required. The guidance document details what should be included within an assessment, how to determine the significance of impacts and the likely mitigation measures required to minimise the impacts.

Guidance on the Assessment of Dust from Demolition and Construction

J2.36 This document[21], published by the IAQM, provides guidance on how to assess the impact of construction activities on air quality associated with new developments. The methodology prescribed within the document allows the impacts to be categorised based on risk (with reference to dust and PM_{10} on sensitive human and ecological receptors) and, where applicable, identify mitigation measures associated to the risk classification determined.

J3.0 Assessment Methodology & Significance Criteria

Assessment Methodology

Scope of the Assessment

J3.1 The scope of the assessment has been determined by the following:

- Review of the air quality data for the area surrounding the Development, including from FHDC annual status reports[22] and Defra[23];
- Desk study to confirm the locations of nearby existing receptors that may be sensitive to changes in local air quality, and a review of the masterplan for the Proposed Development to establish the location of new sensitive receptors; and
- Review of the traffic data provided by DHA Transport (project transport consultants).

J3.2 The scope of the assessment includes consideration of the potential impacts on local air quality resulting from:

- Dust and particulate matter generated by on-site activities during the construction phase;
- Increases in pollutant concentrations as a result of exhaust emissions arising from construction traffic; and
- Increases in pollutant concentrations as a result of exhaust emissions arising from development-generated traffic.

Construction Dust Assessment

J3.3 Assessment of the risk of impact associated with the generation of dust during the construction phase of the Proposed Development and determination of subsequent mitigation measures necessary has been undertaken following IAQM guidelines.

J3.4 The assessment is based on a series of steps: screening the requirement for a detailed assessment; classification of the likely magnitude of dust emissions; characterisation of the area of influence and establishment of its sensitivity to dust; and establishment of the overall risk of impact. The risk of impact from dust emissions from the Proposed Development considers effects on human health, nuisance as a result of dust soiling and ecological receptors from four main activities: demolition; earthworks; construction; and track out. The potential for dust emissions from each activity should be considered, unless any of them are not relevant to the Proposed Development.

J3.5 The guidelines identify appropriate screening criteria for the identification of potential receptors, based on a conservative approach and in consideration of the exponential decline in both airborne concentrations and the rate of deposition with distance. A detailed assessment of the impact of dust from construction sites will be required where:

- A 'human receptor' is located within 250m of the boundary of the Site or within 50m of the route(s) used by construction vehicles on the public highway, up to 250m from the Site entrance; or

- An 'ecological receptor' is located within 50m of the boundary of the Site or within 50m of the route(s) used by construction vehicles on the public highway, up to 250m from the Site entrance.

Establishing Risk

J3.6 The magnitude of dust emissions for each activity is classified as small, medium or large depending upon the scale of the works proposed, materials involved and level of activity required. The IAQM guidelines provide examples of how the magnitude of emission can be defined, which are identified in Table J3.1. The Proposed Development is unlikely to satisfy all criteria within the examples, therefore professional judgement and site-specific information are used to identify appropriate emission magnitude.

Table J3.1 Dust Emission Magnitude (Source: IAQM Guidance v2.2, updated January 2024)

Activity	Small	Medium	Large
Demolition	Total building volume < 12,000m^3 Construction material with low potential for dust release (e.g. metal cladding or timber) Demolition activities < 6m above ground level Demolition during wetter months	Total building volume 12,000 – 75,000m^3 Potentially dusty construction material Demolition activities 6-12m above ground level	Total building volume > 75,000m^3 Potentially dusty construction material (e.g. concrete) On-site crushing and screening Demolition activities > 12m above ground level
Earthworks	Total site area < 18,000m^2 Soil type with large grain size (e.g. sand) < 5 heavy earth moving vehicles at any one time Formation of bunds <4m in height	Total site area 18,500 – 110,000 m^2 Moderately dusty soil type (e.g. silt) 5-10 heavy earth moving vehicles active at any one time Formation of bunds 3-6m in height	Total site area >110,000m^2 Potentially dusty soil type (e.g. clay) >10 heavy earth moving vehicles at any one time Formation of bunds >6m in height
Construction	Total building volume < 12,000m^3 Construction material with low potential for dust (e.g. metal cladding or timber)	Total building volume 12,000 – 75,000m^3 Potentially dusty construction material (e.g. concrete) On-site concrete batching	Total building volume > 75,000m^3 On-site concrete batching, sandblasting.
Trackout	< 20 HDV (>3.5t) outward movements* in any one day# Surface material with low potential for dust release Unpaved road length < 50m	20 – 50 HDV (>3.5t) outward movements* in any one day# Moderately dusty surface material (e.g. high clay content) Unpaved road length 50 – 100m	>50 HDV (>3.5t) outward movements* in any one day# Potentially dusty surface material (e.g. high clay content) Unpaved road length >100m

Activity	Small	Medium	Large
* A vehicle movement is a one-way journey, i.e. from A to B, and excludes the return journey. #HDV movements during a construction project vary over its lifetime, and the number of movements is the maximum not the average.			

J3.7 Consideration is given to the likely sensitivity of the area to the impacts of dust, establishing a sensitivity of low, medium or high for dust soiling, human health and ecological receptors. The sensitivity of the area considers a number of factors, including the specific sensitivities of receptors in the area, the proximity and number of those receptors, local baseline conditions such as background conditions and site-specific factors.

J3.8 The first step in identifying the sensitivity of the area is to establish the sensitivity of the receptor, based on the presence or level of activity associated with the area influenced by the Proposed Development. Professional judgement and site-specific information are used to assign an appropriate level of receptor sensitivity using the principles outlined in Table J3.2. Following this, the sensitivity of the area can be established from Tables J3.3-J3.5 based on the sensitivity of the receptor, number of receptors (in the case of human health and dust soiling) and the distance from source.

Table J3.2 Receptor Sensitivity Definitions (Source: IAQM Guidance, v2.2 updated January 2024)

Activity	Low	Medium	High
Dust Soiling	Enjoyment of amenity would not reasonably be expected; There is property that would not reasonably be expected to be diminished in appearance, aesthetics or value by soiling; Transient exposure, where people or property is only expected to be present for limited periods of time as part of the normal pattern of use; Indicative examples including playing fields, farmland, footpaths, short-term car parks and roads.	Users would expect to enjoy a reasonable level of amenity, but not reasonably at same level as in their home; The appearance, aesthetics or value of property could be diminished by soiling; Indicative examples include parks and places of work.	Users can reasonably expect enjoyment of a high level of amenity; The appearance, aesthetics or value of property would be diminished by soiling, and continuous or regularly extended periods of presence expected during normal pattern of land use; Indicative examples include dwellings, museum and other culturally important collections, medium and long-term car parks and car showrooms.
Human Health	Locations where human exposure is transient; Indicative examples include public footpaths, playing	Locations where the people exposed are workers#, and exposure is over a time period relevant to the air quality objective for PM_{10}*;	Locations where members of the public are exposed over a period of time relevant to the air quality objective for PM_{10}*;

Activity	Low	Medium	High
	fields, parks and shopping streets.	Indicative examples include office and shop workers, but not those occupationally exposed to dust.	Indicative examples include residential properties, hospitals, schools and residential care homes.
Ecological	Locations with a location designation where the features may be affected by dust deposition, e.g. Local Nature Reserve.	Locations where there is a particularly important plant species, where its dust sensitivity is uncertain or unknown; Locations with a national designation where the features may be affected by dust deposition, e.g. Site of Special Scientific Interest.	Locations with an international or national designation and the designated features may be affected by dust soiling, e.g. Special Area of Conservation with acid heathland; Location where there is a community of a particularly dust sensitive species such as vascular species included in the Red Data List for Great Britain.
*In the case of the 24-hour objectives, a relevant location would be one where individuals may be exposed for eight hours or more in a day, following Defra guidance. #Workers are considered to be less sensitive than the general public as a whole because the most sensitive to the effects of air pollution, such as young children, are not normally workers.			

Table J3.3 Sensitivity of the Area to Dust Soiling Effect on People and Property (Source: IAQM Guidance, v2.2 updated January 2024)

Receptor Sensitivity	Number of Receptors	Distance from Source			
		<20m	<50m	<100m	<250m
High	>100	High	High	Medium	Low
	10-100	High	Medium	Low	Low
	1-10	Medium	Low	Low	Low
Medium	>1	Medium	Low	Low	Low
Low	>1	Low	Low	Low	Low

Table J3.4 Sensitivity of the Area to Human Health Impacts (Source: IAQM Guidance, v2.2 updated January 2024)

Receptor Sensitivity	Annual Mean PM_{10} Concentration	Number of Receptors	Distance from Source			
			<20m	<50m	<100m	<250m
High	>32 µg/m^3	>100	High	High	High	Medium
		10-100	High	High	Medium	Low
		1-10	High	Medium	Low	Low
	28 – 32 µg/m^3	>100	High	High	Medium	Low
		10-100	High	Medium	Low	Low
		1-10	High	Medium	Low	Low
	24 - 28 µg/m^3	>100	High	Medium	Low	Low
		10-100	High	Medium	Low	Low
		1-10	Medium	Low	Low	Low

Receptor Sensitivity	Annual Mean PM_{10} Concentration	Number of Receptors	Distance from Source			
			<20m	<50m	<100m	<250m
	<24 µg/m^3	>100	Medium	Low	Low	Low
		10-100	Low	Low	Low	Low
		1-10	Low	Low	Low	Low
Medium	>32 µg/m^3	>10	High	Medium	Low	Low
		1-10	Medium	Low	Low	Low
	28 – 32 µg/m^3	>10	Medium	Low	Low	Low
		1-10	Low	Low	Low	Low
	24 - 28 µg/m^3	>10	Low	Low	Low	Low
		1-10	Low	Low	Low	Low
	<24 µg/m^3	>10	Low	Low	Low	Low
		1-10	Low	Low	Low	Low
Low	-	Low	Low	Low	Low	Low

Table J3.5 Sensitivity of the Area to Ecological Impacts (Source: IAQM Guidance, v2.2 updated January 2024)

Receptor Sensitivity	Distance from Source	
	<20m	<50m
High	High	Medium
Medium	Medium	Low
Low	Low	Low

Establishing Significance

J3.9 The risk of dust related impacts from the Proposed Development is established from the sensitivity of the area and the likely dust emission magnitude. The risk should be established, on the worst-case area sensitivity and in the absence of mitigation, for each of the construction related activities (demolition, earthworks, construction and track out) following the matrix in Table J3.6.

Table J3.6 Risk of Dust Impacts from Each Activity (Source: IAQM Guidance, v2.2 updated January 2024)

Sensitivity of Area	Activity	Dust Emission Magnitude		
		Large	Medium	Small
High	Demolition	High Risk	Medium Risk	Medium Risk
	Earthworks	High Risk	Medium Risk	Low Risk
	Construction	High Risk	Medium Risk	Low Risk
	Trackout	High Risk	Medium Risk	Low Risk
Medium	Demolition	High Risk	Medium Risk	Low Risk
	Earthworks	Medium Risk	Medium Risk	Low Risk
	Construction	Medium Risk	Medium Risk	Low Risk
	Trackout	Medium Risk	Medium Risk	Low Risk
Low	Demolition	Medium Risk	Low Risk	Negligible
	Earthworks	Low Risk	Low Risk	Negligible
	Construction	Low Risk	Low Risk	Negligible

Sensitivity of Area	Activity	Dust Emission Magnitude		
		Large	Medium	Small
	Trackout	Low Risk	Low Risk	Negligible

J3.10 The IAQM guidelines identify a range of mitigation measures intended to reduce the emission and effects of dust from construction sites and identify their likely applicability to a development based on the level of impact risk attributed. Consideration is given to these in the development of mitigation measures, with the significance of the residual effect based on professional judgement.

Road Traffic Emissions

J3.11 Road traffic is the main source of local pollution with respect to NO_2, PM_{10} and $PM_{2.5}$.

J3.12 Following consultation with the project transport consultant (DHA Transport), it was confirmed that traffic generated by the Proposed Development during both construction and operation will exceed the thresholds detailed in the IAQM & EPUK Air Quality (+/- 500 Annual Average Daily Traffic (AADT) for LGVs and/or +/- 100 AADT for HGVs – see Table J3.7). As such detailed dispersion modelling of construction and operational phase impacts has been undertaken.

Table J3.7 Daily Trip Generation (Annual Average Daily Traffic (AADT) Flows) – Construction and Operational

Road Link	Construction-Generated Road Traffic	Development-Generated Road Traffic
Twiss Road	55	533
Princes Parade	120	1539
Seabrook Road	45	765
Sandgate Esplanade	33	406
Sandgate High Street	33	406
East Street	55	533
Rampart Road	44	534
Military Road	44	534
Dymchurch Road	44	534
London Road	44	534
Hythe Road	44	534
Horn Street	12	355

J3.13 To consider the impact on NO_2, PM_{10} and $PM_{2.5}$ concentrations at specified sensitive receptor locations a detailed assessment has been undertaken using the air dispersion model ADMS-Urban, Version 5.0.1 (release date February 2022). This model uses detailed road traffic information, surface roughness, and local meteorological information to predict the impact on pollutant concentrations at specific receptor locations. A summary of the air quality modelling parameters for road traffic is provided below in Table J3.8.

Table J3.8 Air Quality Modelling Parameters.

Parameter	Local Area	Met. Measurement Site
Latitude (◦)	51	51

Parameter	Local Area	Met. Measurement Site
Surface Roughness (m)	1	1
Monin-Obukhov Length (m)	30	30

J3.14 The ADMS model uses meteorological data including wind speed and direction to determine how pollution is transported and diluted with distance from the source. For this assessment, meteorological data from 2024 (to align with the most recent ratified air quality monitoring dataset from FHDC) for Lydd has been utilised as this is considered representative of the Site. Whilst the Met Station at Dover is closer to the Site the data capture was poor.

Model Scenarios

J3.15 For the model verification and the assessment of traffic generated by demolition/construction and operational activities, five scenarios have been modelled:

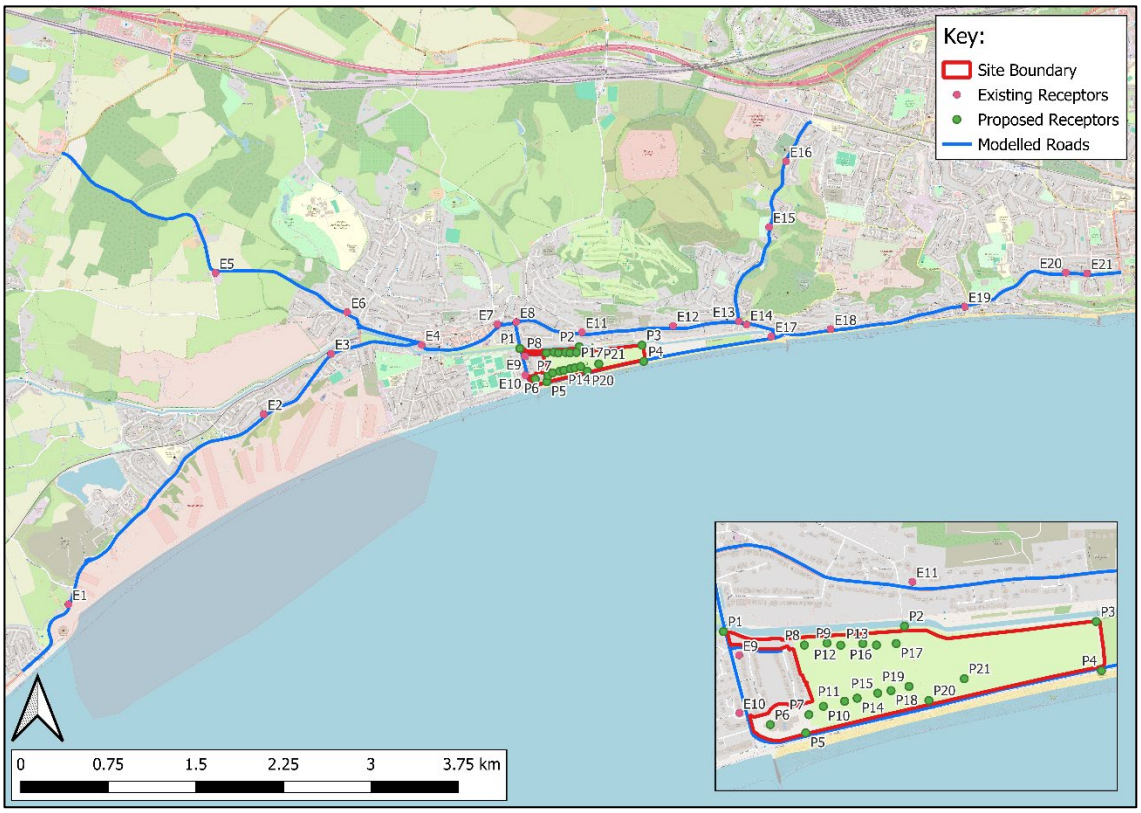
- 2024 Baseline + Verification
- 2028 Interim Baseline
- 2028 Interim Baseline + Peak Construction Traffic
- 2035 Baseline + Cumulative
- 2035 Baseline + Cumulative + Proposed Development

J3.16 A full breakdown of the traffic modelled for each scenario is provided within Appendix J1.

J3.17 Peak construction traffic has been added to the 2028 Interim Baseline for the purposes of the impact assessment. The construction of the Proposed Development is expected to commence in early 2028 and take approximately 7 years, with an anticipated completion year of 2035. By adding the peak construction trips to 2028 the worst—case scenario impacts of construction traffic emissions are captured when considering background concentrations.

J3.18 The receptors modelled within this assessment are identified in Figure J3.1 below. These are further detailed and illustrated in Appendix J2.

Figure J3.1 Modelled Roads and Receptor Locations. (Contains Ordnance Survey Data © Crown copyright database right 2026)



Vehicle Emission Factors

J3.19 Vehicle emission factors for input into ADMS-Urban have been calculated using Defra's Emissions Factors Toolkit (EFT), version 13.1 published in March 2025, available from the Defra website[24]. The EFT allows for the calculation of emission factors arising from road traffic for all years between 2021 and 2050. For the predictions of future year emissions, the toolkit takes into account factors such as anticipated advances in vehicle technology and changes in fleet composition, such that vehicle emissions are assumed to reduce over time.

J3.20 The EFT calculator has been used to calculate the emissions factors for NO_X, PM_{10} and $PM_{2.5}$.

J3.21 Emission factors for 2024 have been used for the baseline/model verification, 2028 for the construction scenarios and 2035 for the operational scenarios.

Model Verification

J3.22 The ADMS-Urban dispersion model has been validated by the software developer and is considered to be fit for purpose; however, local model validation, i.e. in the vicinity of the Proposed Development, has not been undertaken. Therefore, to validate the model and to determine how well the model is performing at a local level, a comparison of the modelling results with local monitoring data has been undertaken. The verification process aims to minimise model uncertainty and error by adjusted the modelled results by a factor to offer

greater confidence in the final results. This is undertaken in accordance with the methodology specified in Chapter 7, Section 4 of LAQM.TG22.

J3.23 Details of the verification factor calculations have been presented in Appendix J3. An adjustment factor of 5.2 was obtained during the verification process, which indicated that the model was under-predicting. This factor was applied to the modelled road-NO_X outputs prior to conversion to annual mean NO_2 concentrations utilising the NO_X to NO_2 calculator (version 9.1, released August 2024) provided by Defra.

J3.24 It is recognised that the adjustment factor is high however each individual monitor is performing well within the model with Root Square Mean Error ('RMSE') within the required 25% (see Appendix J3).

Point Source Emissions

J3.25 Following consultation with the project's sustainability consultant (Hilson Moran) it is understood that there is no on-site combustion plant for the provision of heating and hot water, with these provisions adopting an all-electric approach through Air Source Heat Pumps ('ASHP') and photovoltaic panels ('PV').

J3.26 There are no existing plant or any requirements for backup life-safety generators for the Proposed Development.

Significance Criteria

J3.27 For the construction stage, IAQM guidance has been used to determine the impact, the mitigation and the significance of effects.

J3.28 For the operational phase, EPUK and IAQM provide guidance for establishing the significance of air quality effects arising as a result of the Proposed Development. The magnitude of impact on individual receptors is dependent upon the long-term average pollutant concentrations at the receptor in the assessment year and the percentage change relative to the Air Quality Assessment Level (AQAL), as identified in Table J3.9.

J3.29 Where a 'Moderate' or 'Major' impact is identified, without the implementation of mitigation there is likely to be a Significant effect.

Table J3.9 Impact Descriptors

Long-term Average Concentration at Receptor in Assessment Year	Percentage Change in Concentration to AQAL*			
	1	2-5	6-10	>10
75% of less of AQAL	Negligible	Negligible	Minor	Moderate
76 – 94% of AQAL	Negligible	Minor	Moderate	Moderate
95 – 102% of AQAL	Minor	Moderate	Major	Major
103 – 109% of AQAL	Moderate	Moderate	Major	Major
110% or more of AQAL	Moderate	Major	Major	Major
* Where the % change is <0.5% the change is described as 'Negligible' regardless of concentration.				

J3.30 The guidelines do not, however, provide a set method for establishing the significance of impact. Whilst the establishment of the impact magnitude on individual receptors can be identified as negligible, minor, moderate, or major, the significance of the overall effect is dependent on a number of factors. Therefore, professional judgement will be applied to determine the likely significance of effects, with the following factors considered:

- The existing and future air quality in the absence of the development, notably whether the Air Quality Objectives are likely to be met or the scale of exceedances in the long-term and short-term concentrations;
- The extent of current and future population exposure to the impacts, notably the number of properties and/or people present and the scale of impact (e.g., whether the majority of the local population is subject to substantial or slight magnitude impacts);
- The influence and validity of any assumptions adopted when undertaking the prediction of impacts, such as establishing a worst-case scenario for sensitive receptors.

Sensitive Receptors

J3.31 Defra provides guidance on locations where the air quality objectives should apply and Table J3.10 and professional judgement have been used to select receptors where likely significant exposure to pollutant concentrations may occur.

Table J3.10 Defra guidelines on sensitive receptors and where the air quality objectives do/do not apply

Averaging Period	Objectives should apply	Objectives should not generally apply
Annual mean	All locations where members of the public might be regularly exposed. Building facades of residential properties, schools, hospitals, care homes etc.	Building facades of offices or other places of work where members of the public do not have regular access. Hotels, unless people live there as their permanent residence.
24-hour mean	All locations where the annual mean objective would apply, together with hotels. Gardens of residential properties.	Kerbside sites (as opposed to locations at the building façade), or any other locations where public exposure is expected to be short term.
1-hour mean	All locations where the annual mean and 24-hour mean objectives apply. Kerbside sites (for example, pavements of busy shopping streets) Those parts of car parks, bus stations and railway stations etc. which are not fully enclosed, where members of the public might reasonably be expected to spend one hour or more. Any outdoor locations where members of the public might reasonably expected to spend one hour or longer.	Kerbside sites where the public would not be expected to have regular access.
15-minute mean	All locations where members of the public might reasonably be exposed for a period of 15 minutes or longer.	-

Consultation

J3.32 A Scoping Opinion was received from FHDC on 29 January 2024, with full details provided in Appendix J4. Based on the content of the Scoping Opinion (January 2024), sensitive receptors were selected that were within the vicinity of the Site and along modelled roads that were representative of residential dwellings and pedestrian uses.

J3.33 Based on the content of the Scoping Opinion (January 2024), the RMC Local Wildlife Site was considered a sensitive ecological receptor within the demolition and construction assessment. In addition, the Public Rights of Way (PRoW) and the National Trail have been included within the construction and operational assessments.

J3.34 The operational assessment considers a worst-case assessment; hourly mean NO_2 and daily mean PM_{10} concentrations were modelled within the construction and operational assessments.

Assumptions and Limitations

J3.35 Professional judgement has been used in the completion of the construction dust assessment for the Proposed Development.

J3.36 It is assumed that the information provided by the transport consultants (DHA Transport) is accurate.

J3.37 The ADMS-Urban dispersion models have been used in this assessment to assess the existing and future baseline concentrations in the vicinity of the Site. The dispersion model relies on input data, such as traffic data and predicted emissions data, etc., which may have uncertainties associated with them. The models simplify complex environments and do not always accurately reflect local micro-climatic conditions which may ultimately affect the predicted pollutant concentrations.

J3.38 The ADMS Coastline module has not utilised within this model. In accordance with the ADMS-Urban User Guide and Technical Specification Note P15/01J/17, the effect of a coastline will generally only be significant for emissions from elevated point sources, and will not influence road emissions.

J3.39 The committed and cumulative developments that were included in the traffic data are further detailed in Chapter H: Traffic and Transport, Section H3 paragraph H3.20.

J3.40 The assumptions made in the assessment are considered reasonable and robust.

J4.0 Baseline Conditions

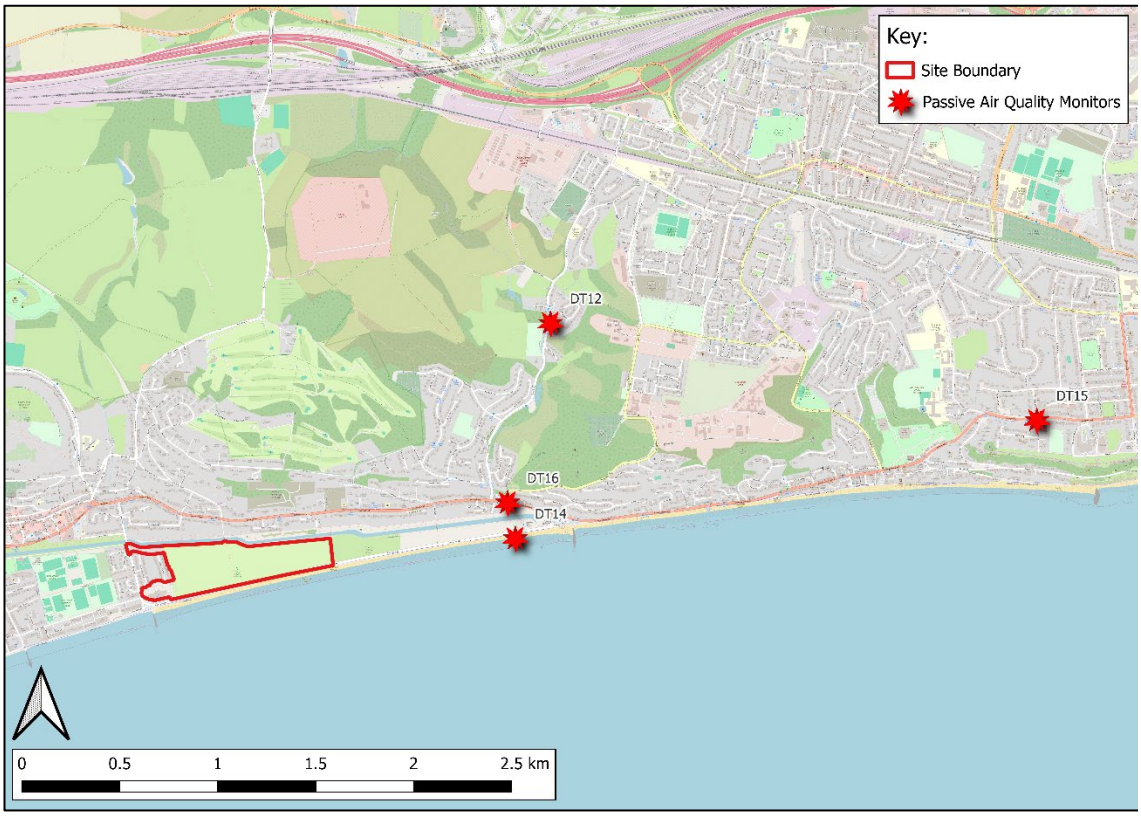
Current Conditions

Local Air Quality Information

J4.1 FHDC currently do not have any declared Air Quality Management Areas (AQMA) within their administrative area.

J4.2 FHDC operate a network of air quality monitors, which includes 18 NO_2 passive diffusion tube locations. No automatic monitoring or monitoring of Particulate Matter (PM_{10} and $PM_{2.5}$) is currently undertaken by FHDC. The air quality monitors most relevant to the location of the Site are identified below in Figure J4.1 and further detailed in Appendix J5.

Figure J4.1 Location of Diffusion Tube Air Quality Monitors most relevant to the location of the site. (Contains Ordnance Survey Data © Crown copyright database right 2026)



Defra Background Maps

J4.3 Background concentrations for NO_2, PM_{10} and $PM_{2.5}$ for the 1x1 km grid squares within which the Site and surrounding receptors are located have been taken from 2021 based Defra background maps for Folkestone and Hythe and are presented in Table J4.1.

Table J4.1 Defra Concentrations (µg/m3)

Grid Square	Pollutant	Pollutant Concentration (µg/m^3)		
		2024	2028	2035
618500, 135500	NO_2	7.24	6.33	5.19
	PM_{10}	9.51	9.18	8.79
	$PM_{2.5}$	5.70	5.40	5.04
616500, 134500	NO_2	7.77	6.74	5.43
	PM_{10}	9.34	9.01	8.62
	$PM_{2.5}$	5.77	5.46	5.10
617500, 134500	NO_2	7.16	6.25	5.10
	PM_{10}	8.75	8.42	8.04
	$PM_{2.5}$	5.45	5.16	4.81

J4.4 Background concentrations for NO_2, PM_{10} and $PM_{2.5}$ are all below the relevant Air Quality Standards (AQS) objectives — 40 µg/m^3 for NO_2 and PM_{10}, and 20 µg/m^3 for $PM_{2.5}$.

Local Air Quality Monitoring Data

J4.5 A summary of air quality monitoring sites which are considered representative of the Site (<1km of the site boundary) as shown in Figure J4.1, are detailed in Table J4.2.

J4.6 It should be noted that monitoring data collected during 2020 and 2021 is unlikely to be representative of current air quality conditions due to the impact of COVID-19.

Nitrogen Dioxide

J4.7 The annual mean NO_2 concentrations at the diffusion tube locations in the vicinity of the Site are presented in Table J4.2.

J4.8 The annual mean objective (40µg/m^3) was met at all four monitoring locations between 2020-2024.

J4.9 The WHO guideline for annual mean NO_2 concentrations (10µg/m^3) was met at one monitoring location in 2024: DT6. The diffusion tubes are located in kerbside and roadside locations along major highways; therefore, concentrations are expected to be elevated, comparatively we would expect concentrations to be reduced at the Site.

Table J4.2 HDC Diffusion Tube Monitoring – Annual Mean NO_2

Site	X, Y	Type	Annual Mean (µg/m^3)				
			2020*	2021*	2022	2023	2024
DT6 – Cold Harbour	614552, 134012	Roadside	9.7	9.9	10.8	9.4	7.4
DT12 – Horn Street	618860, 135899	Kerbside	14.1	14.7	14.8	14.2	12.4
DT14 – Princes Parade	618727, 134797	Roadside	12.9	13.2	14.0	15.1	12.6
DT16 – Seabrook Road	618680, 134977	Roadside	14.4	18.0	15.8	14.7	12.1
Bold indicates an exceedance of the AQS objective. *Concentrations are unlikely to be a true representation of reality due to traffic reduction related to COVID-19.							

Receptors and Receptor Sensitivity

Human Receptors

J4.10 Existing receptors have been selected in locations that are likely to experience the greatest impact from traffic generated by the Proposed Development during construction and operation, based on this a worst-case scenario has been assessed. A summary of the existing receptors in the vicinity of the Site is presented in Table J4.3 below and Figure J3.1 (further detailed in Appendix J2). Background concentrations at each receptor location is also provided in Appendix J2.

Table J4.3 Existing human receptors in the vicinity of the Site.

Receptor ID	Address	Distance from Site (km)	Type	Sensitivity
E1	Sunflower Cottage	4.5	Residential	High
E2	Pennypot Dental Hythe	2.3	Healthcare	High
E3	82 Dymchurch Road	1.7	Residential	High
E4	The Red Lion	1.0	Pub	High
E5	Pedlinge Court	2.8	Residential	High
E6	14 London Road	1.7	Residential	High
E7	Copper's Indian Restaurant and Bar	0.5	Restaurant	Medium
E8	The Bell Inn	0.5	Pub	High
E9	6 Imperial Green	0.2	Residential	High
E10	1 Fisher Close	0.1	Residential	High
E11	Marist Sisters Assisted Living	0.5	Carehome	High
E12	Abbey Lodge Residential Carehome	1.2	Carehome	High
E13	Fountain Inn	1.8	Pub	Medium
E14	Seabrook C of E Primary School	1.8	School	High
E15	8 Horn Street	2.4	Residential	High
E16	St Martin's C of E Primary School	2.8	School	High
E17	1 Olivia Court	2.0	Residential	High
E18	Spencer Court	2.5	Residential	High
E19	Conscious Health Clinic	3.7	Healthcare	High
E20	Sandgate Road Surgery	4.6	Healthcare	High
E21	158D Sandgate Road	4.8	Residential	High

Proposed Receptors

J4.11 Proposed receptors were selected in locations that are likely to experience the greatest impact from traffic generated by the Proposed Development during operation, based on this a worst-case scenario has been assessed. A summary of the proposed receptors in the vicinity of the Site is presented in Table J4.4 below and Figure J3.1 (further detailed in Appendix J2). Background concentrations at each receptor location is also provided in Appendix J2.

Table J4.4 Proposed human receptors in the vicinity of the Site.

Receptor ID	X, Y	Type	Sensitivity
P1	616740, 134687	Residential	High
P2	617246, 134723	Golf Course/Leisure	Medium
P3	617783, 134759	Golf Course/Leisure	Medium
P4	617804, 134622	Golf Course/Leisure	Medium
P5	616982, 134413	Hotel	Medium
P6	616882, 134432	Hotel	Medium
P7	616989, 134464	Hotel	Medium
P8	616968, 134658	Residential	High
P9	617031, 134667	Residential	High
P10	617029, 134489	Residential	High
P11	617087, 134506	Residential	High
P12	617070, 134662	Residential	High
P13	617132, 134670	Residential	High
P14	617122, 134516	Residential	High
P15	617179, 134533	Residential	High
P16	617170, 134667	Residential	High
P17	617225, 134673	Residential	High
P18	617216, 134541	Residential	High
P19	617266, 134555	Residential	High
P20	617324, 134518	Golf Course/Leisure	Medium
P21	617420, 134583	Golf Course/Leisure	Medium

Ecological receptors

J4.12 Recognised ecological designations within the vicinity of the Site include:

- There are areas of Designated Ancient Woodland within 2km of the Site, with the nearest located approximately 800m to the northeast (Paraker Wood) and also areas of Deciduous Woodland classified as Priority Habitat located within 250m of the Site (the nearest approximately 185m to the northwest).
- Sites of Special Scientific Interest ('SSSI') in proximity to the Site include Seabrook Stream (approximately 1.7km northeast); The Folkestone to Etchinghill Escarpment (approximately 3km north); Lympne Escarpment (approximately 2km west); and the Otterpool Quarry (approximately 5.7km northwest).

J4.13 As none of these is located within 50m of the boundary of the Site or within 50m of the route(s) used by construction vehicles on the public highway, up to 250m from the Site entrance the impacts of construction dust on these receptors has been scoped out.

J4.14 Although not a nationally designated ecological designation, the effects of construction dust on the RMC Local Wildlife Site have been scoped in, in accordance with the Scoping Opinion (January 2024).

J4.15 In accordance with the IAQM guidance[25], an assessment of traffic emissions on ecological receptors has been scoped out, on the basis at the development trips and cumulative trips (cumulative and in-combination) do not exceed the 1000 AADT threshold on relevant roads (roads within 200m of a designated ecological site), i.e., Dymchurch Road.

Future Baseline

J4.16 With or without the Proposed Development coming forward there is likely to be an improvement in local air quality conditions due to the potential reduction in tailpipe emissions from road traffic as cleaner and more efficient vehicle technologies become available. This might include the increased uptake of electric and hybrid vehicles (cars, vans, lorries, and buses), both of which have the potential to substantially decrease NOx emissions and greater uptake of sustainable travel methods such as public transport, walking and cycling.

J5.0 Potential Effects

J5.1 This section discusses the potential effects at existing and proposed receptors during the demolition, construction, and operational phases of the Proposed Development.

Embedded Mitigation

J5.2 The IAQM guidelines provide an indication of the mitigation measures that would be appropriate for inclusion within the Proposed Development, based on the level of risk of dust related impacts identified for each of the activities during the construction phase. A site-specific Construction Environmental Management Plan ('CEMP') has been prepared and is provided at Appendix C4. It is anticipated that a detailed CEMP (or CEMPs) will be developed in accordance with the submitted CEMP, providing further detail on how the measures therein will be delivered.

J5.3 The principles and measures included in the CEMP (Appendix C4) that will be implemented during construction and demolition works which are relevant to air quality are reflective of those set out in the IAQM guidance. Mitigation measures that are generic to each of the activities, and therefore should be implemented for the duration of the construction related works (as set out in the CEMP) where applicable are identified in Table J5.1, whilst activity specific mitigation measures are identified in Table J5.2.

Table J5.1 Mitigation to be implemented during the construction phase (Source: IAQM Construction and Demolition Guidance, v2.2 updated January 2024)

Development Element	Mitigation Measure
Communication	• Develop and implement a stakeholder communications plant that includes community engagement before work commences on site. • Display the name and contact details of person(s) accountable for air quality and dust issues on the site boundary. This may be the environment manager/engineer or the site manager. • Display the head or regional office contact information. • Develop and implement a Dust Management Plan (DMP), which may include measures to control other emissions, approved by the Local Authority. The level of detail will depend on the risk, and should include as a minimum the measures recommended in this table.
Site Management	• Record all dust and air quality complaints, identify cause(s), take appropriate measures to reduce emissions in a timely manner, and record the measures taken. • Make the complaints log available to the local authority when asked. • Record any exceptional incidents that cause dust and/or emissions, either on- or off- site, and the action taken to resolve the situation in the log book. • Hold regular liaison meetings with other high risk construction sites within 250m of the site boundary, to ensure plans are co-ordinated and dust and particulate matter emissions are minimised.
Monitoring	• Undertake daily on-site and off-site inspection, where receptors (including roads) are nearby, to monitor dust, record inspection results, and make

Development Element	Mitigation Measure
	the log available to the local authority when asked. This should include regular dust soiling checks of surfaces such as street furniture, cars and window sills within 100m of the site boundary, with cleaning provided if necessary. • Carry out regular site inspections to monitor compliance with the DMP, record inspection results, and make an inspection log available to the local authority when asked. • Increase the frequency of site inspections by the person accountable for air quality and dust issues on site when activities with a high potential to produce dust are being carried out and during prolonged dry or windy conditions. • Agree dust deposition, dust flux, or real-time PM10 continuous monitoring locations with the Local Authority. Where possible commence baseline monitoring at least three months before work commences on site or, if at a large site, before work on a phase commences. Further guidance is provided by IAQM on monitoring during demolition, earthworks and construction.
Preparing and Maintaining the Site	• Plan site layout so that machinery and dust causing activities are located away from receptors, as far as is possible. • Erect solid screens or barriers around dusty activities or the site boundary that are at least as high as any stockpiles on site. • Fully enclose site or specific operations where there is a high potential for dust production and the site is active for an extensive period. • Avoid site run-off of water or mud. • Keep site fencing, barriers and scaffolding clean using wet methods. • Remove materials that have a potential to produce dust from site as soon as possible, unless being re-used on site. If they are being re-used on-site cover as described below. • Cover, seed or fence stockpiles to prevent wind whipping.
Operating Vehicle / Vehicle Movements	• Ensure all vehicles switch off engines when stationary – no idling vehicles. • Avoid the use of diesel or petrol powered generators and use mains electricity or battery powered equipment where practicable. • Impose and signpost a maximum speed-limit of 15 mph on surfaced and 10 mph on unsurfaced haul roads and work areas (if long haul routes are required these speeds may be increased with suitable additional control measures provided, subject to the approval of the nominated undertaker and with the agreement of the local authority, where appropriate). • Produce a Construction Logistics Plan to manage the sustainable delivery of goods and materials. • Implement a Travel Plan that supports and encourages sustainable travel (public transport, cycling, walking and car-sharing).
Operations	• Only use cutting, grinding or sawing equipment fitted or in conjunction with suitable dust suppression techniques such as water sprays or local extraction, e.g. suitable local exhaust ventilation systems.

Development Element	Mitigation Measure
	• Ensure an adequate water supply on the site for effective dust/particulate matter suppression/mitigation, using non-potable water where possible and appropriate. • Use enclosed chutes and conveyors and covered skips. • Minimise drop heights from conveyors, loading shovels, hoppers and other loading or handling equipment and use fin water sprays on such equipment wherever appropriate. • Ensure equipment is readily available on site to clean any dry spillages, and clean up spillages as soon as reasonably practicable after the event using wet cleaning methods.
Waste Management	• Avoid bonfires and burning of waste materials.

Table J5.2 Activity specific mitigation measures to be implemented during the construction phase (Source: IAQM Construction and Demolition Guidance, v2.2 updated January 2024)

Development Phase	Mitigation Measure
Demolition	• Soft strip inside buildings before demolition (retaining walls and windows in the rest of the building where possible). • Ensure effective suppression is used during demolition. Hand held sprays are more effective than hoses attached to equipment as the water can be directed to where it is needed. Additionally, high volume water suppression systems can produce fine water droplets that effectively • Avoid explosive blasting, using appropriate manual or mechanical alternatives. • Bag and remove any biological debris or damp down such material before demolition.
Earthworks	• Re-vegetate earthworks and exposed areas/soil stockpiles to stabilise surfaces as soon as practicable. • Use Hessian, mulches or trackifiers where possible to re-vegetate or cover with topsoil, as soon as practicable. • Only remove the cover in small areas during work and not all at once.
Construction	• Avoid scabbling (roughening of concrete surfaces) if possible. • Ensure sand and other aggregates are stored in bunds in areas that are not allowed to dry out, unless this is required for a particular process, in which case ensure that appropriate additional control measures are in place. • Ensure bulk cement and other fine powder materials are delivered in enclosed tankers and stored in silos with suitable emission control systems to prevent escape of material and overfilling during delivery. • For small supplies of fine powder materials, ensure bags are sealed after use and stored appropriately to prevent dust.
Trackout	• Use water-assisted dust sweeper(s) on the access and local roads, to remove, as necessary, any material tracked out of the site. This may require the sweeper being continuously in use. • Avoid dry sweeping of large areas.

Development Phase	Mitigation Measure
	• Ensure vehicles entering and leaving sites are covered to prevent escape of materials during transport. • Inspect on-site haul routes for integrity and instigate necessary repairs to the surface as soon as reasonably practicable. • Record all inspections of haul routes and any subsequent action in a site log book. • Install hard surface haul routes, which are regularly damped down with fixed or mobile sprinkler systems, or mobile water bowsers and regularly cleaned. • Implement a wheel washing system (with rumble grids to dislodge accumulated dust and mud prior to leaving the site where reasonably practicable). • Ensure there is an adequate area of hard surfaced road between the wheel wash facility and the site exit, wherever site size and layout permits. • Access gates to be located at least 10m from receptors where possible.

Major Hazards and Accidents

J5.4 No relevance between major hazards and accidents and air quality effects has been made; therefore, no further consideration of major hazards and accidents has been made within this assessment.

Phasing

J5.5 Construction phasing set out in Chapter C: Site and Scheme Description has been used to determine the scenarios chosen for traffic modelling, as per Paragraph J3.17.

During Construction

Assessment of Construction Dust

Dust Emission Magnitude

J5.6 The likely magnitude of dust emissions from the Proposed Development for the four main activities have been assessed, as identified in Table J5.3.

Table J5.3 Predicted Magnitude of Dust Emissions from Proposed Development

Activity	Magnitude	Justification
Demolition	Small	Demolition is proposed for some existing hotel areas and existing golf clubhouse; total building volume is <12,000 m3 with potentially dusty construction material e.g. concrete, on site crushing and screening; demolition activities <6 m above ground level.
Earthworks	Large	The Proposed Development includes residential development and the landscaping of the existing golf course. The site area is >110,000 m2. Focus will be placed on raising ground levels and building up, rather than digging below ground, with regards to the golf course. Due to the

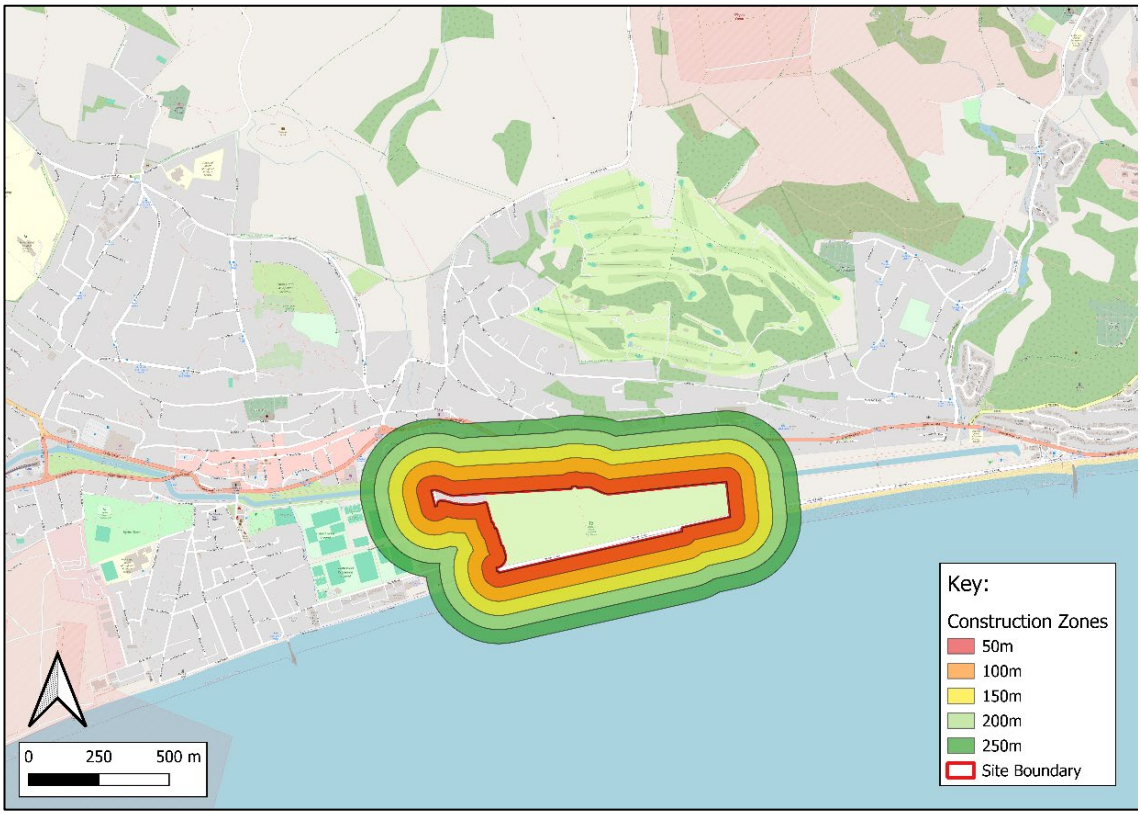
Activity	Magnitude	Justification
		size of the site, the magnitude of earthworks has been classified as Large.
Construction	Large	The Proposed Development comprises construction of golf and leisure offerings, hotel extension and residential scheme. Total building volume >75,000 m3 with potential for dusty construction material (e.g. on site concrete batching, sandblasting). As such, the magnitude of construction has been classified as Large.
Trackout	Large	Vehicle routing has been designed to minimise trackout, as per the CEMP. One-way systems, wheel-wash facilities and checks to ensure vehicles are free from mud and debris prior to leaving the site will be incorporated during the construction phase. Due to the size of the Site, trackout has been classified as Large.

Sensitivity of the Local Area

J5.7 A wind rose for 2024 for Lydd, provided in Appendix J6, indicates that the prevailing wind direction is predominantly from the Southwest. Therefore, existing receptors that are located in the northeast are most likely to fall within the area of influence from dust emissions generated by the construction phase at the site.

J5.8 The majority of dust generated by the construction stage is likely to be deposited in close proximity to the source (within 250m) – Figure J5-1 indicates the construction zone of influence.

Figure J5.1 Zones of Construction Influence (Contains Ordnance Survey Data © Crown copyright database right 2026)



J5.9 The closest existing receptors, as identified in Table J4.3, are residential dwellings located on Imperial Green and Twiss Road (represented by Receptor ID E9 and E10) which are classified as High sensitivity receptors and are located within 50m and 100m of the Site boundary respectively. It is estimated that within 150m of the Site boundary there are over 100 high sensitivity receptors.

J5.10 With regards to ecological receptors, the RMC Local Wildlife Site has been classified as **Low** sensitivity in accordance with IAQM guidance, as this designation is locally recognised (not nationally).

J5.11 The 2024 background PM_{10} concentrations at the Site (detailed in Table J4.1.), taken from the Defra background maps are 9.51 µg/m^3, 9.34 µg/m^3 and 8.75 µg/m^3 (grid squares 618500,135500; 616500, 134500; and 617500, 134500 respectively), and remain well below the relevant annual mean AQS objective.

Receptor Sensitivity

J5.12 The sensitivity of the area to each of the previously identified impact types associated with the Proposed Development are identified in Table J5.4.

Table J5.4 Sensitivity of Receptors to Dust Emission Effects

Dust Emission Effect	Sensitivity of Surrounding Area			
	Demolition	Earthworks	Construction	Trackout
Dust Soiling	Medium	Medium	Medium	Medium

Dust Emission Effect	Sensitivity of Surrounding Area			
	Demolition	Earthworks	Construction	Trackout
Human Health	Low	Low	Low	Low
Ecological	Low	Low	Low	Low

Risk of Impact

J5.13 To determine the risk of impacts prior to the implementation of mitigation, the dust emissions magnitude and the sensitivity of the area have been combined. Table J5.5 below summarises the potential risk of impacts during the construction phase.

Table J5.5 Potential Risk During the Construction Phase

Dust Emission Effect	Risk			
	Demolition	Earthworks	Construction	Trackout
Dust Soiling	Medium	High	High	High
Human Health	Medium	High	High	High
Ecological	Negligible	Low	Low	Low

J5.14 The risk of dust soiling related impacts from the Proposed Development on existing receptors in the vicinity of the Site is **Medium** to **High** without the implementation of mitigation. With embedded mitigation in place only (no additional mitigation), the potential effect is classified as Minor Adverse and Not Significant upon residential receptors within 150m of the Site (represented by residents of Twiss Road and Imperial Green (Receptors E9 and E10)).

The risk of dust related impacts on human health receptors during the construction phase is **Medium** to **High** without the implementation of mitigation. With embedded mitigation in place only (no additional mitigation), the potential effect is classified as Minor Adverse and Not Significant.

The risk of dust related impacts on ecological receptors during the construction phase is **Low** to **Negligible** without the implementation of mitigation. With embedded mitigation in place only (no additional mitigation), the potential effect is classified as Negligible and Not Significant.

Construction Traffic Emissions

J5.15 A detailed assessment using ADMS-Urban has been undertaken to consider the impacts on pollutant concentrations of NO_2, PM_{10} and $PM_{2.5}$ at existing receptors during the construction phase. A summary of the results is provided below: a full suite of results is also provided in Appendix J7.

Annual Mean NO_2

J5.16 The objective for annual mean NO_2 is 40 $\mu g/m^3$.

J5.17 In both the '2028 Baseline' and '2028 Baseline + Construction Traffic' scenarios, annual mean NO_2 concentrations were below the annual AQS objective at all existing receptor locations.

J5.18 The highest predicted concentration during the construction peak was 15.2 μg/m^3 at receptor E8 (The Bell Inn).

J5.19 The greatest predicted change in annual mean NO_2 concentrations brought about by construction traffic at any existing receptor location was 0.3 μg/m^3 at receptor E8. In accordance with EPUK and IAQM guidance, the impacts of construction traffic on annual mean NO_2 concentrations at all existing receptors is considered **Negligible**. Consequently, the potential effect has been classified as Not Significant.

J5.20 On this basis, mitigation to protect existing receptors from elevated annual mean NO_2 concentrations resulting from construction traffic is not required.

Hourly Mean NO_2

J5.21 The objective for hourly mean NO_2 concentrations is 200 μg/m^3, not to be exceeded more than 18 times a year.

J5.22 In both the '2028 Baseline' and '2028 Baseline + Construction Traffic' scenarios, hourly mean NO_2 concentrations were below the hourly AQS objective at all existing receptor locations.

J5.23 The highest predicted concentration during the construction peak was 50.7 μg/m^3 at existing receptor E8 (The Bell Inn).

J5.24 The greatest predicted change in hourly mean NO_2 brought about by construction traffic at any existing receptor location was 1.1 μg/m^3 at receptor E7 (Copper's Indian Restaurant and Bar).

J5.25 In accordance with EPUK and IAQM guidance, the impacts of construction traffic on hourly mean NO_2 concentrations at all existing receptors is considered **Negligible**. Consequently, the potential effect has been classified as Not Significant.

J5.26 On this basis, mitigation to protect existing receptors from elevated hourly mean NO_2 concentrations resulting from construction traffic is not required.

Annual Mean PM_{10}

J5.27 The objective for annual mean PM_{10} is 40 μg/m^3.

J5.28 In both the '2028 Baseline' and '2028 Baseline + Construction Traffic' scenarios, annual mean PM_{10} concentrations were below the annual AQS objective at all existing receptor locations.

J5.29 The highest predicted concentration during the construction peak was 13.4 μg/m^3 at receptor E8 (The Bell Inn).

J5.30 The greatest predicted change in annual mean PM_{10} concentrations brought about by construction traffic at any existing receptor location was 0.1 μg/m^3 at receptors E4 (The Red Lion), E6 (14 London Road) and E8 (The Bell Inn). In accordance with EPUK and IAQM guidance, the impacts of construction traffic on annual mean PM_{10} concentrations at all existing receptors is considered **Negligible**. Consequently, the potential effect has been classified as Not Significant.

J5.31 On this basis, mitigation to protect existing receptors from elevated annual mean PM_{10} concentrations resulting from construction traffic is not required.

Daily Mean PM_{10}

J5.32 The AQS objective for daily mean PM_{10} concentrations is 50 μg/m^3, not to be exceeded more than 35 days a year.

J5.33 In both the '2028 Baseline' and '2028 Baseline + Construction Traffic' scenarios, daily mean PM_{10} concentrations were below the daily AQS objective at all existing receptor locations.

J5.34 The maximum number of days predicted to exceed the daily mean PM_{10} objective is 5 days at existing receptors E10 (1 Fisher Close), E12 (Abbey Lodge Residential Carehome) and E17 (1 Olivia Court).

J5.35 There are no predicted changes in days of exceedance in both the '2028 Baseline' and '2028 Baseline + Construction Traffic' scenarios. In accordance with EPUK and IAQM guidance, the impacts of construction traffic on daily mean PM_{10} concentrations at all existing receptors is considered **Negligible**. Consequently, the potential effect has been classified as Not Significant.

J5.36 On this basis, mitigation to protect existing receptors from elevated daily mean PM_{10} concentrations resulting from construction traffic is not required.

Annual Mean $PM_{2.5}$

J5.37 The AQS objective for annual mean $PM_{2.5}$ concentrations is 20 μg/m^3.

J5.38 In both the '2028 Baseline' and '2028 Baseline + Construction Traffic' scenarios, annual mean $PM_{2.5}$ concentrations were below the annual AQS objective at all existing receptor locations.

J5.39 The highest predicted concentration during the construction peak was 7.8 μg/m^3 at receptor E8 (The Bell Inn).

J5.40 The greatest predicted change in annual mean $PM_{2.5}$ concentrations brought about by construction traffic was 0.1 μg/m^3 at receptors E2 (Pennypot Dental Hythe), E7 (Copper's Indian Restaurant and Bar), E8 (The Bell Inn), E12 (Abbey Lodge Residential Carehome) and E17 (1 Olivia Court). In accordance with EPUK and IAQM guidance, the impacts of construction traffic on annual mean $PM_{2.5}$ concentrations at all existing receptors is considered **Negligible**. Consequently, the potential effect has been classified as Not Significant.

J5.41 On this basis, mitigation to protect existing receptors from elevated annual mean $PM_{2.5}$ concentrations resulting from construction traffic is not required.

Summary

J5.42 During the construction phase, in accordance with EPUK and IAQM guidance, the impacts of construction traffic arising from the Proposed Development on pollutant concentrations (NO_2, PM_{10} and $PM_{2.5}$) at all existing receptors is considered **Negligible**. Consequently, the potential effect has been classified as Not Significant.

During Operation

Annual Mean NO_2

J5.43 The objective for annual mean NO_2 is 40 μg/m³.

J5.44 In both the '2035 Baseline + Cumulative' and '2035 Baseline + Cumulative + Proposed Development' scenarios, annual mean NO_2 concentrations were below the annual AQS objective at all existing and proposed receptor locations.

J5.45 The highest predicted concentration during operation in 2035 was 10.0 μg/m³ at receptor E8 (The Bell Inn).

J5.46 The greatest predicted change in annual mean NO_2 brought about by operational traffic at any receptor location was 1.5 μg/m³ at existing receptors E4 (The Red Lion) and E8 (The Bell Inn) and proposed receptor P5 (616982, 134413). In accordance with EPUK and IAQM guidance, the impacts of operational traffic on annual mean NO_2 concentrations at all existing and proposed receptors is considered **Negligible**. Consequently, the potential effect has been classified as Not Significant.

J5.47 On this basis, mitigation to protect existing and proposed receptors from elevated annual mean NO_2 concentrations resulting from operational traffic is not required.

Hourly Mean NO_2

J5.48 The objective for hourly mean NO_2 concentrations is 200 μg/m³, not to be exceeded more than 18 times a year.

J5.49 In both the '2035 Baseline + Cumulative' and '2035 Baseline + Cumulative + Proposed Development' scenarios, hourly mean NO_2 concentrations were below the hourly AQS objective at all existing and proposed receptor locations.

J5.50 The highest predicted concentration during operation in 2035 was 28.4 μg/m³ at existing receptor E8 (The Bell Inn).

J5.51 The greatest predicted change in hourly mean NO_2 brought about by operational traffic at any receptor location was 1.2 μg/m³ at existing receptor E17 (1 Olivia Court).

J5.52 In accordance with EPUK and IAQM guidance, the impacts of operational traffic on hourly mean NO_2 concentrations at all existing and proposed receptors is considered **Negligible**. Consequently, the potential effect has been classified as Not Significant.

J5.53 On this basis, mitigation to protect existing and proposed receptors from elevated hourly mean NO_2 concentrations resulting from operational traffic is not required.

Annual Mean PM_{10}

J5.54 The objective for annual mean PM_{10} is 40 μg/m³.

J5.55 In both the '2035 Baseline + Cumulative' and '2035 Baseline + Cumulative + Proposed Development' scenarios, annual mean PM_{10} concentrations were below the annual AQS objective at all existing and proposed receptor locations.

J5.56 The highest predicted concentration during operation in 2035 was 13.7 μg/m^3 at existing receptor E8 (The Bell Inn).

J5.57 The greatest change in concentration brought about by the Proposed Development was 0.7 μg/m^3 at existing receptor E8 (The Bell Inn), E17 (1 Olivia Court) and proposed receptor P4 (617804, 134622).

J5.58 In accordance with EPUK and IAQM guidance, the impacts of operational traffic on annual mean PM_{10} concentrations at all existing and proposed receptors is considered **Negligible**. Consequently, the potential effect has been classified as Not Significant.

J5.59 On this basis, mitigation to protect existing and proposed receptors from elevated annual mean PM_{10} concentrations resulting from operational traffic is not required.

Daily Mean PM_{10}

J5.60 The AQS objective for daily mean PM_{10} concentrations is 50 μg/m^3, not to be exceeded more than 35 days a year.

J5.61 In both the '2035 Baseline + Cumulative' and '2035 Baseline + Cumulative + Proposed Development' scenarios, daily mean PM_{10} concentrations were below the daily AQS objective at all existing receptor locations.

J5.62 The maximum number of days predicted to exceed the daily mean PM_{10} objective is 7 days at a number of proposed receptors (P2, P3, P4, P9-P21).

J5.63 There are improvements in changes of days of exceedance from the '2035 Baseline + Cumulative' scenario to the '2035 Baseline + Cumulative + Proposed Development' scenarios, with the greatest change seen at proposed receptor P4 (617804, 134622) where exceedance days decrease by 2 days. This is attributed to a decrease in the percentage of HGVs which is set out in the traffic data (see Appendix J1).

J5.64 In accordance with EPUK and IAQM guidance, the impacts of operational traffic on daily mean PM_{10} concentrations at all existing and proposed receptors is considered **Negligible**. Consequently, the potential effect has been classified as Not Significant.

J5.65 On this basis, mitigation to protect existing and proposed receptors from elevated daily mean PM_{10} concentrations resulting from operational traffic is not required.

Annual Mean $PM_{2.5}$

J5.66 The objective for annual mean $PM_{2.5}$ is 20 μg/m^3.

J5.67 In both the '2035 Baseline + Cumulative' and '2035 Baseline + Cumulative + Proposed Development' scenarios, annual mean $PM_{2.5}$ concentrations were below the annual AQS objective at all existing and proposed receptor locations.

J5.68 The highest predicted concentration during operation in 2035 was 8.0 μg/m^3 at existing receptor E8 (The Bell Inn).

J5.69 The greatest change in $PM_{2.5}$ concentration brought about by the Proposed Development was 0.6 μg/m^3 at existing receptor E8 (The Bell Inn).

J5.70 In accordance with EPUK and IAQM guidance, the impacts of operational traffic on annual mean $PM_{2.5}$ concentrations at all existing and proposed receptors is considered **Negligible**. Consequently, the potential effect has been classified as Not Significant.

J5.71 On this basis, mitigation to protect existing and proposed receptors from elevated annual mean $PM_{2.5}$ concentrations resulting from operational traffic is not required.

Summary

J5.72 During the operational phase, in accordance with EPUK and IAQM guidance, the impacts of operational traffic arising from the Proposed Development on pollutant concentrations (NO_2, PM_{10} and $PM_{2.5}$) at all existing and proposed receptors is considered **Negligible**. Consequently, the potential effect has been classified as Not Significant.

J6.0 Mitigation and Monitoring

During Construction

Construction Dust

J6.1 The IAQM guidelines provide an indication of the mitigation measures that would be appropriate for inclusion within the Proposed Development, based on the level of risk and dust related impacts identified for each of the construction activities (Low to High). The relevant mitigation measures are included within Section J5.0 of this Chapter. No additional mitigation with regards to construction dust is required.

Construction Traffic

J6.2 The impacts of construction traffic on air quality (NO_2, PM_{10} and $PM_{2.5}$) were determined as **Negligible** at all existing receptor locations and the effects are **Not Significant**. On this basis, mitigation for these pollutants is not required. However, this does not deter from good site practice as set out in the CEMP.

During Operation

Operational Traffic

J6.3 The impacts of operational traffic on air quality (NO_2, PM_{10} and $PM_{2.5}$) has been determined as **Negligible** at all existing and proposed receptor locations and the effects are **Not Significant**. On this basis, mitigation for these pollutants is not required.

J7.0 Residual Effects

During Construction

Construction Dust

J7.1 As no additional mitigation is proposed, the residual effects arising from dust and PM_{10} generated by construction activities remain as set out within Section J5.0 of this ES Chapter, which are **Not Significant** on all existing receptors.

Construction Traffic

J7.2 No additional mitigation is proposed; in accordance with IAQM and EPUK guidance, the impacts arising from construction traffic and NRMM on local air quality (NO_2, PM_{10} and $PM_{2.5}$) remain as set out within Section J5.0 of this ES Chapter, which are Negligible at all existing receptor locations.

J7.3 Consequently, the residual effects have been determined as **Not Significant**.

During Operation

Operational Traffic

J7.4 No additional mitigation is proposed; in accordance with IAQM and EPUK guidance, the impacts arising from construction traffic and NRMM on local air quality (NO_2, PM_{10} and $PM_{2.5}$) remain as set out within Section 5.0 of this ES Chapter, which are Negligible at all existing and proposed receptor locations.

J7.5 Consequently, the residual effects have been determined as **Not Significant**.

J8.0 Summary & Conclusions

J8.1 This Chapter has assessed the potential effects on local air quality arising from the Proposed Development resulting from: dust and particulate matter generated by on-site activities during the construction phase; increases in pollutant concentrations as a result of exhaust emissions arising from construction traffic; and increases in pollutant concentrations as a result of exhaust emissions arising from development-generated traffic.

J8.2 No significant air quality effects have been identified for the Proposed Development during construction (including demolition).

J8.3 No significant air quality effects have been identified for the Proposed Development once complete and operational.

J8.4 The summary of effects assessed within this ES Chapter are detailed in **Table J8.1** below.

Table J8.1 Summary of Effects

Receptor	Impact	Potential Effects (taking account of embedded mitigation)	Additional Mitigation and Monitoring	Residual Effects
During Construction				
Existing Human Receptors (see Table J4.3)	Impact of dust and particulate matter on air quality and associated effect on human health during the construction phase.	Minor Adverse and Not Significant.	N/A	Minor Adverse and Not Significant.
The RMC Local Wildlife Site	Impact of dust and particulate matter on air quality and associated effect on ecological receptors during the construction phase.	Negligible and Not Significant	N/A	Negligible and Not Significant
All existing Human Receptors	Impact of construction traffic on air quality and associated effect on human health.	Negligible and Not Significant	N/A	Negligible and Not Significant
During Operation				
All existing Human Receptors	Impact of operational traffic impact on air quality and associated effect on human health.	Negligible and Not Significant	N/A	Negligible and Not Significant
All future Human Receptors (i.e. users of the Proposed Development)	Impact of operational traffic impact on air quality and associated effect on human health.	Negligible and Not Significant	N/A	Negligible and Not Significant

J9.0 Abbreviations & Definitions

Term	Definition
AADT - Annual Average Daily Traffic	A daily total traffic flow (24 hrs), expressed as a mean daily flow across all 365 days of the year.
Air Quality Objective	Policy target generally expressed as a maximum ambient concentration to be achieved, either without exception or with a permitted number of exceedances within a specific timescale (see also air quality standard).
Air Quality Standard	The concentrations of pollutants in the atmosphere which can broadly be taken to achieve a certain level of environmental quality. The standards are based on the assessment of the effects of each pollutant on human health including the effects on sensitive sub groups (see also air quality objective)
Ambient Air	Outdoor air in the troposphere, excluding workplace air.
Annual Mean	The average (mean) of the concentrations measured for each pollutant for one year.
AQMA	Air Quality Management Area.
Conservative	Tending to over-predict the impact rather than under-predict.
Data Capture	The percentage of all the possible measurements for a given period that were validly measured.
Defra	Department for Environment, Food and Rural Affairs
DfT	Department for Transport.
Dust	Dust comprises particles typically in the size range 1-75 micrometres (µm) in aerodynamic diameter and is created through the action of crushing and abrasive forces on materials.
Exceedance	A period of time where the concentrations of a pollutant is greater than the appropriate air quality standard.
HDV/HGV	Heavy Duty Vehicle/Heavy Goods Vehicle
LAQM	Local Air Quality Management
NO_2	Nitrogen dioxide
NO_X	Nitrogen oxides
PM_{10}	Particulate matter with an aerodynamic diameter of less than 10 micrometres (µm)
$PM_{2.5}$	Particulate matter with an aerodynamic diameter of less than 2.5 micrometres (µm)
RMC	Royal Military Canal
Scoping Opinion	The Scoping Opinion (January 2024) received from the Council
Trackout	The transport of dust and dirt from the construction/demolition site onto the public road network, where it may be deposited and then re-suspended by vehicles using the network. This arises when heavy duty vehicles (HDVs) leave the construction/ demolition site with dusty materials, which may then spill onto the road, and/or when HDV's transfer dust and dirt onto the road having travelled over muddy ground on site.

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Imperial Gardens
Volume 1: Environmental Statement
Chapter K Ground Conditions and Geo-Environment

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K1.0 Introduction

K1.1 This Chapter of the Environmental Statement ('ES') has been prepared by Hilson Moran on behalf of the applicant, GSE Group ('the Applicant'). It assesses the Proposed Development described in Chapter C in relation to Ground Conditions and the Geo-environment.

K1.2 The baseline situation is considered before the likely environmental effects of the Proposed Development are identified during its construction and operational phases. Mitigation measures to reduce any negative environmental effects are identified as appropriate, before the residual environmental effects are assessed.

K1.3 This Chapter will assess the potential effects arising from the Proposed Development (i.e. how the Proposed Development may affect or be affected by ground conditions at the Site) in relation to the following interlinked elements:

- *Existing contamination*: The potential effects of existing contamination at the Site (if present) resulting from the historical and current uses of the Site and surrounds, and the potential risks to the identified receptors (including human health, controlled waters, ecological receptors, and the built environment).
- *Development contamination*: The potential effects of the construction and operation of the Proposed Development on the existing ground conditions (including soils and groundwater) and other identified receptors.
- *Land Stability Risks:* The potential effects of the Proposed Development on the existing ground conditions during construction and operation, as well as potential geotechnical/ land stability risks that could affect the Proposed Development, such as foundation design and ground stability issues.

K1.4 This will provide an understanding of the ground conditions at the Site, along with any potential risks arising from contamination and land instability, and identify appropriate assessment mitigation measures to be implemented as part of the development process.

K1.5 In accordance with current contaminated land guidance[1], this Chapter presents the baseline conditions with respect to potential soil and groundwater contamination and ground gas risks, and identifies potential contaminant linkages (PCLs) which could be formed during the construction and operational phases of the Proposed Development. This forms the basis for the assessment of likely significant effects from potential contamination at the Site.

K1.6 This Chapter is intended to be read as part of the wider ES, with particular reference to Chapter D: Water Environment and Flood Risk, which details the likely significant effects of the Proposed Development on flood risk, surface and foul water management and water quality (in relation to surface and foul water pollution control).

K1.7 This Chapter is supported by the following technical appendices provided at Volume 2 to this ES:

- Appendix K1: Phase 1 Geo-Environmental Assessment (Hilson Moran, Ref. 34303-HML-XX-ZZ-RP-U-830001, dated November 2025).

About the Authors

K1.8 This Chapter has been prepared by Sophie Davies and reviewed by Siobhan McGeever of Hilson Moran. Sophie is an Environmental Consultant with four years' experience in the industry (including the preparation of ES chapters), who holds a BSc in Geography and an MSc in Environmental Pollution, and is a member of the Chartered Institute of Water and Environmental Management (CIWEM). Siobhan is an Associate Director with fourteen years' experience in the industry (including the reviewing of ES chapters), who holds a BSc MGeol in Geological Sciences and is also a member of CIWEM and the Geological Society.

K2.0 Policy Context

K2.1 This Chapter has been informed by legislation, policy, guidance and best practice measures relevant to Ground Conditions and the Geo-Environment, as summarised below.

Legislation

K2.2 Environmental legislation and regulation provide the framework for managing land contamination, particularly in relation to risks to human health and the environment. The main governing legislation includes:

- Part 2A of the Environmental Protection Act (EPA) (1990) (as amended)[2];
- The Water Resources Act 1991[3];
- The Environment Act (1995)[4];
- The Water Act 2003[5];
- Contaminated Land (England) Regulations 2006 (and amendment)[6];
- The Water Resources Act 1991 (Amendment) (England and Wales) Regulations 2009[7];
- Contaminated Land (England) Amendment Regulations (2012)[8];
- The Control of Asbestos Regulations 2012 (CAR 2012)[9];
- Environmental Permitting (England and Wales) Regulations 2016[10]; and
- The Environment Act (2021)[11].

K2.3 In the UK, Part 2A of the EPA, as introduced by Section 57 of the Environment Act 1995, provides the legislative framework within which site data is to be assessed. Under Part 2A, sites are identified as 'contaminated land' if they are causing, or there is a significant possibility of them causing, significant harm to human health or non-human receptors, or significant pollution of controlled waters (i.e. surface water and groundwater) as defined by Section 104 of the Water Resources Act 1991. The legislation advocates the use of a risk-based assessment approach for contamination and remedial requirements.

K2.4 The Water Act 2003 introduced a revision to the EPA wording, which requires that if a site is causing or could cause significant pollution of controlled waters, it may be determined as contaminated land. Once a site is determined to be 'contaminated land', remediation is required to render significant pollutant linkages insignificant (i.e. the source-pathway-receptor relationships that are associated with significant harm to human health and/or significant pollution of controlled waters), subject to a test of reasonableness.

K2.5 The Water Resources Act 1991 provides statutory protection for controlled waters (streams, rivers, canals, marine environment and groundwater) and makes it an offence to discharge to controlled waters without the permission or consent of the regulators of these areas.

K2.6 Other key legislation/regulations relating to contamination include the following:

- Anti-Pollution Works Regulations 1999[12];
- The Water Framework Directive (Standards and Classification) Directions (England and Wales) (2015)[13];

- The Environmental Damage (Prevention and Remediation) Regulations 2015[14];
- The Town and Country Planning (Development Management Procedure) (England) Order 2015[15];
- Hazardous Waste (England and Wales) (Amendment) Regulations 2016[16]; and
- The Water Environment (Water Framework Directive) (England and Wales) Regulations (2017)[17].

K2.7 The Environment Act 2021 provides the new UK framework for environmental protection, principally directed to improvements in air and water quality, biodiversity and waste reduction. The Environment Act also established a new environmental watchdog (the Office for Environmental Protection) to hold the government and public bodies to account and ensure compliance with environmental laws. This Act also formally recognised in the UK 25-Year Environment Plan[18].

National Policy

K2.8 The National Planning Policy Framework (NPPF)[19], most recently updated in 2024, is a single document which summarises the Government's planning policies for England and how these are expected to be applied. The NPPF emphasises the need for sustainable development in terms of the resources used, the maintenance of the environment, the economic use of land and societal considerations within the general area. The restoration of derelict and contaminated land is identified as a key consideration.

K2.9 In relation to conserving and enhancing the natural environment, the NPPF states (paragraph 187a) that impacts on geodiversity should be reduced by preventing harm to geological conservation interests. In the UK, geological sites are considered at a local level by designation, and include Geological Conservation Review (GCR) sites (England, Scotland and Wales), Geoparks, Regionally Important Geological and Geomorphological Sites (RIGS), Local Geological/Geomorphological Sites (LGS) and Sites of Importance for Nature Conservation (SINC).

K2.10 The NPPF states (paragraph 187e) that planning policies and decisions should contribute to and enhance the natural and local environment by preventing new development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air and water pollution or land instability. Development should help to improve local environmental conditions such as air and water quality wherever possible, considering relevant information such as river basin management plans.

K2.11 To ensure a site is suitable for its proposed use, the NPPF (paragraphs 196a and 196b) emphasises the requirement to take account of ground conditions and any risks arising from land instability and contamination, and develop appropriate remediation during the planning process. After remediation, as a minimum, land should not be capable of being determined as contaminated land under Part IIA of the EPA 1990.

K2.12 Paragraph 197 clarifies that responsibility for securing a safe development on land affected by contamination or land stability issues rests with the developer and/or landowner.

Local Policy

K2.13 The adopted development plan for Folkestone & Hythe District comprises the Core Strategy Review (2022) and the Places and Policies Local Plan (2020), along with the St Mary in the Marsh Neighbourhood Plan (2019) and the Kent Minerals and Waste Local Plan (2016). The Places and Policies Local Plan sets out the Council's vision for future development across the district.

K2.14 Policy NE7 outlines the Council Policy on contaminated land and requires assessment of the nature and extent of the contamination when development is proposed on or near a site that has been used for the purpose of waste disposal, is known to be contaminated, or where there is reason to believe that contamination may exist.

K2.15 The assessment should be phased, starting with a Phase 1 Desk Study, the results of which will determine the requirement for a Phase 2 Ground Investigation, which will in turn determine any requirement for a Remediation Strategy and associated Verification Report.

K2.16 Development will be permitted subject to the implementation of practicable and efficient measures to treat, contain and/or control any contamination in order to:

1 Protect the occupiers of the development and neighbours from unacceptable risk;

2 Ensure the structural integrity of any existing or proposed structures;

3 Prevent contamination of any watercourse, waterbody or aquifer;

4 Prevent the contamination of adjoining land or halt existing contamination; and

5 Ensure that any remedial measures do not damage adjacent historic artifacts.

Guidance and Best Practice

Land Contamination Risk Management Guidance (LCRM)

K2.17 The Environment Agency (EA) has prepared the Land Contamination Risk Management (LCRM)[20] Guidance to assist in the assessment and management of risks from land contamination. The LCRM guidance was published in October 2020 and last updated in June 2025, replacing CLR 11 'The Model Procedures for the Management of Land Contamination' dated 2004. The LCRM guidance is used to:

- Identify and assess if there is an unacceptable risk (from land contamination);
- Assess what remediation options are suitable to manage the risk;
- Plan and carry out remediation; and
- Verify that remediation has worked.

K2.18 LCRM can be used in a range of regulatory and management contexts, including planning, assessing liabilities or under the Part 2A contaminated land regime. The EA expects you to follow LCRM if you are managing the risks from land contamination.

K2.19 Stage 1 of the LCRM guidance is risk assessment based on the source-pathway-receptor (S-P-R) approach. Risk assessment is an iterative process which starts with a Preliminary Risk Assessment (PRA) (Tier 1) and moves though generic and detailed quantitative risk

assessment tiers (Tiers 2 and 3, respectively) as more information is gathered, including ground investigation data, and the level of uncertainty in the risk assessment is reduced.

K2.20 This Chapter presents the findings of a PRA (i.e. Phase 1 Geo-environmental Assessment) that has been undertaken for the Site. The PRA comprises a desk-based study and site walkover to provide the information required to develop an initial conceptual site model (CSM) of potential (S-P-R) contaminant linkages (PCLs) to establish if there are any potentially unacceptable risks.

Planning Practice Guidance (PPG)

K2.21 The PPG aims to make planning guidance more accessible and to ensure that the guidance is kept up to date. It complements the NPPF and covers several matters of relevance to this Chapter, including land affected by contamination, land stability, water supply, wastewater and water quality and natural environment.

Other Relevant Policy, Standards and Guidance

K2.22 The following standards and guidance documents associated with land contamination and ground hazards have also been considered during the preparation of this Chapter:

- British Standards (BS) 10175+A2:2017: Code of Practice for Investigation of Potentially Contaminated Sites [21];
- BS3882: Specification for Topsoil and Requirements for Use [22];
- BS 5930:2015 + A1 2020: Code of Practice for Site Investigations [23];
- Environment Agency: Soil Screening Values for Assessing Ecological Risks [24];
- Environment Agency (2010) Guiding Principles for Land Contamination [25];
- Environment Agency (2018) The Environment Agency's approach to groundwater protection [26];
- CIRIA C552 'Contaminated Land Risk Assessment. A Guide to Good Practice' [27];
- CIRIA C665 'Assessing Risks Posed by Hazardous Ground Gases to Buildings' [28];
- CIRIA C681: Unexploded ordnance (UXO) A guide for the construction industry [29];
- CL:AIRE 'The Definition of Waste: Development Industry Code of Practice', V2, 2011 [30];
- CL:AIRE 'Control of Asbestos Regulations 2012: Interpretation for Managing and Working with Asbestos in Soil and Construction & Demolition Materials (CAR-SOIL)' [31]
- Department for Environment, Food and Rural Affairs (Defra): Environmental Protection Act 1990: Part 2A – Contaminated Land Statutory Guidance, 2012 [32];
- Department for Environment, Food and Rural Affairs (Defra): Construction Code of Practice for the Sustainable Use of Soils on Construction Sites, 2009 [33];
- Institute of Environmental Management & Assessment (IEMA) Guide: A new Perspective on Land and Soil in Environmental Impact Assessment [34]; and
- Relevant documents held on the CL:AIRE website.

K3.0 Assessment Methodology & Significance Criteria

Assessment Methodology

Scope of the Assessment

K3.1 This section outlines the methodology used to assess the likely significant effects of the Proposed Development on Ground Conditions and the Geo-Environment during the construction and operational phases. It covers the following:

- Organisations, stakeholders, and information sources consulted during the preparation of this Chapter;
- The assessment methodology, including the criteria used to determine receptor sensitivity and the magnitude of change from the identified baseline conditions;
- The process used to identify and assess potential effects on Ground Conditions and the Geo-environment; and
- The criteria and terminology applied to determine the significance of residual effects.

K3.2 The LCRM guidance has been followed, as is required by all parties engaged in/responsible for land contamination. In the context of Ground Conditions and the Geo-environment, LCRM provides a technical framework to identify, assess and manage contamination risks, and advocates the use of a CSM. Further details are provided in the following sections.

K3.3 The potential effect of the Proposed Development on ground conditions, and/or the effect of ground conditions on the Proposed Development, has been assessed during both the construction and operational phases. The significance level attributed to each effect has been assessed based on the magnitude of change due to the Proposed Development and the importance/sensitivity of the affected receptor/receiving environment to change.

Determining Baseline Conditions

Extent of the Study Area

K3.4 Study Areas have been identified for human health (in respect of impacts arising from contamination matters only), controlled waters (groundwater and surface water), ecological receptors and below ground services and building structures. This approach is based on professional judgement and reflects typical contaminant migration distances, consistent with methodologies used on comparable schemes.

K3.5 For the assessment of significant effects, the Study Areas will be limited to:

- Human health – 250 m radius from the Site Boundary. The 250 m distance is typical at the risk identification stage of an assessment based on professional judgement.
- Controlled waters – 1 km radius from the Site Boundary. This is considered appropriate for indirect effects from potential off-site sources of contamination based on the specifics of the Study Area such as the underlying geology, an appreciation of the water environment and previous land use.

- Below ground services and building structures – 250 m radius from the Site Boundary. The 250 m distance is considered appropriate at the risk identification stage of this assessment based on professional judgement.
- Ecological receptors – 1 km radius from the Site Boundary. Ecological receptors are considered in relation to the connection with the water environment (i.e. potential migration of contaminants in groundwater and/or surface water) and therefore the same Study Area is considered appropriate.

K3.6 The above Study Areas will be referred to hereafter as the '250 m Study Area' and '1 km Study Area'.

Method of Baseline Data Collection

K3.7 This Chapter has been informed by the Phase 1 Geo-Environmental Assessment prepared by Hilson Moran (provided at Appendix K1), which comprises a desk-based assessment supplemented by a site visit. The assessment includes a review of available information pertaining to the geological and hydrogeological conditions at the Site, including potential contamination risks, followed by preliminary geo-environmental and geotechnical risk assessments. This information has been used to develop an understanding of the baseline conditions at the Site.

K3.8 The scope of the Phase 1 Geo-Environmental Assessment included the following:

- Review of a proprietary database of environmental permits, records and incidents at the site and surrounding area to identify potential sources of contamination.
- Procurement of a third-party, geo-environmental database, including information on environmental permits, records and incidents at the Site and surrounding area to identify potential sources of contamination.
- Review of historical maps for the Site and the surrounds to identify activities which may have resulted in contamination of soil and/or groundwater.
- Review of published records and maps on the geology, hydrology and hydrogeology of the Site to assess the vulnerability and sensitivity of water resources to contamination (if present).
- Review of the Local Authority planning portal to determine the development history of the Site and identify available previous reports and ground investigation information.
- Consultation with the Health Department of the Council to obtain records relating to ground contamination at the Site.
- Consultation with the Local Petroleum Enforcement Authority to determine if records exist of above ground or below ground licensed (petrol) storage facilities.
- Procurement of a Preliminary Unexploded Ordnance (UXO) Risk Assessment.
- A Site Walkover undertaken by a Geo-Environmental Consultant from Hilson Moran to assess the current Site uses, surrounding land uses and the environmental setting.
- Production of a preliminary CSM including potential source-pathway-receptor linkages (also known as 'contaminant linkages') to develop a Preliminary Risk Assessment.

- Conducted a preliminary assessment of the geotechnical conditions and constraints associated with the Site, including ground stability.

K3.9 The key sources of information used to determine the baseline ground conditions are:

- Groundsure Enviro+Geo Insight report (Ref. GS-GMO-HHC-9IO-4Q5, May 2023);
- CGL, 2023. Imperial Hotel, Hythe – Groundwater Level Letter Report[35];
- CGL, 2023. Imperial Hotel, Hythe – Soil Infiltration Rates[36];
- British Geological Survey (BGS) Geology of Britain viewer[37];
- BGS GeoIndex Onshore Map Viewer[38];
- Mining Remediation Authority Map Viewer[39];
- Multi Agency Geographic Information for the Countryside (MAGIC)[40];
- UK Health Security Agency (UKHSA), UK Maps of Radon[41];
- Folkestone & Hythe District Council Planning portal[42];
- Groundsure.io website[43];
- EA Water Abstraction Licences Geographic coverage: England (December 2023)[44];
- The Environment Agency Catchment Data Explorer[45]; and
- Zetica UXO - Pre-Desk Study Assessment (PDSA).

K3.10 As part of the Phase 1 Geo-Environmental Assessment, a review of previous ground investigation information relating to the Site (limited to trial pits for infiltration testing and groundwater level monitoring) and the adjacent historical landfill site (comprising more comprehensive investigation including laboratory analysis of soil and groundwater samples and ground gas monitoring) has been undertaken.

Assessment Methodology

K3.11 In accordance with LCRM, a preliminary CSM including PCLs has been prepared to assess potential risks to human health and controlled waters from potential contaminants within soil and groundwater at the Site, as well as potential ground gas risks.

K3.12 In terms of risk assessment, “significant harm” or “significant pollution of controlled waters” is defined in the guidance on risk-based criteria and must be the result of one or more relevant ‘contaminant linkages’ relating to the land.

K3.13 The presence of a contaminant linkage relies on the Source-Pathway-Receptor concept, where all three factors must be present and potentially or actually linked for a potential risk to exist. For a risk of pollution or environmental harm to occur as a result of ground contamination, all of the following elements must be present:

- A **source** – a substance that is capable of causing pollution or harm;
- A **receptor** – something which could be adversely affected by the contaminant; and
- A **pathway** – a route by which the contaminant can reach the receptor.

K3.14 If one of these elements is absent there can be no significant risk. If all are present, then the magnitude of the risk is a function of the magnitude and mobility of the source, the sensitivity of the receptor and the nature of the migration pathway.

K3.15 For each of the potential contaminant linkages, the potential consequence/severity of the risk and the probability/likelihood of the risk occurring have been combined in accordance with the matrix included as Table K3.1 below in order to give a level of risk.

Table K3.1 Classification of Risk (after NHBC/EA 2008)

		Consequence			
		Severe	Medium	Mild	Minor
Probability	High Likelihood	Very High	High	Moderate	Moderate/Low
	Likely	High	Moderate	Moderate/Low	Low
	Low Likelihood	Moderate	Moderate/Low	Low	Very Low
	Unlikely	Moderate/Low	Low	Very Low	Very Low

K3.16 The assessment of risks associated with each of the PCLs identified at the Site is used as a basis for assessment of the level of effect during the construction and operational phases of the Proposed Development. Further information is provided below.

Significance Criteria

K3.17 The significance of effects has been determined by considering the sensitivity of the receptor affected against the magnitude of the impact, which are ascribed one of four/five levels (as shown in Table K3.2 below). A matrix is then used to combine sensitivity and magnitude to generate the overall level of the effect (as shown in Table K3.4). The assessment takes into account any embedded mitigation measures to be included as part of the Proposed Development in respect to Ground Conditions and the Geo-environment, which are described within Section K5.0.

Receptor Value/Sensitivity

K3.18 The terminology that will be used to describe the value/sensitivity of receptors identified for the Proposed Development is summarised in Table K3.2.

Table K3.2 Environmental Value (Sensitivity) of Receptors.

Sensitivity	Receptor
High	Future Site users (i.e. residents, workers and visitors). Off-site residents. Surface water bodies of high quality and/or in use as public water supply. Aquifers currently used, or likely to be suitable for use, as public potable supplies (e.g. Principal Aquifers, Source Protection Zone for a potable groundwater supply). Controlled waters that are nationally designated areas (e.g. SSSI) and internationally designated areas (e.g. SAC, SPA, RAMSAR).
Medium	Construction and maintenance workers. Off-site occupants (non-residential; workers and Site visitors). Surface water bodies of moderate quality. Aquifer providing abstraction water for agricultural or industrial use (e.g. Secondary A Aquifers).

Sensitivity	Receptor
	Controlled waters that are regionally designated areas e.g. local nature reserves.
Low	Local water bodies of poor or worse chemical or biological status. Secondary B and undifferentiated aquifers; unproductive strata. Undesignated sites or controlled waters features which appreciably enrich the local habitat resource.
Negligible	Non-aquifer unit that does not afford protection to underlying water bearing units; No designated geological exposures common at a regional or local scale.

Magnitude of Impact

K3.19 The terminology that will be used to describe the magnitude of impacts identified for the Proposed Development is summarised in Table K3.3.

Table K3.3 Magnitude of Impact.

Magnitude	Definition
Major	A severe or acute impact to human health. Major derogation of aquifer/surface water quality or status. Impacts which are predicted to result in a major or irreversible change in the habitat/community of ecosystems.
Moderate	Minor detrimental impact to human health. Minor derogation of aquifer/surface water quality or status. Impacts with potential to affect key attributes of habitats/communities but without changing overall viability.
Minor	A discernible effect that is, however, unlikely to significantly alter human health, aquifer/surface water quality, or the attributes of receptor habitats.
Negligible	Unlikely to have a discernible impact to human health, aquifer/surface water quality or status, or the attributes of receptor habitats/communities.
No change	No loss or alteration of characteristics, features or elements; no observable impact in either direction.

Significance of the Effect

K3.20 The following terms have been used to define the effects identified:

- **Major effect:** where the Proposed Development could be expected to have a very noticeable effect (either beneficial or adverse) on receptors;
- **Moderate effect:** where the Proposed Development could be expected to have a noticeable effect (either beneficial or adverse) on receptors;
- **Minor effect:** where the Proposed Development could be expected to result in a small, barely noticeable effect (either beneficial or adverse) on receptors; and
- **Negligible:** where no discernible effect is expected as a result of the Proposed Development on receptors.
- **Nil/Neutral:** where no observable effect is expected in either direction.

K3.21 Once the sensitivity of the affected receptor to change and the magnitude of change have been established, the significance of the effect (ranging from 'Neutral' to 'Major') will be determined in accordance with the matrix provided in Table K34 below. The likely duration of the effect and likelihood of the effect occurring is also considered when assessing each effect.

Table K34 Significance of Effect Assessment Criteria.

Environmental Value/ Sensitivity of receptor	Magnitude of Impact (Degree of Change)				
	Major	Moderate	Minor	Negligible	No Change
High	Major	Major	Moderate	Negligible	Neutral
Medium	Major	Moderate	Minor to Moderate	Negligible	Neutral
Low	Moderate	Minor to Moderate	Minor	Negligible	Neutral
Negligible	Negligible	Negligible	Negligible	Negligible	Neutral

K3.22 Effects that are classified as 'Moderate' or above (either beneficial or adverse) are considered to be significant in EIA terms. Where a range has been provided (i.e. 'Minor to Moderate'), professional judgement will be used to define the significance.

K3.23 The assessment of environmental impacts relating to Ground Conditions and the Geo-environment will comprise:

- Short and medium term, temporary effects; and,
- Long term, permanent effects.

Consultation

K3.24 A Phase 1 Geo-Environmental Assessment (Ref. 34303-HML-XX-ZZ-RP-U-830001, dated November 2025) (ES Volume 2, Appendix K1) has been prepared by Hilson Moran. This report includes a review of a Groundsure Enviro+Geo Insight report, which presented data from consultees including the Local Authority, Environment Agency, British Geological Survey and the Coal Authority.

K3.25 A request for information was made to the Environmental Health Department of Folkestone & Hythe District Council (FHDC) as part of the Phase 1 Geo-Environmental Assessment. A response was received from the Environmental Health Officer (EHO) on 4 June 2025. The full response is contained within the Phase 1 (Appendix K1). In summary, the EHO confirmed that neither the Site nor any land in its immediate vicinity feature on their Contaminated Land Register, and they have no intentions for any further investigation or action in line with Part IIA of the EPA 1990. The response included a summary of potentially contaminative land-uses in the vicinity of the Site (current and historical). The EHO provided information from a Phase 1 Desk Study and Phase 2 Ground Investigation relating to the adjacent landfill site, which were council funded and not publicly available documents (report dates are unknown).

K3.26 An enquiry was submitted to the Trading Standards/Petroleum Officer (PO) at Kent County Council (KCC) to establish if the Site is currently or has previously been licensed for the bulk storage of petroleum products. A response was received on 26 June 2025, which stated that the PO was unable to locate information relating to the current or historical presence of underground fuel tanks on the Site or within the immediate vicinity, nor any storage of licensable products. The full response is contained within the Phase 1 report.

K3.27 According to the Scoping Note Response (November 2025) (Ref. 23/0809/PREAPP), the consultees from FHDC agreed that the Ground Conditions and Geo-Environment Chapter

should be as set out within the Scoping Report (November 2023). This response should be read in conjunction with the Scoping Opinion (January 2024) (Ref. 23/1910/FH/SCO), which stated the following:

K3.28 *'Section 12 of the Scoping Report sets out the proposed scope of assessment in relation to Ground Conditions and Geo-Environment. The Scoping Report confirms that a Ground Conditions and Geo-Environment ES Chapter will be prepared and will include assessment of existing contamination on Site and potential contamination effects during the demolition and construction phase. A Phase 1 Assessment will be prepared for the Site, this document will inform and be appended to the ES Chapter.'*

Assumptions and Limitations

K3.29 The assessment of effects presented in this chapter is based on a review of information available for the Site at the time of writing from a variety of sources and discussions with relevant authorities and other interested parties. No ground investigation chemical data or gas monitoring was available for the Site itself.

K3.30 The approach adopted for the contamination assessment is based on current best practice guidance (LCRM).

K3.31 It is assumed that potential human health effects (for construction and maintenance workers) would be mitigated through adherence to relevant legislation, including the Construction (Design and Management) Regulations (CDM) 2015)[46], and that the CEMP (ES Volume 2 Appendix C4) will be in place.

K3.32 It should be noted that any risks identified in this Chapter are perceived risks based on the information reviewed; actual risks can only be assessed following further surveys and physical intrusive investigation of the Site.

K4.0 Baseline Conditions

Current Conditions

K4.1 This section of the Chapter provides a summary of the anticipated ground conditions at the Site and describes a preliminary CSM used to assess potential risk to human health and controlled waters from the presence of potential contaminants within soil and groundwater, and also potential ground gas risks.

Site Description

K4.2 The Site is roughly rectangular in shape, covers an area of approximately 17.3 hectares (ha) and currently comprises Hythe Imperial Hotel in the south-western corner and Hythe Golf Club in the east, which is an 18-hole golf course operated by the hotel. A field (known as 'Four Crow field') is included in the north-west of the Site.

K4.3 The hotel is a 92-bed hotel of four to five storeys fronting Princes Parade to the south, with associated landscaping and parking to the north, east and south. A clubhouse with associated maintenance building and access track is located in the south-west of the golf course. Six small outbuildings/sheds are located along the boundary of the golf course, used primarily for maintenance and storage associated with the golf course's use. One of the buildings is understood to be a listed World War Two (WWII) era brick structure.

K4.4 The Site is relatively level and located at an elevation ranging from approximately 1 m AOD in the centre to 4 m AOD in the south-west and north-east. Land was noted to slope up towards the southern, northern and eastern Site boundaries, where footpaths/bridleways are present. The golf course was observed to be slightly undulating, with manicured greens and occasional sand bunkers as typical of a golf course. A raised track/footpath runs through the centre of the Site, at the location of a historical tramway.

Surrounding Land Use

K4.5 The south of the Site is bound by Princes Parade and an associated footpath, with Princes Parade Promenade and the coast beyond. Hythe Beach is a shingle beach, with protective stone groynes observed approximately 180 m west of the Site.

K4.6 The east of the Site is bound by a footpath, which leads to a footbridge across the Royal Military Canal ('RMC') to the north. This footpath is raised relative to the golf course but at the base of a slope relative to the site adjacent to the east, which is a historical landfill.

K4.7 The historical landfill site was vacant land at the time of the site visit and was surrounded by hoarding along Princes Parade with a metal gate on the south-western corner. There was a yellow skip and piles of metal Heras fencing in the south-west of the site. The site was observed to be overgrown with no signs of development, and was noted to slope down towards the RMC, with the slope heavily vegetated/overgrown. The site was subject to an approved planning application for 150 residential dwellings and commercial uses including a hotel, retail, restaurant, café and leisure centre (dated July 2019). The latest available Google Earth aerial imagery dated 15 May 2024 shows no signs of development.

K4.8 The Site is bound to the north by another public footpath/bridleway, with the RMC beyond. Again, this is slightly raised up relative to the golf course and the RMC, which comprises a semi-natural waterway with vegetation, including reeds, bushes and trees along its banks. This contrasts with the RMC further to the west of the Site (to the west of Twiss Road), where stone sides are present and there is landscaped grassed areas with mature trees lining each side of the canal. Beyond the RMC lies residential properties (approximately 60 m north of the Site).

K4.9 The Site is bound to the west by an existing residential development with a central park (Imperial Park) and Twiss Road, which provides access to Hythe Imperial Hotel. Beyond this lies further residential properties (approximately 25 m west) and an arts school (approximately 50 m west).

Site History

K4.10 The history of the Site and the study area is summarised below in Table K4.1. Selected historical maps are presented in Appendix B of the Phase 1 Geo-Environmental Assessment (provided at Appendix K1 of the ES).

Table K4.1 History of the Site and Surrounding Area.

Date	Features On-Site	Features Off-Site
1872-74	The Site appears to be vacant land, with no development apparent. The southern portion of the Site appears to have a differing terrain to the northern portion. A track ran across the Site from east to west. A towing path was located along the northern Site boundary, associated with the RMC to the north.	The RMC bounds the Site to the north, with Royal Military Road on the northern bank and a roadway approximately 100 m north. A gravel pit was located 75 m north-east of the Site (not present in later mapping). The Site was bound to the south by vacant land, with a 'High Water Mark of Ordinary Tides' approximately 10 m south of the Site, associated with the coast/sea beyond. There were several sheepfolds and springs shown in the fields north of the RMC, with one property, Cannon Gate, approximately 150 m north-west of the Site and a water works approximately 400 m north-east. A small surface water feature (pond or similar) was present approximately 50 m north. The town of Hythe was present around 500 m north-west and Seabrook (which had a Gas Works) around 750 m east.
1897-1898	A tramway had been constructed through the centre of the Site, originating from a station 750 m north-west and running to a slipway on Princes Road to the south, and also diverting along the southern boundary. A second road/tramway was present along the eastern Site boundary. Ground workings were visible in the southern portion of the Site.	Development had occurred in the surrounds. The Hythe & Sandgate Branch of the railway network had been built approximately 300 m north, running east to west, with a station approximately 750 m north-west of the Site. Three old quarries were shown 250 - 500 m north along the railway line. A gravel pit was located approximately 350 m north-east.

Date	Features On-Site	Features Off-Site
	A hotel (Seabrook Hotel) had been constructed in the south-west of the Site (location of current hotel). Two buildings marked with a 'P' were located in the north-eastern corner of the Site (possible pump).	The Gas Works in Seabrook was no longer shown, with the area possibly redeveloped for house and a school.
1906-1907	The tramway was labelled as an 'old tramway' (currently used as a footpath). The Seabrook Hotel had been renamed as Imperial Hotel. Several small posts/buildings were located across the Site.	There are additional residential properties along Seabrook Road. The quarries and gravel pit are no longer shown.
1931-1933	The Site was labelled as a 'Golf Links'. A small rectangular building is present in the north of the Site, to the east of the old tramway (still present). One of the buildings in the north-eastern corner of the Site was no longer present.	Several long buildings are located to the west of the Site (present until c.2017). The Bridge that crosses the RMC and connects to the former on-site tramway is labelled as Cannongate Bridge. Allotments are shown to the west of Imperial Hotel. There is a 'Recreation Ground' approximately 500 m east. Residential development had occurred along Seabrook Road and various allotment gardens and recreational areas.
1958-1961	Ground workings/slopes were shown around the Site boundaries and along the old tramway in the centre of the Site.	RMC shown as 'Disused'. Tennis Courts shown to the north of Imperial Hotel. Railway line to the north and station to north-west no longer present.
1976	No significant changes in land use.	Residential development to west of Imperial Hotel and Twiss Road.
2001 - 2010	No significant changes in land use.	No significant changes noted.
2013	The far north-eastern portion appeared to be used as a works compound/site office for the adjacent development.	Redevelopment of tennis courts into housing estate had commenced to the west of the Site (complete by 2018).
2017	Aerial Imagery shows the clubhouse and maintenance building had been constructed in the south-west.	No significant changes noted from aerial Imagery.
Present	No significant changes in land use noted from aerial Imagery.	No significant changes noted from aerial Imagery.

Unexploded Ordnance

K4.11 A Pre-Desk Study Assessment (PDSA) was procured from Zetica UXO (Ref. PA023670, dated 13 June 2025) to identify potential sources of unexploded ordnance (UXO) at the Site or in the surrounding area (if present) and determine whether further detailed research is required prior to breaking ground for a future ground investigation and the redevelopment.

K4.12 The PDSA did not identify readily available records to indicate that the Site was bombed during World War I (WWI). During World War II (WWII), the Site was located in Hythe Municipal Borough, which officially recorded 80 high explosive bombs, with a density of 26.6 bombs per 405 ha. Readily available records indicate that several high explosive bombs fell in close proximity to the Site during WWII.

K4.13 In terms of military activity, during WWII, several anti-invasion defences, including minefields, pillboxes, and roadblocks, were established on and near the Site.

K4.14 Overall, the PDSA recommended that a Detailed Desk Study is undertaken to assess, and potentially zone, the UXO hazard level at the Site.

K4.15 The Remediation Implementation & Verification Plan (Cognition Land & Water, Ref. 1927-V10, dated February 2023) prepared for the adjacent historical landfill site states that one bomb strike was recorded in the north-western corner of this site (adjacent to the Site).

Regulatory Information

K4.16 A Groundsure Enviro+Geo Insight report (Ref. GS-GMO-HHC-9IO-4Q5, dated 12 May 2023) was obtained for the Site as part of the Phase 1 Geo-Environmental Assessment. An updated review of information available on the Groundsure.io tool has also been undertaken. Relevant information on environmental permits, records and incidents at the Site and in the surrounding area is summarised below:

- There are no sites designated under Part 2a of the Environmental Protection Act 1990 as Contaminated Land within 500m of the Site.
- Several historical industrial land-uses are recorded on-Site, including an unspecified pit in the south, unspecified ground workings in the south-west, an unspecified heap/pit in the east, a disused canal along the northern boundary and unspecified ground workings in the south-west of the Site. Further records within 250 m relate to nurseries, unspecified quarries, heaps and ground workings, boat house and hospital.
- There are no licensed discharges to controlled waters within 500m of the Site.
- There are no active Environmental Permits to operate Part A(1) Installations[47], Part A(2) Installations[48], or Part B Installations[49] issued under the Industrial Emissions Directive within 500 m of the Site.
- There are records of two former landfills within 500 m of the Site. The EA record a landfill 2 m east of the Site at Princes Parade, Shepway, Site Ref: SH6, operated by Hythe Borough Council. According to information contained within the database, the landfill was authorised to receive waste including inert and commercial waste; and the first input date was given as December 1946 and the last input date December 1974. The second record relates to a BGS landfill 290 m east at Princes Parade, Hythe (BGS No. 934). According to the BGS, 'no associated risk to aquifers is recorded'. The two records appear to relate to the same area of landfill adjacent to the east of the Site.
- No historical or licensed waste sites are recorded within 500 m of the Site.
- No Radioactive Substance Authorisations are recorded within 500 m of the Site. *NB Due to public security restrictions, certain information on closed or mobile radioactive*

substance authorisations has been removed from the public register and is not available to Hilson Moran.

- There are no Control of Major Accident Hazard (COMAH) sites or Hazardous Substance Storage/Usage sites within 500 m of the Site.
- No pollution incidents are recorded by the EA within 500 m of the Site.
- There is one fuel station entry within a 1 km radius. The nearest (located 340 m west) is a current ESSO branded petrol filling station.
- One waste exemption (use of waste for a specified purpose) is recorded in the south-west of the Site (The Club House, Princes Parade, Ref. WEX195461). There are nine further exemption records within 250 m of the Site, which relate to the sorting and denaturing of controlled drugs for disposal 230m north-east at St Saviours Hospital (Ref. EPR/TE5481JG/A001) and various uses such as recovery of scrap metal, burning waste, use of waste in construction 230m south-east at Great Pett Farm.
- There are no ecologically sensitive sites within a 1 km radius of the Site.
- The Site is not located within a nitrate vulnerable zone (NVZ).

Geology, Hydrogeology and Hydrology

Geology

K4.17 According to original BGS mapping, the majority of the Site is underlain by superficial deposits comprising the Storm Beach Deposits (Gravel), with Alluvium (shown locally to comprise clay) flanking the course of the former Seabrook Stream in the north/north-west. It should be noted that the BGS Geology Viewer and Groundsure report label the 'Alluvium' as 'Tidal Flat Deposits (clay and silt)', which were formerly named 'Estuarine Alluvium'. The bedrock geology underlying the Site comprises the Weald Clay Formation (Mudstone). There is the potential for the presence of Made Ground.

K4.18 The BGS database records a landslip 100 m north of the Site. The hazard rating for landslip on-site is 'Very Low'. Other ground stability hazards (e.g., shrink swell clays, running sands, compressible deposits, collapsible deposits and ground dissolution of soluble rocks) are considered to be negligible to low on-Site with the exception of running sands and compressible deposits, where a moderate risk has been highlighted in some areas**.**

K4.19 A ground investigation was undertaken at the Site by CGL on behalf of GSE Building & Civil Engineering Ltd in December 2022. The investigation comprised the drilling of four (4 No.) boreholes to 4 m bgl (two either side of the central pathway) and the installation of 19 mm piezometer pipes for groundwater level monitoring. In addition, four (4 No.) trial pits were excavated close to the boreholes for soil infiltration testing. The associated groundwater level letter report, soil infiltration rates and exploratory hole logs are appended to the Phase 1 Geo-Environmental Assessment included in Appendix K1.

K4.20 The borehole and trial pit logs confirm ground conditions below the Site comprise the following sequence:

- Topsoil – comprising grass over soft dark grey slightly sandy, slightly gravelly Clay ranging in thickness from 0.2 to 0.5 m.

- Beach and Tidal Flat Deposits (Undifferentiated) – described as firm, brown, slightly sandy, slightly gravelly Clay and in BH03, BH04, TP01, TP02 and TP03, overlying brown slightly sandy clayey Gravel. In TP02, grey fine to coarse gravel was also encountered above the clay. The Beach and Tidal Flat Deposits were encountered between 0.2 m and 1.8 m bgl.
- Storm Beach Deposits – medium dense brown, grey, black and white sub-angular to well rounded, fine to coarse, flint Gravel. The top of this strata was recorded at between 1.4 m and 1.8 m bgl and extended to at least 4 m bgl (the base of the boreholes).

K4.21 As such, no Made Ground was recorded at the Site during the ground investigation. Bedrock (Weald Clay Formation) was not encountered.

Hydrogeology

K4.22 The granular superficial deposits below the Site (Storm Beach Deposits) are classified by the EA as a Secondary A Aquifer and the low permeability deposits (Tidal Flat Deposits) are classified as an Unproductive Stratum. The bedrock below the Site (Weald Clay Formation) is also classified as an Unproductive Stratum. The EA does not currently classify a groundwater body as being present at the Site.

K4.23 The Site is not situated within an EA designated groundwater Source Protection Zone (SPZ). There are no SPZs located within 500 m. The nearest is approximately 2.5 km north-east of the Site.

K4.24 In terms of groundwater vulnerability, the Site is in an area classified as 'High' vulnerability. This is defined by the BGS as 'areas able to easily transmit pollution to groundwater. They are likely to be characterised by high leaching soils and the absence of low permeability superficial deposits'.

K4.25 During the ground investigation undertaken at the Site by CGL in 2022, groundwater was only recorded in one of the four boreholes during drilling. This was BH01 at 1.40 m bgl and coincided with the top of the Storm Beach Deposits. Groundwater levels were recorded via divers installed into the piezometers after installation and are summarised in Table K4.2 below. This indicates groundwater to be present at between 0.03 m and 1.57 m bgl.

Table K4.2 Groundwater Monitoring Data.

Borehole ID	Duration Monitored	Min m bgl (m AOD)	Max m bgl (m AOD)
BH01	02/02/23 to 11/05/23	0.03 (1.11)	1.57 (2.65)
BH02	15/02/23 to 11/05/23	1.40 (2.22)	1.05 (1.87)
BH03	02/02/23 to 11/05/23	1.16 (2.14)	0.92 (1.90)
BH04	15/02/23 to 11/05/23	1.64 (2.47)	0.66 (1.43)

K4.26 It is anticipated that the groundwater below the Site is tidally influenced due to its proximity to the sea. It is unknown if there is hydraulic connectivity between groundwater on-site and the Canal to the north.

K4.27 Four trial pits were excavated close to the four boreholes to allow soil infiltration tests to be undertaken. Infiltration rates were only obtained for two of the tests, in trial pits TP02 (1.05 x 10-3 m/s) and TP04 (4.3 x 10-6 m/s). It was noted that for TP02 free draining gravels were being tested and that for TP04 soils at the base of the trial pit appeared relatively

impermeable (firm, brown slightly sandy, slightly gravelly Clay). No infiltration test was possible in TP01 due to the presence of groundwater at 1.2 m bgl and in TP03 no measurable water column was formed due to free draining gravel being tested.

K4.28 According to EA information provided in the Groundsure report (dated May 2023) and EA Water Abstraction Licences Map (dated 2024), there is one active licensed groundwater abstraction within a 1 km radius. This is located adjacent to the west of the Site and relates to Spray Irrigation – Direct at Point 'O' on the Golf Course at Hotel Imperial (Southern Region Groundwater, GSE Cheriton Parc Limited). There are no active potable groundwater abstractions within 1 km of the Site.

K4.29 The Environmental Health Department of FHDC have confirmed that there are no private (unlicensed) abstractions (that are generally of smaller scale) within a 1 km radius of the Site (response dated 17 June 2025).

Hydrology

K4.30 According to the Groundsure report, the nearest identified watercourse is the RMC (West Hythe to sea) immediately to the north of the Site. The EA currently classifies the RMC as being of 'Moderate' ecological quality and 'Fail' chemical quality under the Water Framework Directive classification scheme (dated 2019).

K4.31 The Kent South Water Body (part of the English Channel) is located approximately 60 m south of the Site. The EA currently classifies the coastal waterbody as being of 'Moderate' ecological quality and 'Fail' chemical quality under the Water Framework Directive classification scheme (dated 2019 and 2022, respectively).

K4.32 According to the environmental database (dated May 2023), there are no licensed surface water abstractions within a 1 km radius of the Site.

Ground Stability

K4.33 A preliminary assessment of the geotechnical conditions at the Site and the associated constraints has been undertaken as part of the Phase 1 Geo-environmental Assessment, which should be read in conjunction with this Chapter.

K4.34 The BGS geology map shows an area of landslip around 500m to the north of the Site. This is where the Hythe formation (Limestone), Atherfield Clay and Weald Clay form the cliffs to the north of Hythe. This comprises several platforms on which roads and residential properties are constructed and where slopes are often steeper than the overall slope gradient. Whilst landslips are recorded and may well be active in these areas, given the distance to Site and the changing nature of the topography approaching the beach, cliff instability is not considered a significant constraint for the Proposed Development.

K4.35 Based on the above, the risk of landslips at the Site is regarded as low, however this should be reviewed once proposed site levels and layout have been finalised.

Foundations

K4.36 Based on the preliminary geotechnical assessment of the Site, it is considered that shallow foundations could probably be formed within the underlying denser Storm Beach deposits. However, it is likely that these will flood or need dewatering to remain dry and stable. As

such, bored or driven piles sunk into the denser beach deposits or the underlying dense sands that are part of the Weald Group are considered likely to be required. The foundation design will be confirmed by future geotechnical ground investigation.

K4.37 The groundwater is variable and has been measured to vary with the tide. This variation needs to be taken into account during the design process.

Mining Activities

K4.38 According to the Coal Authority, the Site is not located within a Coal Mining Affected Area. The Groundsure report indicates that other (non-coal) mining activities may have affected the area, including potential mining for iron ore (Class B) on the Site. Localised small scale underground mining may have occurred, however the potential for difficult ground conditions at the Site is reported to be unlikely or localised and are at a level where they need not be considered.

Radon Gas Risk

K4.39 According to the UK maps of radon published by the UK Health Security Agency (UKHSA), the Site lies within a "Radon Affected Area" as defined by Public Health England. The Site is recorded as being located in an area where 1-3% of residential properties are projected to contain radon above the residential action threshold. This corresponds with a 'Medium' general risk level for radon gas, as shown in Table K4.3 below.

Table K4.3 Radon Potential and UKHSA Recommendations (Source: UKHSA).

Radon potential band (%)	General risk	Affected area?	Test advised?	Building Control Regulations?		
				England & Wales	Scotland	Northern Ireland
0 - 1	Low	No	No#	No#	No#	No#
1 - 3	Medium	Yes	Yes	No#	Yes - Stage 1	Yes - Zone 1
3 - 5	Medium	Yes	Yes	Yes - Basic	Yes - Stage 1	Yes - Zone 1
5 -10	Medium	Yes	Yes	Yes - Basic	Yes - Stage 1	Yes - Zone 1
10 - 30	High	Yes	Yes	Yes - Full	Yes - Stage 2	Yes - Zone 2
Over 30	High	Yes	Yes	Yes - Full	Yes - Stage 2	Yes - Zone 2

Testing existing buildings and fitting radon prevention in new buildings might still be considered, particularly if there is a high risk location such as a routinely occupied basement.

K4.40 Under Health and Safety legislation, employers have a duty to manage workplace risks including the potential for radon exposure. Health and Safety Executive guidance recommends radon monitoring for workplaces located in radon Affected Areas. If the workplace radon threshold is exceeded, the Ionising Radiations Regulations 1999 require employers to take action to reduce risks.

K4.41 As per Table K4.3, there are no mandatory radon requirements under the Building Control Regulations (England & Wales), however testing existing buildings (such as the on-Site hotel) for radon is recommended.

K4.42 According to BRE Report BR211 (2015) Radon: Protective Measures for New Buildings[50], precautionary measures (such as radon gas barriers/membranes) should be considered for new builds, especially if there are high-risk features like basements.

Contamination

Preliminary Conceptual Site Model

K4.43 This section details the preliminary CSM for the Proposed Development, defining the plausible contaminant source, pathway and receptor linkages in accordance with Tier 1 of LCRM, which are integral to defining baseline conditions.

K4.44 Table K4.4 provides a summary of the potential sources of contamination identified on the Site and in the surrounding area associated with current and historical uses, as well as the likely nature of such sources.

Table K4.4 Potential Sources of Contamination.

Potential Source	Potential Contaminants of Concern	Likely/Anticipated Distribution
Historical – On-Site		
Made Ground (unknown origin)	Range including heavy metals, organics, inorganics, ground gases (methane and carbon dioxide), Total Petroleum Hydrocarbons (TPH), Polyaromatic Hydrocarbons (PAHs), Volatile Organic Compounds (VOCs), Semi-Volatile Organic Compounds (SVOCs) and asbestos	Site wide Location of former ground workings in the south of the Site
Tramway	TPH, PAHs, VOCs and SVOCs	Centre of the Site
Potential sediments dredged from RMC	Heavy metals	Northern golf course embankment
Current – On-site		
Golf course activities (maintenance and fertiliser / pesticide use)	TPH, PAHs, nitrogen and phosphorus	Site wide Localised in the south-east at maintenance sheds
Potential asbestos within existing hotel	It is considered possible that ACMs were used during construction (pre-1999)	Hotel in the south-west of the Site
Historical – Surrounds		
Historical landfill adjacent to the east of the Site	Landfill gas (methane and carbon dioxide) and leachate	Surrounding land and water
Tramways along Princes Parade and eastern boundary	TPH, PAHs, VOCs and SVOCs	Land to the south and east of the Site

Potential Source	Potential Contaminants of Concern	Likely/Anticipated Distribution
Various quarries, ponds and gravel pit	These may have been infilled and could represent a source of ground gas	Within 500 m, mostly present to the north of the Site beyond the RMC
Current – Surrounds		
Car park	TPH, PAHs, VOCs and SVOCs	10 m south-east of the Site

K4.45 Potential receptors associated with the Study Area of the Proposed Development are summarised in Table K4.5 below.

Table K4.5 Potential Receptors of Contamination.

Potential Receptors	Identified Receptors Relevant to the Assessment
Human Health	Construction workers Future Site users (including residents, workers and visitors) Adjacent site users (including residents, workers and site visitors)
Water Environment (Controlled Waters)	Secondary A Aquifer (superficial Storm Beach Deposits) RMC to the north (adjacent) English Channel to the south (approximately 50 m) Ponds/basins which form part of the Proposed Development Adjacent abstraction for spray irrigation
Flora and Fauna	Soft landscaped areas of the Proposed Development Priority Deciduous Woodland from 190 m north-west Designated Ancient Woodland from 800 m north-east
Built Environment	New buildings and associated utilities (including water supply pipes) Adjacent existing buildings and proposed new buildings RMC (Scheduled Ancient Monument) to the north Conservation Area (Hythe) 30 m west Two listed buildings (Grade II) comprising the Black Cottage 130 m north-east and Pound Cottage 170 m north-west

K4.46 The human health exposure pathways that are considered viable based on UK guidance (EA, Contaminated Land Exposure Model 'CLEA UK')[51] are listed below:

- Direct contact, dermal absorption or ingestion of soil;
- Ingestion of fruit and vegetables and/or water;
- Inhalation of soil particulates derived from soils; and
- Migration of hazardous gases/vapours via permeable strata into confined spaces (asphyxiation/explosion).

K4.47 The evaluation of exposure pathways for controlled waters receptors (groundwater and surface water) requires an understanding of geological and hydrogeological pathways beneath the Proposed Development. The controlled waters pathways considered viable with respect to the Proposed Development are as follows:

- Spillage/loss/run off from surface, direct to receiving water;

- Leaching of chemicals and vertical migration via permeable unsaturated strata to shallow groundwater; and
- Migration of potential groundwater contaminants from the adjacent historical landfill site onto the Site via groundwater flow.

K4.48 The ecosystem pathways (flora and fauna) considered viable with respect to the Proposed Scheme are as follows:

- Fauna: Direct contact, dermal absorption or ingestion of soil/ingestion of fruit and vegetables and/or waters/inhalation of soil particulates derived from soils and shallow groundwater; and
- Flora: Direct contact with contaminated soils and shallow groundwater/uptake via the root system.

K4.49 The infrastructure pathways considered viable in relation to the Proposed Development are as follows:

- Direct contact of buried concrete and underground services with contaminated soils (i.e. hydrocarbons) and aggressive ground conditions (pH and sulphate); and
- Migration of hazardous gases/vapours via permeable strata into enclosed spaces and service/utility trenches. Potential explosion risk.

K4.50 Overall, based on the information reviewed, the soil and groundwater at the Site are considered unlikely to be widely or grossly contaminated due to current and former Site uses. The Site has been occupied by a hotel since 1897 and golf course since 1931. However, there is a potential for contamination associated with Made Ground, possible deposited RMC dredgings and the former tramway. There is also a potential for localised hotspots of contamination, particularly in the south-west corner of the Site, associated with the maintenance of the golf course (i.e. due to minor fuel/oil spills from mowers etc).

K4.51 In the surrounding area, the adjacent historical landfill site presents ground gas and leachate risk to identified receptors. Further information is provided in the below section.

Review of Previous Reports – Historical Landfill Site

K4.52 The most significant potentially contaminative use in the vicinity of the Site is the historical landfill located adjacent to the east of the Site, which has been subject to past development proposals. Hybrid application ref. Y17/1042/SH relates to proposals for a mixed residential, commercial (including hotel), retail and leisure use (approved with conditions 18/07/2019). Condition 25 of the permission related to contaminated land and required (a) desk top study, (b) an investigation and risk assessment, (c) detailed remediation scheme, (d) verification report and (e) reporting of previously unidentified contamination.

K4.53 Several desk studies and ground investigations have previously been undertaken for this site (dating from 2002 to 2022) and some of the associated reports are available on the HFDC planning portal. The reports include:

- Ground Solutions Group Ltd (June 2002). Phase 1 Assessment with Soil Spike Survey. Ref: 44518_1/OJR.

- Ground Solutions Group (October 2002). Phase 2 Geo-Environmental Investigation – Princes Parade. Ref. 44518/1/OJR.
- Ashdown (April 2017). Phase 2 Ground Investigation. Ref. R17-12010.
- Idom Merebrook Ltd (March 2017). Geo-Environmental Assessment. Ref. L-17436ai-17-S235.
- Idom Merebrook Ltd (May 2017). Geo-Environmental Assessment. Ref: GEA-17436AI-15-193.
- Ashdown (February 2018). Phase 2 Ground Investigation. Ref. R17-12010.
- Idom Merebrook Ltd. (May 2021) Factual Report – Princes Parade. Report Ref. FR-22281-21-195.

K4.54 The May 2017 assessment by Idom Merebrook Ltd ('Merebrook') summarises the two 2002 investigations by Ground Solutions Group (GSG) and was submitted in support of the ES Chapter for the development (dated August 2017). The first comprised a soil spike survey at 87 locations, which recorded methane (CH_4) concentrations below the limit of detection and carbon dioxide (CO_2) concentrations up to 7% v/v. The second included three boreholes to 7.5 m bgl and 30 trial pits to between 3.3 and 5 m bgl. Contamination was observed in all trial pits, consistent with household refuse. Exceedances of the residential generic assessment criteria (GAC) for heavy metals and polycyclic aromatic hydrocarbons (PAHs) were recorded, and asbestos was detected at one location. Leachate analysis recorded exceedances for heavy metals, total petroleum hydrocarbons (TPH) and PAH. Significant contamination was not reported in groundwater samples, with groundwater levels ranging from 5.14 m to 6.47 m bgl. Gas monitoring in 13 piezometers and three boreholes found CO_2 concentrations above 5% v/v at five locations, with a maximum of 15% v/v. Elevated CH_4 was found at three locations (up to 60% v/v in the west of the site). Concentrations of volatile organic compounds (VOCs) ranged from 1 to 15.6 ppm.

K4.55 The investigation undertaken by Merebrook in May 2017 indicated the presence of landfill materials with contamination comprising metals, PAH, TPH and asbestos in Made Ground and PAHs in the natural stratum. In contrast to past investigations, the ground gas risk assessment (based on four monitoring visits undertaken in June 2015 and July, August, October 2016) classified the site as Characteristic Situation 2 (CS2 - low hazard potential) due to elevated CO_2 (9.3% v/v) with a corresponding depleted oxygen (O_2) level of 14.2 % v/v being recorded in one round. *Hilson Moran note that only four locations were monitored in the first round, one in the second and two in the third and fourth, as the installations could not be located.* Merebrook reported that additional gas monitoring (at least six visits) was required. Groundwater was not encountered during the monitoring.

K4.56 Merebrook's preliminary recommendations for remediation comprised clean capping in areas of soft landscaping, including 600mm in private gardens with soil, 300mm in private gardens with shingle and communal areas with soil, and 150mm with geotextile marker in communal areas with shingle and public open space. Basic ground gas protection measures to proposed buildings were recommended, together with further monitoring over a range of atmospheric conditions.

K4.57 Wider investigations were undertaken by Merebrook and LBHGEO in 2021 and Socotec carried out further ground investigations in 2022 which included 19 trial pits along the line

of the new road to be constructed in the proposed Phase F (see below for further details). The trial pits showed that the western half of the landfill (closest to the Site) contained greater proportions of household waste and associated discoloration and odours, whereas the eastern end contained more ashy materials and construction arisings.

K4.58 The permission for the development was subject to a Non-Material Amendment to Condition 25 issued on 22 April 2022 (planning ref. 22/0590/NMA) which split the development into six phases which may require additional ground investigation and risk assessment, phase-specific detailed remediation scheme, discovery strategy and individual verification processes for each phase.

K4.59 Planning Application 22/0745/FH/CON requested approval of details in relation to Phase F, which appeared to be the first phase of the proposed development (new roadway running from the south-eastern corner to the north-western corner). The documents submitted along with this application included:

- Ashdown Site Investigation Ltd (April 2017). Geotechnical Assessment and Ground Contamination Status Report – Seapoint Canoe Centre.
- Ashdown Site Investigation Ltd (February 2018). Ground Gas Risk Assessment – Seapoint Canoe Centre.
- LBHGEO (March 2021). Land Contamination Preliminary Risk Assessment.
- Socotec (July 2022). Geotechnical investigation Phase F. Ref G2028-22.
- LBHGEO (August 2022). Land Contamination Assessment & Remediation Strategy.
- Cognition Land + Water (February 2023). Remediation Implementation & Verification Plan. Ref: 1927/v10/Feb23.

K4.60 The Geotechnical Assessment and Ground Contamination Status Report was prepared for the Seapoint Canoe Centre, located in the far east of the landfill site. No exceedances of the adopted Public Open Space GAC were reported, and an initial ground gas risk assessment (comprising three monitoring rounds) classified the site as Characteristic Situation 1 (CS1 - Low Risk). A further three rounds were undertaken as part of the gas risk assessment to give six monitoring rounds in total, and the site remained as CS1. *Hilson Moran note that these reports relate to a small portion of the landfill site on the opposite side to the Site.*

K4.61 The Land Contamination Preliminary Risk Assessment by LBHGEO reviewed the ground investigations undertaken on the landfill. The landfill material appears to extend up to approximately 4m or 4.5 m bgl. Investigation of the upper landfill layers via trial pitting both in 2002 and in 2017 suggested that both commercial and domestic waste is present within the landfill material (presence of plastic bags and bottles as well as fragments of electronic appliances). As is typical for pre-1974 landfills, LBHGEO noted that the waste recorded during the investigation was not in agreement with the Historic Landfill Dataset (HLD) records and that unregulated deposits were made within both areas of the landfill.

K4.62 It notes that unfortunately, the 2017 Merebrook investigation failed to install groundwater monitoring wells deep enough to reach the tide level and hence no groundwater sampling and analysis was possible. The earlier 2002 GSG investigation had tested three samples and detected a trace of pyrene (0.15 µg/l) in the groundwater.

K4.63 The report notes that no satisfactory gas monitoring has yet been completed at this site. The following maximum gas concentrations have been reported:

- Methane (CH_4) – 60% v/v.
- Carbon Dioxide (CO_2) – 15% v/v.
- PID – 16 ppm.

K4.64 The report concluded that there are a number of potentially significant land contamination risks affecting this site, some of which can be appreciated on the basis of evidence that has already been studied, but importantly, other potentially significant pollutant linkages have yet to be investigated. A phased scheme of investigation of the landfill was being developed to address the present data gaps at the time of reporting.

K4.65 The LBHGEO Land Contamination Assessment & Remediation Strategy established the mitigation measures to address the identified land contamination risks in Phase F, including construction management, asbestos control, landfill capping, marker membrane, suitable imported materials, clean cover (minimum of 300mm in Phase F), suitable buried service material and gas protection. *Hilson Moran note that this clean cover specification relates to a road, and 600mm of imported clean cover comprising subsoil and topsoil would be required for residential gardens.*

K4.66 The Cognition Land + Water Remediation Implementation & Verification Plan states the remediation for Phase F is predominantly within the landfill capping, with the landfill beneath the capping to remain in place after redevelopment. It states that compaction, remediation and stabilisation are required to make the site suitable for the proposed residential-led development.

K4.67 The plan states that the site became a municipal landfill following WWII (in the 1950s) and was operated by Shepway District Council. Filling commenced in the east of the site and progressed westwards (towards the Site). It is thought the landfill was capped with topsoil and left to vegetate from the 1970s. Dredged material from the RMC was also placed on the site in the early 2000s. The plan also states undulations of the ground surface have been noted, mostly in the western portion of the site, suggestive of differential settlement caused by variable consolidation and decomposition of the underlying landfill material.

K4.68 Part a of Condition 25 (desk study) was approved for the whole site. Parts b (investigation and risk assessment) and c (detailed remediation scheme) were approved for Phase F only.

K4.69 The latest application submitted in relation to this site was a Reserved Matters Application seeking approval of appearance, landscaping, layout, scale and access pursuant to the outline permission granted under reference Y17/1042/SH (ref. 22/1192/FH, submitted July 2022). This was finally disposed of as undetermined on 3 June 2025.

K4.70 All planning applications relating to the historical landfill site are now marked as 'Closed' on the FHDC planning portal.

Summary of Sensitive Receptors

K4.71 Based on a review of the baseline conditions, Table K4.6 presents the receptors likely to be affected by the Proposed Development, along with their sensitivity. This takes into account the location of the receptor and its relationship with the Site boundary.

Table K4.6 Receptor Sensitivity.

Receptor	Description	Sensitivity
Human Health	Construction workers	Medium
	Future Site users (residents, workers and visitors)	High
	Adjacent Site users (residents, workers and Site visitors)	High
Water Environment (Controlled Waters)	Secondary A Aquifer (superficial Storm Beach Deposits)	Medium
	RMC to the north (adjacent)	Medium
	English Channel to the south (approximately 50 m)	Low
	Ponds/basins forming part of the Proposed Development	Low
	Adjacent abstraction for spray irrigation	Medium
Flora and Fauna	Soft landscaped areas of the Proposed Development	Low
	Priority Deciduous Woodland from 190 m north-west	Low
	Designated Ancient Woodland from 800 m north-east	Low
Built Environment	New buildings and utilities (including water supply pipes)	Medium
	Adjacent existing buildings and any proposed buildings	Low
	RMC (Scheduled Ancient Monument) to the north	Medium
	Conservation Area (Hythe) 30 m west	Low
	Listed buildings (Grade II) comprising the Black Cottage 130 m north-east and Pound Cottage 170 m north-west	Low

Future Baseline

K4.72 The assessment includes a prediction of how baseline ground conditions may change in the absence of the Proposed Development. This is termed the 'future baseline' and takes into account the anticipated effects of other known developments in the area. Conditions at the time of construction (2028–2035) may differ from the current baseline, which could affect the sensitivity of existing receptors or result in the presence of new sensitive receptors.

K4.73 Should the Site remain in its current use, it is considered unlikely to present a significant risk to the identified sensitive receptors. As the Site is currently occupied by a hotel and golf course with and given that gross widespread contamination is not anticipated to be present, the degree of risk to the receptors is unlikely to increase if the Site use remains unchanged.

K4.74 The potential for the baseline conditions to change in the lead up to the construction of the Proposed Development is limited by the extent to which any new surrounding development requires remediation or mitigation measures in relation to contaminated land. Any new development at/adjacent to the Site on potentially contaminated land would need to be suitable for its intended use as set out in the NPPF and LCRM. To meet this requirement, new development sites may require remediation, meaning that some areas described as having potentially contaminative current or historical land use may no longer be of significance at the time of construction. At the time of writing, there are no known application sites within/adjacent to the Site boundary where this may apply. The planning applications relating to the adjacent landfill site (Cumulative schemes 1a and 1b, planning Refs. Y17/1042/SH and 21/2282/FH, respectively) are marked as 'Closed'.

K4.75 The potential for the baseline conditions to change would also depend on whether any land has been classified as contaminated land by the Local Authority under Part 2A of the EPA

1990 (none has been classified currently). Several mechanisms drive these determinations, and they are therefore difficult to predict. Where Part 2A determinations are made, the potential baseline change occurs where remediation works are subsequently undertaken.

K4.76 Based on the above, the assessment does not anticipate any significant future changes to the baseline ground conditions by 2028–2035 (seven-year construction programme). If redevelopment proposals for the adjacent historical landfill site during this period, this assumption would be.

K5.0 Potential Effects

K5.1 This Section discusses the potential effects on identified receptors during the construction (including demolition) and operational phases of the Proposed Development, taking into account primary mitigation that is embedded into the design of the Proposed Development, and tertiary measures secured by other mitigation or best practice (as detailed below).

K5.2 It should be noted that ground levels will be regraded to accommodate the Proposed Development. It is understood that levels within the residential part of the Site (which currently range from approximately 2.7 m to 3.1 m above Ordnance Datum (AOD)) are proposed to be raised by approximately 1.4 m to 1.8 m to a final level of 4.5 m AOD. The area beneath the proposed Golf Clubhouse in the south of the Site is also proposed to be raised by up to 1 m to a final level of 4.5 m AOD. The material used to raise levels will comprise imported fill (i.e. impermeable fill for built form, and permeable fill for paving and areas of swales/drainage). For the remainder of the Site (comprising public open space and a new academy golf course), it is proposed that existing levels will be retained or adapted using neutral cut and fill.

Embedded Mitigation

K5.3 The Proposed Development has been designed, as far as possible, to avoid and minimise significant adverse effects on Ground Conditions and the Geo-Environment during both the construction (including demolition works) and operational phases, through the incorporation of the following embedded and tertiary mitigation measures:

- Redevelopment will be undertaken in accordance with relevant legislation, regulations and guidance, including the Construction (Design and Management) Regulations 2015[52], CIRIA C741: Environmental Good Practice on Site and relevant Pollution Prevention Guidance.
- Refurbishment and Demolition Surveys will be undertaken for buildings prior to the proposed refurbishment and demolition works and any recommendations (including asbestos removal and abatement) will be implemented in accordance with CAR 2012 and associated guidance. Appropriate risk assessments, method statements and control measures will be implemented as part of the redevelopment.
- A CEMP has been prepared to support the planning application (included as Appendix C4 of this ES) and will be implemented to manage potential environmental effects and risks to human health during the construction phase. The plan includes pollution prevention measures, the appropriate storage and handling of fuels and chemicals, water suppression and dampening down processes to control/minimise dust, emergency response/spillage control procedures and a protocol for unforeseen contamination if encountered during the construction phase.
- In line with CIRIA 'C681 Unexploded Ordnance (UXO) A Guide for the Construction Industry', a Detailed UXO Desk Study will be commissioned to assess the UXO hazard level at the Site. This is a health and safety requirement and will be undertaken prior to intrusive works, including ground investigation and enabling/construction works. The potential requirement for UXO risk mitigation measures to safely manage risks during ground investigation/redevelopment works, such as supervision by a Specialist UXO

Contractor and UXO safety briefings, will be informed by the Detailed UXO Desk Study. BRE Report BR211 (2015) advises testing existing on-Site buildings for radon gas and fitting basic radon protection measures in new buildings (such as a radon membrane), especially if there are high-risk features like basements.

- Appropriate drainage design in accordance with the Surface Water Management Strategy ('SWMS') and Foul Water Management Strategy ('FWMS') provided in Appendix D1, Flood Risk Assessment and Drainage Strategy, and described in Chapter D Water Environment and Flood Risk. These will include an efficient system for the collection of storm and foul water from the Site and conveyance to an appropriate receptor, and measures to remove background contaminants from surface water drainage prior to discharge and to contain any accidental liquid spillages at the Site. This includes installation of interceptors into surface water drainage to prevent ingress of petroleum hydrocarbons from vehicles using roadways and car parks.

K5.4 These embedded measures form part of the standard design and construction approach for the Proposed Development and will ensure that the potential for contamination and other ground-related impacts is minimised as far as practicable.

Major Hazards and Accidents

K5.5 During both the construction and operational phases of the Proposed Development, there is potential for accidents to occur that may impact ground conditions at the Site through the spillage or leakage of oils/fuels/chemicals, resulting in contamination of the ground, groundwater or surface water.

K5.6 For both phases, risks from the above accidents may be mitigated by the suitable management and storage of hazardous substances in line with best practice and also the preparation of an emergency response plan to minimise, contain and remediate contamination from the accidental release of contaminating substances.

K5.7 During the construction phase of the Proposed Development, there is potential for major hazards to occur as a result of potential UXO buried in soils underlying the Site. Risks include accidental detonation during excavation/construction, contamination of soils and groundwater from contaminants such as heavy metals and ground stability.

K5.8 Risks from UXO hazards may be mitigated through compliance with CIRIA 'C681 Unexploded Ordnance (UXO) A Guide for the Construction Industry'. This includes a four-stage risk management process, comprising a Preliminary UXO Risk Assessment, Detailed UXO Risk Assessment, UXO Risk Management and UXO Support/Implementation (if required). As per the PDSA for the Site (refer to Section K4.14), a Detailed UXO Risk Assessment should be obtained prior to breaking ground for ground investigation or construction purposes, and the recommendations should be implemented.

Phasing

K5.9 The Proposed Development is proposed to be delivered in six phases (Phases 0–5) which includes demolition activities, as described in ES Chapter C: Site and Scheme Description. However, this assessment has been undertaken for the entire scheme as a single project on the basis that the potential environmental effects are not expected to be material or differ significantly between phases. Therefore, a phased assessment approach has not been

adopted for this Chapter and mitigation measures have also been applied on a scheme-wide basis where appropriate.

During Construction

Human Health

K5.10 Human health receptors potentially affected by the Proposed Development during the construction phase have been identified to include demolition/construction workers and adjacent site users i.e. those living in surrounding residential areas. The potential effects on these receptors are summarised below. It should be noted that at present, there is no Site-specific ground investigation data available regarding contaminant concentrations in soils and groundwater, nor on potential ground gas risks at the Site.

Construction Workers

K5.11 Construction workers could be exposed to contaminants present in the Made Ground, including asbestos, during earthworks and construction. They may also be exposed to asbestos during the demolition/refurbishment of the Imperial Hotel. Potential spills of fuels, oils and Site-stored materials could occur during construction. The workers could be affected by inhalation of dusts, gases, fibres or vapours, dermal contact with soil and groundwater and ingestion of soil and dust. However, the length of direct exposure would be limited to the duration of works in which the construction workers are directly involved, and thus the effect would likely be medium term (temporary). Any subsequent health effects from hazardous materials (including asbestos) and potentially contaminated soil groundwater could have a medium (temporary) to long term (permanent) effects.

K5.12 A CEMP has been produced for the Site and forms part of the embedded mitigation for the Proposed Development, along with compliance with the CDM Regulations 2015 and appropriate risk assessments, method statements and control measures for potential asbestos in existing buildings. Responsibilities will be clearly assigned to the Principal Contractor and other duty holders, and the works will be notified to the Health and Safety Executive (HSE) via an F10 submission as required.

K5.13 The CEMP includes the following mitigation measures:

- Construction workers would be required to wear PPE such as gloves and face masks (where appropriate) to prevent dermal contact and inhalation or ingestion. Appropriate Site hygiene facilities will be put in place and the potential presence of contaminants and the associated risks will be explained to groundworkers before they begin work.
- Dust suppression measures will be implemented if required to prevent contaminated dust from becoming airborne where it may affect construction workers. Wheel washing of Site vehicles will be carried out to minimise the potential for dust generation.
- Fuel storage on-Site to be carried out under best practice i.e. integrally bunded containers. Plant refuelling to be carried out using best practice techniques and any spills to be controlled with spill kit.
- Appropriate covering of on-Site stockpiled materials and during transport to/from the Site to prevent dust generation.

K5.14 The sensitivity of construction workers is Medium, and the magnitude of impact following embedded mitigation is considered Minor. Therefore, there is likely to be a direct, temporary/permanent, medium to long term Minor to Moderate Adverse (Not Significant) effect on construction workers with the implementation of the embedded mitigation measures.

Adjacent Site Users

K5.15 Should contamination be present within soil and groundwater at the Site, properties in the immediate vicinity of the Proposed Development (i.e. residential) may also be exposed to contaminants present in the Made Ground or natural ground (i.e. after migrating from off-site sources) during earthworks or activities that involves Made Ground disturbance. These works may facilitate exposure to asbestos or other contaminants by the inhalation of dusts, gases or vapours, dermal contact with soil and groundwater and ingestion of soil/dust.

K5.16 The impact to adjacent site users would depend on the type and nature of contamination (if present) and the characteristics of receptor and duration of exposure (i.e. vulnerable child or elderly person). Exposure would mostly likely be indirect (i.e. inhalation of windblown dusts/fibres in ambient air). If the receptors are exposed to contaminants above threshold concentrations, there is potential for both short (temporary) and long term (permanent) health problems to arise, dependent on the nature of the contaminants encountered.

K5.17 The CEMP to be implemented prior to/during construction (embedded mitigation) will minimise risks to adjacent site users from the Proposed Development (if risks are found to be present during future ground investigation). Measures include dust suppression techniques to prevent it from becoming airborne and wheel washing of Site vehicles to prevent tracking of contaminated material off-Site.

K5.18 In addition, if asbestos is found to be present within existing buildings (principally the hotel), appropriate risk assessments, method statements and control measures will be implemented in accordance with CAR 2012 and associated guidance to minimise the potential for migration of asbestos fibres off-Site.

K5.19 The sensitivity of adjacent site users is considered to be High, and the magnitude of impact, following embedded mitigation, is considered Negligible. Therefore, there is likely to be an indirect, temporary/permanent, short to long term Negligible (Not Significant) effect on adjacent site users with the implementation of embedded mitigation measures.

Controlled Waters

K5.20 At present, there is no chemical data available for soils and groundwater at the Site. As such, the potential contamination risks to controlled waters are currently unknown, but are considered unlikely to be significant based on current/former Site uses.

K5.21 Construction work has the potential to increase the rate of infiltration of rainfall and therefore leaching of contaminants from shallow materials (such as Made Ground) to the Secondary A Aquifer (Storm Beach Deposits) by decreasing the thickness of the unsaturated zone during stripping of topsoil/grass cover. In addition, activities such as drilling, piling and excavation have the potential to create new migratory pathways through which contaminants could migrate into underlying aquifers and surface waters (adjacent RMC).

K5.22 The use of machinery and plant (including the establishment of a construction compound and use and storage of chemicals and fuels) could give rise to localised contamination that may represent a risk to groundwater through accidental spills and leaks, particularly if new migratory pathways have been created. There could also be a risk of contaminated run-off, including hydrocarbon contamination, associated with the operation of vehicles. This has the potential to create overland migration pathways to surface water features.

K5.23 The above direct impacts (increased mobilisation/introduction of contamination sources) are unlikely to persist beyond the construction phase, and are therefore considered as short to medium term, temporary effects. In accordance with the CEMP, fuel storage and plant refuelling will be carried out using best practice methods i.e. integrally bunded containers and spills to be controlled with spill kit.

K5.24 The sensitivity of controlled waters is considered to be Medium, and the magnitude of change, following embedded mitigation, is considered Minor. Therefore, there is likely to be a direct, temporary, short to medium term Minor to Moderate Adverse (Not Significant) effect on controlled waters with the implementation of embedded mitigation measures.

Built Environment

K5.25 Risks to existing below ground services, building structures and foundations may be present in the construction phase during open trench excavation for new installations.

K5.26 In addition, existing ground conditions may pose risk to new building structures (including buried concrete) and services (including new potable water supply pipes) through direct contact with contaminated soils and groundwater (hydrocarbons) and aggressive ground conditions (pH and sulphate), and migration of ground gases/vapours into enclosed spaces and service trenches (potential explosion risk) during the proposed 7-year construction period. At present, there is no available chemical data (soil and groundwater) and ground gas data for the Site. As such, the potential risks to the Site from the adjacent historical landfill (i.e. ground gas and groundwater contamination risks) are currently unknown.

K5.27 The construction phase will be undertaken in accordance with relevant legislation, guidance and best practice as per the embedded mitigation measures.

K5.28 The sensitivity of the built environment is Low to Medium and the magnitude of impact, following embedded mitigation, is considered Moderate. Therefore, there is likely to be a direct, temporary, short term **Moderate Adverse (Significant)** effect on the built environment with the implementation of embedded mitigation measures.

Ecological Receptors (Flora & Fauna)

K5.29 There is the potential for soils and groundwater impacted by contaminants to be present on the Site (currently no Site-specific data is available). Construction phase activities (such as drilling, piling, and excavation) have the potential to create new migratory pathways through which contaminants could migrate into underlying aquifers, surface waters and ultimately ecological receptors dependent upon groundwater. There is also potential for construction activity to introduce contaminants to the Study Area (for example, due to ineffective control of fuel). However, due to the nature and distance of the receptors (Priority Deciduous Woodland from 190 m north-west of the Site and Designated Ancient Woodland from 800 m north-east), there is not considered to be a significant risk.

K5.30 The sensitivity of ecological receptors is considered to be Low, and the magnitude of change, following embedded mitigation, is considered to be No Change. Therefore, there is likely to be an indirect, temporary, short-term Neutral (Not Significant) effect on ecological receptors with the implementation of embedded mitigation measures.

Ground Stability & Geotechnical Hazards

K5.31 Due to the Site's low-lying topography and distance from known areas of landslip, the risk of landslips at the Site is regarded as low, and slope stability is not considered a significant development constraint. However, this should be reviewed once proposed Site levels and layout have been finalised.

K5.32 Shallow foundations may be feasible within the denser underlying Storm Beach deposits; however, these are likely to be subject to flooding and will require dewatering to remain dry and stable. It is anticipated that piles founded in the denser beach deposits or underlying dense sands of the Weald Group will be required to achieve suitable bearing capacity and mitigate potential settlement risks at the Site.

K5.33 It is understood that levels within the residential part of the Site are proposed to be raised by approximately 1.4 m to 1.8 m, and the area beneath the new clubhouse is proposed to be raised by up to 1 m, to a final level of 4.5 m AOD in both areas. The material used to raise levels is proposed to comprise imported, permeable fill, which will need to be verified as geotechnically suitable for use below building structures.

K5.34 Prior to mitigation, the potential for adverse effects from land instability, differential settlement, or loading is considered to be direct, temporary/permanent, short to long term, and Minor Adverse (Not Significant).

During Operation

Human Health

K5.35 Future Site users (including residents) may be exposed to contaminants that are present in the Made Ground, or in the natural ground after migrating from contaminant sources. They could be affected through inhalation of dust, dermal contact with soil and groundwater, inhalation of ground gas and vapours, and ingestion of soil and dust. Although significant and widespread on-Site contamination is not anticipated based on current/historical Site uses, the potential risks from the adjacent historical landfill are currently unknown.

K5.36 It is understood that levels within the residential part of the Site are proposed to be raised by approximately 1.4 m to 1.8 m using imported fill, and soils will be imported to form the residential gardens. For the rest of the Site (including public open space and golf course), it is proposed that existing levels will be retained or adapted using neutral cut and fill.

K5.37 The sensitivity of future users is High and the magnitude of change, following embedded mitigation, is considered Minor. Therefore, there is likely to be a direct, permanent, long-term **Moderate Adverse (Significant)** effect on future Site users.

Controlled waters

K5.38 There is potential for ingress of surface water infiltration (which may be impacted with hydrocarbons from the areas of car parking) into groundwater or nearby surface waters. Installation of interceptors into surface water drainage will prevent ingress of petroleum hydrocarbons from vehicles using roadways and car parks. Use of permeable pavements and penstocks and oil interceptors will also be used where required.

K5.39 The sensitivity of Controlled Waters is considered to be Medium, and the magnitude of change following embedded mitigation is considered Negligible. Therefore, there is likely to be an indirect, permanent, long term Negligible (Not Significant) effect on controlled waters.

Built Environment

Buildings

K5.40 Ground gas could infiltrate into enclosed spaces and cause an explosive hazard. Given the distance from the adjacent historical landfill to the proposed residential buildings and hotel extension, which are located in the far west of the Site, this is considered unlikely. However, an assessment of the ground gas regime at the Site has not yet been undertaken, and the potential need for ground gas mitigation measures (such as a gas resistance membrane) in line with BS8485 has not been assessed.

K5.41 Made Ground (if present) is likely to be removed from the proposed building footprints during the construction phase. This is likely to remove the majority of the Made Ground (potential source of ground gas) from beneath the buildings. Levels within the residential part of the Site and beneath the clubhouse are proposed to be raised by approximately 1.4 m to 1.8 m, and up to 1 m respectively, using imported fill.

K5.42 The sensitivity of building structures is Medium and the magnitude of change, following embedded mitigation, is considered to be Moderate. Therefore, there is likely to be a direct, permanent, long-term **Moderate Adverse (Significant)** effect on buildings from potential ground gas risks.

Water Supply Pipes

K5.43 The new on-Site water supply pipes may be at risk from direct contact with contaminated soils or from contaminant migration into the supply pipes. Hydrocarbons can permeate through plastic pipes, while other contaminants may chemically degrade plastic components, potentially compromising water quality and pipe integrity. No Site-specific ground investigation data for soils or groundwater is currently available, however significant and widespread contamination is not anticipated likely to be present.

K5.44 The majority of the Made Ground is considered likely to be removed from the building footprints prior to construction, and the residential and clubhouse areas are proposed to be raised by imported fill. The construction phase will be undertaken in accordance with relevant legislation, guidance and best practice as per the embedded mitigation measures.

K5.45 The sensitivity of water supply pipes is Medium and the magnitude of change, following embedded mitigation, is Minor. Therefore, there is likely to be a direct, permanent, long-term Minor to Moderate Adverse (Not Significant) effect on water supply pipes.

Ecological Receptors (Flora & Fauna)

K5.46 There is the potential for soil contamination at the Site. The Proposed Development will introduce soft landscaped areas (including residential gardens and public open space) onto the Site which could be affected by phytotoxic contaminants e.g. heavy metals. No Site-specific ground investigation data for soils or groundwater is currently available, however significant and widespread contamination is not anticipated likely to be present. In addition, imported soils will be used for the residential gardens.

K5.47 The sensitivity of ecological receptors is considered to be Low, and the magnitude of change, following embedded mitigation is considered to be Minor. Therefore, there is likely to be a direct, permanent, long-term Minor Adverse (Not Significant) effect on ecological receptors.

Ground Stability & Geotechnical Hazards

K5.48 During the operational phase, the Proposed Development is not expected to be significantly affected by ground stability issues, as it is assumed that the foundations designed sufficiently, and ground improvement works (if required) undertaken.

K5.49 The low-lying topography and distance from known landslip areas mean that slope instability is not anticipated as an ongoing constraint. Piled foundations and engineered earthworks will provide long-term stability for built structures.

K5.50 With embedded mitigation in place, the potential for adverse effects on ground stability during operation is considered to be direct, permanent, long-term Minor Adverse (Not Significant).

K6.0 Mitigation and Monitoring

K6.1 This section discusses whether any secondary mitigation measures are required in addition to the primary (embedded) and tertiary mitigation measures outlined in Section 5.0.

During Construction

K6.2 The following additional mitigation is proposed for the construction phase:

- A Geo-environmental ground investigation (including a programme of groundwater and ground gas monitoring) will be undertaken to identify PCLs prior to commencement of the construction phase and is likely to be conditioned as part of the planning permission for the Proposed Development. If the investigation identifies contaminant linkages, a Remediation Strategy will be produced for the Site to specify mitigation measures for the enabling/construction phase of the development.
- On the completion of any remedial works, a Verification Report will be required to demonstrate that remediation objectives have been met, and the Site has been made suitable for its intended use. These works area also anticipated to be required as part of a planning condition for planning permission of the Proposed Development.
- A Geotechnical ground investigation will be required as part of the detailed design stage and can be combined with the above geo-environmental ground investigation. This will inform a Geotechnical Risk Register and will assess potential ground instability risks in relation to construction (albeit considered low at this stage). If risks are identified, stabilisation works will be required prior to construction.
- A Foundation/Piling Risk Assessment will be undertaken prior to construction to ensure that piling or other ground stability/foundation techniques do not create preferential pathways for contamination or pose unacceptable risks to groundwater. Due to the proposed hotel extension, foundation inspection pits will be required to determine the nature and extent of the existing foundations.
- Due to the proposed cut and fill works (refer to Paragraph K5.2), an Earthworks Specification will be produced for the proposed redevelopment. The specification will include protocols for testing and limiting values to ensure that imported materials are suitable for their intended use in terms of their chemical and geotechnical quality.
- Given that material re-use and long-term stockpiling are anticipated, a Materials Management Plan (MMP) will be prepared alongside the Earthworks Specification prior to construction works in accordance with CL:AIRE Definition of Waste Code of Practice (DoWCoP). The MMP will detail the procedures and measures that will be undertaken to classify, track, store, dispose of and possibly re-use excavated materials, and also ensure that imported materials are suitable for their intended use. A Verification Report will be required to demonstrate that the MMP has been followed.

During Operation

K6.3 Monitoring of groundwater, surface water and/or ground gas may be recommended post-construction, depending on the findings of the geo-environmental ground investigation and

subsequent water and ground gas monitoring rounds. No further additional mitigation above embedded are proposed for the operational phase of the Proposed Development.

K7.0 Residual Effects

During Construction

Human Health

Construction Workers

K7.1 In addition to the embedded mitigation (including CEMP implementation, compliance with the CDM Regulations 2015 and asbestos control measures), the potential risks to construction workers will be assessed through a pre-commencement geo-environmental ground investigation and managed through remediation and mitigation measures where required. The ground investigation and remediation are likely to be conditioned, and will require verification to demonstrate that the remediation strategy has been complied with and no significant risks to human health remain (also likely to be conditioned).

K7.2 There is a possibility that previously unidentified contamination may be encountered within soils and groundwater during the construction works. As such, a protocol for unforeseen contamination will be in place (covered by the CEMP and also the ground investigation report and/or remediation strategy to be produced for the Site).

K7.3 A MMP will be required prior to the commencement of cut and fill works (post panning consent) by the Contractor(s) to monitor the reuse of both natural soil and Made Ground. The MMP would be undertaken in accordance with the CL:AIRE DoWCoP to ensure that soil reuse and imported materials are suitable for their intended use and will not significantly affect human health or the environment.

K7.4 The sensitivity of construction workers is Medium, and the magnitude of impact following additional mitigation is considered Negligible. Therefore, there is likely to be a direct, temporary/permanent, medium to long term Negligible (Not Significant) effect on construction workers.

Adjacent Site Users

K7.5 In addition to the embedded mitigation measures, the potential risks to adjacent site users from the Proposed Development will be assessed through the geo-environmental ground investigation, which will provide information on the type and nature of contamination (if present), and managed through remediation and mitigation measures where required.

K7.6 The MMP will ensure that excavated soils and other materials are managed in accordance with the CL:AIRE DoWCoP. The plan will provide a structured approach for tracking, verifying, and controlling the movement and reuse of materials (including potentially contaminated materials). By ensuring that materials are only reused in suitable locations and that handling practices minimise dust and runoff, the MMP will help limit potential exposure pathways and reduce risks to adjacent site users during construction.

K7.7 The sensitivity of adjacent site users is considered to be High, and the magnitude of impact, following additional mitigation, is considered No Change. Therefore, there is likely to be an indirect, temporary/permanent, short to long term Neutral (Not Significant) effect on adjacent site users with the implementation of additional mitigation measures.

Controlled Waters

K7.8 In addition to the embedded mitigation, which will ensure fuel storage and plant refuelling is carried out using best practice methods, the risks to controlled waters from the Proposed Development will be assessed through a ground investigation, and remediation/mitigation will be implemented where required. This may include the identification and remediation of contamination hotspots present in shallow soils prior to the construction phase.

K7.9 There is a possibility that previously unidentified contamination may be encountered in soils and groundwater during construction works. As such, a protocol for unforeseen contamination will be in place (covered by the CEMP and the ground investigation report/remediation strategy to be produced for the Site). Further, the Piling Risk Assessment, Earthworks Specification and MMP would set out mitigation measures for preferential pathways to controlled waters.

K7.10 The sensitivity of controlled waters is considered to be Medium, and the magnitude of change, following additional mitigation, is considered Negligible. Therefore, there is likely to be a direct, temporary, short to medium term Negligible (Not Significant) effect on controlled waters.

Built Environment

K7.11 The ground investigation will assess the risks to new building structures and services (including buried concrete and potable water supply pipes) from contaminated soils (i.e. hydrocarbons) and aggressive ground conditions (i.e. pH and sulphate), and migration of ground gases/vapours into enclosed spaces and service trenches (potential explosion risk).

K7.12 Chemical obtained from the ground investigation will be used to ensure appropriate construction materials (such as concrete classification) are selected for new buildings and services. If a ground gas risk and/or vapour risk is identified (albeit considered unlikely), appropriate mitigation will be implemented for the construction phase.

K7.13 The sensitivity of the built environment is Low to Medium and the magnitude of impact, following additional mitigation, is considered Negligible. Therefore, there is likely to be a direct, temporary, short term Negligible (Not Significant) effect on the built environment.

Ecological Receptors (Flora & Fauna)

K7.14 No additional mitigation required. Residual effects are as set out in Section K5.0 i.e. there is likely to be an indirect, temporary, short-term Neutral (Not Significant) effect on ecological receptors with the implementation of embedded mitigation measures.

Ground Stability & Geotechnical Hazards

K7.15 Although slope stability is not considered a significant development constraint, this should be reviewed once proposed Site levels and the layout have been finalised. The material used to raise levels beneath the residential part of the Site and new clubhouse are proposed to comprise imported, permeable fill, which will be verified as geotechnically suitable for use below building structures as detailed below.

K7.16 A comprehensive, design-stage geotechnical ground investigation will be undertaken to inform foundation design and mitigate potential risks from land instability, differential settlement or loading. This will include a piling risk assessment to evaluate and mitigate potential contaminant migration pathways to controlled waters or sensitive receptors. An Earthworks Specification and MMP will also be prepared to manage site-won and imported materials in accordance with CL:AIRE DoWCoP, ensuring suitability for use.

K7.17 With the implementation of additional mitigation measures, the potential for adverse effects from land instability, differential settlement, or loading is considered to be direct, temporary/permanent, short to long term, and Negligible (Not Significant).

During Operation

Human Health

K7.18 A pre-construction ground investigation will be carried out to identify PCLs. If necessary, a Remediation Strategy will be produced for the Site, which may include measures such as the removal of contamination hotspots, a clean cover layer in soft landscaping and public open space and ground gas protection measures in new buildings. Significant remediation is not considered likely to be required. Remedial works will then be appropriately validated. The presence of building and hardstanding cover will limit the potential for dermal contact, ingestion or inhalation of contaminated soil by future users in these areas.

K7.19 The sensitivity of future users is High and the magnitude of change, following additional mitigation, is considered Negligible. Therefore, there is likely to be a direct, permanent, long-term Negligible (Not Significant) effect on future Site users.

Controlled waters

K7.20 No additional mitigation required. Residual effects are as set out in Section K5.0 i.e. there is likely to be an indirect, permanent, long term Negligible (Not Significant) effect on controlled waters following the implementation of embedded mitigation measures.

Built Environment

Buildings

K7.21 Ground gas could infiltrate into enclosed spaces and cause an explosive hazard. Given the distance from the adjacent historical landfill to the proposed residential buildings and hotel extension, which are located in the far west of the Site, this is considered unlikely. However, the geo-environmental ground investigation will include an assessment of the ground gas regime at the Site in line with best practice (CIRIA C665).

K7.22 Should the ground gas risk assessment indicate that the buildings structures require ground gas mitigation measures (such as a gas resistance membrane) in line with BS8485, then this will be installed during construction of the building. The installation of any gas protection measures should be validated by a competent and qualified person.

K7.23 The sensitivity of building structures is Medium and the magnitude of change, following embedded mitigation, is Negligible. Therefore, here is likely to be a direct, permanent, long-term Negligible (Not Significant) effect on buildings from potential ground gas risks.

Water Supply Pipes

K7.24 If contaminants capable of attacking/migrating through plastic supply pipes are identified during the ground investigation, the guidance set out in UK Water Industry Research (UKWIR): Risk Assessment for Water Pipes in Land Potentially Affected by Contamination - Contaminated Land Assessment Guidance (2014) will be followed during the redevelopment. It may be necessary to backfill trenches with clean imported material.

K7.25 The sensitivity of water supply pipes is Medium and the magnitude of change, following additional mitigation, is negligible. Therefore, there is likely to be a direct, permanent, long term Negligible (Not Significant) effect on water supply pipes.

Ecological Receptors (Flora & Fauna)

K7.26 The geo-environmental ground investigation will assess the risks to proposed soft landscaping from potential phytotoxic contaminants e.g. heavy metals. Furthermore, the Remediation Strategy and Verification Report will ensure imported soils and materials used to form soft landscaped areas are chemically suitable for use.

K7.27 The sensitivity of ecological receptors is considered to be Low, and the magnitude of change, following additional mitigation, is considered to be Negligible. Therefore, there is likely to be a direct, permanent, long-term Negligible (Not Significant) effect on ecological receptors.

Ground Stability & Geotechnical Hazards

K7.28 During the operational phase, the Proposed Development is not expected to be significantly affected by ground stability issues. The geotechnical ground investigation undertaken as part of the additional mitigation will ensure that the foundations have been designed sufficiently, and ground improvement works (if required) have been designed and undertaken in accordance with the additional mitigation.

K7.29 The low-lying topography and distance from known landslip areas mean that slope instability is not anticipated as an ongoing constraint. Piled foundations and engineered earthworks will provide long-term stability for built structures.

K7.30 With embedded mitigation in place, the potential for adverse effects on ground stability during operation is considered to be direct, permanent, long-term Negligible (Not Significant).

K8.0 Summary & Conclusions

K8.1 The Site is approximately 17.3 ha in size and comprises Hythe Imperial Hotel in the south-western corner and Hythe Golf Club in the east, which an 18-hole golf course operated by the hotel. A field is included in the north-west of the Site. The south of the Site is bound by Princes Parade and an associated footpath, the east of the Site is bound by a footpath with a historical landfill beyond, to the north by another public footpath/bridleway, with the RMC beyond, and to the west by an existing residential development and Twiss Road.

K8.2 Historically, from 1897, a tramway ran through the centre of the Site, a possible road/tram ran along the eastern boundary and Seabrook Hotel was located in the south-west. There was evidence of ground disturbance in the southern portion of the Site from 1897-1939. By 1906, the tramway was disused (currently a footpath), and the hotel had been renamed as Imperial Hotel. The eastern portion of the Site has been used as a golf course since 1931.

K8.3 The adjacent historical landfill reportedly became a municipal landfill in the 1950s and was capped with topsoil and left to vegetate from the 1970s (c.20-year operation). This site has been subject to several ground investigations, which have recorded contamination including heavy metals, PAHs, TPH and asbestos (fibres/bundles). It is understood that no satisfactory ground gas monitoring has yet been completed at the site, however maximum concentrations of methane have been recorded as 60% v/v, carbon dioxide as 15% v/v and volatile organic compounds (VOCs) as 16 ppm (ground investigation undertaken in 2002).

K8.4 Potential on-site sources of contamination include Made Ground (particularly where ground workings were undertaken in the south of the Site and along the former tramway route), localised hotspots from golf course maintenance activities and potential asbestos in the hotel (constructed pre-2000. Off-site sources of contamination include the historical landfill, which previously had planning permission for a residential-led development.

K8.5 The PDSA procured from Zetica UXO reported that during WWII, several high explosive bombs fell in close proximity to the Site, and several anti-invasion defences were established on and near the Site. Zetica therefore recommended the need for a further Detailed UXO Desk Study report to further assess the UXO hazard level of the Site.

K8.6 Due to the engineered topography of the golf course, it is anticipated that Made Ground is present across the Site. Geological mapping indicates that most of the Site is underlain superficial deposits comprising the Storm Beach Deposits (Gravel), with Alluvium flanking the course of the former Seabrook Stream. It should be noted that the BGS Geology Viewer and environmental database label the Alluvium as 'Tidal Flat Deposits (clay and silt)', which were formerly named 'Estuarine Alluvium'. The bedrock geology underlying the Site comprises the Weald Clay Formation (Mudstone).

K8.7 The granular Storm Beach Deposits are classified by the EA as a Secondary A Aquifer and the low permeability deposits (Tidal Flat Deposits) are classified as Unproductive. The Weald Clay Formation is also classified as Unproductive. The Site is not located within a groundwater Source Protection Zone. A licensed groundwater abstraction is located adjacent to the west of the Site for spray irrigation.

K8.8 The nearest identified watercourse is the RMC) immediately to the north of the Site. The Kent South Water Body (part of the English Channel) is located approximately 60 m south.

K8.9 The likely significant receptors identified include the following:

- Construction workers (medium sensitivity);
- Future Site users (high sensitivity);
- Adjacent site users (high sensitivity);
- Secondary A aquifer (medium sensitivity);
- RMC (medium sensitivity);
- English Channel 50m south (low sensitivity);
- Ponds/basins forming part of the Proposed Development (low sensitivity);
- Flora and fauna (low sensitivity); and
- Built Environment (low to medium sensitivity).

K8.10 The Proposed Development has been designed, as far as possible, to avoid and minimise significant adverse effects on Ground Conditions and the Geo-Environment during both the construction and operational phases, through the incorporation of embedded mitigation. A number of additional mitigation measures are also required to further reduce the identified effects, many of which are likely to be implemented through planning conditions.

K8.11 The residual effects during construction and operation of the Proposed Development have been assessed as not Significant in EIA terms, based upon the embedded and additional mitigation measures being undertaken appropriately, including the implementation of a Remediation Strategy to render the Site suitable for its proposed use. Table K8.1 below summarises the residual effects associated with the Proposed Development.

Table K8.1 Summary of Effects

Receptor	Impact	Potential Effects (taking account of embedded mitigation)	Additional Mitigation and Monitoring	Residual Effects
During Construction				
Construction Workers	Potential effects on human health from exposure to existing contamination and/or ground gas risks at the Site	Minor to Moderate Adverse (Not Significant)	Ground investigation, remediation (if required), verification, MMP	Negligible (Not Significant)
Adjacent Site Users	Potential effects on human health from exposure to contamination during the earthworks and construction activities	Negligible (Not Significant)	Ground investigation, remediation (if required), verification, MMP	Neutral (Not Significant)
Groundwater within the Secondary A Aquifer	Potential effects on controlled waters from contamination within the underlying soils/ groundwater and increased mobilisation from construction activities	Minor to Moderate Adverse (Not Significant)	Ground investigation, remediation (if required), verification, Piling Risk Assessment, Earthworks Specification, MMP	Negligible (Not Significant)
Surface waters including the RMC		Minor to Moderate		Negligible (Not Significant)

Receptor	Impact	Potential Effects (taking account of embedded mitigation)	Additional Mitigation and Monitoring	Residual Effects
		Adverse (Not Significant)		
Below ground services and building materials	Potential effects associated with construction activities impacting below ground services and building structures	Moderate Adverse (Significant)	Ground investigation, remediation/ mitigation (if required), verification	Negligible (Not Significant)
Ecological receptors	Potential effects on ecological receptors from contamination within the underlying soils/ groundwater	Neutral (Not Significant)	Not required	Neutral (Not Significant)
Ground stability & geotechnical hazards	Potential effects on the Proposed Development (including stability and foundations etc) from geotechnical risks	Minor Adverse (Not Significant)	Geotechnical ground investigation, piling risk assessment, Earthworks specification and MMP	Negligible (Not Significant)
During Operation				
Site Users	Potential effects on human health from exposure to contamination and/or ground gas/vapours associated with historical and current land use	Moderate Adverse (Significant)	Ground investigation, remediation (if required), verification	Negligible (Not Significant)
Groundwater within the Secondary A Aquifer	Potential for increased mobilisation of chemical contaminants into surface water and/or groundwater	Negligible (Not Significant)	Not required	Negligible (Not Significant)
Surface waters				
Buildings and services	Potential impact to buildings from ground gases (explosive hazard)	Moderate Adverse (Significant)	Ground investigation, remediation/ mitigation (if required), verification	Negligible (Not Significant)
	Potential degradation/ permeation of water supply pipes from contaminants in soils and groundwater	Minor to Moderate Adverse (Not Significant)		Negligible (Not Significant)
Ecological receptors	Potential effects on ecological receptors from contamination within the underlying soils/ groundwater	Minor Adverse (Not Significant)	Ground investigation, remediation (if required), verification	Negligible (Not Significant)
Ground stability & geotechnical hazards	Potential effects on the Proposed Development (including stability and foundations etc) from geotechnical risks	Minor Adverse (Not Significant)	Geotechnical ground investigation, piling risk assessment, Earthworks specification and MMP	Negligible (Not Significant)

K9.0 Abbreviations & Definitions

Term	Definition
Potential contaminant linkages (PCLs)	Connections between a source (contaminant), a pathway (route), and a receptor (human health and the environment). If all three exist, a contaminant linkage is established, forming the basis for risk assessment under Part 2A of the EPA (see below).
Environmental Protection Act (EPA)	Part IIA of the Environmental Protection Act 1990 provides the legal definition and framework for identifying, assessing, and remediating contaminated land.
Control of Asbestos Regulations (CAR)	UK regulations (CAR 2012) that govern the management, removal, and disposal of asbestos in buildings and soil.
National Planning Policy Framework (NPPF)	Sets out the government's planning policies for England and how these are expected to be applied.
Geological Conservation Review (GCR)	Produced by the UK's Joint Nature Conservation Committee (JNCC). It is designed to identify sites of national/international importance needed to show all the key scientific elements of the geological and geomorphological features of Britain.
Regionally Important Geological and Geomorphological Sites (RIGS)	Non-statutory local or regional geoconservation sites recognised for their educational, scientific, historical or aesthetic importance.
Local Geological/ Geomorphological Sites (LGS)	Locally designated sites selected by geoconservation groups for their regional geological or geomorphological value.
Sites of Importance for Nature Conservation (SINC)	Locally designated non-statutory wildlife sites identified for their habitat or species importance. They carry protection through local planning policies and rely on landowner stewardship.
Environment Agency (EA)	A non-departmental public body established in 1996 and sponsored by the UK government's Department for Environment, Food and Rural Affairs (DEFRA), with responsibilities relating to the protection and enhancement of the environment in England.
Land Contamination Risk Management (LCRM)	A Government guidance framework providing stage-based, risk-based procedures for assessing, remediating, and verifying contaminated land, replacing CLR11.
Source-pathway-receptor (S-P-R)	The fundamental model in contaminated land risk assessment: assessing whether a contaminant (source) can reach a receptor via a pathway. Significant risk exists only if all three are present.
Conceptual site model (CSM)	A structured representation of how contamination may be present at a site and how it could affect human health or the environment, summarising all known and hypothesised contaminant sources, pathways, and receptors on a site.
Preliminary Risk Assessment (PRA)	Tier 1 of LCRM: initial, desk-based evaluation (plus site walkover) to identify PCLs and inform whether ground investigation is necessary at the Site.
Planning Practice Guidance (PPG)	Online guidance accompanying NPPF which sets out how the government envisages the day to day working of the planning system in England to operate.
British Standards (BS)	British Standards are the standards produced by BSI Group which is incorporated under a Royal Charter for the UK). Standards such

Term	Definition
	as BS 10175 (investigation) and BS 8485 (gas protection) provide best-practice protocols and technical specifications for contaminated land assessment and remediation.
Unexploded ordnance (UXO)	Explosive weapons (bombs, shells, grenades etc) that did not explode when they were deployed and remain at risk for detonation.
Control of Asbestos Regulations 2012: Interpretation for Managing and Working with Asbestos in Soil and Construction & Demolition Materials (CAR-SOIL)	Industry Code of Practice interpreting CAR 2012 for soil and construction & demolition materials, developed under HSE and CL:AIRE, providing guidance for asbestos in soil.
Department for Environment, Food and Rural Affairs (Defra)	Government department overseeing environmental legislation.
Institute of Environmental Management & Assessment (IEMA) – now ISEP (The Institute of Sustainability and Environmental Professionals)	Professional body providing guidelines, frameworks, and credentialing for environmental practitioners.
British Geological Survey (BGS)	A world-leading geological survey and global geoscience organisation, focused on public-good science for government and research to understand earth and environmental processes.
UK Health Security Agency (UKHSA)	Government agency responsible for public health, including oversight of health risks from environmental hazards like contamination, radon and asbestos exposure.
Folkestone & Hythe District Council (FHDC)	Local District Council.
Pre-Desk Study Assessment (PDSA)	A brief summary report detailing what sources of UXO (if any) may be present and whether a more detailed desk-based risk assessment is required, obtained from Zetica UXO.
Site of Special Scientific Interest (SSSI)	A conservation designation designed to protect areas of land or water that are considered particularly valuable for their wildlife, geology or landform features.
Special Area of Conservation (SAC)	Protected sites designated under the EU Habitats Directive to conserve habitat types and species of European importance.
Special Protection Area (SPA)	Protected areas under the EU Birds Directive designated for rare and migratory birds, requiring environmental assessment for any development taking place nearby.
Ramsar Site	Wetlands of international importance under Ramsar Convention, designated to protect wetland ecology.
Environmental Health Officer (EHO)	Local authority official responsible for enforcing public health regulations, including inspecting land and building work for contamination, pollution and related human health impacts.
Petroleum Officer (PO)	Council-appointed specialist overseeing safe use, storage, and removal of petroleum on domestic and commercial premises.
Kent County Council (KCC)	Local authority responsible for planning, environmental health, and contaminated land oversight within Kent.

Term	Definition
Construction (Design and Management) Regulations (CDM)	Main set of regulations for managing the health, safety and welfare of construction projects.
Construction Environmental Management Plan (CEMP)	Plan used in construction which details procedures and controls for minimising environmental impacts during construction, including dust, runoff and contamination management.
World War I (WWI)	First World War.
World War Two (WWII)	Second World War.
Royal Military Canal (RMC)	Historical military engineering feature stretching between Hythe and Cliff End.
Control of Major Accident Hazard (COMAH)	Regulations for facilities handling large quantities of hazardous substances.
Nitrate vulnerable zone (NVZ)	Designated agricultural areas where land application of nitrates is controlled to prevent groundwater and surface water pollution.
Source Protection Zone (SPZ)	Defined zones around public water supply sources where activities are restricted to protect groundwater from contamination.
Contaminated Land Exposure (CLEA) Model	A UK Standard Model used to calculate human health risk from soil or water contamination, feeding into Generic Assessment Criteria (GAC) and remediation targets.
Generic assessment criteria (GAC)	Screening values derived via CLEA or similar models used in generic quantitative risk assessment (Tier 2) to determine whether contaminant levels pose unacceptable risk.
Polycyclic aromatic hydrocarbons (PAHs)	Group of organic compounds composed of multiple fused aromatic rings, primarily formed during the incomplete combustion of organic materials.
Total petroleum hydrocarbons (TPH)	Sum of all hydrocarbons present in soil or water from petroleum sources.
Volatile organic compounds (VOCs)	Organic chemicals (e.g. benzene, solvents) that readily vaporise, posing inhalation risk.
Characteristic Situation 2 (CS2)	A classification used in ground gas risk assessment under BS 8485:2015+A1:2019 and CIRIA guidance. CS2 indicates a low to moderate risk from ground gases (typically methane and carbon dioxide) to buildings.
Above Ordnance Datum (AOD)	A standard vertical datum used in engineering and mapping to report elevation of ground relative to mean sea level.
Materials Management Plan (MMP)	A document outlining the handling, reuse, or disposal of excavated materials (soil, aggregates), ensuring compliance with waste, contamination and DoWCoP requirements.
Definition of Waste Code of Practice (DoWCoP)	Guidance detailing when excavated material ceases to be waste and can be reused or transferred without being classified as waste, supporting site excavation and material management.
Scoping Report	EIA Scoping Report (November 2023) submitted to the Council.
Scoping Opinion	(January 2024) The Council's response to the EIA Scoping Report.
Scoping Note	EIA Scoping Note (July 2025) submitted to the Council.

Term	Definition
Scoping Note Response	(November 2025) The Council's response to the EIA Scoping Note.

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Chapter L Climate Change and Resilience

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L1.0 Introduction

L1.1 This Chapter of the Environmental Statement ('ES') has been prepared by Hilson Moran on behalf of the applicant, GSE Group ('the Applicant'). It assesses the Proposed Development described in Chapter C in relation to climate change and resilience.

L1.2 The baseline situation is considered before the likely environmental effects of the Proposed Development are identified during its construction and operational phases. Mitigation measures to reduce any negative environmental effects are identified as appropriate, before the residual environmental effects are assessed.

L1.3 This Chapter is supported by the following technical appendices provided at Volume 2 to this ES:

- Appendix L1: Legislation, Policy and Guidance
- Appendix L2: Assessment Boundries
- Appendix L3: Embodied Carbon Assumptions

About the Author

L1.4 The author of this Climate Change Chapter is Sian Grimsley. Sian is a Senior Environmental Consultant with over 5 years technical experience in preparing ES Chapters, an MSc in Atmospheric Science, and an associate member of the Institute of Environmental Science ('IES').

L1.5 Andy Hart is the reviewer of this Climate Change Chapter. Andy is an Associate Director at Hilson Moran, a Chartered Engineer (CEng) with over 16 years technical experience and a full member of the Engineering Council ('EC').

L2.0 Policy Context

L2.1 A summary of the relevant legislation, policy and guidance used to inform the assessment presented within this chapter is provided below. Full details are provided within **Appendix L1**.

Legislation

L2.2 A summary of the relevant legislation is provided below:

- Climate Change Act (2008) and 2050 Target Amendment (Order 2019)[1];
- Climate Change and Sustainability Energy Act (2006)[2];
- Energy Act (2013)[3];
- Environment Act (1995, 2021)[4].
- EIA Directive (2014/52/EU)[5];
- Town and Country Planning Regulations Environmental Impact Assessment (EIA) Regulations (2017)[6]; and,
- Infrastructure Planning (EIA) Regulations (2017)[7].

National Policy

L2.3 A summary of the relevant national planning policy is provided below:

- National Planning Policy Framework[8];
- The National Adaptation Programme and Third Strategy for Climate Adaptation[9];
- The Clean Growth Strategy[10]; and,
- The Carbon Plan: Delivering Low Carbon Future[11].

Regional and Local Policy

L2.4 A summary of the relevant regional and local planning policy is provided below:

- FHDC Adopted Development Plan: Core Strategy Review (2022)[12];
- FHDC Adopted Development Plan: Places and Policies Local Plan (2020)[13]; and,
- Kent Minerals and Waste Local Plan (2020)[14].

Guidance

L2.5 A summary of the relevant technical guidance is provided below:

- IESP: Assessing Greenhouse Gas Emissions and Evaluating their Significance (2022)[15];
- ISEP: Environmental Impact Assessment Guide to: Climate Change Resilience and Adaption (2020)[16];
- RICS: Whole life carbon assessment for the built environment version 1 (2017)[17];
- RICS: Whole life carbon assessment for the built environment version 2 (2023)[18];

- LETI: Embodied Carbon Primer (2020)[19];
- LETI: Embodied Carbon Benchmarks (2022)[20]; and,
- UKGBC: Net Zero Whole Life Carbon — Consultation Slides & Embodied Carbon Benchmarks (consultation)[21].

L3.0 Assessment Methodology & Significance Criteria

Assessment Methodology: Greenhouse Gas Assessment

L3.1 The assessment methodology presented in this chapter draws upon the Institute of Sustainability and Environmental Professionals (ISEP) guidance on 'Assessing Greenhouse Gas Emissions and Evaluating their significance'. This document provides guidance on how to assess the impact of climate change, within the context of EIA, emphasising the need for proportionality in the context of nation, sector and local Greenhouse Gas (GHG) emissions. It sets out advice to the key components necessary to deliver a robust, appropriate and consistent assessment.

The following six steps outline the framework that has been followed within this assessment of GHG emissions:

1 Define the scope and boundaries of the GHG assessment;

2 Develop the baseline;

3 Determine the emissions calculation methodologies;

4 Data collection;

5 Calculate and determine the GHG emissions inventory; and,

6 Consider mitigation opportunities and assessment of residual effects.

L3.2 GHG emissions associated with the construction, operation and decommissioning of the Proposed Development are quantified and assessed within this chapter. GHG is assessed using a whole-life approach (i.e. from cradle to grave), including GHG emissions (direct and indirect) and embodied carbon associated with the Proposed Development, to develop a GHG footprint for the Proposed Development.

Assessment Scope and Boundaries

L3.3 The scope of this assessment reflects the whole-life-carbon (WLC) approach throughout the construction and operation of the Proposed Development. **Appendix L2** presents the modular approach of the life-cycle stages that are used to set the boundaries of this GHG assessment presented in Table L3.1.

L3.4 The assessment scope includes emissions arising from material production, transportation, construction activities, equipment installation (life-cycle phases A1 to A5).

L3.5 Emissions arising from the use, maintenance, repair and operation of the onsite buildings (B1-B6) over a lifespan of 60 years. Operational emissions include the energy and water consumption of all building types as well as an estimate for the energy water consumption associated with the external landscaping.

L3.6 The scope also includes emissions generated through the end-of-life stages (C1-C4) associated with deconstruction of the onsite structures and buildings.

Table L3.1 GHG Assessment Boundaries

Development Phase		
Construction	Product Stage (A1-A3)	Emissions released through the extraction and processing of raw materials, manufacturing of products and the transportation of materials to the manufacturing sites.
	Transport (A4)	Emissions from transporting construction materials, components and equipment to the site, modelled based on average distances and vehicle emissions.
	Construction Stage (A5)	Emissions generated from on-site construction activities, including any fuel/gas combusting processes and the development of the new structure and supporting infrastructure.
Operational	Refrigerant Impact (B1)	Emissions associated with refrigerant loss from the proposed onsite heating and cooling systems.
	Use, Maintenance, Repair and Refurbishment (B1-B5)	Emissions associated with the maintenance and repair of any onsite systems and the embodied carbon associated with the replacement of any materials. Emissions arising from waste generation onsite (e.g., general waste and mixed recycling).
	Operational Energy (B6)	Emissions associated with energy consumption of the Proposed Development, i.e., electricity, and the provision of heating and hot water. The energy strategy for the Proposed Development will be all electric with the use of Air Sourced Heat Pumps (ASHPs).
	Operational Water Use (B7)	Emissions associated with consumption of water by the Proposed Development, i.e., water supply and treatment. Including water consumption associated with the additional external landscaping and golf course.
	Operational Traffic	Emissions associated with all modes of transport generated by the Proposed Development. Including residential trips and visitors to the hotel, leisure and golf facilities.
End of Life	End of Life Stage (C1-C4)	Emissions arising from the deconstruction and demolition of the Proposed Development at the end of its operational lifetime. Including the transportation of materials to waste processing facilities, waste processing (reuse, recovering or recycling) and disposal.

L3.7 Due to insufficient design information no embedded material emissions associated with infrastructure works such as drainage, cabling, sewage systems etc., have been accounted for but would be considered minimal impact.

L3.8 There is no life safety combustion plant, such as life-safety generators, in the existing hotel, and it is understood that the proposed plans also do not include any combustion plant.

Temporal Scope

L3.9 Based on industry standards, the GHG emissions have been quantified and assessed over a 60-year period, which is the estimated operational lifetime of the Proposed Development.

Defining the Baseline

L3.10 For the purpose of this assessment a baseline has been defined which the impact of a new project can be compared against. The ISEP guidance (2022) requires the baseline of an assessment should either be determined based on available data or alternatively to be represented as zero, where data is not available or where no physical development or activity is taking place. The assessment should determine the baseline GHG emissions based on the current existing projects (i.e. energy consumption of building scheduled for deconstruction for a complete redevelopment) and infrastructure (i.e. current operational and use emissions of a road due to be upgraded) within the Site boundary.

Methods of Assessment

L3.11 The metric for assessing climate change impacts of GHG emissions in this assessment is Global Warming Potential ('GWP'), expressed as tonnes of carbon dioxide equivalent ('tCO_2e') in total or per annum. This accounts for six key GHGs: carbon dioxide ('CO_2'), methane ('CH_4'), nitrous oxide ('N_2O'), hydrofluorocarbons ('HFCs'), perfluorocarbons ('PFCs'), and sulphur hexafluoride ('SF_6').

L3.12 The calculation for determining GHG emissions is based upon the multiplication of relevant emission factors with the activity producing GHG emissions, with the units used to report GHG emissions as tonnes of CO_2 equivalent (tCO_2e), for example:

Electricity consumed (kWh) x electricity emission factor (tCO_2e per kWh) = total tCO_2e

L3.13 Embodied Carbon calculations have been undertaken using industry benchmarks for embodied carbon and operational carbon (London Energy Transformation Initiative (LETI) and UK Green Building Council (UKGBC) net zero carbon) as well as the industry recognised and approved tool for assessing environmental impacts over a project lifecycle: etoolLCD. This tool aligns with international standards ISO 14044 '*Environmental management – Life Cycle Assessment – Requirements and Guidelines*' and EN 15978 '*Sustainability of Construction works – Assessment of Environmental Performance of Buildings – Calculation Methods'*.

L3.14 Embodied carbon calculations were performed using the latest carbon database available in eToolLCD, the United Kingdom LCI – V20 – Life Cycle Strategies.

L3.15 The quantification of annual emissions for the assessment is carried out to allow comparison of the Proposed Development's GHG emissions to regional and national annual emissions and targets.

Identification of Receptor Sensitivity

L3.16 GHG emissions arising from the construction and operation of the Proposed Development are considered the key impacts, with the principal receptor being the 'global atmosphere'. The consequence of GHG emissions associated with the Proposed Development is that atmospheric GHG emissions are pushed closer towards their environmental limit, triggering subsequent detrimental effects on the global climate system.

L3.17 In line with the ISEP (2022) guidance, the sensitivity of the receptor (i.e. the global atmosphere) in relation to GHG emissions is always considered to be 'high', based on the following conclusions:

- Value of the resource: the atmosphere and its role in regulating the global climate is of high ecological, social and economic value and underpins life on the planet, therefore is of global critical value;
- Vulnerability: it is recognised by the Paris Agreement (2015) that the GHG concentrations in the atmosphere are already approaching their environmental limit and the effects of climate change are already evident; and
- Reversibility of the effect: climate change is considered irreversible, with a delayed effect in any actions or technologies employed to reduce concentrations of GHG emissions already in the atmosphere.

Determining Effect

L3.18 In accordance with ISEP guidance (2022) the nature of the effect (i.e. beneficial, or adverse) is determined by whether the greenhouse gas (GHG) emissions contribute positively or negatively to the achievement of climate-related targets and objectives. An effect is generally considered beneficial if it leads to a reduction in GHG emissions or supports climate change mitigation efforts. Conversely, an effect is considered adverse if it results in an increase in GHG emissions or hinders efforts to mitigate climate change. The following terms have been used to define the level of the effects identified locally and nationally, on a Borough or the UK level, respectively:

- Major effect: where the Proposed Development is likely to cause a considerable change from the baseline conditions and the receptor has limited adaptability, tolerance or recoverability or is of the highest sensitivity;
- Moderate effect: where the Proposed Development is likely to cause either a considerable change from the baseline conditions at a receptor which has a degree of adaptability, tolerance or recoverability or a less than considerable change at a receptor that has limited adaptability, tolerance or recoverability;
- Minor effect: where the Proposed Development is likely to cause a small, but noticeable change from the baseline conditions on a receptor which has limited adaptability, tolerance or recoverability or is of the highest sensitivity; or where the Proposed Development is likely to cause a considerable change from the baseline conditions at a receptor which can adapt, is tolerant of the change or/and can recover from the change; and,
- Negligible: where the Proposed Development is unlikely to cause a noticeable change at a receptor, despite its level of sensitivity or there is a considerable change at a receptor which is not considered sensitive to a change.

L3.19 The level of effect has been informed by the magnitude of change due to the Proposed Development and the evaluation of the sensitivity of the receptor. The level of effect has been determined using professional judgement and the criteria set out in Table L3.2.

Table L3.2 Determining the level of effect in EIA

		Sensitivity			
		High	Medium	Low	Negligible
Scale of Effect	Large	Major	Moderate - Major	Minor - Moderate	Negligible
	Medium	Moderate - Major	Moderate	Minor	Negligible
	Small	Minor - Moderate	Minor	Negligible - Minor	Negligible
	Negligible	Negligible	Negligible	Negligible	Negligible

L3.20 As recommended by ISEP guidance (2022), the scale of effect has been considered in relation to the context of where the Proposed Development is located. The GHG emissions generated during the construction, operation and decommissioning of the Proposed Development have been considered in the context of CO_2e emissions for FHDC, Kent and the wider UK Carbon Budget.

L3.21 The incremental GHG emissions have been assessed in the relation to FHDC's and Kent's annual emissions (2023, latest available datasets) and the UK's Seventh Carbon Budget. This will place the GHG emissions impact into context and demonstrate its magnitude and level of contribution.

L3.22 To determine the magnitude of effect of GHG emissions, the criteria detailed in Tables L3.3, L3.4 and L3.5 have been used.

Table L3.3 Scale of Effect against FHDC annual GHG emissions

Scale of Effect	Criteria
Major Adverse	Emissions from Proposed Development above 1% of annual FHDC emissions (471.2 ktCO2e).
Moderate Adverse	Emissions from Proposed Development above 0.1% of annual FHDC emissions (471.2 ktCO2e).
Minor Adverse	Emissions from Proposed Development below 0.1% of annual FHDC emissions (471.2 ktCO2e).
Negligible	Emissions from Proposed Development below 0.01% of annual FHDC emissions (471.2 ktCO2e).

Table L3.4 Scale of Effect against Kent annual GHG emissions

Scale of Effect	Criteria
Major Adverse	Emissions from Proposed Development above 1% of annual Kent emissions (7,305.9 ktCO2e).
Moderate Adverse	Emissions from Proposed Development above 0.1% of annual Kent emissions (7,305.9 ktCO2e).
Minor Adverse	Emissions from Proposed Development below 0.1% of annual Kent emissions (7,305.9 ktCO2e).
Negligible	Emissions from Proposed Development below 0.01% of annual Kent emissions (7,305.9 ktCO2e).

Table L3.5 Scale of Effect against the UK's Carbon Budget

Scale of Effect	Criteria
Major Adverse	Emissions from Proposed Development above 1% of the UK's 7th Carbon Budget (535 Mt CO2e).
Moderate Adverse	Emissions from Proposed Development above 0.1% of the UK's 7th Carbon Budget (535 Mt CO2e).
Minor Adverse	Emissions from Proposed Development below 0.1% of the UK's 7th Carbon Budget (535 Mt CO2e).
Negligible	Emissions from Proposed Development below 0.01% of the UK's 7th Carbon Budget (535 Mt CO2e).

Determining Significance

L3.23 As recommended by ISEP guidance on 'Assessing Greenhouse Gas Emissions and Evaluating their Significance', the assessment will take a highly precautionary approach where any net increase in GHG emissions is treated as having a likely significant effect.

L3.24 The guidance sets out in EIA context relative significance descriptors to assist GHG assessments (beneficial, negligible, minor adverse, moderate adverse, major adverse), Major or Moderate Adverse effects and Beneficial effects are considered Significant. Minor Adverse and Negligible effects are considered to be Not Significant.

L3.25 The levels of significance are not solely based on the Proposed Development's GHG emissions alone, but on the Proposed Development's contribution towards limiting global warming to 1.5°C and the transition towards net-zero.

Summary of Data

L3.26 A summary of the data used within this assessment is provided below with supporting benchmarks, drawings and tables included within the Appendices.

Product Stage

L3.27 Schedules of areas provided by the applicant were the basis of the for deriving the GHG emissions of materials required on the Site based on benchmarks provided by LETI. Where specific material information was provided by the design team, for example the landscaping, generic data from approved LCA tools such as etoolLCD were used to calculate the GHG emission within the product stage.

Transport

L3.28 Royal Institute of Chartered Surveyors (RICS) Professional Statement on 'Whole life carbon assessment for the built environment' was used to gather data for the transport of materials along the procurement route. Where specific material information was provided by the design team generic data from approved LCA tools such as etoolLCD were used to calculate the embodied carbon emission within the transport stage.

L3.29 Construction vehicle movements were provided by the project Transport Consultant (DHA). Vehicle distances were assumed based on the Site locale. Construction traffic emissions were calculated using the factors presented in **Table L3.6**.

L3.30 Operational vehicle movements were provided by the project Transport Consultant (DHA). Transport emissions have been calculated using information provided by the transport consultant (number of trips per year per transport mode) and vehicle distances were calculated using the statistics from the National Travel Survey 2025. Operational traffic emissions were calculated using the most current Department for Business, Energy and Industrial Standard (BEIS) factors provided **in Table L3.7**.

Table L3.6 Transport Emission (Carbon) Factors 2025 – Construction Traffic

Mode	Type	Unit	2025 BEIS Factor (kg CO2e)
Car	Average car, fuel unknown	km	0.1673
HGV	All HGVs, average Laden	km	0.8912

Table L3.7 Transport Emission (Carbon) Factors 2025 – Operational Traffic

Mode	Type	Unit	2025 BEIS Factor (kg CO2e/km)
Walk	No emission	-	0
Cycle	No emission	-	0
Bus	Average local bus	km	0.1039
Car/Van	Average car, fuel unknown	km	0.1673
Car share	Average car, fuel unknown	km	0.1673
Rail	National Rail	km	0.0355
Other	Average of taxis, minibus, and ferry.	km	0.1730

Construction

L3.31 GHGs associated with the construction of the Proposed Development include those embedded in the materials used during construction. As well as emissions generated from on-site construction activities including fuel and gas combusting processes and emissions from construction vehicles.

L3.32 Carbon arising from the energy consumption by on-site machinery during construction was estimated using either (1) LETI benchmarks or (2) eToolLCD default carbon rates and the closest available datasets (3) Manual calculations following RICS guidance for estimating site impacts using Cut and fill estimates, and Gov.uk GHG emissions factors.

Maintenance, Repair and Refurbishment

L3.33 Over the lifetime of the Proposed Development, emissions arising from the maintenance, repair and operation of the onsite systems (B1-B6) were calculated over a lifespan of 60 years. The 60-year lifespan is also assessed to consider the operational timescale of the Proposed Development in line with industry standards.

L3.34 Appropriate allowances for future material maintenance and repair have been made in accordance with the default rates included in the selected etoolLCD database or are based on the benchmark rates provided by LETI.

Operational Energy

L3.35 At this stage the Applicant could not provide detailed information of the operation of the Proposed Development, instead energy consumption rates were calculated using industry standards for the various building typologies and landscaping plans available. Carbon emissions were estimated using BEIS factors emission factors, summarised in Table L3.8 below.

L3.36 As the residential elements of the Proposed Development form part of the outline planning application, any assumptions made on the emissions associated with the outline residential uses, have been made using the indicative accommodation schedule provided by the project architect.

Table L3.8 Operational energy EUIs and Emissions factors

Building type	EUI (kWh/m2GIA/yr)	EUI source	BEIS Carbon Factor (kgCO2e/kWh)
Houses	45	UKGBC net zero carbon building standard	0.177
Apartments	40	UKGBC net zero carbon building standard	
Hotel	164	UKGBC net zero carbon building standard	
Leisure	725	Energy consumption guide – Energy use in sports and recreation buildings	
Golf building	80	UKGBC net zero carbon building standard	
Landscaping	13.1*	Hilson Moran	
*Operation emissions relating to landscaping relate to lighting only. Not all landscaping areas have been assumed to have external lighting. Assumptions on which areas have lighting have been made by Hilson Moran.			

L3.37 The operational energy emissions also consider the emissions resulting from the loss of refrigerant associated with the heating of buildings within the Proposed Development. These have been calculated based on an assumed heating strategy and guidance from CIBSE's TM65: Embodied carbon in building services a calculation methodology.

End of Life Stage

L3.38 The 'end-of-life' stage accounts from carbon emissions arising from the demolition and deconstruction of the Proposed Development and the processing and disposal of materials (C1-C4).

L3.39 GHG Emissions associated with building decommissioning of the Proposed Development have been obtained from LETI lifecycle benchmarks or using etoolLCD database, where assumptions have been made, they are aligned with the guidance of section 3.5.4 of RICS Professional Standard: Whole Life Carbon Assessment for the Built Environment, 1st Edition.

Assessment Methodology: Climate Change Resilience (CCR) Assessment

L3.40 The Proposed Development's Climate Change Resilience ('CCR') during its operation has also been assessed as part of this ES Chapter. The approach to assessing the potential impact of climate change on the Proposed Development has been undertaken in line with ISEP guidance 'Climate Change Resilience and Adaptation', which presents a framework for the consideration of climate change resilience and adaptation within the EIA process.

L3.41 The ISEP guidance indicates key steps within the assessment of CCR:

1 Pre-EIA Stage: Embedding building climate resilience and adaptation into the project design;

2 Scoping climate change adaptation into the EIA;

3 Defining the future (climate) baseline;

4 Identifying and determining sensitivity of receptors (Vulnerability);

5 Reviewing and determining magnitude of the effects;

6 Determination of significance;

7 Developing additional adaptation and mitigation measures; and

8 Post-EIA Stage: Monitoring and Adaptive Management.

L3.42 The ISEP guidance recommends considering and assessing the 'in-combination' climate impacts as well as the possibility of new significant effects arising throughout the Proposed Developments lifetime. The assessment should assess whether additional effects of future climate impacts will alter the sensitivity or magnitude of the effects, and consequently the significance of effects.

L3.43 The CCR assessment examines how climate change may pose risk to the Proposed Development in relation to other environmental disciplines (including those scoped into EIA):

- Transport;
- Air Quality
- Socio Economic;
- Landscape & Visual Impact;
- Ecology & Biodiversity; and,
- Human Health.

L3.44 For each topic listed above, the CCR assessment will aim to:

- Identify and determine sensitivity of receptors;
- Review and determine the magnitude of effect;
- Determine the significance of effect; and,
- Identify appropriate mitigation (adaptation) measures.

L3.45 The CCR assessment considers whether the effect on receptors by potential impacts of the Proposed Development under the current condition (without climate change) are likely to be different under an alternative future climate baseline. A key aspect of the assessment (for each of the technical topics considered) has been to identify the likely effect of those receptors considered more vulnerable to changes in climate, having taken into account the resilience and adaptive measures proposed for the scheme in order to mitigate the risk presented by climate change.

L3.46 Due to uncertainty in both the future climate projections and the effect of future climate conditions of receptors, the assessment is qualitative and based on objective professional judgement, unless where there is published, accepted quantifiable methods available. Adaption and resilience measures are also outlined.

Identification of Receptor Sensitivity

L3.47 The CCR aims to identify potential receptors to the effects of future climate change. Potential receptors relevant to the location, nature and scale of the Proposed Development will be identified. These receptor groups may include:

- Buildings and infrastructure (including equipment and building operations);
- Human health receptors (e.g., workers and site users);
- Ecological receptors (e.g., habitats and species); and,
- Climatic systems (i.e., the atmosphere).

L3.48 The sensitivity of the receptors or receiving environment refers to how strongly it responds to change, as well as its ability to adapt to and recover from that change once impacted. In ascribing the sensitivity of receptors in relation to potential climate change effects, the following factors must also be considered:

- Susceptibility of the receptor (e.g., ability to be affected by a change) (opposite of resilience); and,
- Vulnerability of the receptor (e.g., potential exposure to a change).

L3.49 The susceptibility of a receptor can be determined using the following scale:

- High susceptibility: receptor has no ability to withstand/not be substantially altered by the projected changes to the existing/prevailing climatic factors (e.g., lose much of its original function and form).
- Moderate susceptibility: receptor has some limited ability to withstand/no be altered by the projected changes to the existing/prevailing climatic conditions (e.g., retain elements of its original function and form).
- Low susceptibility: receptor has the ability to withstand/not be altered much by the projected changes to the existing/prevailing climatic factors (e.g., retain much of its original function and form).

L3.50 The vulnerability of a receptor can be defined using the following scale:

- High vulnerability: receptor is directly dependent on existing/prevailing climatic factors and reliant on these specific existing climate conditions continuing in future (e.g., river

flows and groundwater level) or only able to tolerate a very limited variation in climate conditions.

- Moderate vulnerability: receptor is dependent on some climatic factors but able to tolerate a range of conditions (e.g., a species which has a wide geographic range across the entire UK but is not found in southern Spain).
- Low vulnerability: climatic factors have little influence on the receptors (consider whether it is justifiable to assess such receptors further within the context of EIA – i.e., it is likely that such issues should have been excluded through the EIA scoping process).

Determining Magnitude of Impact

L3.51 A combination of susceptibility and vulnerability in addition to value/importance of the receptor should be used to reach a reasoned conclusion on sensitivity.

L3.52 The magnitude is the degree of change from the determined baseline conditions which drives from the construction, operation and decommissioning of a development. A combination of probability and consequence should be used to reach a reasoned conclusion on the magnitude of impact/change. Professional judgement should be applied to assign magnitude.

Determining Significance

L3.53 Once the sensitivity and magnitude have been determined, these should be combined to reach an overall judgement on the significance of the likely environmental effect. As there is no legislative definition of 'significance', the conclusion of whether an effect is significant/the level of significance is down professional judgement of the sustainability consultant evaluating, in conjunction with the EIA Coordinator. An explanation of the outcomes of the assessment should be clearly set out.

L3.54 The matrix taken from ISEP guidance used to inform the likelihood, magnitude and significance outcomes of the CCR assessment are set out in Tables L3.9, L3.10 and L3.11 below.

Table L3.9 Likelihood Categories (Source: ISEP Guidance: EIA Guide to: Climate Change Resilience & Adaptation, 2020)

Likelihood Category	Description (probability and frequency of occurrence)
Very high	The event occurs multiple times during the lifetime of the project (60 years), e.g. approximately annually, typically 60 events.
High	The event occurs several times during the lifetime of the project (60 years), e.g. approximately once every five years, typically 12 events.
Medium	The event occurs limited times during the lifetime of the project (60 years), e.g. approximately once every 15 years, typically 4 events.
Low	The event occurs during the lifetime of the project (60 years), e.g. once in 60 years.
Very low	The event may occur once during the lifetime of the project (60 years).

Table L3.10 Likelihood Categories (Source: ISEP Guidance: EIA Guide to: Climate Change Resilience & Adaptation, 2020)

Consequence of Impact	Description
Very large adverse	National-level (or greater) disruption to strategic route(s) lasting more than 1 week.
Large adverse	National-level disruption to strategic route(s) lasting more than 1 day but less than 1 week OR Regional level disruption to strategic route(s) lasting more than 1 week.
Moderate adverse	Regional level disruption to strategic route(s) lasting more than 1 day but less than 1 week.
Minor adverse	Regional level disruption to strategic route(s) lasting less than 1 day.
Negligible	Disruption to an isolated section of a strategic route lasting less than 1 day.

Table L3.11 Likelihood Categories (Source: ISEP Guidance: EIA Guide to: Climate Change Resilience & Adaptation, 2020)

Measure of Likelihood						
		Very Low	Low	Medium	High	Very High
Measure of Consequence	Negligible	NS	NS	NS	NS	NS
	Minor	NS	NS	NS	S	S
	Moderate	NS	NS	S	S	S
	Large	NS	S	S	S	S
	Very Large	NS	S	S	S	S
Notes: NS = Not Significant, S = Significant						

Consultation

L3.55 Consultation undertaken as part of the EIA Scoping Process is described in Chapter B of this ES. No further consultation in relation to the assessment of Climate Change and Resilience has taken place.

L3.56 Based on the content of the outcome of the scoping process, the following scope has been considered:

- The physical effects of future climate change on the significance of effects considered in the ES;
- The resilience of the Proposed Development to physical effects of climate change; and
- The impact of the Proposed Development on climate change in the form of GHG emissions.

Assumptions and Limitations

GHG Assessment

L3.57 The metric for assessing climate change impacts of GHG emissions within this assessment is Global Warming Potential (GWP), expressed as tonnes of carbon dioxide equivalent (tCO_2e) in total or per annum. This accounts for six key GHGs: carbon dioxide (CO_2),

methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulphur hexafluoride (SF_6).

L3.58 This assessment is based on information available at this stage of development. Where Site specific information was not available, data from industry benchmarks were used in the assessment. The use of industry benchmarks and preliminary modelling results have supported the development of the assessment. The findings arising from this assessment can provide insight as to the priority for reducing the impact of GHG emissions resulting from the Proposed Development.

L3.59 Biogenic carbon has been reported as required by EN 15978:2011 'Sustainability of construction works' Assessment of environmental performance buildings. Calculation method. The biogenic carbon of timber products in the scheme followed the rule of thumb provided in EN 16449, which assumes that half of the dry mass of wood is assumed to be biogenic carbon. Due to the early stage of the project, this same rule was extended to other biogenic materials included in the soft landscape areas.

L3.60 Vehicle movements were provided by the project transport consultant (DHA). Average distances travelled for operational modes of travel were calculated using statistics from the National Travel Survey 2025. Average distances travelled for construction vehicles were assumed based on site locale.

L3.61 As the residential elements of the Proposed Development form part of the outline planning application, any assumptions made on the emissions associated with the outline residential uses, have been made using the indicative accommodation schedule provided by the project architect at this stage.

L3.62 The assumed lifespan of the Proposed Development is 60-years, in accordance with industry standards.

L3.63 The assessment presents total carbon emissions generated throughout the construction, operation and end-of-life phases of development. The annual carbon footprint of each stage has been compared to the local (FHDC 2023 annual emissions – latest available dataset), regional (Kent 2023 annual emissions) and national (UK's seventh carbon budget) emissions. The emissions from all stages have been annualised using the operational lifetime (60 years).

L3.64 It is important to note that the UK electricity factor is prone to fluctuate from year to year as the fuel mix consumed in UK power stations (and auto-generators) and the proportion of net imported electricity changes. Projected grid decarbonisation has not been considered when calculating the operational carbon of the Proposed Development to represent a current worse case scenario.

Embodied Carbon Assessment

L3.65 Due to the early phase of the design and following the guidance of RICS Whole Life Carbon Assessment for the Built Environment (2023), industry benchmarks were weighted to determine the embodied carbon calculations across the lifecycle of the residential, leisure spa and hotel and golf buildings at the Proposed Development. The following industry benchmarks were consulted as source of impacts per m^2 of GIA:

- LETI - Embodied Carbon Target Alignment (2020)[1];

L3.66 The relevant data of each of the benchmarks were weighted to analyse the performance levels as per **Table L3.12**.

Table L3.12 Embodied Carbon Assessment – Benchmarks

Building Type	Business-as-usual design (Band E) Upfront (A1-A5)	Business-as-usual design (Band E) Lifecycle (A-C)
Residential	850	1200
Hotel and Spa	1000	1250
Leisure	850	1200
Golf building	850	1050
Business-as-usual (BaU): BaU refers to the baseline scenario against which a project's carbon performance is compared. A1-A5: Product and Construction modules. A-C: Whole-Life-Carbon.		

L3.67 Since the above benchmarks do not cover all ancillary areas and elements supporting the residential units, additional calculations were carried out to supplement the embodied carbon assessment. A schedule of areas for landscaping as well as detailed of the excavation an preparation works were provided by the design team and assessed using eTool LCD carbon factors.

L3.68 Transportation emissions were modelled based on an assumed average transport distance along the procurement route, using standard emission data from eToolLCD. The Applicant's local supply chain was incorporated into these calculations.

L3.69 Emissions resulting from refrigerant losses have been calculated based on CIBSE's TM65: Embodied carbon in building services a calculation methodology and a typical servicing strategy.

CCR Assessment

L3.70 The UK Climate projections have been used with the CCR assessment in line with UKCP18 modelling, which assumes different Representative Concentration Pathways ('RCP'). This CCR follows the RCP 8.5 which is the highest-impact scenario and therefore takes a worst-case approach. It is important to note that because the assessment is based on projections and modelling, fluctuations are expected and therefore uncertainties are inherently present within the modelling and CCR assessment.

L3.71 The assessment takes a long-term view approach and therefore, the receptor types considered within the assessment may be more broadly defined, as opposed to other ES Chapters that are more specific in the receptors identified.

L3.72 The mitigation measures proposed within this CCR assessment are provided as advisory and as non-committing recommendations. It is not stipulated by policy the requirement for a Climate Change Adaptation Plan nor the requirement for monitoring the Proposed Development's resilience over time. Therefore, the advised mitigation measurements are not mandatory but should be considered for best practice and long-term resilience.

L4.0 Baseline Conditions

L4.1 For the purpose of this assessment a baseline is defined against which the impact of the Proposed Development can be compared against. As described within the ISEP guidance, the baseline for the assessment should either be determined based on available data or alternatively to be zero, where data is not available or where no physical development or activity is taking place. The assessment should determine the baseline GHG emissions based on the current existing projects (i.e. energy consumption of building scheduled for deconstruction for a complete redevelopment) and infrastructure (i.e. current operational and use emissions of a road due to be upgraded) within the Site Boundary.

Current Conditions

L4.2 The Site is located within the coastal town of Hythe in Kent, under the jurisdiction of Folkestone and Hythe District Council ('FHDC'). The Site is currently comprised of the existing Hythe Imperial Hotel and an 18-hole golf course to the west which is operated by the Hotel. The hotel is four/five storeys fronting Princes Parade with associated landscaping and parking. At the southwest corner of the Site, there is a small clubhouse, associated maintenance building and access track. Six small outbuildings/sheds are located along the boundary of the golf course, used primarily for maintenance and storage associated with the golf course's use.

L4.3 Based on the existing uses on the Site ('the existing development') the current baseline GHG emissions associated with operation have been calculated where data is available and an annual carbon footprint for the existing development has been presented.

L4.4 Baseline emissions associated with the construction phase have been assumed as zero. Baseline emissions associated with repairs, maintenance and refurbishment have also been assumed as zero. Baseline emissions associated with refrigerant leakages of existing systems have been excluded due to limited data availability.

Energy Usage

L4.5 Baseline annual energy usage (Operational Energy (B6)) for the existing development has been calculated using electricity and gas (hotel only) usage data provided by the Applicant, as summarised in **Table L4.1**. Emissions were then calculated using emission factors obtained from current BEIS data.

Table L4.1 Baseline Conditions – Operational Energy

	Usage (kwh/year)	2025 BEIS Factor (kg tCO2e)		TOTAL tCO2e/year
Electricity	978,918.50	Electricity	0.196	173.27
Gas	1,640,067.00	Natural gas	0.203	332.44
Total				523.85

Water Usage

L4.6 Baseline emissions associated with the supply and treatment of water (Operational Water (B7)) for the existing development have been calculated using data provided by the

Applicant, as summarised in **Table L4.2**. Emissions were then calculated using emission factors obtained from current BEIS data.

Table L4.2 Baseline Conditions – Operational Water Emissions

	Usage (m^3/year)	2025 BEIS Factor (kg tCO_2e)		TOTAL tCO_2e/year
Water	17923	Supply	0.1913	3.42867
		Treatment	0.17088	3.06268
Total				6.49135

Transport

L4.7 Vehicle movements associated with the existing development were provided by the project transport consultants (DHA). Average distances travelled were calculated using statistics taken from the National Travel Survey 2025. Transport emissions were then calculated using emission factors obtained from current BEIS data for each mode of transport, as set out in **Table L4.3** below.

Table L4.3 Baseline Conditions – Operational Traffic Emissions

Mode	Trips	Average distance (km/trip)	Emission factor (kg CO_2e /km)	Total distance (kms)	Total emissions (kg CO_2e /yr)
Walk	48505	1.46	0.0000	70,817	0
Cycle	13858	5.31	0.0000	73,589	0
Bus	20788	7.96	0.1039	165,470	17,184
Car/Van	526623	13.67	0.1673	7,198,935	1,204,022
Car Sharing	27717	13.67	0.1673	378,891	63,370
Rail	41575	58.39	0.0355	2,427,593	86,082
Other	13858	21.23	0.1730	294,216	50,911

A summary of all estimated baseline GHG emissions is provided in **Table L4.4** below.

Table L4.4 GHG Assessment – Baseline Conditions

Development Phase		Baseline Emissions (tCO_2e/year)	Rationale
Construction	Embodied Carbon – Product and Construction Stages (A1-A3, A5)	0.00	Baseline for construction and demolition is zero
	Construction Traffic (A4)	0.00	Baseline for construction and demolition is zero
	Refrigerant Impact (B1)	0.00	Conservative assumption. Information on refrigerant loss from the existing systems not available; therefore, emissions assumed as zero.
	Embodied Carbon - Repair, Maintenance	0.00	Conservative assumption. Some materials will be reused and

Development Phase		Baseline Emissions (tCO_2e/year)	Rationale
Operational	and Refurbishment (B2-B4)		repurposed; however, this figure is not available at this stage and therefore baseline emissions assumed as zero.
	Energy (B6)	524	Calculated using utility usage data provided by the Applicant and BEIS carbon factors for gas and electricity
	Water (B7)	6	Calculated using usage data provided by the Applicant and BEIS carbon factors for the supply and treatment of water.
	Traffic	500	Calculated using vehicle movements provided by DHA, average distances travelled and BEIS carbon factors.
End of Life	Embodied Carbon – End of Life (C1-C4)	0.00	Baseline for end-of-life is zero.

Future Baseline

GHG

L4.8 The future baseline assumes that the Proposed Development is not constructed, and therefore the conditions will remain the same as the current baseline.

L4.9 Some improvements would be anticipated attributed to improvements in GHG emissions, driven by improvements in grid carbon intensity, adoption of cleaner technologies, and the transition to a lower-emission vehicle fleet.

Climate Resilience

L4.10 In line with the ISEP guidance, a baseline has been established and a future climate scenario has been developed using the future climate projections published by the Met Office (UK Climate Projections (UKCP18)). The results include projections for several variables including annual mean temperatures, annual changes in summer and winter precipitation. Data is provided for different time periods, from 1961 until 2100, under different scenarios with different probability levels within each scenario. In alignment with guidance, a high emissions scenario is used (RCP8.5) for the 2080 future baseline year, considered most relevant to the Proposed Development. The projected change to the range of climatic conditions has adopted the 50% probability level, which is a central estimate adopted given the level of uncertainty associated with predicting the modelled scenarios.

L4.11 The variations in temperature and precipitation for Southeast England area, where the Site is located, can be seen in the table below. The 'UKCP18 Factsheet: Derived Projections' (August 2022) was used to inform the table and CCR assessment, as it provided an accessible and clear summary.

Table L4.5 UK Climate Projections for Southeast England following the RCP8.5 Scenario

Variable	Project Change in Trend		
	10th Percentile	50th Percentile	90th Percentile
Temperature (°C)			
Mean Annual Temperature	↑	↑	↑
Mean Summer Temperature	↑	↑	↑
Mean Winter Temperature	↑	↑	↑
Precipitation (%)			
Mean Summer Precipitation	↓	↓	↑↓
Mean Winter Precipitation	↑↓↑↓	↑	↑

Temperature

L4.12 Overall UKCP18 derived projects in the UK for 2°C of global mean warming include:

- The largest warming in the UK will be in the Southeast where summer temperatures may increase another 3 to 4°C relative to present day (1981-2000);
- Median warming will be at least 1 to 2°C throughout the year across the whole of the UK;
- Winter cool days will warm by 1 to 1.5°C across the country, whilst temperatures on warmer winter days increase by less than 1°C; and,
- In summer both hot and cool days warm by 1 to 1.5°C across Scotland and 1.5 to 2°C across England.

L4.13 For overall UK 4°C of global warming, the changes in pattern include:

- All seasons warm, but summers warmer than winters;
- Summer temperatures rise by another 4 to 5°C in the South of England and 3 to 4°C elsewhere in the country;
- Hot summer days warm by 4.5 to 5°C compared to present day (1981-2000), across much of Southern England, possibly exceeding 5°C in some locations;
- Cooler summer days warm by 4 to 4.5°C across England and up to 5°C in the Southeast. Increases reduce toward to north to under 3°C in the far Northwest of Scotland"
- Cool winter days warm by 2.5 to 3°C across the country; and,
- Warm winter days warm by 2.5 to 3°C in England but by 2 to 2.5°C in Wales and Scotland.

Precipitation

L4.14 Overall UKCP18 derived projects in the UK for 2°C of global mean warming include:

- Changes are uncertain, but suggest slightly wetter winters and drier summers, with summer drying more in the South; and,
- Dry days in summer have 30% less precipitation in parts of the Southwest.

L4.15 For overall UK 4°C of global warming, the changes in pattern include:

- Median winter precipitation increases by up to 20% across most of the country;
- Median summer precipitation decreases most in the south with median reductions of up to 20 to 30% across much of the England and Wales;
- Dry summer days decrease in precipitation by up to 50% in summer across much of Southern Wales and England. This drying reducing toward the north to under 20% in Northern Scotland; and,
- The wettest summer days dry by up to 40% on parts of the south coast. This decreases toward zero in the North.

Sea-Level Rise

L4.16 Global sea levels are expected to keep rising, influenced by future GHG emissions and how sensitive the climate system is to warming. In England, the amount of sea level rise experienced locally also depends on land movement, with land generally sinking in the south-east and rising in the north-west.

L5.0 Potential Effects

Embedded Mitigation

L5.1 Embedded mitigation measures, set out below will be incorporated throughout the construction and operational phases of the Proposed Development to minimise environmental impacts.

Construction Phase

L5.2 To reduce emissions during the construction of the Proposed Development a number of measures have been considered for incorporation into the design:

- Selecting materials with low embodied impact, focusing on key elements of the Proposed Development that typically have higher carbon impacts;
- Sourcing materials locally to reduce the need for transport;
- Committing to resourcing construction materials through local supply chains;
- Where possible utilise cut and fill civil engineering techniques, to minimise emissions generated by transporting materials throughout the construction phase; and,
- Select materials with long life and require little maintenance.

L5.3 A Framework Construction Environmental Management Plan (CEMP) has been prepared by the Applicant (provided at Appendix C4) which sets out the measures to be taken in relation to materials and waste management to minimise potential GHG emissions, including:

- The amount of excavated material held on site will be minimised;
- Waste during the construction process will be minimised, through waste reduction, material efficiency and waste tracking;
- Waste arising from the construction of the Proposed Development will be managed in accordance with local and national policy and guidance. It shall be managed in accordance with the waste hierarchy; and
- The Proposed Development should adhere to sustainable waste management principles with the objective of reducing and recycling materials either on or off site as far as practicable.

Operational Phase

L5.4 To reduce emissions during the operation of the Proposed Development a number of embedded mitigation and sustainable design measures have been considered. These are presented in the Sustainability and Environmental Standards Statement (submitted as a standalone document with the planning application) and summarised below.

- Passive design seeks to maximise the use of natural sources of heating, cooling and ventilation to maintain thermal comfort levels within the building. Where feasible external features will be included to provide a degree of shading from the sun. It is

intended that the building will have the potential to be naturally ventilated via openable windows and vents.

- Fabric efficiency concerns the thermal properties associated with the building fabric and construction. Building fabric will incorporate low U-Values to reduce heat loss; a high level of air tightness is also proposed to control air filtration and further reducing heating demand; and, building fabric will be constructed to avoid thermal bridging and heat loss.
- System efficiency where fans are employed, the specific fan power for these systems will be efficient and target a low power consumption rate.
- Metering: the major energy uses shall be monitored via separate "smart" energy meters with time and temperature zone control.
- Lighting: internal lighting design is intended to be highly efficient and in excess of Building Regulation requirements. It is intended that lighting efficiency shall be in excess of 110 lumens/circuit Watt and predominantly LEDs.
- Ventilation / cooling systems: where practical mechanical ventilation heat recovery will be incorporated in the apartments to help maintain thermal comfort levels. There is potential for the apartments to be naturally ventilated/ purge ventilated via openable windows.
- Low carbon / renewable technologies: Will be considered for the Proposed Development to ensure that the most low carbon sources of technologies are implemented. Green and blue roofs with PV panels are proposed for the new Western Wing of the hotel and new leisure building. The golf building will have a part green, part green and blue roof.

L5.5 A Framework Travel Plan (provided at Appendix H2) will also be implemented to encourage more sustainable modes of transport for residents and visitors to the Proposed Development.

Major Hazards and Accidents

L5.6 No consideration of major hazards or accidents has been made in relation to GHG emissions within this assessment.

L5.7 With regards to climate resilience, the vulnerability of the Proposed Development to climate change, potential natural climatic hazards have been considered including flooding, high winds, storms, heatwaves and drought.

Phasing

L5.8 Phasing of construction is not relevant to the assessment presented within this Chapter. This considers the total combined impacts throughout the construction and operation of the Proposed Development.

Project Carbon Footprint

L5.9 The total emissions associated with the construction, operation and decommissioning of the Proposed Development are presented below and compared against local (FHDC), regional (Kent) and national (UK 7th Carbon Budget) emissions.

During Construction

L5.10 Table L5.1 presents a summary of the overall emissions associated with the construction of the Proposed Development compared to local, regional and national emissions.

Table L5.1 Summary of Proposed Development Carbon Footprint – Construction Phase

	Embodied Carbon (Product & Construction Stage)	Traffic Emissions	Total Construction
Total Proposed Development Emissions (tCO_2e)	41,196	28,216	69,412
Baseline Emissions (tCO_2e/year)	0.00	0.00	0.00
Construction Emissions (tCO_2e/year)	686.60	470.27	1,156.86
Net Emissions (tCO_2e/year)	686.60	470.27	1,156.86
FHDC - Annual GHG Emissions (tCO_2e)	471,167		
Proposed Development as % of FHDC	0.1457%	0.0998%	0.2455%
Kent - Annual GHG Emissions (tCO_2e)	7,305,869		
Proposed Development as % of Kent	0.0094%	0.0064%	0.0158%
UK Carbon Budget (tCO_2e)	535,000,000		
Proposed Development as % of UK CB	0.00013%	0.00009%	0.00022%
*Significant effects indicated in bold. EoL (End of Life). CB (Carbon Budget)			

Embodied Carbon

L5.11 The assessment of embodied carbon associated with the transport of construction materials and the construction of the Proposed Development (A1-A5) determined total emissions to be 41,196 tCO_2e . With the annual emissions accounting for 0.1457% of local emissions, 0.0094% of regional emissions and 0.00013% of the UK's latest carbon budget.

L5.12 Based on the criteria set out in Tables L3.3, L3.4 and L3.5, embodied carbon emissions throughout the construction phase are considered to have a **Moderate Adverse** effect, which is **Significant** in relation to local carbon budgets, and a Negligible (Not Significant) effect in relation to regional and UK budgets, without the implementation of additional mitigation.

Construction Traffic

L5.13 The assessment of traffic associated with the construction of the Proposed Development has been undertaken using vehicle movements provided by DHA as detailed in Paragraph L3.29. The total construction traffic emissions were determined to be 28,216 tCO_2e. With annual emissions accounting for 0.0998%% of local emissions, 0.0064% of regional emissions and 0.00009% of the UK's latest carbon budget.

L5.14 Based on the criteria set out in Tables L3.3, L3.4 and L3.5, emissions generated by construction traffic are considered to have a Minor Adverse (Not Significant) effect in relation to local budgets, and Negligible (Not Significant) effect in relation to regional and UK budgets.

Summary

L5.15 The total emissions associated with the construction of the Proposed Development were determined to be 69,412 tCO_2e. With annualised emissions accounting for 0.25% of local emissions, 0.0158 of regional emissions and 0.00022% of the UK's carbon budget.

L5.16 Based on the criteria set out in Tables L3.3, L3.4 and L3.5, the effect of emissions generated throughout the construction phase are considered **Moderate Adverse** (**Significant**) when compared to the local carbon budget, Minor Adverse (Not Significant) compared to the regional budget, and Negligible (Not Significant) in relation to the UK's carbon budget, without the implementation of additional mitigation.

During Operation

L5.17 Table L5.2 presents a summary of the overall emissions associated with the operation of the Proposed Development compared against local (FHDC), regional (Kent) and national (UK 7th Carbon Budget) emissions.

Table L5.2 Summary of Proposed Development Carbon Footprint – Operational

	Refrigerant Loss	Repair, Maintenance and Refurbishment	Energy	Water	Traffic	Total Operational
Total Proposed Development Emissions (tCO_2e)	38	20,244	52,976	1,329	85,294	159,843
Baseline Emissions (tCO_2e/year)	0.00	0.00	505.71	6.49	499.61	1011.81
Operational Emissions (tCO_2e/year)	0.63	337.40	882.93	22.15	1421.57	2664.05
Net Emissions (tCO_2e/year)	0.63	337.40	377.22	15.65	921.96	1652.24
FHDC - Annual GHG Emissions (tCO2e)	471,167					
Proposed Development as % of FHDC	0.000134%	0.0716%	0.0801%	0.0033%	0.1957%	0.3507%
Kent - Annual GHG Emissions (tCO2e)	7,305,869					

	Refrigerant Loss	Repair, Maintenance and Refurbishment	Energy	Water	Traffic	Total Operational
Proposed Development as % of Kent	0.0000086 %	0.0046%	0.0052 %	0.0002 %	0.0126 %	0.0226%
UK Carbon Budget (tCO2e)	535,000,000					
Proposed Development as % of UK CB	0.00000012 %	0.00006%	0.0000 7%	0.0000 029%	0.0001 7%	0.00031%
	*Significant effects indicated in bold. EoL (End of Life). CB (Carbon Budget)					

Refrigerant Loss

L5.18 Operational embodied carbon emissions include for the impact of refrigerant losses (B1) associated the Proposed Development as detailed in paragraph L3.36.

L5.19 The assessment of embodied carbon associated with the losses of refrigerants during the operation of the Proposed Development (B1) determined total emissions to be 38tCO_2e. With the annualised emissions accounting for 0.000134% of local emissions, 0.0000086% of regional emissions and 0.00000012% of the UK's carbon budget.

L5.20 Based on the criteria set out in Tables L3.3, L3.4 and L3.5, embodied carbon emissions throughout the operational phase associated with losses of refrigerants are considered to have a Negligible (Not Significant) effect in relation to the local, regional and nationwide carbon budgets, without the implementation of mitigation.

Repair, Maintenance and Refurbishment

L5.21 Operational embodied carbon emissions include for the repair and maintenance of the Proposed Development as detailed in paragraphs L3.34 and L3.35.

L5.22 The assessment of embodied carbon associated with the operation of the Proposed Development (B1-B5) determined total emissions to be 20,244tCO_2e. With the annualised emissions accounting for 0.0716% of local emissions, 0.0046% of regional emissions and 0.00006% of the UK's carbon budget.

L5.23 Based on the criteria set out in Tables L3.3, L3.4 and L3.5, embodied carbon emissions throughout the operational phase are considered to have a Minor Adverse effect (Not Significant) in relation to the local carbon budget, and a Negligible (Not Significant) effect in relation to the regional and nationwide carbon budgets, without the implementation of mitigation.

Transport

L5.24 The assessment of GHG emissions associated with traffic generated throughout the operation of the Proposed Development determined total emissions to be 85,294 tCO_2e. With the annualised emissions accounting for 0.1957% of local emissions, 0.0126% of regional emissions, and 0.00017% of the UK's carbon budget.

L5.25 Based on the criteria set out in Tables L3.3, L3.4 and L3.5, the effect of operational traffic emissions throughout the operational phase are considered **Moderate Adverse**

(Significant) in relation to local emissions, Minor Adverse (Not Significant**)** in relation to regional emissions and Negligible (Not Significant) in relation to the UK carbon budget.

Operational Energy

L5.26 The assessment of energy associated with the operation of the Proposed Development (B6) determined the total emissions to be 52,976 tCO_2e. With the annualised emissions accounting for 0.0801% of local emissions, 0.0052% of regional emissions and 0.00007% of the UK's carbon budget.

L5.27 Based on the criteria set out in Tables L3.3, L3.4 and L3.5, the effect of operational energy emissions throughout the operation of the Proposed Development are considered Minor Adverse (Not Significant) in relation to local emissions, and Negligible (Not Significant) in relation to regional emissions and the UK's carbon budget, without the implementation of mitigation.

Water

L5.28 The assessment of emissions associated with the supply and treatment of water (B7) determined the total emissions to be 1,329 tCO_2e. With the annualised emissions accounting for 0.0033% of local emissions, 0.0002% of regional emissions and 0.0000029%of the UK's carbon budget.

L5.29 Based on the criteria set out in Tables L3.3, L3.4 and L3.5, the effect of the emissions generated by water supply and treatment throughout the operation of the Proposed Development are considered Negligible (Not Significant) in relation to local emissions, regional emissions and the UK's carbon budget, without the implementation of mitigation.

Summary

L5.30 The total emissions associated with the operation of the Proposed Development were determined to be 159,881 tCO_2e. With annualised emissions accounting for 0.35% of local emissions, 0.0224 of regional emissions and 0.00031% of the UK's carbon budget.

L5.31 Based on the criteria set out in Tables L3.3, L3.4 and L3.5, the effect of emissions generated throughout the operational phase are considered **Moderate Adverse** (**Significant**) when compared to the local carbon budget, Minor Adverse (Not Significant) compared to the regional budget, and Negligible (Not Significant) in relation to the UK's carbon budget, without the implementation of additional mitigation.

During Decommissioning

Embodied Carbon

L5.32 Table L5.2 presents a summary of the overall emissions associated with the decommissioning (End of Life ('EoL')) of the Proposed Development compared against local (FHDC), regional (Kent) and national (UK 7th Carbon Budget (CB)) emissions

Table L5.3 Summary of the Proposed Development Carbon Footprint – End of Life Stage

	Embodied Carbon – End of Life (EoL) (C1-C3)
Baseline Emissions (tCO2e)	0.00

	Embodied Carbon – End of Life (EoL) (C1-C3)
EoL Emissions (tCO2e)	45.57
Net Emissions	45.57
FHDC - Annual GHG Emissions (tCO2e)	471,167
Proposed Development as % of FHDC	0.00967%
Kent - Annual GHG Emissions (tCO2e)	7,305,869
Proposed Development as % of Kent	0.00062%
UK Carbon Budget (tCO2e)	535,000,000
Proposed Development as % of UK CB	0.00001%
*Significant effects indicated in bold. EoL (End of Life). CB (Carbon Budget)	

L5.33 The assessment of emissions associated with the decommissioning of the Site was undertaken as part of the embodied carbon assessment.

L5.34 The assessment of embodied carbon arisings associated with the end of life of the Proposed Scheme equate to 2,734 tCO2e. With the annual emissions accounting for 0.00967%of local emissions, 0.00062% of regional emissions and 0.00001% of the UK carbon budget.

L5.35 Based on the criteria set out in Tables L3.3, L3.4 and L3.5, the effect of embodied carbon emissions associated with the decommissioning of the Proposed Development are considered Negligible (Not Significant) in relation to local emissions, regional emissions and the UK's carbon budget, without the implementation of additional mitigation.

Climate Resilience Potential Effects

During Operation

L5.36 A Climate Change Resilience (CCR) assessment has been undertaken for the Proposed Development, considering the key climate hazards and potential impacts on sensitive receptors. The sensitive receptors considered within the CCR assessment are identified in **Table L5.3** below.

L5.37 The assessment has been undertaken using information available other Technical ES Chapters and planning reports, ISEP guidance and using professional judgement. The matrix for determining likelihood, magnitude and significance used to inform this assessment are taken from ISEP guidance, included within Section L3.0 of this Chapter.

L5.38 The findings of the CCR assessment are presented in **Table L5.4**.

Table L5.4 Findings of CCR Assesment

Climate Effect / Event	Receptor	Potential Impact	Adaptation Design Measures / Embedded Mitigation	Likelihood of Effect	Magnitude of Risk (Measure of Consequence)	Significance
UKCP 8.5 Projection: Rising Temperatures						
Increase in mean temperatures (annual and seasonal) Heatwave event	Buildings & Infrastructure	Buildings and homes overheating - impacting thermal comfort, reducing overall health, wellbeing and productivity. Utilities & energy - overheating of electrical equipment, risk of power outages, reduced grid efficiency and higher demand for cooling. Transport - increased stress on infrastructure (rails buckling, cable sags, trackside fires), weakened the integrity/damage of highways (melting tarmac, potholes), overheating of vehicles."	Buildings will be designed with suitable systems in place to avoid overheating and adequate ventilation as detailed within the Sustainability Statement (SS) prepared for the Proposed Development (submitted as a standalone document with the planning application (Ref: 34303-HML-XX-XX-RP-V-000001). Details renewable energy generation opportunities as secondary energy supplies. The Energy Strategy, (submitted as a standalone document with the planning application, details renewable energy generation opportunities, increasing the resilience of the Proposed Development energy supplies (Ref: 34303-HML-XX-XX-RP-V-000001) The Energy strategy considers the use of heat pumps which can be reversible to provide cooling for future weather conditions (Ref: 34303-HML-XX-XX-RP-V-000001). A Framework Travel Plan (TP) (ES Appendix H2) and Transport Assessment (ES Appendix H1) have been produced for the Site. The TP encourages the use of sustainable transport (Ref: DHA PL/TV/35744).	Increase in mean temperatures (annual and seasonal) - **Low to Medium.** Heatwave event - **Medium to High.**	Increase in mean temperatures (annual and seasonal) - **Negligible to Minor.** Heatwave event - **Negligible to Minor.**	Increase in mean temperatures (annual and seasonal) - **Not Significant**. Heatwave event – **Significant**.

Climate Effect / Event	Receptor	Potential Impact	Adaptation Design Measures / Embedded Mitigation	Likelihood of Effect	Magnitude of Risk (Measure of Consequence)	Significance
	Human Health	Increase in heat-related illnesses and mortality. Increased infectious disease risk from ticks (Lyme disease), mosquitos, food and water borne bacteria during heat. Worsening of air quality during heatwaves. Reduced mobility and access to transport services due to stress on transport infrastructure as well as reduced appeal to walk, run or cycle.	The site-specific Construction Environmental Management Plan (CEMP) has been prepared (see Appendix C4 of the ES) includes measures for mitigating air pollution throughout the construction phase. An Air Quality Assessment has been undertaken as part of the ES (Ref: Chapter J: Air Quality) demonstrates baseline air quality conditions well below the relevant AQS objectives for pollutants of concern (NO2 and Particulates) within and surrounding the site.	Increase in mean temperatures (annual and seasonal) - **Low to Medium.** Heatwave event - **Medium to High.**	Increase in mean temperatures (annual and seasonal) - **Negligible to Minor.** Heatwave event - **Negligible to Minor.**	Increase in mean temperatures (annual and seasonal) - **Not Significant**. Heatwave event – **Significant.**
	Ecology & Natural Environment	Soil cracking, subsidence and ground instability from stress during heatwave periods resulting in a loss of habitat. Habitat stress and biodiversity loss resulting during heatwave events. Changes in breeding patterns of species and food availability due to rises in annual/seasonal mean temperatures. "	Water reuse and management plan (e.g., rainwater harvesting) to support the landscaping and vegetation on Site (see Flood Risk Assessment (FRA) and Drainage Strategy at ES Appendix D1). Green and blue roofs with PV panels are proposed for the hotel extension and new leisure building. The golf building will have a part green, part green and blue roof see Flood Risk Assessment (FRA) and Drainage Strategy at ES Appendix D1).	Increase in mean temperatures (annual and seasonal) - **Low to Medium.** Heatwave event - **Medium to High.**	Increase in mean temperatures (annual and seasonal) - **Negligible to Minor.** Heatwave event - **Negligible to Minor.**	Increase in mean temperatures (annual and seasonal) - **Not Significant**. Heatwave event – **Significant**.
UKCP 8.5 Projection: Wetter Winters (Increased Precipitation %)						
Extreme rainfall events	Buildings & Infrastructure	Property damage due to floodwaters and ground subsidence.	The FRA identified that the Site is located within Flood Zones 1, 2 and 3. Several measures have been incorporated into the design of the	Extreme rainfall events - **Very Low to Low.**	Extreme rainfall events - **Negligible to Minor**.	Extreme rainfall events - **Not Significant**

Climate Effect / Event	Receptor	Potential Impact	Adaptation Design Measures / Embedded Mitigation	Likelihood of Effect	Magnitude of Risk (Measure of Consequence)	Significance
Surface water flooding		Damage to the foundations and integrity of the existing and proposed buildings due to ground subsidence and movement resulting from over saturated soils. Utilities/Energy - damage to utilities infrastructure and power outages due to floodwaters Transport - damage to infrastructure and roads from floodwaters."	Proposed Development to reduce flood risk identified within the FRA and the Water Environment and Flood Risk ES Chapter (Ref: Chapter D: Water Environment and Flood Risk). Land levels with the proposed residential area are raised to 4.50 AODN as shown on the Maximum Number of Storeys Plan (Appendix C1), golf clubhouse to 4.50 AODN, hotel to 4.30 AODN and leisure to 5.73 AODN as shown on the detailed planning drawings (Appendix C2). Internal floor levels will also be raised at some units. The less vulnerable land uses (i.e., commercial and car parking) located at ground level. Sensitive land uses (i.e., living and sleeping accommodation) located on upper or raised floors. A Surface Water Management Strategy (SWMS) has been prepared (Ref: Chapter D: Water Environment and Flood Risk). The SWMS ensures that rain falling onto the site is captured and management sustainably. This includes the provision of Sustainable Drainage Systems (SuDS), including water butts, green/blue roofs permeable surfaces, infiltration basins and soakaways.	Surface water flooding - **Very low to Low**.	Surface water flooding - **Negligible to Minor.**	Surface water flooding - **Not Significant**.
	Human Health	Risks to health and safety of visitors, staff and residents during flood events.	The SWMS and Foul Water Management Strategy (FWMS) (Ref: Chapter D: Water Environment and	Extreme rainfall	Extreme rainfall events -	Extreme rainfall events - **Not Significant.**

Climate Effect / Event	Receptor	Potential Impact	Adaptation Design Measures / Embedded Mitigation	Likelihood of Effect	Magnitude of Risk (Measure of Consequence)	Significance
		Risk of disease from contaminated floodwaters. Reduced mobility and access to transport for residents. Potential displacement of residents and workers during flooding events.	Flood Risk) detail how foul water will be managed appropriately - the appropriate storage and discharge of foul water and sewage will help to prevent contamination of floodwaters.	events - **Very Low to Low.** Surface water flooding - **Very low to Low.**	**Negligible to Minor.** Surface water flooding - **Negligible to Minor**.	Surface water flooding - **Not Significant**.
	Ecology & Natural Environment	Soil erosion and top soil run off as a result of flash flooding/surface water flooding resulting in a loss of habitat and carbon release. Loss of habitat due to waterlogging. Risk of fluvial flood with the Royal Military Canal (RMC) located adjacent to the Site boundary.	Landscape strategy includes naturally waterlogged wetland habitats around the Site (golf course) as shown on the Landscape Masterplan (Appendix C2) - acts as a natural flood defence as these habitats can absorb, store and slowly release large volumes of water. The inclusion of wetland buffers supporting reedbeds will also help improve the water quality from run-off. The provision of the SuDS features will limit waste-water runoff both into the sea, the Royal Military Canal Local Wildlife Site ('RMC LWS') and/or sewer system (Ref: Chapter G: Ecology and Biodiversity).	Extreme rainfall events - **Very Low to Low.** Surface water flooding - **Very low to Low.**	Extreme rainfall events - **Negligible to Minor**. Surface water flooding - **Negligible to Minor.**	Extreme rainfall events - **Not Significant**. Surface water flooding - **Not Significant.**
UKCP 8.5 Projection: Wetter Winters (Increased Precipitation %)						
Drought events	Buildings & Infrastructure	Stress on water storage and supply during prolonged period of drought in Summer - increased demand, reduced supply for the buildings, homes and landscaping. Subsidence and ground instability caused by low moisture content in the soil causing damage to the landscaping.	Water management plan and reuse systems to reduce reliance on potable water. Options for rainwater harvesting and attenuating storm water have been explored as set out in the FRA (Appendix D1) .	Drought events - **Medium to High.**	Drought events - Negligible to Minor.	Drought events – **Significant**.

Climate Effect / Event	Receptor	Potential Impact	Adaptation Design Measures / Embedded Mitigation	Likelihood of Effect	Magnitude of Risk (Measure of Consequence)	Significance
	Human Health	Reduced water supply for residents, visitors and staff affecting daily activities and livelihood. Increase in heat-related illnesses and mortality.	Water management plan will reduce the reliance potable water resources and relief the stress on residents, visitors and staff. A Health Impact Assessment (HIA) (Ref: Imperial Gardens, Health Impact Assessment), has been prepared for the Proposed Development which presents the accessible healthcare services in the vicinity.	Drought events - **Medium to High.**	Drought events - **Minor to Moderate**.	Drought events - **Significant.**
	Ecology & Natural Environment	Low soil moisture content causing cracking, subsidence and ground instability resulting in habitat stress and loss of biodiversity. Water stress on ecosystems - lower river flows and increased temperatures will threaten aquatic life.	Use of native species within the landscaping strategy as shown on the Landscape Masterplan (Appendix C2). Native species are naturally more resilient to weather extremes include heatwaves and drought.	Drought events - **Medium to High**.	Drought events - **Negligible to Minor**.	Drought events – **Significant.**
UKCP 8.5 Projection: Rising Sea Levels						
Tidal flooding Storm surges	Buildings & Infrastructure	Damage to buildings during storms from high wind speeds, leading to increased material use for maintenance and repairs. Utilities/Energy - damage to utilities infrastructure and power outages. Transport - damage to infrastructure from flooding and high winds during storms preventing transport from accessing the development.	Several flood mitigation measures are identified with the FRA (Appendix D1) as set out in the rows above. Including raising land levels and internal floor levels. A SWMS provides details of the proposed SuDS. The buffer of the shingle beach between the sea and the site boundary provides an initial natural buffer against flooding and surges (Ref: FRA (Appendix D1)). To mitigate against coastal flooding and storm surges a tertiary line of defence will be constructed along the southern boundary of the Site as part of the	Tidal flooding - **Low to Medium**. Storm surges - **Medium to High**.	Tidal flooding - **Negligible to Minor Adverse**. Storm surges - **Negligible to Minor Adverse.**	Tidal flooding - **Not Significant.** Storm surges – **Significant**.

Climate Effect / Event	Receptor	Potential Impact	Adaptation Design Measures / Embedded Mitigation	Likelihood of Effect	Magnitude of Risk (Measure of Consequence)	Significance
			Proposed Development. The defence will have a crest height of 7.30m AODN, which will be achieved by either building a wall or raising land levels (where the wall is not feasible due to access). Location of the tertiary line of defence is shown within the Landscape Masterplan Appendix C2.			
	Human Health	Displacement of people from homes, damage to homes and possessions. Risk to healthy and safety of workforce, temporary (or permanent) loss of employment. Disruption to business operations, damage/loss of business revenue, impacting local economy, incomes and livelihood. Reduced mobility and access to transport services due to damage of infrastructure. Risk of injury and water borne disease.	A Health Impact Assessment (HIA) (Ref: Imperial Gardens, Health Impact Assessment), has been prepared for the Proposed Development which presents the accessible healthcare services in the vicinity.	Tidal flooding - **Low to Medium.** Storm surges - **Medium to High**.	Tidal flooding - **Negligible to Minor Adverse**. Storm surges - **Negligible to Minor Adverse**.	Tidal flooding - **Not Significant**. Storm surges - **Significant.**
	Ecology & Natural Environment	Increased tide height due to rising sea levels will cause coastal erosion to the natural landscapes causing a loss of habitat. Damage to trees. Saltwater intrusion affecting soils and freshwater habitats Long-term geomorphological change reducing ecosystem resilience."	The landscape design as shown on the Landscape Masterplan (Appendix C2) with naturally waterlogged habitats incorporated supports the SuDs and can help to mitigate stormwaters during surges and tidal floods.	Tidal flooding - Low to **Medium**. Storm surges - **Medium to High**.	Tidal flooding - **Negligible to Minor Adverse**. Storm surges - **Negligible to Minor Adverse**.	Tidal flooding - **Not Significant**. Storm surges – **Significant.**

L5.39 The assessment of CCR identified some potential significant effects during the operational lifetime of the Proposed Development. Significant effects identified include Heatwave, Drought and Storm Surge events on all receptor types (Buildings & Infrastructure, Human Health and Ecology).

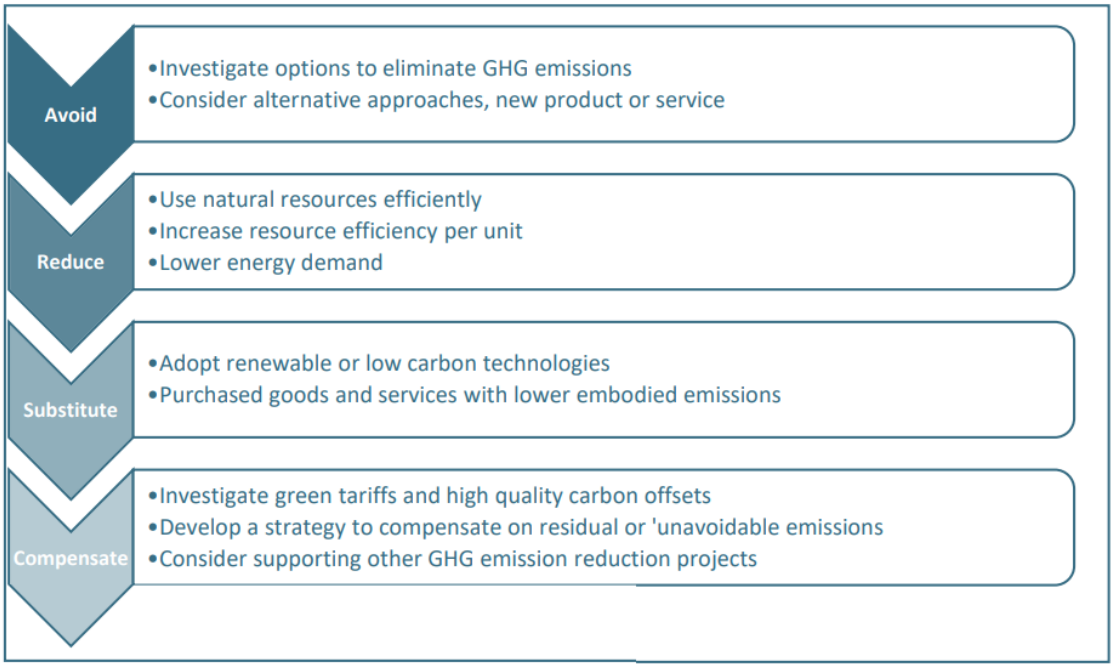
L6.0 Mitigation and Monitoring

Greenhouse Gas

L6.1 It is important to consider measures to reduce GHG emissions as a means to mitigate climate change. The emissions estimated for the Proposed Development may be deemed to be relatively low in relation to the FHDC, Kent and UK carbon budgets; however, the sensitivity of the receptor (i.e. the global climate) is considered high, resulting in some Significant Adverse potential effects. This section sets out steps in which the Proposed Development intends to minimise and/or avoid GHG emissions.

L6.2 It is possible to reduce emissions by following the GHG Management Hierarchal approach (adapted by ISEP) illustrated in Figure L6.1.

Figure L6.1 GHG Management Hierarchal approach



L6.3 The mitigation measures below will be taken into account by the Applicant in order to reduce emissions related to the Proposed Development. These have been split across construction and operational phases.

During Construction

L6.4 In addition to the measures embedded into the design of the Proposed Development, several measures are recommended for implementation which would reduce direct emissions during the construction phase will be implemented, these include:

- Use low-emission or electric/ hybrid/Stage V-compliant plant and equipment;
- Enforce strict no-idling policies and optimise plant duty cycles;
- Use cleaner fuels (e.g., sustainably sourced HVO) where appropriate;

- Maintain plant regularly to ensure efficient operation and minimise emissions;
- Minimise generator use; prioritise grid connections and hybrid/battery units;
- Plan efficient site layout and logistics to reduce vehicle movements;
- Provide operator training on efficient machinery use and fuel-saving behaviours; and
- Monitor and report fuel use.

L6.5 As the measures above are recommendations, rather than firm commitments, they cannot be considered as mitigation in the assessment of residual effects.

During Operation

L6.6 No additional mitigation measures are proposed during the operation of the Proposed Development beyond those identified as Embedded Mitigation within this Chapter.

Climate Change Resilience

L6.7 This CCR assessment in Table L5.4 sets out a number of embedded mitigation measures that will mitigate the impacts of climate change upon the Proposed Development. In addition to these measures, the following additional mitigation measures are proposed:

- the construction team should sign up to the EA's Flood Warning Service; and
- the proposed tertiary line of defence should be implemented prior to the construction of the residential units, hotel extension and golf building to reduce the risk of flooding to the built elements during the construction phase.

L7.0 Residual Effects

L7.1 No additional mitigation is proposed based on the outcomes of the GHG and CCR Assessments, on this basis, the residual effects remain as presented in Section L5.0 on Potential Effects.

L7.2 The findings of the assessment of the Proposed Development's carbon footprint throughout the construction, operational and decommissioning stages include:

- **Moderate adverse** (**significan**t) impacts on the local carbon budget for FHDC throughout the construction stage (embodied carbon (A1-3 and A5);
- **Moderate adverse (significant**) on the local carbon budget for FHDC throughout the operational stage (operational transport).
- All other impacts during the construction, operational and decommissioning stages on the local carbon budget were considered **minor adverse** or **negligible** (**not significant**); and,
- All impacts on the UK wide carbon budget are considered **negligible** (**not significant**).

L7.3 Whilst the construction and operation of the Site identified some **moderate adverse** (**significant**) impacts, the majority of impacts were found to have negligible or minor adverse impacts (not significant). Subsequently, when considering the impact of the Proposed Development as a whole throughout all life-stages, the overall impact on the FHDC emissions is likely to be not significant (minor adverse/negligible).

L7.4 The assessment of CCR identified some potential significant effects during the operational lifetime of the Proposed Development. Significant effects identified include Heatwave, Drought and Storm Surge events on all receptor types (Buildings & Infrastructure, Human Health and Ecology).

L8.0 Summary & Conclusions

L8.1 The summary of effects identified throughout the construction, operation and decommissioning stages of development are presented in Table L8.1 and L8.2 below.

Table L8.1 Summary of Effects – GHG Assessment

Receptor	Impact	Potential Effects (taking account of embedded mitigation)	Additional Mitigation and Monitoring	Residual Effects
During Construction				
Global Climate	Total Construction (Embodied Cardon + Traffic)	Moderate Adverse and Significant at the local level; Minor Adverse and Not Significant at the regional level; and Negligible and Not Significant at the national level	-	Moderate Adverse and Significant at the local level; Minor Adverse and Not Significant at the regional level; and Negligible and Not Significant at the national level
During Operation				
Global Climate	Total Operational (Embodied Carbon + Traffic)	Moderate Adverse and Significant at the local level; Minor Adverse and Not Significant at the regional level; and Negligible and Not Significant at the national level	-	Moderate Adverse and Significant at the local level; Minor Adverse and Not Significant at the regional level; and Negligible and Not Significant at the national level
During Decommissioning				
Global Climate	Total Decommissioning (Embodied Carbon)	Negligible and Not Significant at the local, regional and national level)	-	Negligible and Not Significant at the local, regional and national level

Table L8.2 Summary of Effects – CCR Assessment

Receptor	Impact	Potential Effects (taking account of embedded mitigation)	Additional Mitigation and Monitoring	Residual Effects
During Operation				
Buildings & Infrastructure	Increase in Mean Temperature	Not Significant	-	Not Significant
	Heatwave	Significant	-	Significant
	Extreme Rainfall	Not Significant	-	Not Significant
	Surface Water Flooding	Not Significant	-	Not Significant
	Drought	Significant	-	Significant
	Tidal Flooding	Not Significant	-	Not Significant
	Storm Surges	Significant	-	Significant
Human Health	Increase in Mean Temperature	Not Significant	-	Not Significant
	Heatwave	Significant	-	Significant
	Extreme Rainfall	Not Significant	-	Not Significant
	Surface Water Flooding	Not Significant	-	Not Significant
	Drought	Significant	-	Significant
	Tidal Flooding	Not Significant	-	Not Significant
	Storm Surges	Significant	-	Significant
Ecology & Natural Environment	Increase in Mean Temperature	Not Significant	-	Not Significant
	Heatwave	Significant	-	Significant
	Extreme Rainfall	Not Significant	-	Not Significant
	Surface Water Flooding	Not Significant	-	Not Significant
	Drought	Significant	-	Significant
	Tidal Flooding	Not Significant	-	Not Significant
	Storm Surges	Significant	-	Significant

L9.0 Abbreviations and Definitions

Abbreviations

- ASHP - Air Sourced Heat Pump
- CCR - Climate Change Resilience
- CEMP - Construction Environmental Management Plan
- CH_4 - methane
- CO_2 - carbon dioxide
- EC - Engineering Council
- EIA - Environmental Impact Assessment
- EoL - End of Life
- ES - Environmental Statement
- FHDC - Folkestone and Hythe District Council
- FRA - Flood Risk Assessment
- FWMS - Foul Water Management Strategy
- GHG - Greenhouse Gas
- GWP - Global Warming Potential
- HFCs - hydrofluorocarbons
- HIA - Health Impact Assessment
- IES - Institute of Environmental Science
- ISEP - Institute of Sustainability and Environmental Professionals
- kWh - kilowatts per hour
- LETI - (formerly) London Energy Transformation Initiative
- LWS - Local Wildlife Site
- N_2O - nitrous oxide
- PFCs - perfluorocarbons
- PV - photovoltaic
- RCP - Representative Concentration Pathway
- RICS - Royal Institute of Chartered Surveyors
- RMC - Royal Military Canal
- SF_6 - sulphur hexafluoride
- SuDS - Sustainable Drainage Systems
- SWMS - Surface Water Management Strategy
- tCO_2e - tonnes of carbon dioxide equivalent

- TP - Travel Plan
- UKGBC - UK Green Building Council
- WLC - whole-life-carbon

L10.0 References

1 Climate Change Act 2008 (2050 Target Amendment) Order 2019.

2 Change and Sustainable Energy Act 2006.

3 Energy Act 2013.

4 Environment Act 1995; 2021.

5 EIA Directive (2014/52/EU).

6 Town and Country Planning (EIA) Regulations (2017).

7 Infrastructure Planning (EIA) Regulations (2017).

8 Ministry of Housing, Communities and Local Government (2024, Updated 2025). National Planning Policy Framework.

9 Department for Environment, Food and Rural Affairs (2018). The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting.

10 HM Government (2017). Clean Growth Strategy.

11 HM Government (2011). The Carbon Plan: Delivering our Low Carbon Future.

12 Folkstone and Hythe District Council (2022). Core Strategy Review.

13 Folkstone and Hythe District Council (2020). Local Plan: Places and Policies.

14 Kent Minerals and Waste Local Plan (2025)

15 Institute of Environmental and Sustainability Professionals Assessment (2022) Assessing Greenhouse Gas Emissions and Evaluating their Significance.

16 Institute of Environmental and Sustainability Professionals Assessment (2020) Climate Change Resilience and Adaptations.

17 RICS, 2017. Whole life carbon assessment for the built environment. Professional Statement, 1st ed. Royal Institution of Chartered Surveyors.

18 RICS, 2023. Whole life carbon assessment for the built environment. Professional Statement, 2nd ed. Royal Institution of Chartered Surveyors.

19 LETI: Embodied Carbon Primer.

20 LETI: Embodied Carbon Benchmarks (2022).

21 UKGBC: Net Zero Whole Life Carbon — Consultation Slides & Embodied Carbon Benchmarks (consultation).

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Volume 1: Environmental Statement

Chapter M Socio-Economics

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M1.0 Introduction

M1.1 This Chapter of the Environmental Statement ('ES') has been prepared by Lichfields on behalf of the applicant, GSE Group ('the Applicant'). It assesses the Proposed Development described in Chapter C in relation to potential socio-economic effects.

M1.2 The baseline situation is considered before the likely environmental effects of the Proposed Development are identified during its construction and operational phases. Mitigation measures to reduce any negative environmental effects are identified as appropriate, before the residual environmental effects are assessed.

M1.3 This Chapter is supported by the following technical appendices provided at Volume 2 to this ES:

- Appendix M1: Health Impact Assessment.

About the Author

M1.4 The Chapter has been prepared by Luke Bonnici, Associate Director, BA (Hons) MSc MIED, and Ed Welch, Senior Economics Consultant, MA (Oxon) MSc MRTPI MIED of Lichfields, who are experienced in the preparation of socio-economic assessments for a range of development projects across the UK. It has been reviewed by Ciaran Gunne-Jones, Senior Director and Head of Economics, BA (Hons) MSc FRGS MIED of Lichfields.

M2.0 Policy Context

National Policy

National Planning Policy Framework (2024)

M2.1 The National Planning Policy Framework ('NPPF') (Ref 1) sets out the Government's planning policies for England addressing economic, social and environmental issues. Paragraph 8 of the NPPF states that:

"Achieving sustainable development means the planning system has three objectives…

a an economic objective – to help build a strong, responsive, and competitive economy;

b a social objective – to support, strong vibrant and healthy communities; and

c *an environmental objective – to protect and enhance our natural, build and historic environment.*"

M2.2 At the heart of the NPPF is the presumption in favour of sustainable development, which states that:

"All plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment'; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects…" (paragraph 11).

M2.3 The NPPF also outlines the importance of delivering a sufficient supply of homes, and for planning to support the delivery of land required to do so. Paragraph 63 highlights that:

"… housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but not limited to) those who require affordable housing (including Social Rent), families with children, looked after children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes."

M2.4 In promoting healthy and safe communities, the NPPF outlines that planning policies and decisions should help facilitate developments which:

a "*Promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other;*

b Are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion; and

c *Enable and support healthy lives, through both promoting good health and preventing ill health, especially where this would address identified local health and well-being needs and reduce health inequalities between the most and least deprived communities.*" (paragraph 96a-c)

M2.5 The NPPF also states that planning policies and decisions should "*promote an effective use of land in meeting the need for homes and other uses*" (paragraph 124). Further to this, planning policies and decisions should, "e*ncourage multiple benefits from both urban and*

rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains." (paragraph 125a).

National Planning Practice Guidance (2024)

M2.6 Updates to the Planning Practice Guidance ('PPG') (Ref 2) were issued in February 2024.

M2.7 The Housing and Economic Land Availability Assessment guidance informs local authorities on how to identify a future supply of land which is suitable for housing and economic development.

M2.8 The 'Housing and Economic Needs Assessment' guidance subsequently informs local authorities about the appropriate way to assess their housing and economic development needs.

M2.9 Most importantly, the PPG emphasises the requirement for local authorities to produce a five-year housing land supply plan to take into account the needs of the local population in terms of housing.

M2.10 The Open space, sports and recreation facilities, public rights of way and local green space guidance emphasises the importance of open space, sports and recreational facilities in achieving sustainable development. These facilities provide recreational benefits to local residents whilst contributing to green infrastructure. Local authorities are therefore encouraged to assess the need for these spaces and opportunities to provide new facilities.

Local Policy

Folkestone and Hythe District Council Core Strategy Review (2022)

M2.11 The Folkestone and Hythe Core Strategy Review (Ref 3) was published in 2022 and is part of the adopted Local Plan. The Review outlines the need for 738 new homes per annum on average over the plan period, equating to 13,284 new homes in total. The Review also outlines various policies of relevance to the assessment of socio-economic impacts, including:

a **Policy CSD1: Balanced Neighbourhoods –** encourages development which create balanced neighbourhoods through high-quality design proposals and which address identified affordable housing needs. All housing development should include a broad range of tenures incorporating market housing for sale and affordable housing, wherever practicable and subject to viability; and

b **Policy CSD7: Hythe Strategy** – states that Hythe should develop as the high-quality residential, business, service, retail and tourist centre for the central District in line with the overall vision. All new development should respect the historic character of the town.

Folkestone and Hythe Places and Policies Local Plan (2020)

M2.12 The Folkestone and Hythe Places and Policies Local Plan (Ref 4) outlines the overall vision and objectives for the sustainable delivery of the social, economic and environmental needs of the District over the plan period to 2037. The Plan includes various policies relating to

the delivery of housing (including affordable housing) over the plan period. Other policies of relevance to this assessment include:

a **Policy HW2 – Improving the Health and Wellbeing of the Local Population and Reducing Health Inequalities** – states that where significant health 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;

b **Policy C3: Provision of Open Space** – to meet the additional need in open space generated by new residential developments, the Council will require proposals of 20 or more dwellings to provide for open space in accordance with the relevant standards;

c **Policy HB1: Quality Places Through Design** – proposals should make a positive contribution to their surroundings, facilitate ease of movement within the locality, create, enhance and integrate areas of public open space and not lead to an adverse impact on the amenity of future occupiers, neighbours or the surrounding area;

d **Policy E3: Tourism** – planning permission will be granted in or on the edge of centres for proposals to provide new tourism development including hotels, guest houses, bed and breakfast, self-catering accommodation and new visitor attractions where the location is accessible by a range of means of transport, there is no detrimental impact on neighbourhood amenities. In particular, the policy requires that evidence is provided to demonstrate how the proposal contributes to the diversification of tourist attractions in the district; and

e **Policy C4: Children's Play Space** – proposals of 10 or more family dwellings (2 or more bedrooms) are required to provide for child play space in accordance with the relevant quantity standards.

Other Relevant Guidance

ISEP EIA Guide to Effective Scoping of Human Health (2022)

M2.13 The Institute of Sustainability and Environmental Professionals ('ISEP') (formally called the Institute for Environmental Management and Assessment) ('IEMA') presents a framework for identifying and scoping information to be submitted to the competent authority with regards to the assessment of health effects as part of environmental impact assessments. The EIA Guide to Effective Scoping of Human Health (Ref 5) includes guidance on identifying relevant wider health determinants to be included within the assessment of effects.

Determining Significance for Human Health in Environmental Impact Assessment (2022)

M2.14 ISEP also sets out guidance for EIA practitioners on how to determine the significance of human health effects arising from development in EIA terms (Ref 6). It includes criteria for assigning the sensitivity of population groups, as well as for assessing the magnitude of impact arising from health determinants such as air quality, noise or access to open space.

M3.0 Assessment Methodology & Significance Criteria

Assessment Methodology

M3.1 This assessment analyses the potential socio-economic, health and wellbeing effects of the Proposed Development (as described in Chapter C) across the impact areas (identified below). Effects are set out separately for the construction and operational phases of the Proposed Development. Opportunities to mitigate any adverse effects, while enhancing beneficial ones are examined in further detail in Section M6.0 of this ES Chapter. This includes consideration of embedded measures proposed as a part of the Proposed Development.

Study Area

M3.2 The assessment of the Proposed Development is undertaken against the existing socio-economic conditions at the following spatial levels:

- The Local Impact Area ('LIA') – The area in which the effect of the Proposed Development will be primarily felt. The LIA varies depending on the receptor considered as outlined in Table M3.1;
- The Wider Impact Area ('WIA') – Folkestone and Hythe District (formerly Shepway District); and
- Regional – South East.

M3.3 Table M3.1 outlines the impact area catchments for each of the receptors assessed.

Table M3.1 Impact area catchments by receptor

Receptor	Catchment	Justification
Population and labour market	LIA comprising the wards of Folkestone Harbour, East Folkstone, Broadmead, Folkestone Central, Cheriton, Sandgate and West Folkestone, Hythe, and Hythe Rural. Collectively, these wards form a best fit statistical area for the Folkestone and Hythe Urban Area as outlined in the Council's Core Strategy Review (2020) (Ref 3), as well as the WIA	The LIA and WIA cover the areas in which the population and labour market impacts are most likely to occur based on professional judgement.
Local economy including the local visitor economy	WIA and South East region	The majority of the economic impacts will be experienced at the district spatial level. Effects relating to construction phase employment are assessed at the regional level due to the geographically dispersed nature of the construction labour market. The effect of additional on-

Receptor	Catchment	Justification
		site employment, visitor accommodation and leisure provision on the visitor economy will be felt more locally at the WIA level.
Local housing provision	WIA	Housing delivery targets are set at the Local Planning Authority level.
Primary schools	The LIA comprises the Hythe Primary Planning Area	Commissioning Plan for Education Provision in Kent
Secondary schools	The LIA comprises the Folkestone and Hythe Secondary Planning Area	Commissioning Plan for Education Provision in Kent
Primary healthcare (GP and dental practices)	The LIA comprises a 3.0km radius from the Site	Professional judgement based on typical catchments for primary healthcare facilities.
Open space	The LIA comprises the following radii: District park – 1.2km Local park – 0.4km Small local park - 0.28km Amenity green space – 0.28km Allotments – 1.2km	Shepway Open Space Strategy
Play space	The LIA comprises up to a 0.6km radius from the Site	Shepway Open Space Strategy
Social and community infrastructure	The LIA comprises a 2.0km radius from the Site	Professional judgement based on typical walking distances to access local community infrastructure.
Public rights of way ('PRoW')	The LIA comprises PRoW within or adjacent to the Site boundary	Based on professional judgement, the impacts on the PRoW network are likely to be highly localised.
Health and wellbeing	The population and Labour market LIA (as identified above)	Based on professional judgement, health effects relating to the Proposed Development are likely to be localised.

Establishing Baseline Conditions

M3.4 The analysis of the baseline conditions draws on publicly available datasets published by the Office for National Statistics ('ONS'), government departments, Folkestone and Hythe District Council ('FHDC'), and other organisations (e.g., the NHS). The key datasets used to establish the baseline include:

- ONS, Annual Population Survey ('APS') (Ref 7);
- ONS, Census of Population 2021 (Ref 8);
- ONS, Business Register and Employment Survey ('BRES') (Ref 9); and
- ONS, Claimant data (Ref 10).

M3.5 For comparative purposes, the LIA and WIA are considered against regional and national averages where this is appropriate.

M3.6 The assessment also takes account of a range of local planning evidence and policy documents in order to build a broader picture of the local baseline conditions.

Methodological Approach

M3.7 For socio-economics, there are no published standards or technical guidelines that set out a preferred approach for assessing the likely effects of a development as part of the EIA process. However, there are a series of commonly used methods to quantify the socio-economic effects during both construction and once operational. Other established qualitative techniques are frequently adopted to assess the social effects of a proposed development.

M3.8 The socio-economic assessment can be broadly split into temporary and short-term effects relating to the construction phase, and permanent and long-term effects relating to the completed, and therefore operational phase of the Proposed Development.

M3.9 The identification and assessment of the likely socio-economic effects of the Proposed Development is based on the following, well-established models and best practice. Where necessary, this has been supplemented by professional judgement.

Temporary Construction Employment

M3.10 To estimate the temporary employment supported throughout the Proposed Development's construction phase, output per construction job figures from the Construction Industry Trading Board ('CITB') (Ref 27) are applied to the anticipated level of capital investment required for the Proposed Development.

M3.11 This generates an overall estimate of person-years of construction employment, which is then divided by the anticipated length of the construction programme to provide an estimate of the average number of full-time equivalent[1] ('FTE') construction workers supported directly each year on the Site.

M3.12 It is acknowledged that whilst some construction jobs supported by the Proposed Development will be taken up by local residents, the majority of construction workers are likely to be drawn from the wider labour market. Therefore, the effect of the Proposed Development on construction activity is assessed at the regional (i.e. the South East) spatial level.

M3.13 To quantify the contribution of construction activity to the national economy, ONS input-output analytical tables (Ref 29) are used along with the indicative cost of construction. ONS input output analytical tables are also used to calculate the indirect benefits associated with construction activity.

Population and Labour Market Characteristics

M3.14 The population that could be accommodated within the Proposed Development is based on the delivery of 291 net additional dwellings on the Site. To estimate the overall number of residents within the Proposed Development, the assessment makes use of the District's average household size assuming a 100% occupancy rate.

[1] Full-time equivalent is a unit that indicates the workload of an employed person. An FTE of 1.0 is equivalent to full-time employee (working up to 40-hours), whilst a part-time employee working half the hours is 0.5 FTE.

M3.15 To estimate the Proposed Development's effect on the local labour market, the proportion of people of working age and the economic activity rate in the WIA are applied to the anticipated population of the Proposed Development.

Impact on Local Housing Supply

M3.16 The assessment of the Proposed Development's effect on the Folkestone and Hythe District housing supply is based on the proposed housing mix, and draws on evidence from the Core Strategy Review (2022) (Ref 3).

Impact on Local Expenditure

M3.17 The direct effects of household expenditure are based on typical weekly household expenditure benchmarks from the ONS's Family Spending in the UK survey (Ref 11).

M3.18 In addition, this Chapter assumes that the average homeowner spends around £7,900 (in 2025-pricing)[2] to make their house "feel like a home" in the first 18-months following initial occupation. This expenditure is generally spent on furnishing and decorating a property and provides a range of benefits to the local economy including supporting the vitality and viability of local shops and high streets.

M3.19 Visitor expenditure by hotel guests is calculated based on the number of new hotel rooms delivered, an assumption of a likely occupancy of 87% based on information from the operator, as well as data on visitor spending in Folkestone and Hythe from Visit Kent (Ref 12).

M3.20 The assessment of the impact of the Proposed Development on local expenditure is based on a retail catchment area comprising the WIA.

Demand for the Provision of Education Facilities

M3.21 The capacity of existing (and planned schools) is assessed based on data and information from the Department for Education ('DfE') (Ref 13).

M3.22 The assessment of the impact of the Proposed Development on the provision of primary and secondary schools is based on the catchment areas identified in Table M3.1 above.

M3.23 To assess the demand for primary and secondary schools generated by the Proposed Development, Kent County Council ('KCC') pupil yield assumptions are used (Ref 14). This assumes that every house will support 0.28 primary aged children and 0.20 secondary aged children. Meanwhile, every flat or apartment is assumed to yield 0.07 primary aged children and 0.05 secondary aged children.

Demand for Healthcare Facilities

M3.24 The assessment of the demand for healthcare facilities draws on the anticipated population of the Proposed Development based on the approach for assessing the effects on population and labour market characteristics outlined above. The socio-economic assessment assumes that the residents of the Proposed Development are to be registered with local general practitioners ('GPs') within the LIA.

[2] This is based on research carried out by OnePoll on behalf of Barratt Homes (August 2014), which suggests that an upfront average of £5,500 (2014 prices) is typically generated as a first-time occupation cost per home.

M3.25 Using NHS data (Ref 15) on the number of FTE GPs in each of the primary healthcare facilities within the LIA, together with the total number of registered patients, the average number of patients per FTE GP is estimated. This is then compared against a benchmark of 1,800 patients per FTE GP from the Royal College of General Practitioners and NHS London Healthy Urban Development Unit (Ref 16) in order to make a judgement of the effect the Proposed Development will have on future capacity.

M3.26 The assessment of the impact of the Proposed Development on the demand for healthcare facilities is based on a 3.0km catchment area, as outlined in Table M3.1 above.

Open Space Provision

M3.27 The assessment of the demand for formal and informal open space generated by the Proposed Development draws on guidance and local accessibility standards by FHDC in the Shepway Open Space Strategy (2017) (Ref 17). The findings are also compared to the Open Space Assessment ('OSA') submitted as part of this application.

Play Space Provision

M3.28 The assessment of the demand for play space draws on guidance by FHDC in the Shepway Open Space Strategy. The assessment of the impact of the Proposed Development on the demand for play space provision is based on the LIA as identified in Table M3.1 above.

Social, Community, Leisure and Recreation Facilities

M3.29 The assessment of the Proposed Development's effects on the demand for, and provision of, social, community, leisure and recreation facilities draws upon evidence from across various sources and professional judgement. It includes consideration of the facility's distance to the Site, as well as the number and variety of facilities available locally.

M3.30 The assessment of the impact of the Proposed Development on demand for social, community, leisure and recreation facilities is based on a catchment of 2.0km from the Site as identified in Table M3.1 above.

Public Rights of Way

M3.31 The assessment of the impact of the Proposed Development on the use of PRoW includes all PRoW and formalised cycling routes within or adjacent to the Site boundary and relies on information provided within the Construction Environmental Management Plan and professional judgement.

Health and Wellbeing

M3.32 This Chapter analyses the potential public health effects of the Proposed Development including those relating to physical and mental health, wellbeing, and health inequalities. Effects are set out separately for the construction and operational phases of the Proposed Development. The assessment of public health effects is conducted at the 'population' level, rather than the individual level in line with the ISEP guidance, which states that an EIA assessment at the individual level would be disproportionate.

M3.33 Following consultation with FHDC through the EIA Scoping Opinion (January 2024) and review of the ISEP EIA Guide to Effective Scoping of Human Health (Ref 5), health effects

to the local population will be assessed based in the impact of the Proposed Development on the following wider determinants of health during both the construction and operation phase:

- Access to opportunities for physical activity;
- Transport modes, access and connections;
- Air quality; and
- Noise.

M3.34 Effects relating to access to health facilities and open space are detailed above in sections M3.24 and M3.27 respectively.

M3.35 This assessment should be read in conjunction with Chapter I: Noise and Vibration, Chapter J: Air Quality, as well as the Health Impact Assessment ('HIA') appended to this ES Chapter.

Sensitivity of Receptors

Socio-Economic Receptors

M3.36 The approach to defining the sensitivity of the socio-economic receptors is informed by factors such as the receptor's capacity to accept and/or respond to change, the local baseline position, local needs and priority groups. In some instances, qualified judgement is required to establish where the receptor's sensitivity lies on a scale from 'low' (i.e. can easily adapt to change) to 'very high' (i.e. does not easily adapt to change).

M3.37 The receptors considered in this assessment include:

- Local economy and employment;
- Local population and housing;
- Education facilities provision (including primary and secondary school places);
- Provision of healthcare facilities;
- Provision of open spaces and children's play spaces;
- Provision of social, community, and recreation facilities;
- Provision of PRoW; and
- The health and wellbeing of the local population.

Health Receptors

M3.38 The sensitivity of the receptor is informed by baseline data, including demographic and public health statistics, as well as professional judgement regarding characteristics of the local population, including their capacity to adapt.

M3.39 In line with ISEP guidance, the sensitivity of the local population is assigned on a scale from 'High' – where the population includes high levels of deprivation, a large proportion of people with very poor health status, and that have a very low capacity to adapt, to 'Very

Low' where the population has low levels of deprivation, a low proportion of people with very poor health, and that have a high capacity to adapt.

Significance Criteria

Socio-Economic Effects

M3.40 Given that there is no formal guidance for assessing the significance of socio-economic effects, the assessment is based on the scale (i.e. magnitude) of change relative to the baseline position, in addition to the nature and context of the effect (i.e. taking account of the sensitivity of the receptor). Where possible, the location of the effects and their likely duration are also considered. However, in cases where this cannot be quantified and / or measured, the nature of the effect is considered more generally, taking account of qualitative factors.

M3.41 The magnitude of impact on a receptor is assessed by considering the changes relative to the baseline position, both before and (if required) following additional mitigation. The magnitude of impact on a receptor can range from negligible (i.e. no discernible change) to high (i.e. large-scale change relative to the baseline).

M3.42 The significance of socio-economic effects on a receptor is defined based on the interaction between the receptor's sensitivity and the magnitude of impact, having regard to the specific characteristics of the receptor and applying professional judgement as appropriate (as outlined in Table M3.2 below).

Table M3.2 Significance of effect matrix

		Sensitivity of Receptor			
		Very High	High	Medium	Low
Magnitude of Impact	High	Major	Moderate to Major	Minor to Moderate	Minor
	Medium	Moderate to Major	Moderate	Minor	Negligible
	Low	Minor to Moderate	Minor	Negligible to Minor	Negligible
	Negligible	Negligible	Negligible	Negligible	Negligible

M3.43 The significance of socio-economic effects can range from 'Negligible' (i.e. no discernible effect is expected) to 'Major' (i.e. where the Proposed Development could be expected to have considerable effects), as outlined in Table M3.3, effects of **Moderate** and **Major** scale are considered to be **Significant**, while the effects of Negligible and Minor scale are considered to be Not Significant.

Table M3.3 Significance of socio-economic effects

Significance of Effects	Definition
Major	Where the Proposed Development could be expected to have considerable effects (due to their extent, duration, or magnitude) of more than local significance on the existing population, levels/types of employment, levels of deprivation, economic characteristics, and community infrastructure.
Moderate	Where the Proposed Development could be expected to have noticeable effects, which may be considered significant on the existing population,.
Minor	Where the Proposed Development could be expected to result in small, very short, or highly localised effects on the existing population, levels/types of employment, levels of deprivation, economic characteristics, and community infrastructure.
Negligible	Where no discernible effect is expected as a result of the Proposed Development on the existing population, level/types of employment, levels of deprivation, economic characteristics, and community infrastructure.

M3.44 The nature of a socio-economic effect is defined as being 'Beneficial', 'Negligible', or 'Adverse'.

M3.45 The duration of the socio-economic effect is considered against whether it is temporary or permanent. Due to their nature, all effects related to the Proposed Development's construction phase are considered to be temporary and short-term, unless otherwise stated. By comparison, all effects arising from the completed Proposed Development are considered to be permanent and long-term in nature, unless otherwise stated.

Health Effects

M3.46 As with the assessment of socio-economic effects, the assessment of health effects is defined based on the interaction between the receptor's sensitivity and the magnitude of impact for each health determinant.

M3.47 The magnitude of impact on a health determinant is informed by the expected degree of change. This is informed by professional judgement and wider technical assessments including, Chapter I: Noise and Vibration and Chapter J: Air Quality of this ES, as well as the HIA appended to this assessment. The magnitude of effect ranges from 'High' – including where there is a high scale or long-term duration, continuous frequency, its severity is predominantly related to mortality or changes in morbidity, and where the majority of the population is affected. Magnitude of impact ranges down to 'Negligible' – where there is a negligible scale or very short duration, the severity predominately relates to minor changes in quality-of-life, or where very few people are affected.

M3.48 Table M3.4 identifies how the significance of effect for health is derived from the sensitivity and magnitude of effect.

Table M3.4 Significance of effect for health matrix

		Sensitivity of Receptor			
		High	Medium	Low	Very Low
Magnitude of Impact	High	Major	Major/Moderate	Moderate/Minor	Minor/Negligible
	Medium	Major/Moderate	Moderate	Minor	Minor/Negligible
	Low	Moderate/Minor	Minor	Minor	Negligible
	Negligible	Minor/Negligible	Minor/Negligible	Negligible	Negligible

Source: ISEP (2022)

M3.49 The significance public health effects can range from Negligible (i.e. no discernible effect is expected) to 'Major' (i.e. where the Proposed Development could be expected to have considerable effects). All effects, whether beneficial or adverse, assessed to be **Major** or **Moderate** are considered to be **Significant** in EIA terms. All effects assessed to be Minor or Negligible are considered to be Not Significant in EIA terms.

Consultation

M3.50 An EIA Scoping Report in relation to a commercial led mixed-use scheme on part of the Site was submitted to FHDC to accompany a request for a formal EIA Scoping Opinion 2 November 2023. FHDC issued an EIA Scoping Opinion on 29 January 2024 which requested that the existing Hythe Golf Club within the Site should not be considered as a community facility given that it is a private, for members only facility. However, as outlined in the OSA, Hythe Golf Club is not considered to be publicly accessible open space within the Council's Open Space Strategy (i.e., from 2017), and therefore has not been included in the assessment of open space provision.

M3.51 The Scoping Opinion (January 2024) also requested that the impact on resident health and wellbeing, as well as to local tourism resulting from impacts or alterations of PRoW should be included in the assessment of socio-economic effects. Following submission of a Scoping Note in July 2025, and subsequent Scoping Note Response (November 2025) from FHDC, it was agreed that these effects would be covered in the Socio-Economic ES Chapter.

M3.52 The Scoping Opinion (January 2024) also requested that a Health ES Chapter should be scoped into the ES. Following consultation with FHDC through the Scoping Note (July 2025) and FHDC's subsequent Scoping Note Response (November 2025), it was agreed that the assessment of Health effects would be included as part of the Socio-Economics ES Chapter as informed by a standalone HIA which is included in Appendix M1.

M3.53 The EIA Scoping process is described in full in Chapter B of this ES.

Assumptions and Limitations

M3.54 The assessment of the socio-economic effects of the Proposed Development on the various receptors identified is based on data from the ONS, MHCLG, DfE, FHDC, as well as other sources as outlined in Section M4.0 below. As with any dataset, these may be subject to updates and/or revision and are accurate at the time of writing (December 2025) and data has not been independently verified by Lichfields.

M3.55 As the residential elements of the Proposed Development form part of the outline planning application, any assumptions made regarding the number of primary and secondary aged pupils that will reside in the Proposed Development, have been made using the indicative accommodation schedule provided by the project architect.

M4.0 Baseline Conditions

M4.1 This section sets out the profile of the LIA by identifying the characteristics of the local population and environment based on a number of demographic and socio-economic indicators. Whenever possible, the demographic and socio-economic characteristics of the LIA are benchmarked against the WIA, the South East region, and national averages to help understand the wider context within which the LIA sits.

Population and Local Economic Profile

Population

M4.2 Data from the ONS (Ref 18) indicates that in 2024 the LIA had a resident population of just over 71,400 people, equivalent to approximately 63.5% of the total population of Folkestone and Hythe District (of 112,400 people).

M4.3 Table M4.1 below provides a breakdown of the LIA's population by broad age-group, compared against the wider geographies of Folkestone and Hythe District and the South East. It shows that 59.8% of the resident population within the LIA is of core working age (i.e. aged 16-64), which is above the average for the WIA (of 57.9%) but below the regional average (of 61.7%).

M4.4 The LIA has a slightly lower proportion of elderly residents (of 23.0%) compared with the WIA (of 25.7%) but a higher proportion than the regional average (of 19.8%).

Table M4.1 Comparative age structure (2024)

Age		LIA	WIA	South East
0-15		17.2%	16.4%	18.5%
16-64		59.8%	57.9%	61.7%
65+		23.0%	25.7%	19.8%
16-64	14.8%	14.8%	14.5%	16.3%
	51.3%	51.3%	48.7%	52.1%
	33.9%	33.9%	36.8%	31.7%

Source: Office for National Statistics ('ONS'), Population estimates (2024) / Lichfields analysis

Housing

M4.5 The 2021 Census (Ref 8) indicates that there were an estimated 48,300 households within the WIA. Of these 65.8% were owner-occupied which was broadly in line with the regional rate of 65.7%. A further, 33.4% of households in the WIA were privately or socially rented, a proportion which was slightly higher than across the South East as a whole (32.8%).

M4.6 Data from the 2023 Housing Delivery Test ('HDT') (Ref 19) indicates that Folkestone and Hythe recorded delivery of 1,378 dwellings between 2020/21, and 2022/23. The HDT identified a total deficit of 280 homes over this three-year period against a target of 1,658 homes, equivalent to an overall delivery rate of 83.0% of the District's total identified housing need. This is equivalent to a HDT outcome of 'buffer' which indicates that a 20%

buffer will be added to the local authority's 5-year land supply and an action plan must be produced.

M4.7 In addition, the Council's most recent Authority Monitoring Report (Ref 20) indicates that the District has delivered a total of 2,208 homes between 2019/20 and 2023/24, which falls significantly below the identified target of 3,110 homes over the same period (equivalent to 622 homes per annum).

Labour Market

M4.8 Data from the APS (Ref 7) shows that in the 12-months to June 2025, the overall labour market participation (also referred to as the economic activity rate) for people of core working age (i.e. aged 16-64) in the WIA was 81.1%. This is higher than the equivalent figures for both the South East and England (i.e. of 81% and 79.1%, respectively). In addition, the unemployment rate for core working age residents across the WIA over the same period was 6.4%, which was higher than both the regional (3.5%) and national (4.2%) averages.

M4.9 Data for 2024/2025 is not available at the LIA spatial level, with the latest data available being from the 2021 Census (Ref 8). At the time of the Census, the economic activity rate within the LIA stood at 55.5%, which was higher than the WIA average of 54.0% but lower than the regional average of 60.1%. In addition, the unemployment rate across the LIA stood at 5.8%, which was higher than both the WIA and regional averages (of 5.2% and 4.2% respectively). It should be noted that Census data is not directly comparable with the latest data presented above as it considers residents aged 16+, rather than 16-64. This indicates that the LIA exhibits a mixed performance compared with the District as a whole, with a higher economic activity rate and a higher rate of unemployment.

M4.10 ONS claimant data (Ref 10) from September 2025 indicates that across the LIA, there were approximately 1,800 residents claiming unemployment support, equating to around 4.3% of the LIA's working age population. This is higher than the equivalent figures across both the WIA (3.8%) and regionally (3.1%).

Occupations and Qualifications

M4.11 In the 12 months to December 2024, 39.5% of the WIA's core working age residents had degree-level qualifications (i.e. defined as Regulated Qualifications Framework level 4 qualification and above, or 'RQF4+') (Ref 7). This was lower than the averages across the South East (48.2%) and England as a whole (46.8%).

M4.12 Of the residents in the WIA, an appreciably higher proportion of residents (i.e. 12.2%) held no formal qualifications relative to the South East as a whole (5.5%) and nationally (6.6%).

M4.13 In the 12 months to June 2025, a total of 46.9% of employed residents in the WIA were in management, professional and/or associate occupations (i.e. defined as jobs in standard occupational classification, or 'SOC' 2020 major groups 1-3) (Ref 7). This is lower than the equivalent figures for both the South East (55.4%) and England (53.8%). This indicates that residents across the WIA tend to work in lower skilled (and lower paying) jobs. Over the same period, 21.1% of residents in the WIA were employed in sales and customer services, elementary occupations, or as machine operatives (i.e. defined as SOC major groups 7-9). This was higher than the equivalent proportions for both the South East (17.8%) and

England as a whole (20.1%). This aligns with the data on qualifications above, indicating that residents across the WIA generally hold fewer qualifications and are disproportionately employed in lower skilled occupations when compared with the regional and national averages.

Employment and Economy

M4.14 Employment data (Ref 9) estimates that in 2023[3] there were around 26,500 jobs within the LIA, accounting for 69.1% of all jobs across the WIA (i.e. of 38,300 jobs).

M4.15 The largest employment sectors within the LIA were public administration and defence (13.2% of all jobs), health (13.2%), retail (11.3%), and accommodation and food services (11.3%). Similarly, the largest sectors across the WIA were health (13.2%), accommodation and food services (11.8%), and retail (10.5%).

M4.16 Between 2015 and 2023, the LIA has seen the loss of 1,235 jobs, equivalent to an overall decline of -4.5%. This decline was considerable when compared with the slight decline witnessed across the WIA (of -0.3%), and an increase of +5.4% across the South East region.

M4.17 Between 2015 and 2023 the largest increases in employment by sector in the LIA included public administration and defence (+1,250 jobs), arts and entertainment (+750 jobs), and accommodation and food services (+500 jobs). In contrast, the sectors which saw the largest decreases in employment across the LIA were business administration (-1,750 jobs), retail (-500 jobs), education (-500 jobs), and health (-500 jobs).

Education

Primary School Provision

M4.18 The Commissioning Plan for Education Provision in Kent (Ref 21) was produced by KCC in 2025 and outlines the relevant school planning areas across the County.

M4.19 The Plan indicates that within the Hythe Primary Planning Area ('PPA') (i.e. the planning area in which the Site is located), there are a total of five primary schools as identified in Table M4.2. According to DfE data (Ref 13), these primary schools have a total of 965 pupils on roll, with a total capacity of 1,138 pupils. This equates to an overall surplus of 173 primary school places, equivalent to 15.2% of capacity. This is above the National Audit Office's ('NAO') recommended surplus of between 5.0% and 10.0% (Ref 22) to ensure sufficient flexibility and accommodation of parental choice. Therefore, this indicates that there is currently too much capacity within primary schools within the Hythe PPA which can lead to higher operational costs.

[3] 2023 represents the latest year for which data at the LIA spatial level is available.

Table M4.2 Primary school provision

Name	Number of Pupils	Capacity	Surplus/Deficit
Palmarsh Primary School	197	210	+13
Seabrook Church of England Primary School	103	105	+2
Saltwood CofE Primary School	216	210	-6
St Augustine's Catholic Primary School	175	210	+35
Hythe Bay CofE Primary School	274	403	+129
Total	**965**	**1,138**	**+173**

Source: DfE (2025), School capacity data / Lichfields analysis

Secondary School Provision

M4.20 For secondary education, the Commissioning Plan for Education Provision in Kent splits schools into selective and non-selective categories, with differing planning areas for each. The Folkestone and Hythe Secondary Planning Area ('SPA') is the planning area in which the Site is located. This area includes three non-selective secondary schools and two selective secondary schools[4] as shown in Table M4.3.

M4.21 According to DfE data, these schools have capacity for 6,665 secondary school pupils, and a total roll of 5,520 pupils. This equates to an overall surplus of 1,145 secondary places, or a surplus capacity of approximately 17.2%, although the majority of this surplus is within the non-selective schools. This also far exceeds the recommended surplus of between 5.0% and 10.0%, therefore indicating that there is currently too much capacity across the Folkestone and Hythe SPA which can lead to higher operational costs.

Table M4.3 Secondary school provision

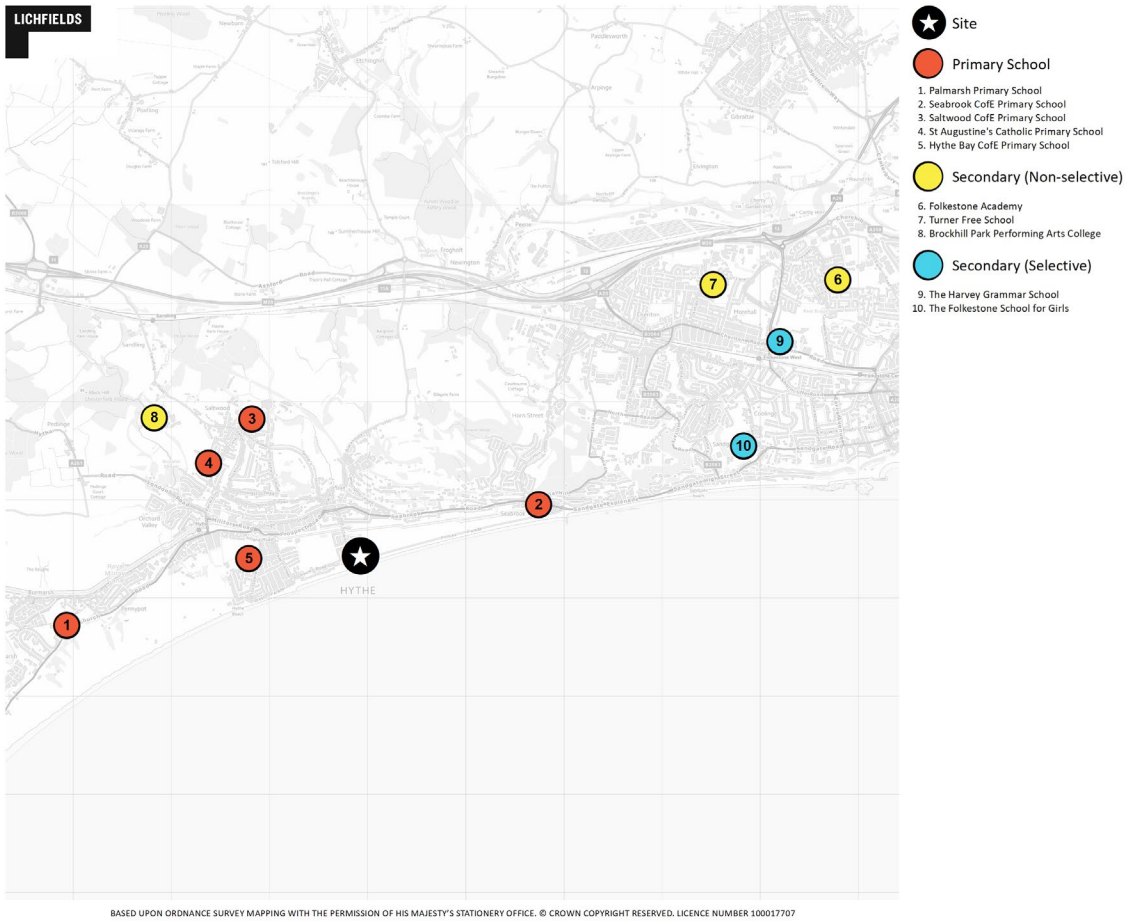
Name	Pupils	Capacity	Surplus/Deficit
Non-selective schools			
Folkestone Academy	1,031	1,750	+ 719
Turner Free School	956	1,260	+304
Brockhill Park Performing Arts College	1,344	1,405	+61
Total (Non-selective)	**3,331**	**4,415**	**+1,084**
Selective schools			
The Harvey Grammar School	1,026	1,050	+24
The Folkestone School for Girls	1,163	1,200	+37
Total (Selective)	**2,189**	**2,250**	**+61**
Total (All schools)	**5,520**	**6,665**	**+1,145**

Source: DfE (2025), School capacity data / Lichfields analysis

[4] Selective schools are schools which require additional examinations for entry, while non-selective schools are accessible to any child living within the relevant catchment area.

M4.22 Figure M4.1 identifies the primary and secondary school provision within the study area.

Figure M4.1 Primary and secondary schools within the study area



Healthcare Provision

M4.23 The NHS Kent and Medway Integrated Care Board ('ICB') is the relevant NHS body in charge of healthcare facilities in both the LIA and WIA. NHS data (Ref 15) indicates that the ICB comprises 176 General Practitioner ('GP') surgeries, which together support 838 FTE GPs and look after around 2 million patients. Based on this, it is estimated that each FTE GP within the ICB area supports around 2,438 patients, compared with an overall national average of 1,690 patients per FTE GP.

M4.24 A review of NHS data indicates that there are currently two GP surgeries located within 3.0 km of the Site. Together these practices support just under six FTE GPs and provide care for over 17,500 patients, giving the LIA an overall ratio of 2,974 registered patients per FTE GP. This is significantly higher than both the ICB average (of 2,438 patients per FTE GP), and the national average (of 1,690 patients per FTE GP), indicating a large deficit in capacity across the local healthcare system.

Table M4.4 General practice capacity

Name	Patients	FTE GPs	Patients per FTE GP
Sun Lane	5,404	2.2	2,456
Oaklands Health Centre	12,132	3.7	3,282
Total	**17,536**	**5.9**	**2,974**

Source: NHS (August 2025), General Practice Workforce / Lichfields analysis

M4.25 There are also two dental practices located within a 3.0 km radius of the Site, one of which is accepting new patients. These dentists list a total of nine dental practitioners (excluding orthodontists and hygienists).

M4.26 The closest hospital providing accident and emergency ('A&E') services is William Harvey Hospital, located in Ashford, approximately 15.0 km northwest of the Site as shown in Figure M4.2. In addition to A&E, the hospital also provides cardiology, intensive care, and maternity services.

Figure M4.2 Local health facilities within the study area

Open Space and Play Space

M4.27 The Shepway Open Space Strategy (Ref 17) was produced by FHDC (formerly Shepway District Council) in 2017 and outlines the relevant size and accessibility criteria for different typologies of open space and play space across the District. For the purposes of this assessment, the following open space categories are considered relevant:

- Parks and Gardens – providing accessible, high-quality opportunities for informal recreation and community events. These spaces are more multi-functional than other open spaces, offering space for quiet relaxation as well as a range of amenities and activities for visitors. In particular, parks and gardens often include children's play and/or outdoor sports facilities;
- Amenity Green Spaces – providing opportunities for informal activities close to home or work. Amenity Green Spaces provide a less formal green space experience than parks and gardens, and generally provides fewer habitats;
- Allotments – providing opportunities for people to grow their own produce as part of the long-term promotion of sustainability, health and social inclusion; and
- Children's Play Space - areas designed primarily for play and social interaction involving children and young people, such as equipped play areas, ball courts, skateboard areas and teenage shelters.

M4.28 Table M4.5 below outlines the open spaces and play spaces in proximity to the Site which fall within the relevant accessibility criteria. There are also several other public open spaces within close proximity of the Site which are available for the local community to use, despite not strictly meeting the relevant accessibility criteria outlined below. Overall, there is an identified deficit in local open space, including an absence of district parks and smaller local parks. There are also no children's play spaces within the relevant accessibility guidelines.

M4.29 An OSA has also been prepared as part of this application. The OSA updates the findings of the Shepway Open Space Strategy and determines that there is a surplus of open space across the 'Urban Area' comprising both Hythe and Folkestone towns. The study area and methodology used applied in the OSA differs from those applied within this assessment. However, the OSA indicates that there are a range of open spaces located across the wider Folkestone and Hythe Urban Area that can also be used by the local community (although it is noted that these fall outside the accessibility standards defined by the Council's Open Space Strategy).

Table M4.5 Open space and play space provision

Type of space	Accessibility standard (km from the Site)	Size standard (ha / 1,000 population)	Name of space	Size (ha)
Parks and Gardens				
District Park	1.2	2.89	/	
Local Park	0.4	2.89	South Road Recreation Ground	10.4
Small Local Park	0.28	2.89	/	

Type of space	Accessibility standard (km from the Site)	Size standard (ha / 1,000 population)	Name of space	Size (ha)
Other				
Amenity Green Space	0.28	2.89	The Grove	1.8
Allotments	1.2	0.12	Eaton Lands (North) Allotments Eaton Lands (South) Allotments Twiss Road Allotments	0.4 0.8 0.6
Children's Play Space				
Neighbourhood equipped play area ('NEAP')	0.6	0.08	/	
Local equipped play area ('LEAP')	0.24	0.08	/	
Local area for play ('LAP')	0.06	0.01	/	

Source: Lichfields analysis

M4.30 Figure M4.3 identifies the open spaces within the relevant accessibility criteria for the Site.

Figure M4.3 Opne space and play space provision within the relavent accessibility catchments for the Site

Community Facilities

M4.31 The Folkestone and Hythe Places and Policies Local Plan outlines the importance of community facilities for people's health and wellbeing, as well as the need to ensure facilities are provided in accessible locations to serve both existing and new residents. It also states than community facilities should be flexible and adaptable in order to meet the changing needs of local communities. Table M4.6 below provides a breakdown of social infrastructure and community facilities located in close proximity to the Site.

Table M4.6 Social infrastructure and community facilities in Proximity to the Proposed Development

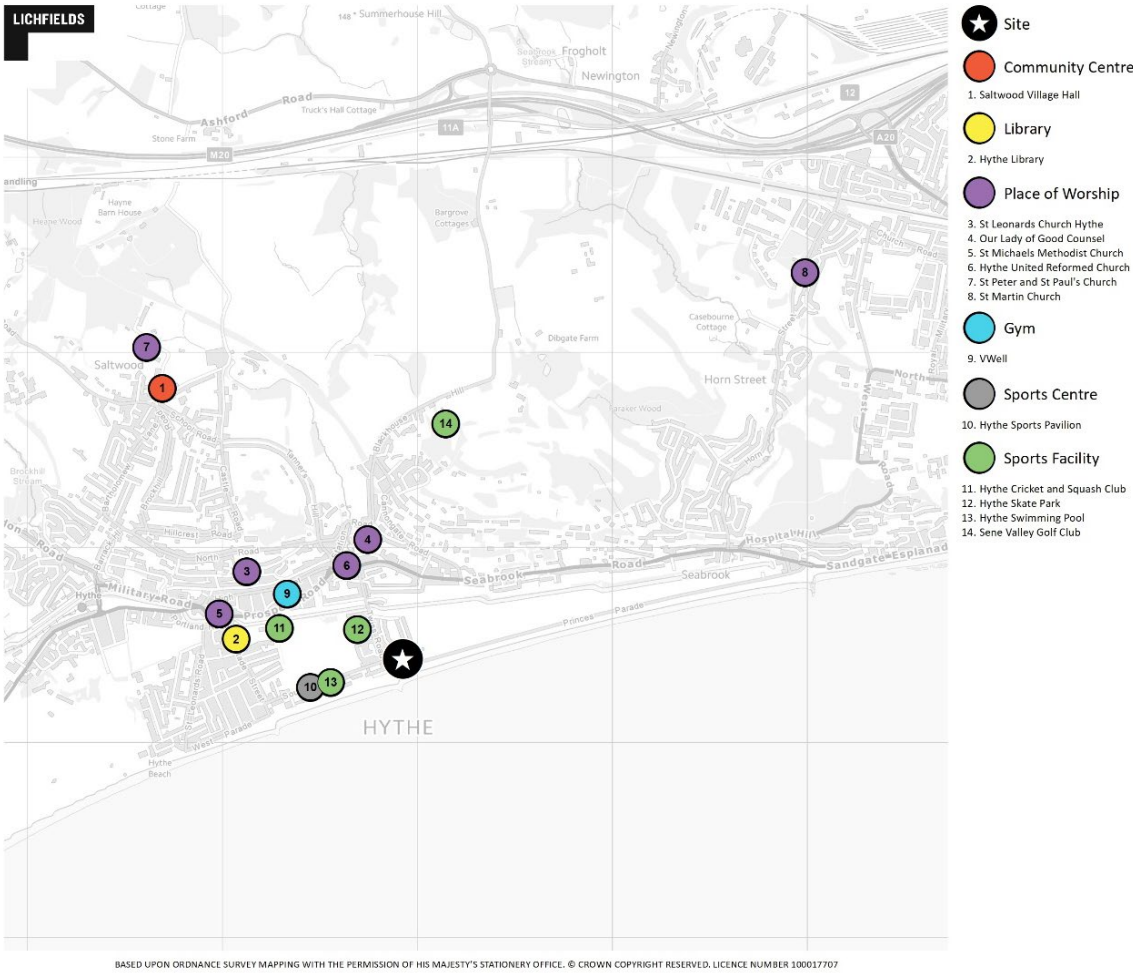
Facility name	Facility type	Distance from site (km)
Saltwood Village Hall	Community centre	1.8
Hythe Library	Library	0.8
St Leonards Church Hythe	Place of worship	0.8
Our Lady of Good Counsel	Place of worship	0.5
St Michaels Methodist Church	Place of worship	0.8
Hythe United Reformed Church	Place of worship	1.2
St Peter and St Paul's Church, Saltwood	Place of worship	1.9
St Martin Church	Place of worship	2.0
VWell	Gym	0.6
Hythe Sports Pavilion	Sports centre	0.4
Hythe Cricket and Squash Club*	Sports facility	0.4
Hythe Skate Park	Sports facility	0.3
Hythe Swimming Pool	Sports facility	0.2
Sene Valley Golf Club*	Sports facility	0.6

Source: Lichfields analysis

* While these facilities offer memberships, they also provide opportunities for members of the public to use their facilities on an ad hoc basis.

M4.32 Community facilities within the study area are identified in Figure M4.4. Hythe Golf Club forms part of the Site, however it is private for members only and therefore has been omitted from the baseline following feedback from FHDC within the Scoping Opinion (January 2024). Additional private sports clubs, including the Hythe Lawn Tennis Club and Hythe Bowling Club are located to the west, and have been excluded given their nature as private members' clubs.

Figure M4.4 Community facilities within the study area



Visitor Economy

M4.33 Information from the Folkestone and Hythe Visitor Economy (Ref 12) report indicates that in 2023, there were a total of 4.7 million visitors to the District, generating a total economic output of £269 million and supporting over 5,000 jobs. In comparison, the wider Kent economy saw 66 million visitors, who generated an economic output of £4.1 billion and supporting around 77,900 jobs.

M4.34 Of the 4.7 million visitors to the District, around 4.3 million were day visitors, while around 398,000 were overnight visitors. Of the overnight visitors, 319,000 were domestic visitors while 79,000 were overseas visitors.

Public Rights of Way

M4.35 There are several PRoWs located in proximity to the Site, including:

- The King Charles coastal path – This path runs along the southern boundary of the Site from east to west, running parallel to Hythe Beach;

- The Royal Military Canal path – This path runs along the Royal Military Canal ('RMC'), from east to west along the Site's northern boundary;
- Public Bridleway (0135/HB83/1) – This bridleway runs east to west along the Site's northern boundary, while also running parallel to the RMC to the north.
- Public Bridleway (0135/HB65/5) – This bridleway runs east to west along the RMC, located north of the canal and running parallel to the Site's northern boundary.

M4.36 In addition, National Cycle Network ('NCN') Route 2 runs along the south of the Site along the promenade to the south of Princes Parade. It forms a long-distance route running from Cornwall in the west to Dover in the east.

M4.37 A private footpath which runs across the centre of the Site, connecting Princes Parade to the RMC, is also open for the public to use.

Health & Wellbeing

M4.38 Data from the 2021 Census (Ref 8) indicates that 29.1% of the LIA's population has a long-term health problem or disability, compared with around 29.5% for the WIA, and 23.7% across the South East. Within the LIA, 9.3% of residents defined their day-to-day activities as being 'limited a lot', which is lower than the equivalent figure for the WIA (of 9.5%), but higher than the regional average (of 6.3%).

M4.39 Census data also indicates that in 2021, 78.7% of the LIA's residents identified themselves as being in 'good' or 'very good' health. This is slightly higher than the equivalent figure across the WIA (78.2%) but lower than the regional average (84.0%). In contrast, just 6.4% of residents in the LIA identified themselves being in 'bad' or 'very bad' health. This is slightly below the WIA average (of 6.5%) but higher than the average across the South East (of 4.2%).

M4.40 The 2025 English Indices of Deprivation ('IoD') (Ref 23) ranks Folkestone and Hythe as the 80th most deprived local authority in England (out of 317 local authorities, where 1 is the most deprived) in terms of health deprivation and disability. This places the District within the 30% most deprived local authorities in England.

M4.41 The Department of Health and Social Care's Local Authority Health profile[5] (Ref 24) for Folkestone and Hythe indicates that in 2018 (the latest data available), male life expectancy across the District was 79.7 years, which was lower than the regional average (80.7 years) but slightly higher than the national average (79.6 years). For females, life expectancy across the District was 83.1 years, which was lower than both the regional and national averages (84.1 and 83.2 years, respectively).

M4.42 Across the District, the all-cause mortality rate for under 75s was 337.6 people per 100,000 residents, which was higher than both the regional and national averages (of 292.3 and 330.5 per 100,000 people, respectively).

M4.43 The proportion of self-reported smokers across the District was 22.8%, which was higher than both the regional and national averages (12.9% and 14.4%, respectively).

[5] As of 2021, Public Health England was renamed as The Department of Health and Social Care.

M4.44 In relation to children's health, the infant mortality rate across the District in 2018 stood at 3.87 per 1,000 live births, which was higher than the regional average (3.65 per 1,000 live births) but lower than the national average (3.93 per 1,000 live births). In addition, 21.0% of year 6 pupils in the District were classified as obese, compared with 16.8% regionally and 20.2% across England.

M4.45 House of Commons Library data (Ref 25) indicates that across the Folkestone and Hythe constituency[6] in 2024/25, 3.7% of GP patients were diagnosed with coronary heart disease. This is above both the regional and national averages (of 2.8% and 3%, respectively). In addition, 9.2% of adult GP patients across this constituency were diagnosed with diabetes, which is higher than both the regional (7.3%) and national (7.9%) averages.

Sensitivity of Receptors

M4.46 Drawing on the analysis of the current baseline conditions, as well as the local and national policy contexts outlined above, Table M4.7 below presents an assessment of the sensitivity for each receptor considered in this socio-economic assessment.

Table M4.7 Sensitivity of receptors

Receptor	Sensitivity of receptor	Justification
Economy and employment	WIA: High Region: Low	The WIA perform poorly compared to the regional and national averages for metrics including unemployment, skills and educational attainment, and employment growth.
Population and housing	WIA: Medium	The Housing Delivery Test identifies an overall shortfall of 280 homes across the WIA between 2020/21 and 2022/23, equating to a delivery rate of 83.0%. The most recent AMR also identifies substantial shortfall between 2019/20 and 2023/24 across the District.
Primary school provision	LIA: Low	Analysis of primary schools within the relevant catchment suggests that in aggregate, primary schools within the Folkestone and Hythe primary planning area have 15.2% spare capacity.
Secondary school provision	LIA: Low	Analysis of secondary schools within the Folkestone and Hythe secondary planning area suggests that local secondary schools (including both selective and non-selective schools) have 17.2% spare capacity].
Primary healthcare provision	LIA: High	The patient to GP ratio across the LIA is 2,974, which is appreciably higher than both the ICB average (of 2,438 patients per FTE GP), and the wider national average (of 1,690 patients per FTE GP), indicating a large deficit in capacity across the local healthcare system.
Open space	LIA: Medium	There are a variety of open spaces which fall within the relevant accessibility criteria, as well as additional local spaces which do not meet the criteria. However, there is a deficiency in small local parks and green spaces, which meet the relevant accessibility criteria.

[6] Please note that the Folkestone and Hythe Parliamentary Constituency varies slightly from the District's boundary.

Receptor	Sensitivity of receptor	Justification
Play space	LIA: High	There are no children's play spaces within the recommended accessibility criteria to the Site.
Community facilities	LIA: Low	There is a range of leisure and community facilities in proximity to the Site.
Visitor economy	WIA: Low	The local visitor economy in Folkestone and Hythe performs strongly, with almost 5 million annual visitors to the District.
PRoW	LIA: Low	There are a variety of PRoW in proximity to the Site, including the King Charles coastal path and the RMC path. These are assessed to be used both for leisure and connectivity between communities on either site of the Site.
Health and wellbeing	LIA: Medium	The District performs slightly worse than national and regional averages in relation to a variety of health indicators, including health deprivation, life expectancy, all-cause mortality, smoking prevalence, child obesity, heart disease, and diabetes. While health data is not available at the LIA level for all health metrics, the LIA often performs better than the WIA, but below than the regional average for metrics relating to self-reported health and prevalence of long-term health conditions.

Future Baseline

M4.47 EIA guidance suggests that it is good practice to consider the evolution of a site in the absence of a development coming forward, or in other words a "do nothing" scenario (also known as the reference case). In this context, it would be possible to conclude that should the Proposed Development (which is the subject of this assessment) not proceed, then the current uses at the Site would likely continue. Under this scenario, the economic, social and housing benefits generated by the Proposed Development would not come forward at the Site and accrue to the LIA.

Housing

M4.48 The Folkestone and Hythe Core Strategy Review identifies a housing target of 13,284 new homes over the plan period (i.e., to 2036/37), equating to an average of 738 new homes each year.

M4.49 A review of the cumulative schemes listed in Chapter N: Cumulative and Residual Effects indicates that a total of 2,035 new homes could be delivered if all of the cumulative schemes were to be delivered in full.

Population

M4.50 The 2022-based subnational population projections ('SNPP') represent the latest population forecasts produced by the ONS (Ref 26), which projects a total population of around 119,000 residents within Folkestone and Hythe by 2035. It should be noted that the population change referenced is not directly related to any particular development proposal.

M4.51 A review of cumulative schemes within proximity of the Proposed Development suggests that if all schemes were to be delivered in full, the new housing provided would generate a total population increase of approximately 4,500 new residents.

Labour Market

M4.52 The overall economic breakdown and sector mix of employment within the LIA is expected to broadly reflect the current position. However, the level of future economic growth (i.e. within the sectors and across the economy) is dependent on wider economic trends. Similarly, the types of occupations held by workers, economic activity rate, unemployment and educational attainment will depend upon the future strength of the local economy. Therefore, it is not possible to accurately forecast a specific future baseline for the labour force within the LIA or WIA.

M4.53 Instead, this assessment considers the potential impact of the Proposed Development on the current status of relevant labour market indicators, which are taken to represent the future baseline.

Education, Healthcare, Open Space and Community Facilities

M4.54 A review of cumulative schemes in proximity to the Proposed Development indicates that a new primary school and nursery facility totalling around 3,500 sq.m is to be provided as part of the Shorncliffe Garrison development in Folkestone.

M4.55 No new healthcare facilities are planned across the cumulative schemes considered. The cumulative schemes will also provide a significant quantity of new open space, however the total quantum of open space has not yet been provided for the majority of these schemes. A total of 1,998 sq.m of new community facilities will also be provided as part of the Shorncliffe Garrison development.

Visitor Economy, PRoW and Health and Wellbeing

M4.56 The current performance of the local visitor economy and health and wellbeing indicators across the WIA, and the existing PRoW network are taken to represent the future baseline position.

M5.0 Potential Effects

M5.1 This section assesses the potential socio-economic and health effects of the Proposed Development on receptors at the various impact areas identified in section 3.0.

Embedded Mitigation

M5.2 Primary mitigation measures are embedded within the Proposed Development, as set out in the respective chapters, in order to reduce other construction and operational effects (such as noise, air quality, transport and landscape). Of relevance to socio-economics and health and wellbeing is the Construction Environmental Management Plan ('CEMP') (provided at Appendix C4) which seeks to reduce and mitigate any adverse effects on the local community and existing facilities through the use of best practice construction measures.

Major Hazards and Accidents

M5.3 Major hazards and accidents are not considered relevant to this assessment. The assessment includes the likely health and wellbeing effects resulting from the exposure of the population to impacts on wider health determinants that are predicted to result from the Proposed Development. There is no available method for assessing the potential health outcomes of a major accident or disaster which, while potentially wide-ranging and severe, are unlikely to occur.

Phasing

M5.4 For the purpose of this assessment, it has been assumed that construction of the Proposed Development will consist of one phase lasting a duration of seven years as set out in Chapter C of this ES.

During Construction

Employment

M5.5 Based on the anticipated level of investment required, along with labour coefficients from the CITB (Ref 27) and an assumed seven-year construction period, it is estimated that the Proposed Development could support in the region of 178 direct FTE jobs per annum. However, it is acknowledged that the number of construction workers on site will fluctuate over time due to the need for different construction specialisms at different points during the construction process.

M5.6 While the construction phase will generate new employment opportunities, it is important to take account of the potential displacement of jobs from elsewhere in the local economy, as well as some of the new employees living outside of the South East. Some of the people employed during construction could decide to switch jobs from elsewhere in the study area, leading to a temporary displacement of local jobs. 'Leakage' refers to the jobs generated that accrue to those living outside of the study area.

M5.7 In the absence of specific local information, a low displacement rate (25%) and low (10%) leakage rate from the HCA's Additionality Guidance (Ref 28) has been considered appropriate to balance construction workforce mobility with the fact that the South East

represents a large-sized labour pool (of around 223,000 people working in construction) from which a reasonable proportion of the construction workforce could be drawn.

M5.8 Applying these displacement and leakage rates to the number of gross direct jobs, it is estimated that construction will support an average of 120 (direct) FTE net additional construction jobs directly over the 7-year build period.

M5.9 Construction involves the purchase of goods and services from a range of suppliers who, in turn, procure goods and services from their own suppliers via their supply-chain. The relationship between the initial direct spending and total economic effects is known as the 'multiplier effect'. This demonstrates that an initial expenditure can have a larger economic impact as this is diffused through the economy. It is anticipated that businesses in the WIA and the South East more widely would benefit from trade linkages established during the construction phase. As a result, further indirect jobs would be supported in the impact area through suppliers of construction materials and equipment. In addition to these indirect effects, induced employment is also expected to arise, generated by the increased spending of workers employed directly and indirectly in the construction process within the local economy, for example, in retail, hospitality and other service sectors.

M5.10 Analysis of ONS input-output analytical tables (Ref 29) indicates that the construction industry has an indirect and induced employment multiplier of 2.52 in the UK. This means that every direct job (i.e. 1 FTE) supports an additional 1.52 FTE jobs more widely through the supply chain and wider induced effects. Applying this multiplier to the 120 net additional jobs derived, and accounting for displacement (25%) and leakage (10%) outside of the South East, it is estimated that a further 123 FTE jobs are supported more widely (i.e. via supply chain and induced effects) during each year of the construction phase.

M5.11 Taking account of the net direct, supply chain and wider induced jobs supported by the construction phase, a total of 243 (net additional) FTE jobs are expected to be supported across the South East each year, a proportion of which are likely to be located the WIA. A breakdown of this calculation is presented in Table M5.1 below.

Table M5.1 Construction employment

	FTE Jobs p.a. in the South East
Gross Direct Employment	178
Net Direct Employment	120
Net Indirect and Induced Employment	123
Total Net Employment	**243**

Source: Lichfields analysis

Economic Output

M5.12 As well as supporting employment, the economic activity enabled by the construction phase will generate additional economic benefit, measured in terms of GVA[7]. Drawing on ONS benchmarks, it is estimated that around £5.8 million of (gross) direct GVA is generated in each year of the construction phase.

[7] GVA represents the value a producer adds to the raw products and inputs used through the production of their goods and services.

M5.13 Once accounting for the displacement of economic activity from elsewhere (i.e. 25%) and leakage outside of the South East (i.e. 10%), it is estimated that construction activity of the Proposed Development could generate an estimated £3.9 million net additional GVA each year.

M5.14 Based on an indirect GVA multiplier of 2.68 (i.e. where every £1 GVA generates a further £1.68 through supply chain and wider induced effects), and once accounting for displacement (25%) and Leakage (10%) outside of the South East, it is estimated that a further £4.0 million of wider GVA could be generated each year. In aggregate, it is therefore estimated that the construction phase of the Proposed Development will generate an estimated £7.9 million (net additional) GVA each year in the South East as shown in Table M5.2.

Table M5.2 Construction GVA

	GVA p.a. in the South East
Gross Direct GVA	£5.8 million
Net Direct GVA	£3.9 million
Net Indirect and Induced GVA	£4.0 million
Total Net GVA	**£7.9 million**

Source: Lichfields analysis

M5.15 Drawing on the analysis above, it is estimated that the net additional employment and economic activity supported by construction is estimated to represent 0.1% of the sector's footprint in the South East region. On this basis, the magnitude of impact of construction activity on employment and economic activity is assessed as temporary negligible across the region. With the sensitivity of the receptor assessed as low at the region spatial level, the effect on the receptor is assessed as temporary (short-term) and Negligible at regional level. This is Not Significant in EIA terms.

PRoW

M5.16 During construction, all PRoWs within the LIA will remain open. This includes Public Bridleway 0135/HB83/1 located on the southern bank of the RMC, which lies along the northern boundary of the Site, as well as The King Charles III England Coast Path and NCN Route 2 which both run along the promenade to the south of Princes Parade.

M5.17 There is an additional private footpath that runs through the centre of the Site which is currently available for use by the public; this will be retained across the Site, although the southern section will be redesigned to form part of the central plaza (see Chapter C of this ES) as part of the Proposed Development. Chained heras fencing will be erected along the length of the footpath to prevent Site access by users, and where required for Site access at the haul road location, there will be permanently manned and gated crossing points for Site vehicles across the footpath during site hours. This will ensure that access along the path will be maintained once the footpath has been constructed.

M5.18 Therefore, the construction of the Proposed Development is assessed to have a temporary negligible magnitude of impact on the use of PRoW and NCN Route 2, which along with the low sensitivity results in a short-term Negligible effect which is considered to be Not Significant in EIA terms.

Health and Wellbeing

Access to opportunities for physical activity

M5.19 During construction, PRoW and cycle routes in close proximity to the Site will remain open. A private footpath passing through the centre of the Site, which is currently open to the general public, may be partially closed temporarily to allow for enhancements and the construction of a new seating area.

M5.20 Overall, the magnitude of impact on access to opportunities for physical activity with regards to public health is assessed to be negligible due to the short duration of the loss of part of the footpath and the very small number of people affected by the closure of Hythe Golf Course. Therefore, a short-term, Negligible effect is assessed at the LIA spatial level which is considered to be Not Significant.

Transport modes, access and connections

M5.21 As above, during construction, PRoW and cycle routes in close proximity to the Site will remain open to users. A private footpath passing through the centre of the Site, which is currently open to the general public, may be partially closed to allow for enhancements and the construction of a new seating area.

M5.22 Overall, the magnitude of impact on access to sustainable transport modes and connections with regards to public health is assessed to be negligible due to the short duration of the loss of the footpath and the very small number of people affected by its closure. Therefore, a short-term, Negligible effect is assessed at the LIA spatial level which is considered to be Not Significant.

Air quality

M5.23 Chapter J: Air Quality assesses the impact of dust and traffic emissions during the construction phase. It concludes that through implementation of appropriate embedded mitigation measures during construction, there will be no significant effects on neighbouring receptors arising from both construction dust and traffic emissions.

M5.24 Overall, the magnitude of impact of construction upon air quality with regards to public health is assessed to be negligible across the LIA due to the very small scale and the small number of people affected. Overall, the effect of construction upon air quality is assessed to be short term, Negligible and Not Significant in EIA terms for the general population in the LIA.

Noise

M5.25 Chapter I: Noise and Vibration assesses the impact of noise effects during construction. It concludes that following implementation of appropriate embedded mitigation measures, moderate adverse, short-term local residual effects would be experienced at Hythe Imperial Hotel during Phase 3 of the construction phase. However, this effect is not considered to be significant due to its short-term duration. All other effects during construction are assessed to be negligible or temporary and Minor Adverse at the local level, and are considered to be Not Significant.

M5.26 Overall, the magnitude of impact of construction noise with regards to public health is assessed to be negligible across the LIA due to the small scale and the very small number of people affected. Overall, the effect of construction noise is assessed to be short term, Negligible and Not Significant in EIA terms for the general population in the LIA.

During Operation

Employment

M5.27 The Proposed Development will deliver a range of employment generating floorspace on Site once it is built and fully operational. This includes an extension to the existing hotel to provide 24 additional rooms, 8 serviced apartments, and spa facilities, as well as a new academy golf course (9-holes), associated club building, and adventure golf course. A new leisure complex comprising a swimming pool and gym will also be delivered as part of the Proposed Development.

M5.28 Information provided by the applicant indicates that the expansion of the hotel and delivery of the new leisure facilities will create 28 FTE new jobs on Site. In addition, the academy golf course and adventure golf course will support a further 16 FTE jobs on Site. However, as part of the delivery of the golf facilities, the existing golf course on the Site will be lost. The existing golf course supports 6 FTE jobs, therefore the delivery of the new golf facilities will result in an increase of 10 FTE jobs on Site. In total, once operational, the Proposed Development will result in an increase of 38 (gross) FTE jobs directly on Site.

M5.29 Based on the nature of the floorspace delivered within the Proposed Development, it is anticipated that the majority of the jobs will go to people living within the WIA. It is also assumed that due the relatively high number of people claiming unemployment benefits in the WIA (i.e. of c.2,400 people) there will be a low displacement of jobs from elsewhere in the study area; although, some more skilled opportunities such as physiotherapists may be displaced from elsewhere. Once accounting for displacement (25%) and leakage (10%) it is estimated that the operational Proposed Development will support 25 (net additional) FTE jobs on Site.

M5.30 The net direct employment generated will also support additional indirect and induced employment more widely. ONS benchmarks show that employment in the accommodation, sports and recreation sector has an indirect and induced employment multiplier of 1.53 in the UK (i.e. every 1 direct FTE job will support a further 0.53 indirect and induced jobs more widely). By applying this multiplier to the (net additional) direct employment supporting, it is estimated that a further 8 FTE jobs will be supported across the WIA more widely.

M5.31 Through the net direct, indirect and induced jobs generated during operation, it is estimated that a total of 33 FTE net jobs will be supported in the WIA. Table M5.3 presents a full breakdown of how the total net employment results are calculated.

Table M5.3 Total operational FTE employment

	FTE jobs in the WIA
Gross Direct FTE Employment	38
Net Direct FTE Employment	25

	FTE jobs in the WIA
Net Indirect & Induced FTE Employment	8
Total Net FTE Employment	**33**

Source: Lichfields analysis

Economic Output

M5.32 As well as supporting employment, the economic activity induced by the operational phase will generate additional economic output, measured in GVA. Based on Experian data (Ref 30), it is estimated that around £2.9 million of gross direct GVA could be generated annually. Once accounting for displacement (25%) and leakage (10%) of economic activity from elsewhere, it is estimated that operational employment will generate around an estimated £2.0 million net additional GVA each year.

M5.33 By applying a composite multiplier of 1.57 for the sports and recreation sector to the net direct GVA generated, and accounting for displacement (25%) and leakage (10%) outside of the WIA, it is estimated that the Proposed Development could generate around £0.8m of indirect and induced GVA per annum in the WIA. Therefore, the Proposed Development is estimated to have the potential to generate a net total of £2.8m in the WIA as summarised in Table M5.4.

Table M5.4 Total operational GVA

	GVA p.a. in the WIA
Gross Direct GVA	£2.9m
Net Direct GVA	£2.0m
Net Indirect & Induced GVA	£0.8m
Total Net FTE GVA	**£2.8m**

Source: Lichfields analysis

M5.34 Overall, the jobs generated by Proposed Development could equate to less than 0.1% of jobs within the WIA. Considering this, the magnitude of impact on employment is assessed to be to be negligible at the WIA level. This results in a permanent Negligible effect at the WIA level, which is considered to be Not Significant in EIA terms.

Population Growth

M5.35 Based on an anticipated average household size of 2.1 residents, it is estimated that the Proposed Development (i.e. consisting of 291 residential units) will accommodate approximately 611 residents.

M5.36 The following assessment is based on the maximum parameters for the Proposed Development, and assumes that none of the residents currently live within either the LIA or WIA. However, it is likely that some of the new dwellings would be occupied by existing residents, such as residents buying their first homes, trading up and people on the Housing Association or the Council's waiting list. In any event, it is assumed that residents who relocate to within the Proposed Development would release other dwellings for occupation by others (incl. potentially new) residents to the LIA, which would ultimately increase the level of choice and availability in the local market.

M5.37 ONS data estimates there are around 71,400 people living within in the LIA. Based on this, it is estimated that the new residents living within the Proposed Development will represent an increase of around 0.9% over the current baseline. On this basis, the magnitude of impact on the receptor at the LIA spatial level is assessed as negligible. With the sensitivity of the receptor assessed as medium, the significance of effect on the receptor is therefore assessed as permanent (long-term) and Negligible at the LIA spatial level, which is considered to be Not Significant in EIA terms.

M5.38 The baseline analysis puts the WIA's population at around 112,400 people. This means that the increase in population as a result of the Proposed Development, representing a negligible increase in the WIA's population of 0.01%. With the sensitivity of the receptor assessed as medium, the significance of effect on the receptor is therefore assessed as permanent (long-term) and Negligible at the WIA spatial level. This is considered to be Not Significant in EIA terms.

Local Labour Market Impacts

M5.39 Drawing on current population estimates, and key labour market metrics for residents in Folkestone and Hythe District, it is estimated that around 365 of the residents living within the Proposed Development could be of core working age (i.e. aged 16 to 64). Applying the existing levels of economic activity for the District (i.e. of 54.0%) to the residents of core working age, it is therefore assumed that around 197 residents living within the Proposed Development will be economically active and therefore, either employed and/or looking for employment opportunities.

M5.40 The baseline section indicates that across the WIA there are currently around 49,400 residents who are economically active and engaged in the labour market, including 32,000 within the LIA. Therefore, the 197 economically active residents living within the Proposed Development would grow the labour market within the LIA by 0.6%, and the WIA by 0.4% over the current baseline. However, as noted previously, it is likely that the magnitude of impact on the labour market will be lower due to some of the incoming residents already residing within the LIA and WIA. This means that the number of additional workers could be less. New residents of the dwellings may also already participate in the local workplace as in-commuters. However, any increase in the economically active population will grow the workforce that supports local businesses.

M5.41 Therefore, the increase in the economically active residents enabled by the Proposed Development is assessed to have a negligible magnitude of impact in the LIA and the WIA, resulting in a Negligible, permanent effect in the LIA and the WIA. This is considered to be Not Significant in EIA terms.

Housing

M5.42 The delivery of 291 new homes will constitute approximately 2.2% of Folkestone and Hythe's identified housing need in the Core Strategy Review (2022) of 13,284 in the period to 2036/37. The Proposed Development will include a range of housing tenures, including 25% affordable units.

M5.43 Therefore, the magnitude of impact on the receptor at the WIA spatial level is assessed as low beneficial. With the sensitivity of the receptor assessed as medium, the significance of effect

on the receptor is therefore assessed as permanent (long-term) and Negligible at the WIA spatial level. This is considered to be Not Significant in EIA terms.

Resident Expenditure

M5.44 The Proposed Development will lead to increased expenditure within the local economy as people go about purchasing goods and services to support their daily lives. The ONS Family Spending in the UK survey (Ref 11) provides data on household spending by socio-economic classification. It is assumed that the residents of the Proposed Development will form part of the 'Urbanites' socio-economic output area classification ('OAC') supergroup. This is currently the predominant supergroup in Hythe and the area surrounding the Site of the Proposed Development. This includes residents of areas located in urban areas, who typically live in flats or terraces and are likely to be below retirement age.

M5.45 Based on this, it is assumed that each household has potential to generate an average weekly spend of around £616 (in 2025 prices), which is equivalent to £9.3 million (gross expenditure) per annum across the whole Proposed Development. However, not all expenditure will be retained locally, as some will 'leak' outside of the WIA (in the form of holiday expenditure, online shopping, and expenditure with nation-wide national businesses (such as energy providers)). Based on evidence from the Folkestone and Hythe Retail and Leisure Needs Assessment Update (2019) (Ref 31), it is estimated that 78.8% of comparison and convenience goods' expenditure will be retained within the study area. In the case of the Proposed Development, this is equivalent to £7.3 million per annum, and is estimated to support around 59 FTE jobs in retail, leisure, hospitality, catering and other local service sectors. On this basis, the magnitude of impact of the Proposed Development at the WIA is assessed as Medium beneficial.

M5.46 In addition, it is estimated that the first occupation expenditure, which relates to an initial spend aimed at making a house "feel like a home", is estimated to be around £2.2 million (in 2025 price). Research carried out by OnePoll (Ref 32) indicates that each new dwelling generates a 'first occupation' expenditure in the region of £7,900 (in 2025-pricing). This additional spending will support the vitality and viability of local businesses as well as the local and wider economy.

M5.47 Drawing on the above, the magnitude of impact on the local economy is therefore assessed as medium beneficial. With the sensitivity of the receptor assessed as high, the significance of effect on the receptor is therefore assessed as permanent (long-term) and **Moderate Beneficial** at the WIA spatial level. This is considered to be **Significant** in EIA terms.

Visitor Expenditure

M5.48 Once completed, the Proposed Development will deliver 24 new hotel rooms and 8 new serviced apartments as part of an extension to the existing hotel. Visitors staying in the hotel extension will boost the local economy through their expenditure in the local economy. It has been estimated that the new visitor accommodation will generate up to around 15,200 additional visitor nights per annum at the hotel, based on information on the likely number of beds in the visitor accommodation, as well as an assumed occupancy based on estimates from the Applicant.

M5.49 Information from Visit Kent (Ref 12) indicates that each visitor night in Folkestone and Hythe generates value of around £59.40 to the local economy. Therefore, the additional visitor accommodation delivered as part of the hotel extension is estimated to generate around £905,200 in GVA per annum in the Folkestone and Hythe economy. This represents a 0.3% increase in the Folkestone and Hythe tourist economy from its value in 2023 of £269 million.

M5.50 Therefore, the magnitude of impact on the local economy is assessed as negligible. With the sensitivity of the receptor assessed as high, the significance of effect on the receptor is assessed to be permanent (long-term) and Negligible at the WIA spatial level. This is considered to be Not Significant in EIA terms.

Education

M5.51 Drawing on guidance from KCC (Ref 14) it is anticipated that once fully occupied the Proposed Development will create demand for 31 primary age places, in addition to 23 secondary aged places as shown in Table M5.5.

Table M5.5 Pupil yield arising from the operational Proposed Development

Dwelling Type	Units	Primary		Secondary	
		Factor	Child Yield	Factor	Child Yield
Flat / apartment	243	0.07	17	0.05	13
House	48	0.28	14	0.20	10
Total	**291**		**31**		**23**

Source: KCC (2023) / Lichfields analysis
Note: All child yield figures have been rounded up to the nearest whole to form an assessment of the worst-case scenario.

M5.52 Analysis of primary school provision within the Hythe PPA (see Table M4.2) indicates that there is currently a surplus of 173 pupil places in the area. Therefore, it is anticipated that the additional demand for 31 primary school aged children generated by the Proposed Development can be fully accommodated within the existing primary school capacity. This results in a remaining surplus of 12.5% which is above the NAO's recommended surplus of between 5.0% and 10.0%. On this basis, the magnitude of impact on primary education facilities is assessed to be low, which along and with the low sensitivity of the receptor, results in a permanent and Negligible effect. This is considered to be Not Significant in EIA terms.

M5.53 The Proposed Development will generate demand for 23 secondary aged pupils. This additional demand can also be accommodated within the existing surplus of 1,145 pupil places across the Folkestone and Hythe SPA. Once accounting from the additional demand generated by the Proposed Development, there will be a remaining surplus of 1,122 secondary pupil places. This surplus is equivalent to 16.8% of the capacity which is above the NAO's recommended surplus capacity of between 5.0% and 10.0%. The additional demand generated for secondary schools by the Proposed Development in the Folkestone and Hythe SPA can therefore help to reduce the costs incurred by the large existing surplus of secondary school places. Therefore, the magnitude of impact on secondary education facilities is assessed to be low adverse, which along and with the low sensitivity of the

receptor, results in a permanent and Negligible effect. This is considered to be Not Significant in EIA terms.

Healthcare services

M5.54 The new residents living within the Proposed Development will create additional demand for healthcare services. As the baseline analysis indicates, there are currently two GP practices located within 3.0 km of the Site. Together, these practices serve 17,536 patients and support 5.9 FTE GPs. This means that each FTE GP within the local area looks after an average of 2,974 patients, which is higher than both the national average (1,690 patients per FTE GP) and the ICB average (2,438 patients per FTE GP).

M5.55 Under the worst-case scenario, it is assumed that all 611 residents will be new (i.e. net additional) to the local area and, therefore, generate increased demand for healthcare services locally. Therefore, it is estimated that the total number of registered patients per FTE GP within the local area will increase to 3,076 patients per FTE GP. This ratio remains above the national average of 1,690 patients per FTE GP and the recommended benchmark of 1,800 patients per FTE GP.

M5.56 Considering the above, there will be an increase in the ratio by 102 more patients per GP in the local area (i.e. +3.4%). Therefore, the magnitude of impact of the proposed development on the receptor is judged as medium adverse. With the sensitivity of the receptor assessed as high, the significance of the effect of the Proposed Development is therefore assessed as permanent and **Moderate Adverse** at the LIA spatial level. This is considered to be **Significant** in EIA terms.

Community Facilities

M5.57 The residents living within the Proposed Development will also give rise to additional demand for community facilities such as libraries, places of worship, community halls and leisure facilities. As indicated in the baseline, there are a range of existing community facilities in the surrounding area. It is assessed that the demand for community facilities generated by the Proposed Development can be accommodated by the existing provision of facilities.

M5.58 In addition, the Proposed Development will deliver a range of new health and leisure facilities for use by the general public. This includes a new swimming pool and gym, as well as the re-provision of Hythe Golf Course in the form of a 9-hole academy course and a new adventure golf course.

M5.59 Taking these factors into account, the magnitude of impact on the receptor is assessed as high beneficial. With the sensitivity of the receptor assessed as low, the significance of effect on community facilities is assessed as permanent and Minor Beneficial at the LIA spatial level. This is considered to be Not Significant in EIA terms.

Open Space and Play Space

M5.60 The residents living in the Proposed Development will also create demand for open space and play space facilities, particularly within the LIA.

M5.61 As outlined in the baseline analysis, although there is a surplus of open space across the wider Folkestone and Hythe Urban Area (as outlined in the OSA), there is a deficiency of small local parks and green spaces, as well as children's play spaces within the relevant accessibility catchments from the Site. Therefore, the delivery of new publicly accessible open space and public realm, including a new public park, a new public plaza to connect the Proposed Development to the existing public realm along the Princes Parade promenade, as well as a new 'Splash Park' play area for children, will make a meaningful contribution to local open space provision.

M5.62 Taking account of the above proposals, the magnitude of impact on open space is assessed to be medium in the LIA given that the delivery of the open space and play areas will primarily provide for the increased demand generated by future residents of the Proposed Development but will also contribute to addressing the under-supply of open space identified within the LIA. This results in a Minor Beneficial, permanent effect at the LIA level which is considered to be Not Significant in EIA terms.

M5.63 Correspondingly, the magnitude of impact on play space in LIA is also considered to be medium beneficial. This results in a **Moderate Beneficial**, permanent effect which is considered to be **Significant** in EIA terms.

PRoW

M5.64 The Proposed Development will deliver a new publicly accessible combined footpath and cycleway which will run along the northern and eastern boundaries of the Site, providing a new connection between the RMC and the seafront. The private footpath which runs through the centre of the Site will also be enhanced with a new seating area installed to improve user experience.

M5.65 Therefore, the Proposed Development is assessed to have a medium beneficial magnitude of impact, which in conjunction with the low sensitivity of the PRoW network results in a permanent Minor Beneficial effect which is considered Not Significant in EIA terms.

Health and Wellbeing

Access to opportunities for physical activity

M5.66 Once the Proposed Development is operational, Hythe Golf Club will be re-opened with a reconfigured 9-hole academy golf course and an adventure golf course. A new 25m swimming pool and gym will also be delivered which will be open for the public to use. Furthermore, the existing footpath will be retained and enhanced, while a new combined cycle and footpath will be delivered running along the northern and eastern boundary of the Site. Finally, a minimum of 62 spaces will be provided for the leisure centre, golf club and hotel extension, and further cycle spaces will be provided for the residential component in accordance with local standards, as set out in the Transport Assessment (DHA) (Appendix H1). All cycle parking provided will be covered and secure. Together, these facilities will encourage and facilitate physical activity in the local community, including the uptake of active modes of travel through the delivery of walking and cycling infrastructure.

M5.67 Overall, the magnitude of impact of the provision of opportunities for physical activity is assessed to be medium beneficial due to the permanent nature of the change, and the

opportunity for local residents to use the new facilities for physical activity. Therefore, a permanent, Moderate Beneficial effect is assessed at the LIA level which is considered to be Significant in EIA terms.

Transport modes, access and connections

M5.68 The operational Proposed Development includes the retention and enhancement of the existing footpath through the Site, while a new combined cycle and footpath will be delivered running along the northern and eastern boundary of the Site. Furthermore, a minimum of 62 spaces will be provided for the leisure centre, golf club and hotel extension, and further cycle spaces will be provided for the residential component. All cycle parking provided will be covered and secure, and the publicly accessible promenade will be enhanced on the northern side of Princes Parade, including the delivery of new covered seating areas.

M5.69 New pedestrian crossing points into the Site will be installed via raised tables along Princes Parade, as shown on the Landscape Masterplan. This will improve pedestrian access and safety, as well as act as a traffic calming measure.

M5.70 Together, these measures have potential to encourage and facilitate active modes of transit and improve connectivity to, and through the Site.

M5.71 Overall, the magnitude of impact of the provision of opportunities for physical activity is assessed to be low beneficial due to the permanent nature of the change, and a moderate proportion of the local population that will likely use the improved pedestrian and cycle infrastructure. Therefore, a permanent, Minor Beneficial effect is assessed at the LIA level which is considered to be Not Significant in EIA terms.

Air quality

M5.72 Chapter J: Air Quality assesses the impact of traffic emissions on neighbouring receptors once the Proposed Development is operational. It concludes that the impacts of operational traffic on air quality (including NO_2, PM_{10} and $PM_{2.5}$) are determined to be negligible on all existing and proposed receptor locations and that the effects are not significant.

M5.73 Therefore, the magnitude of impact of air quality effects with regards to public health at the population level is assessed to be negligible due to the very small scale and the small number of people affected. Overall, the health effects of air quality once the Proposed Development is built and operational is assessed to be Negligible and Not Significant in EIA terms in the LIA.

Noise

M5.74 Chapter I: Noise and Vibration assesses the impact of noise effects arising from amenity areas, building services plant noise, and from road traffic once the Proposed Development is built and operational. It concludes that there will be no significant noise impacts from amenity areas or from road traffic generated by the Proposed Development that require mitigation.

M5.75 Therefore, the magnitude of impact of noise effects with regards to public health at the population level is assessed to be negligible due to the very small scale and the small

number of people affected. Overall, the health effects of noise once the Proposed Development is built and operational is assessed to be Negligible and Not Significant in EIA terms in the LIA.

M6.0 Mitigation and Monitoring

During Construction

M6.1 No additional mitigation measures are identified beyond the embedded measures referenced in paragraph M5.2.

M6.2 However, measures to enhance the beneficial effects of the Proposed Development may be implemented. These include providing opportunities for jobs and training to local people during the construction phase, and local procurement initiatives.

During Operation

M6.3 Most of the operational effects generated by the Proposed Development have been assessed to be beneficial and therefore no further mitigation is required beyond embedded mitigation measures identified within paragraph M5.2.

M6.4 The Proposed Development has been assessed to have a permanent Moderate Adverse effect on healthcare provision due to the increase in demand for healthcare facilities by the new residents of the Proposed Development. This adverse effect will be mitigated through proportionate Section 106 contributions towards the provision of healthcare.

M6.5 Additional mitigation will be included to further enhance pedestrian and cycle safety around the Site and encourage active modes of transit. This includes a scheme of highway improvements on Princes Parade to reduce traffic speeds, such as reducing the speed limit to 30 miles per hour, the installation of chicane features, and new road markings in the vicinity of the Site. Improved street lighting will also be installed to improve pedestrian safety along Princes Parade.

M6.6 Measures to further enhance the benefits of the Proposed Development include opportunities for training and employment for residents living in the final development and the local area.

M7.0 Residual Effects

M7.1 This section considers the residual effects of the Proposed Development, taking into account the baseline position and any proposed mitigation measures. As no secondary mitigation measures are considered necessary, the residual effects are in most cases the same as the potential effects discussed in the earlier sections.

During Construction

M7.2 As no additional mitigation is proposed during the construction phase, the residual effects remain as set out in the previous section.

During Operation

M7.3 Following mitigation, no Significant adverse residual effects are anticipated to be created during the operation of the Proposed Development. It is considered that following the implementation of the mitigation measures outlined in Section M6.0, the residual effect on healthcare facilities would be Minor Adverse and permanent across the LIA, which is considered to be Not Significant in EIA terms.

M7.4 The Proposed Development will otherwise support a range of beneficial impacts once completed and operational.

M8.0 Summary & Conclusions

M8.1 In summary, the Proposed Development will deliver an extension to the existing Hythe Imperial Hotel, comprising 24 new hotel rooms, 8 serviced apartments and new spa facilities, along with up to 291 new homes, a new swimming pool and gym, and redevelopment of the existing golf course to provide a new leisure offering.

M8.2 The Proposed Development is assessed to support beneficial impacts on local employment and the local economy during the construction phases as well as a range of beneficial impacts once it is completed and inhabited.

M8.3 Section 106 contributions will be required to mitigate against the pressures of additional demand on healthcare facilities within the local area. These contributions will help mitigate the Moderate Adverse and Significant effect on healthcare, and subsequently, the residual effect is assessed to be Minor Adverse which is not considered to be Significant in EIA terms. No further mitigation is required based on the impact assessment.

M8.4 The residual socio-economic effects of the Proposed Development are summarised in Table M8.1 and the residual health and wellbeing effects of the Proposed Development are summarised in Table M8.2.

Table M8.1 Summary of socio-economic effects

Receptor	Impact	Potential Effects (taking account of embedded mitigation)	Additional Mitigation and Monitoring	Residual Effects
During Construction				
Regional economy	Generation of new construction employment and GVA	Negligible (temporary, Not Significant)	N/A	Negligible (temporary, Not Significant)
PRoW	Impact on use of PRoW and cycle routes	Negligible (temporary, Not Significant)	N/A	Negligible (temporary, Not Significant)
During Operation				
WIA economy	Generation of new employment and GVA	Negligible (permanent, Not Significant)	N/A	Negligible (permanent, Not Significant)
	Additional resident expenditure	**Moderate Beneficial (permanent, Significant)**	N/A	**Moderate Beneficial (permanent, Significant)**
	Additional visitor expenditure	Negligible (permanent, Not Significant)	N/A	Negligible (permanent, Not Significant)
WIA population	Population growth	Negligible (permanent, Not Significant)	N/A	Negligible (permanent, Not Significant)

Receptor	Impact	Potential Effects (taking account of embedded mitigation)	Additional Mitigation and Monitoring	Residual Effects
LIA labour market	Increase in the available labour market	Negligible (permanent, Not Significant)	N/A	Negligible (permanent, Not Significant)
WIA labour market		Negligible (permanent, Not Significant)	N/A	Negligible (permanent, Not Significant)
WIA housing market	Provision of new dwellings	Negligible (permanent, Not Significant)	N/A	Negligible (permanent, Not Significant)
Primary education providers across the Hythe PPA	Generation of additional demand for education services	Negligible (permanent, Not Significant)	N/A	Negligible (permanent, Not Significant)
Secondary education providers across the Folkestone and Hythe SPA	Generation of additional demand for education services	Negligible (permanent, Not Significant)	N/A	Negligible (permanent, Not Significant)
Healthcare providers within 3.0km of the Site	Generation of additional demand for healthcare services	**Moderate Adverse (permanent, Significant)**	Appropriate Section 106 contributions to local healthcare services	Minor Adverse (permanent, Not Significant)
Community Facilities	Delivery of new health and leisure facilities	Minor Beneficial (permanent, Not Significant)	N/A	Minor Beneficial (permanent, Not Significant)
Local open spaces	Generation of additional demand for open spaces	Minor Beneficial (permanent, Not Significant)	N/A	Minor Beneficial (permanent, Not Significant)
Local play spaces	Generation of additional demand for play spaces	**Moderate Beneficial (permanent, Significant)**	N/A	**Moderate Beneficial (permanent, Significant)**
PRoW	Impact on use of PRoW and cycle routes	Minor Beneficial (permanent, Not Significant)	N/A	Minor Beneficial (permanent, Not Significant)
Determinant of Health	**Impact**	**Potential Effects (taking account of embedded mitigation)**	**Additional Mitigation and Monitoring**	**Residual Effects**
During Construction				

Table M8.2 Summary of health and wellbeing effects

Receptor	Impact	Potential Effects (taking account of embedded mitigation)	Additional Mitigation and Monitoring	Residual Effects
Health and wellbeing of the general population	Access to opportunities for physical activity	Negligible (temporary, Not Significant)	N/A	Negligible (temporary, Not Significant)
	Transport modes, access and connections	Negligible (temporary, Not Significant)	N/A	Negligible (temporary, Not Significant)
	Air quality	Negligible (temporary, Not Significant)	N/A	Negligible (temporary, Not Significant)
	Noise	Negligible (temporary, Not Significant)	N/A	Negligible (temporary, Not Significant)
During Operation				
Health and wellbeing of the general population	Access to opportunities for physical activity	**Moderate Beneficial (permanent, Significant)**	N/A	**Moderate Beneficial (permanent, Significant)**
	Transport modes, access and connections	Minor Beneficial (permanent, Not Significant)	N/A	Minor Beneficial (permanent, Not Significant)
	Air quality	Negligible (permanent, Not Significant)	N/A	Negligible (permanent, Not Significant)
	Noise	Negligible (permanent, Not Significant)	N/A	Negligible (permanent, Not Significant)

M9.0 Abbreviations & Definitions

Abbreviations

- A&E – Accident and Emergency
- APS – Annual Population Survey
- BRES – Business Register and Employment Survey
- CEMP – Construction Environmental Management Plan
- CITB – Construction Industry Training Board
- DfE – Department for Education
- FHDC – Folkstone and Hythe District Council
- FTE – Full-time equivalent
- GVA – Gross Value Added
- HCA – Homes and Communities Agency
- HDT – Housing Delivery Test
- HIA – Health impact assessment
- ICB – Integrated Care Board
- IEMA – Institute of Environmental Management and Assessment
- IoD – Indices of Deprivation
- ISEP – Institute of Sustainability and Environmental Professionals
- KCC – Kent County Council
- LAP – Local area for play
- LEAP – Local equipped area for play
- LIA – Local impact area
- MHCLG – Ministry of Housing, Communities & Local Government
- NAO – National Audit Office
- NCN – National Cycle Network
- NEAP – Neighbourhood equipped area for play
- NPPF – National Planning Policy Framework
- OAC – Output Area Classification
- ONS – Office for National Statistics
- PPA – Primary Planning Area
- PPG – Planning Practice Guidance
- PRoW – Public right of way
- RMC – Royal Military Canal

- SOC – Standard occupational classification
- SPA – Secondary Planning Area
- WIA – Wider impact area

Definitions

- **Direct impacts** – The primary effects of economic activity including the employment generated and economic output at the Site of the investment.
- **FTE** - Full-time equivalent is a unit that indicates the workload of an employed person. An FTE of 1.0 is equivalent to full-time employee (working up to 40-hours), whilst a part-time employee working half the hours is 0.5 FTE.
- **GVA** – Gross Value Added represents the value a producer adds to the raw products and inputs used through the production of their goods and services.
- **Indirect and induced impacts** – The secondary effects of economic activity that occur within the supply chain following the direct impact. Indirect impacts include the economic activity effects within the supply chain, while induced impacts include the employee spending from jobs created by the direct impact.
- **Scoping Note** – EIA Scoping Note (July 2025) submitted to the Council.
- **Scoping Note Response** – (November 2025) The Council's response to the EIA Scoping Note.
- **Scoping Opinion** - (January 2024) The Council's response to the EIA Scoping Report. A document prepared by the relevant determining authority to confirm its opinion on the scope and level of detail of the information to be provided in the Environmental Statement.
- **Scoping Report** - EIA Scoping Report (November 2023) submitted to the Council.

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N1.0 Introduction

N1.1 This chapter draws together the findings from the individual inputs into the Environmental Statement ('ES'); defines inter-relationships between these assessments of the likely significant environmental effects of the Proposed Development and any other developments in the area surrounding the Site; and establishes whether there are any other residual effects on the identified sensitive receptors which may require additional mitigation not previously identified.

N1.2 There are different inter-relationships between the various assessments within the ES and this section identifies where key links between any impacts identified and how these may influence each other during the construction and operational phases. Where these relationships give rise to other combined direct effects arising from the Proposed Development, it is necessary to identify how these impact on those defined sensitive receptors identified in this ES.

N1.3 There may also be other indirect effects arising from the Proposed Development when considered with other proposals or schemes in the surrounding area. These effects may also give rise to the need to consider additional mitigation measures; albeit it is necessary to consider the likelihood of those other schemes proceeding and the ability or necessity of the applicant to mitigate any such effects for other sites.

N1.4 Accordingly, this chapter considers two types of cumulative environmental effects in association with the Proposed Development:

- **Synergistic:** the combined effect of different types of impacts attributable to the Proposed Development in respect of a particular receptor. This includes consideration of the impacts during the construction and operational phases; and
- **Cumulative:** these arise from the combined effect of the Proposed Development with other committed development schemes that individually may be insignificant but when combined with other impacts may be significant.

N1.5 Sensitive receptors have been identified in individual chapters of the ES and are summarised in Section M2.0. These receptors are those with varying degrees of sensitivity to the environmental impact and change as a result of the proposals. Regard has been given to the sensitivity of the identified receptors to ensure consideration is then given to those which are potentially the most sensitive to impact, taking into account the extent of the effects arising. The professional judgement of those undertaking the EIA as well as topic specific criteria, legislation or guidelines have been used to identify the degree of sensitivity.

N1.6 A consideration of the impacts arising from the construction and operational phases of the Proposed Development has been carried out with each of the technical chapters and is also addressed in the assessment of the inter-relationship and cumulative effects arising from the scheme.

N1.7 The structure of this chapter is as follows:

- **Section N2.0:** Provides a summary of the residual effects arising (following mitigation) as identified within the main ES technical assessment chapters D - L and identification of sensitive receptors;

- **Section N3.0:** Considers the inter-relationship of Direct Effects arising from the proposals (synergistic effects) and whether any additional mitigation measures are required to have regard to those effects;
- **Section N4.0:** Identifies the cumulative assessment developments;
- **Section N5.0:** Considers any cumulative effects arising from the scheme when considered with other identified proposals in the surrounding area. Not all schemes will be of relevance to every environmental aspect/topic; and
- **Section N6.0:** Provides a summary and conclusions.

N1.8 This Chapter is supported by the following technical appendices:

1 Appendix N1: Cumulative Schemes Map; and

2 Appendix N2: Correspondence with FHDC.

N2.0 Summary of Residual Effects and Identification of Key Sensitive Receptors

N2.1 Chapters D to M of this ES have identified a series of receptors most likely to be affected by significant environmental effects as a result of the Proposed Development. The EIA process has then identified the degree of change or impact to which each receptor is likely to be affected.

N2.2 Assuming that identified mitigation will be implemented as identified in this ES, an analysis has been carried out of the residual effects arising from the assessment of each technical aspect scoped into the EIA. This section draws out and identifies those key sensitive receptors which are likely to be affected by an impact which will be greater than Negligible. This means any receptor identified with an effect classified as being of Minor, Moderate or Major significance is identified.

N2.3 It is assumed that there is a low likelihood for cumulative or synergistic effects to arise for those receptors which are subject to no or Negligible impacts when the Proposed Development is considered in isolation. These are therefore discounted at this stage.

N2.4 Using the significance criteria described within Chapters B and D to M, it is also then possible to identify which of these effects are significant and which are non-significant effects. This approach accords with EIA legislation and best practice which focuses on the main or significant effects arising from the development. The Planning Practice Guide states (ID: 4-035-20170728, last updated 13 May 2020)[i];

N2.5 *"Whilst every Environmental Statement should provide a full factual description of the development, the emphasis should be on the "main" or "significant" environmental effects to which a development is likely to give rise."*

N2.6 It is against these identified key sensitive receptors that the analysis of synergistic and cumulative effects will be carried out. This will include all receptors likely to be affected by significant effects (typically Major or Moderate effects unless otherwise stated in the topic-specific methodology). It also considered all those receptors currently likely to be affected by non-significant (typically only Minor effects) to robustly assess whether, cumulatively or synergistically, these may give rise to new significant effects previously not identified.

Summary of Residual Effects

N2.7 Table N2.1 provides a summary of the main residual effects (following incorporation of the mitigation measures described in Chapter O) as identified in Chapters D to M of this ES that could be expected to arise during construction and operation of the Proposed Development:

Table N2.1 Summary of Residual Effects

Environmental Topic	Summary of Residual Effects
During Construction	
Water Environment/ Flood Risk	All effects relating to Water Environment and Flood Risk are Negligible (Not Significant).

Environmental Topic	Summary of Residual Effects
Cultural Heritage and Archaeology	Most likely Minor Adverse (Not Significant) but potentially **Major Adverse (Significant)** effects on Presently Unknown Archaeological Evidence within the Site. Minor Adverse (Not Significant) effects on the Twiss Road Bridge to Seabrook Lodge Bridge section of the Royal Military Canal Scheduled Monument and Second World War Structure within Site. Other effects related to Cultural Heritage and Archaeology are Negligible (Not Significant) or Neutral (Not Significant).
Landscape and Views	**Major Adverse (Significant)** effects upon residents at the eastern edge of Imperial Green. Moderate Adverse (Not Significant) effects upon: • onsite vegetation; • the Twiss Road Bridge to Seabrook Lodge Bridge section of the Royal Military Canal Scheduled Monument; • the RMC & Imperial Hythe Coastal Strip Local Character Area ('LCA'); • Residents at the western end of Cliff Road and at the southern end of Twiss Road / eastern end of South Road; and • Local People and Interest Groups in the immediate vicinity of the Site. Minor Adverse (Not Significant) effects upon: • onsite topography; • the landscape setting of the Hythe Imperial Hotel; • Princes Parade Coastline LCA; • Residents of properties north of the Site (south of Seabrook Road) and those to the north of Seabrook Road / Elm Gardens Area; and • Local People, Interest Groups and people engaged in active recreation in the vicinity of the Site. Minor Adverse/Negligible (Not Significant) effects upon Local People, Interest Groups and people engaged in active recreation and Seasonal Visitors in the vicinity of the Site.
Ecology and Biodiversity	All effects relating to Ecology and Biodiversity are Neutral (Not Significant) or Negligible (Not Significant).
Traffic and Transport	Minor Adverse (Not Significant) effects on users of Princes Parade in terms of visual amenity, Driver Delay and pedestrian amenity. Other effects related to Traffic and Transport are Negligible (Not Significant) or Neutral (Not Significant).
Noise and Vibration	Moderate Adverse (Not Significant) effects on users of the Hythe Imperial Hotel, residents at Moncrieff Gardens and Imperial Green, Cobay Close

Environmental Topic	Summary of Residual Effects
	and Sturdy Close in relation to vibration from Construction Works with Vibratory Bored Piling (required for construction of any houses). Moderate Adverse (Not Significant) effects on users of Hythe Imperial Hotel in respect of Noise from Construction Works during sub phase 3 (demolition works and construction of the new Western Wing of the hotel) of construction. Minor Adverse (Not Significant) effects on: • Users of Hythe Imperial Hotel, residents at Moncrieff Gardens and Imperial Green, Cobay Close and Sturdy Close in respect of Vibration from Construction Works with Rotary Bored Piling (required for construction of new western wing of the hotel, the new leisure building and any blocks of flats); • Users of the RMC and of Hythe Beach and England Coast Path in respect of Vibration from Construction Works with Vibratory Bored Piling; • Users of Hythe Imperial Hotel and Users of Hythe Beach and England Coast Path in respect of noise from construction traffic. Other effects related to Noise and Vibration are Negligible (Not Significant).
Air Quality	Minor Adverse (Not Significant) effects on existing residents within 150m of the Site (represented by residents at Imperial Green and on Twiss Road) in respect of the impact of dust and particulate matter on air quality and human health. Other effects related to Air Quality are Negligible (Not Significant).
Ground Conditions and Geo-Environment	All effects related to Ground Conditions and Geo-Environment are Negligible (Not Significant) or Neutral (Not Significant).
Climate Change/Resilience	Greenhouse Gas Assessment **Moderate Adverse (Significant)** effects on the global climate in respect of the local carbon budget for FHDC (embodied carbon (A1-3 and A5). Effects are considered Minor Adverse (Not Significant) at the regional level and Negligible (Not Significant) at the national level.
Socio-Economics	All effects related to Socio-Economics are Negligible (Temporary and Not Significant).
During Operation	
Water Environment/ Flood Risk	All effects related to Water Environment and Flood Risk are Negligible (Not Significant).
Cultural Heritage and Archaeology	**Moderate Adverse (Significant)** effects on the Twiss Road Bridge to Seabrook Lodge Bridge section of the Royal Military Canal Scheduled Monument. All other effects related to Cultural Heritage and Archaeology are Neutral (Not Significant)

Environmental Topic	Summary of Residual Effects
Landscape and Views*	**Major Adverse (Significant)** effects, becoming **Major to Moderate Adverse (Significant)** by year 15, upon residents at the eastern edge of Imperial Green. **Major Adverse (Significant)** effects, becoming **Moderate Adverse (Significant)** by year 15, upon: • Local People and Interest Groups at the southern boundary of the Site (where the private footpath intersects Princes Parade) and to the immediate north west of the Site (on southern towpath of RMC); and • Residents at the western end of Cliff Road. **Major to Moderate Adverse (Significant)** effect upon residents at the southern end of Twiss Road / eastern end of South Road **Major to Moderate Adverse (Significant)** effects, becoming Minor Adverse/Neutral (Not Significant) by year 15, upon: • Local People and Interest Groups to the south west of the Site (at the eastern end of Marine Parade) and to the north east of the Site (Seabrook Lodge footbridge); and • People engaged in active recreation to the immediate north west of the Site (on southern towpath of RMC). Moderate Adverse (Not Significant) and Moderate to Minor Adverse (Not Significant) effects, becoming Minor Adverse/Neutral (Not Significant) by year 15, upon Local People and Interest Groups in the immediate vicinity of the Site; Moderate Adverse (Not Significant) effects, becoming Moderate Neutral (Not Significant) by year 15, upon residents at the southern edge of North Road. Moderate Adverse (Not Significant) effects upon residents to the north of Seabrook Road / Elm Gardens Area. Moderate to Minor Adverse (Not Significant) effects upon: • the Twiss Road Bridge to Seabrook Lodge Bridge section of the Royal Military Canal Scheduled Monument; and • residents in properties to the north of the Site, south of Seabrook Road. Minor Adverse (Not Significant) effects upon: • the grain of development; and • the landscape setting of the Hythe Imperial Hotel. Minor Adverse (Not Significant) effects, becoming Minor Neutral (Not Significant) by year 15, upon: • onsite vegetation;

Environmental Topic	Summary of Residual Effects
	• RMC & Imperial Hythe Coastal Strip LCA; • Princes Parade Coastline LCA; • Local People, Interest Groups, people engaged in active recreation and Seasonal Visitors in the vicinity of the Site; and • Residents in the Temeraire Heights Area. Minor Neutral (Not Significant) effects upon: • onsite topography; and • Local People and Interest Groups in the vicinity of the Site. Minor Adverse or Minor Neutral (Not Significant), becoming Minor Beneficial (Not Significant) effects, upon Local People and Interest Groups in the vicinity of the Site. Minor/Negligible Adverse (Not Significant) effects upon: • the Hythe Coast District LCA; and • Local People and Interest Groups in the vicinity of the Site.
Ecology and Biodiversity	Minor Beneficial (Not Significant) effects on the RMC Local Wildlife Site ('LWS') and foraging bat assemblage. Other effects related to Ecology and Biodiversity are Neutral (Not Significant) or Negligible (Not Significant).
Traffic and Transport	Minor Beneficial (Not Significant) effects on users of Princes Parade and Twiss Road in terms of severance, pedestrian delay and pedestrian amenity. Other Traffic and Transport effects are Negligible (Not Significant).
Noise and Vibration	Minor Adverse (Not Significant) effects on users of the Hythe Imperial Hotel and Users of Hythe Beach and England Coast Path in respect of Operational Traffic Noise. Other effects related to Noise and Vibration are Negligible (Not Significant).
Air Quality	Air Quality effects are Negligible (Not Significant).
Ground Conditions and Geo-Environment	All effects related to Ground Condition and Geo-Environment are Negligible (Not Significant)
Climate Change/Resilience	<u>Greenhouse Gas Assessment</u> **Moderate Adverse (Significant)** effects on the global climate as a result of embodied carbon and traffic emissions at the local level. Effects are considered Minor Adverse (Not Significant) at the regional level and Negligible (Not Significant) at the national level. <u>Climate Change Resilience Assessment</u> Effects on Buildings & Infrastructure, Human Health and Ecology & Natural Environment are **Significant** in relation to impacts from Heatwave, Drought and Storm Surges. Other effects relating to climate change resilience are Not Significant.

Environmental Topic	Summary of Residual Effects
Socio-Economics	**Moderate Beneficial (Permanent, Significant)** effects on the wider local economy, local play spaces and the health and wellbeing of the general population relating to access to opportunities for physical activity. Minor Beneficial (Permanent, Not Significant) effects on community facilities, local open spaces, Public Rights of Way ('PRoW) the health and wellbeing of the general population relating to transport modes, access and connections. Minor Adverse (Permanent, Not Significant) effects on healthcare providers within 3km of the Site. Other Socio-Economics effects are Negligible (Permanent, Not Significant).

* It is noted that in the LVIA the term Neutral is used to describe the nature of an effect (i.e., one that is neither adverse nor beneficial, but where noticeable change takes place), whilst in other technical disciplines, it is used to describe 'no effect'.

Summary of Sensitive Receptors

N2.8 Table N2.1 has identified that the following sensitive receptors are likely to be affected by effects that can be considered to be Significant during either construction or operation:

- **Residents** on Imperial Green, Cliff Road (western end), Twiss Road (southern end) and South Road (eastern end);
- **The Royal Military Canal (RMC)**; the Scheduled Monument designation (Twiss Road Bridge to Seabrook Lodge Bridge section); the LWS; and users of the RMC.
- **Unknown Archaeological Evidence** within the Site;
- **Local People and Interest Groups** at the south, south west, immediate north west and to the north east of the Site, and in the general vicinity of the Site;
- **The local population**, due to impacts on the local economy, local play space provision, open space provision, community facilities and health and wellbeing
- Future users of **the Proposed Development**, its buildings and infrastructure and onsite ecology the& natural environment; and
- **The global climate**.

N2.9 Table N2.1 has also identified that the following sensitive receptors are likely to be affected by effects considered to be Not Significant during either construction and operation (this does not include negligible or neutral effects and does not repeat the receptors above that also experience significant effects):

- **Residents** within 150m of the Site including at Moncrieff Gardens, Cobay Close and Sturdy Close, properties north of the Site (south of Seabrook Road), north of Seabrook Road in the Elm Gardens area, on North Road and in the Temeraire Heights area;
- **Users of Princes Parade and Twiss Road**;
- **Users of Hythe Beach and of local PRoW**;

- **Landscape resources** including onsite vegetation, onsite topography and the grain of development;
- **Local Landscape Character Areas ('LCA')** including: Hythe Coast District, the RMC & Imperial Hythe Coastal Strip LCA, and Princes Parade Coastline;
- **Hythe Imperial Hotel** and its users;
- **People engaged in active recreation and Seasonal Visitors** in the vicinity of the Site;
- **Healthcare providers** within 3km of the Site; and
- **Foraging Bats**.

N3.0 Inter-Relationship of Direct Effects

N3.1 This section considers the inter-relationship between the direct effects or synergistic effects arising from the Proposed Development. It takes account of the residual effects affecting the key sensitive receptors identified in Section N2.0.

N3.2 The analysis has considered both positive and negative impacts and makes reference to the degree of effect as identified within the technical assessments. The objective is to identify where the accumulation of effects on particular receptors, and the relationship between those effects, may give rise to a need for additional mitigation not identified previously.

N3.3 To assist in this analysis, the table below summarises the effects anticipated against each receptor and identifies where particular receptors may be subject to an accumulation of environmental impacts.

Table N3.1 Direct Residual Effects for Identified Sensitive Receptors

Receptor	During Construction	During Operation
Residents on Imperial Green, Cliff Road (western end), Twiss Road (southern end) and South Road (eastern end)	**LV**-(LV) (NV) (AQ)	**LV**↓
The RMC, and its users	(CHA) (LV) (NV)	**CHA** (LV) (E)
Unknown Archaeological Evidence within the Site	**CHA**-(CHA)	X
Local People and Interest Groups	(LV)	**LV**-(LV)↓ -(LV)
The local population	X	**SE**-(SE)
Future users of the Proposed Development, its buildings and infrastructure and onsite ecology and the natural environment	X	**CCR**-(CCR)
The global climate	**CCR**-(CCR)	**CCR**-(CCR)
Residents within 150m of the Site including at Moncrieff Gardens, Cobay Close and Sturdy Close and properties north of the Site (south of Seabrook Road), north of Seabrook Road in the Elm Gardens area, on North Road and in the Temeraire Heights area	(LV) (NV) (AQ)	(LV)
Users of Princes Parade and Twiss Road	(T)	(T)
Users of Hythe Beach and of local PRoW	(NV)	(NV) (SE)
Landscape resources	(LV)	(LV)↓
Local Landscape Character Areas ('LCA')	(LV)	(LV)↓
Hythe Imperial Hotel and its users	(LV) (NV)	(LV)↓ (NV)
People engaged in active recreation and Seasonal Visitors	(LV)	**LV**-(LV)↓
Healthcare providers within 3km of the Site	X	(SE)
Foraging Bats	X	(E)

Key: WE – Water Environment and Flood Risk; CHA – Cultural Heritage and Archaeology; LV – Landscape and Visual Impact; E – Ecology and Biodiversity; T – Traffic and Transport; NV – Noise and Vibration; AQ – Air Quality; GC – Ground Conditions; CCR – Climate Change and Resilience; SE – Socio-Economics;

BLACK – neutral/no effects **RED** – Adverse Effect; **GREEN** – Beneficial Effect; **X** – Negligible/ No Effect Anticipated; **Bold** – Significant effect; **( )** – Not Significant Effect (Minor); ***** – Transitory/Short Term Effect; ↓ - effect reduces over time

N3.4 Table N3.1 highlights residual effects on identified receptors after mitigation. Where a series of technical aspects have the potential to impact (adversely or beneficially; significantly or non-significantly) a particular receptor, then a review of whether the interaction of these different effects could rise to a new significant effect giving rise to a need for mitigation has been undertaken. This has been conducted with reference to the technical aspect chapters of this ES and the understanding of sensitivity of the relevant receptor which those chapters have identified.

N3.5 As the analysis has regard only to residual effects, consideration has been given to mitigation measures already either embedded into the Proposed Development or additional mitigation identified throughout the technical chapters, which are capable of being delivered through planning conditions or planning obligations. This means that the likelihood of significant environmental effects has already been reduced as far as is possible.

N3.6 The conclusions of this review have highlighted the following:

1 During construction of the Proposed Development residents on Imperial Green, Cliff Road (western end), Twiss Road (southern end) and South Road (eastern end) will be likely to experience adverse effects relating to visual, noise and vibration and air quality impacts. Of these, Significant adverse effects relate only to visual impacts for residents on Imperial Green; all other effects are anticipated to be Not Significant. The nature of these synergistic effects which will exist only during the construction phase are not considered to require additional mitigation;

2 During the construction phase the RMC is anticipated to subject to non-Significant adverse impacts relating to cultural heritage, landscape and visual and noise and vibration impacts. The effects are an inevitable outcome of the development of the Site and are not considered to require additional mitigation;

3 During construction of the Proposed Development residents within 150m of the Site including at Moncrieff Gardens, Cobay Close and Sturdy Close and properties north of the Site (south of Seabrook Road), north of Seabrook Road in the Elm Gardens area, on North Road and in the Temeraire Heights area will be likely to experience adverse effects relating to visual, noise and vibration and air quality impacts. All of these impacts are individually Not Significant and they will only occur simultaneously during the construction phase and they are not considered to require additional mitigation;

4 During the construction phase, the Hythe Imperial Hotel and its users will be subject to landscape and noise and vibration impacts. The effects are an inevitable outcome of the development of the Site and are not considered to require additional mitigation;

5 No other synergistic effects are predicted to occur during the construction phase;

6 During the operation phase, the RMC is anticipated to receive adverse effects due to cultural heritage (Significant) and landscape and visual (Not Significant) impacts and beneficial effects (Not Significant) due to ecological impacts. The cultural heritage and landscape impacts both arise due to visual change for which further mitigation is not feasible;

7 The local population are due to experience a range of different beneficial socio-economics effects relating to additional resident expenditure, provision of local play

space and open space, access to opportunities for physical activity and provision of community facilities during the operational phase of the Proposed Development;

8 During operation of the Proposed Development users of Hythe Beach and local PRoWs are likely to experience adverse noise impacts from additional traffic and beneficial impacts from the provision of a new foot- and cycle way along the northern and eastern boundaries of the Site. Balancing these beneficial and adverse effects it is not considered that additional mitigation is required; and

9 During the operation phase, the Hythe Imperial Hotel and its users may experience adverse impacts relating to both landscape and noise impacts. There is not expected to be any interaction between these impacts as they arise due to changes in the landscape setting of the hotel and noise from operational traffic. Therefore, it is not considered that any additional mitigation will be required.

N3.7 The analysis above has demonstrated a need to ensure mitigation measures recommended within this ES are implemented to manage some of the effects arising affecting receptors close to the Site. However, the analysis has demonstrated that mitigation already identified through the EIA process is sufficient to ensure that both individual and synergistic effects can be addressed.

N3.8 Mitigation measures relating to the individual effects summarised in Table N3.1 are described further in Chapter O of this ES and are all capable of being secured via planning conditions and section 106 obligations.

N4.0 Other Cumulative Effects

N4.1 An assessment has been carried out of whether any cumulative effects may arise from the Proposed Development when considered with other schemes in proximity to the Site. The objective is to identify whether effects from several developments which individually might be insignificant could, when considered together, cause a significant indirect and cumulative effect requiring mitigation.

Schemes to be Assessed

N4.2 Best practice dictates that cumulative assessments of this nature should have regard to those schemes which are 'reasonably foreseeable' (i.e. usually those under construction or with planning permission, as specified in guidance such as ISEP's "Guidelines for Environmental Impact Assessment" (2004), the EC's "Guidelines for the Assessment of Indirect and Cumulative Impacts as well as Impact Interactions" (1999) and the Planning Inspectorate's Advice Note 174). This is further clarified in the Planning Practice Guidance (Environmental Impact Assessment) which states that:

"The local planning authorities should always have regard to the possible cumulative effects arising from any existing or approved development" [Lichfields emphasis] (ID: 4-024-20170728) (last updated 28 July 2017)

N4.3 The assessment is also only capable of being carried out based on the information available at this time. The assessment has focused on where there is the potential for significant cumulative effects and, for this development, an initial review of potential developments requiring review has focussed on those developments that due to their proximity or scale are most likely to give rise to cumulative effects. Consideration has also been given to the areas within which cumulative effects are most likely.

N4.4 Seven cumulative schemes have been identified which are outlined at Table N4.1 below, and their locations are identified on Figure N4.1, which is reproduced at Appendix N1 for completeness.

N4.5 It is noted that the Scoping Note submitted to FHDC in July 2025 (described further in Chapter B of this ES) included a hybrid planning permission and subsequent reserved matters approval at a site immediately to the east of the Site (ref.'s: Y17/1042/SH and 21/2282/FH). The Council have since confirmed in an email (provided at Appendix N2) that the hybrid planning permission is no longer capable of being implemented; these permissions have therefore been omitted from the cumulative assessment on the basis that they are no longer 'reasonably foreseeable'.

Table N4.1 List of Cumulative Schemes

Scheme No.	Site Address (Distance from Site)	Application Reference	Description of Development	Status - Approved/In Planning/Under Construction
1	Land adjacent to Saltwood Care Centre,	20/1608/FH	The erection of 12 dwellings, 8 extra care dwellings and 4-storey building of 32 extra care	Under consideration

Scheme No.	Site Address (Distance from Site)	Application Reference	Description of Development	Status - Approved/In Planning/Under Construction
	Tanners Hill, Hythe, CT21 5UQ 0.7km northwest		units with access and landscaping	
2	Land Opposite 24, Station Road, Hythe 0.5km northwest	21/0553/FH	Outline scheme for 44 dwellings and associated access and landscaping	Approved 20/11/25
3	Foxwood and Highview School, 59 Seabrook Road, Hythe, CT21 5QJ 0.15km north	20/0015/FH	Erection of 150 dwellings with associated landscaping and access	Approved 25/03/22
		25/2112/FH	Hybrid application comprising of a full planning application for the erection of 60 dwellings together with retained and enhanced green infrastructure framework, open space, parking and all associated engineering operations, together with an outline application (all matters reserved except access) for up to 90 residential units.	Under consideration
4	Burgoyne Barracks North & Napier Barracks West Road Folkestone Kent 2km northeast	Y19/0318/FH	Erection of 355 dwellings with landscaping, infrastructure and earthworks	Approved 18/09/20, conditions being discharged.
5	The Stadium, Aldridge Road, Folkestone, Kent 2.1km northeast	24/0980/FH	Reserved matters application for 48 dwellings, together with associated accesses, landscaping, infrastructure and earthworks pursuant to outline application Y14/0300/FH	Approved 13/12/2024
6	Shorncliffe Garrison Aldridge Road Folkestone Kent Shorncliffe Garrison Aldridge Road Folkestone Kent 2.5km northeast	Y14/0300/SH	Hybrid scheme for erection of up to 906 dwellings (plus 294 dwellings in detail), community services and facilities, new Primary school and nursery, combined new pavilion/cadet hut facility, cricket/mini football pitches, improvements to 'The	Approved with conditions 17/12/2015, conditions being discharged.

Scheme No.	Site Address (Distance from Site)	Application Reference	Description of Development	Status - Approved/In Planning/Under Construction
			Stadium' sports facilities and new car park, equipped play improvements/works to The Backdoor Training Area, access, open space and landscaping	
7	Risborough Barracks, Pond Hill Road, Shorncliffe Garrison, Folkestone, CT20 3HN 2.5km northeast	21/1618/FH	Application for the approval of reserved matters for scheme of 230 dwellings pursuant to outline planning permission reference Y14/0300/SH	Approved with conditions 01/07/2022, conditions being discharged.

Figure N4.1 Cumulative Schemes Map

Source: Lichfields

N5.0 Consideration of Cumulative Effects

N5.1 The cumulative schemes identified as included in the cumulative assessment in Table N4.1 have been reviewed by the ES project team.

N5.2 Those schemes where cumulative effects are not considered to be reasonably foreseeable in relation to a particular topic have been scoped out of the cumulative assessment. Having undertaken this process no or Negligible cumulative effects are considered reasonably foreseeable in relation to the following topics:

- **Cultural Heritage and Archaeology**: the extent of intervening distance and modern built development between these sites of the cumulative schemes and the Site will preclude cumulative impacts on any Cultural Heritage receptors. Specifically, this is because the Proposed Development will not have a potential impact on any Cultural Heritage asset relevant to any of the cumulative schemes. Conversely, no Cultural Heritage asset relevant to the Proposed Development is relevant to any of the cumulative schemes.
- **Landscape and Views**: A review of the schemes identified in Table N4.1 has shown that there are no schemes that are relevant to the assessment of Landscape and Views in relation to cumulative effects, as summarised below:
  a Schemes 1, 2, 4, 5, and 6 are physically and visually separated from the Site and would therefore have no additional cumulative effects during construction or operation on the identified landscape and visual receptors within the assessment within Chapter F, or the new receptors introduced by these schemes; and
  b Scheme 3 is to the north of the eastern part of the Site, where open spaces and golf courses are proposed. Views from publicly accessible and private properties from Scheme 3 of the proposed construction and operation phase are therefore assessed to be Negligible and Neutral, due to the extent of intervening development and vegetation, the oblique angle of views towards the proposed residential development and the surrounding developed urban context.
- **Transport:** The transport consultant (DHA) has confirmed that the assessment of effects presented in Chapter H of this ES are considered to represent the cumulative effects from the schemes in Table N4.1 for the following reason. The potential for cumulative effects during the operational phase has already been considered as part of the assessment undertaken within the Transport ES Chapter. Future baseline conditions have been established using TEMPro growth forecasts, which include traffic from committed and planned developments (including those in Table N4.1) in the surrounding area. As such, the cumulative context in which the Proposed Development will operate is inherently reflected in the traffic modelling and subsequent assessment.
- **Noise and Vibration**: On the basis of the cumulative schemes identified in Table N4.1, all cumulative scheme sites are located at distances greater than 200 m from the Proposed Development Site, with the exception of Cumulative Scheme 3, which is located at an approximate separation distance of 150 m. At these separation distances, noise and vibration arising from demolition, construction and operational activities associated with the Proposed Development at the Site itself would be subject to substantial attenuation with distance. As a result, any noise and vibration effects would

be localised and would not be expected to combine or interact with emissions from other cumulative schemes. Accordingly, significant cumulative noise and vibration effects are not anticipated, and these schemes can reasonably be scoped out of further cumulative assessment.

- **Ground Conditions and Geo-Environment**: A review of the schemes identified in Table N4.1 has shown that the majority of cumulative schemes are located at distances greater than 500 m from the Site. As such, any effects from these schemes would not be expected to combine or interact with effects from the Proposed Development. This excludes Cumulative Scheme no. 3, which is located approximately 150 m north of the Site and comprises the erection of 150 dwellings with associated landscaping and access. Despite this, it is assumed that standard and scheme-specific mitigation and best practise measures will be secured for this scheme (such as a CEMP, materials management plan and appropriate drainage and piling designs), thereby limiting the potential for inter-project effects to arise. Accordingly, significant cumulative ground conditions and geo-environment effects during either the construction or operational phase of development are not anticipated, and these schemes can reasonably be scoped out of further cumulative assessment.
- **Climate Change and Resilience**: A GHG assessment has been undertaken to assess the potential for GHG from the construction, operational and decommissioning stages of the Proposed Development. GHGs are gases in the atmosphere which have the potential to increase air temperatures and contribute towards climate change. It is important to note that all GHG emissions have the potential to result in a cumulative effect in the atmosphere over long periods of time. All GHG emissions are described as Significant in accordance with the relevant guidance for the assessment of GHGs as part of the EIA process. This does not mean that the contribution of GHG emissions from the Proposed Development alone will equate to a likely significant effect; for the majority of development projects, the individual contribution to total GHG emissions (relative to a national and global scale) will be minimal. Therefore, it important to acknowledge that GHG impacts are considered to be exclusively cumulative impacts because no single project makes a significant contribution to global climate change. The assessment of significance is based on whether a project's GHG emissions cumulatively represent a considerable contribution to the global atmosphere.

N5.3 Below consideration is given, by topic, as to whether there will be any additional effects when the development is assessed in combination with the identified cumulative developments.

Water Environment and Flooding

N5.4 A review of the schemes identified in Table N4.1 has shown that schemes no. 1, 2 and 3 are relevant to the assessment of flood risk and surface and foul water management cumulative effects.

N5.5 Schemes no. 1, 2 and 3 are located upstream of the Site, within the same catchment. They are however, expected to have limited, if not negligible, impacts on the Site in terms of flood risk and surface water management as any flood risk management and surface water runoff generated by these schemes will need to adhere to the same guidance and policies as the

Proposed Development. As such, it is predicted that there will be no increase in water entering the Site as a result of these sites coming forward.

N5.6 Schemes no. 1, 2 and 3 will discharge into the public combined sewer connected to Hythe Wastewater Treatment Works (WwTW). It should however be noted that, if there is insufficient capacity within the existing sewer network and/or WwTW, Southern Water will be required to reinforce the network to accommodate the additional flows, typically within 24 months of planning approval. Therefore, no significant cumulative effects on the foul sewerage network are anticipated.

N5.7 All other schemes listed in Table N4.1 have been scoped out as they will drain away from the Site.

Ecology and Biodiversity

N5.8 A review of the schemes identified in Table N4.1 has shown that scheme no. 3 is relevant to the assessment of ecology and biodiversity cumulative effects, in respect of the foraging bat assemblage.

N5.9 Schemes 1, 2 and 4 – 7 in table N4.1 are scoped out of further assessment. This is due to a lack of functional linkage between the locations of these developments and the Proposed Development Site. Changes in habitat use, including loss are unlikely to affect the ecological receptors identified as sensitive to the Proposed Development, therefore there are no impact pathways between these schemes and the Proposed Development.

N5.10 In relation to scheme 3, the planned development at the former Foxwood school will result in the removal of areas of existing bat foraging habitat, which will likely result in an overall net loss of foraging habitat on site. Due to its proximity to the Proposed Development Site, it is likely that the site of scheme 3 could also support the similar bat assemblage (possibly even from the same roosts) as those supported by the Site. It is considered that there is potential for cumulative effects during the construction phase.

N5.11 During the operational phase, the Proposed Development is anticipated to lead to a Minor Beneficial (Not Significant) effect on foraging bats due to provision of additional suitable habitat. Therefore, no combined operational effects on foraging bats are anticipated once both the Proposed Development and scheme 3 are operational.

During Construction

N5.12 Loss of woodland habitat at the Former Foxwood school combined with medium term habitat losses within the Proposed Development Site are likely to result in a reduction in available foraging habitat for bat species roosting close to the Site (bats recorded using the Site such as known maternity roosts off site). The areas involved are relatively small, but add an additional pressure to being able to obtain sufficient food within the core sustenance zone of these roosts.

N5.13 During the construction phase the Proposed Development is anticipated to have a negligible effect (Not Significant) on the foraging bat assemblage due to loss of foraging habitat and therefore does not significantly contribute to foraging habitat loss.

N5.14 Considering the combined amount of habitat loss during the construction phases, this amounts to roughly 10ha, formed mostly of open grassland (6.7ha modified grassland, 1ha of other neutral grassland) which have been found to be of low importance to foraging bats (approximately 3.8ha Foxwood School site and 7.2ha Hythe Proposed Development Site). In combination, the habitat losses are likely to result in a Minor Adverse effect (Not Significant) on foraging bats.

Air Quality

N5.15 A review of the schemes identified in Table N4.1 has shown that all schemes are of relevance to the assessment of Air Quality cumulative effects.

N5.16 It is considered that there is potential for cumulative effects during the construction and operational phases.

During Construction

N5.17 The IAQM guidance suggests that cumulative construction dust impacts are only likely where sites are within 250m of each other. It is recognised that scheme no. 3 lies around 250m from the Site boundary. It is assumed that any cumulative schemes within this radius will also have measures in place to minimise their construction dust emissions. Work would also have to be taking place in areas of all sites that are close to a receptor in order for cumulative effects to occur.

N5.18 With these measures in place, the cumulative effects of dust emissions from demolition and construction activities will be **Not Significant**.

During Operation

N5.19 A review of the schemes identified in Table N4.1 has shown that all schemes are relevant to the assessment of cumulative air quality cumulative effects during operation, as they have been incorporated into the traffic data provided by the project transport consultant (DHA), detailed in Chapter H: Traffic and Transport of the ES. Therefore, Chapter J: Air Quality has accounted for the combined effect of traffic from both the Proposed Development and the aforementioned cumulative schemes, to assess a worst-case impact scenario.

N5.20 Due to current and future proposed traffic restrictions, the Project Transport Consultants (DHA) have confirmed that flows will not change at future baseline level, or with cumulative schemes. Chapter J: Air Quality thus includes the impacts of traffic associated with the cumulative schemes. Impacts have been shown to be Negligible at all locations, and thus the cumulative effect will remain Not Significant.

Socio-Economics

N5.21 A review of the schemes identified in Table N4.1 has shown that all cumulative schemes are relevant to the assessment of socio-economics effects.

N5.22 It is considered that there is potential for cumulative effects during the construction and operational phases.

During Construction

N5.23 The scale of the construction employment generated cannot be readily quantified based on the information available for each cumulative scheme. In addition, the timing and phasing of the construction of these schemes are unknown. However, for the purpose of this assessment, it is assumed that all the cumulative schemes will be constructed and completed during the construction period of the Proposed Development. Therefore, the construction activity generated by the cumulative schemes is likely to overlap with the construction of the Proposed Development.

N5.24 A proportion of the construction jobs generated by the cumulative schemes would be expected to be based in the wider impact area ('WIA') and the South East region. The combined effects of the cumulative schemes and the Proposed Development are likely to have a temporary (short-term) Minor Beneficial (Not Significant) cumulative effect on construction employment in the South East region due to the large size of the construction sector in the South East.

Health and Wellbeing

N5.25 The Air Quality cumulative assessment identifies that the only cumulative scheme which falls within the Zone of Influence of the Proposed Development is scheme no. 3 Foxwood and Highview School. The Air Quality cumulative assessment states that the cumulative scheme will have measures in place to minimise their construction dust emissions, and that the cumulative effect regarding construction air quality is assessed to be Not Significant. Therefore, with regards to the health and wellbeing cumulative effects of construction dust is assessed to be negligible at the population level.

N5.26 The Noise and Vibration cumulative assessment also identifies scheme no. 3 Foxwood and Highview School as the only cumulative scheme falling within the noise and vibration Zone of Influence. It assesses that given the distance of the Proposed Development from the cumulative scheme, their respective noise emissions during construction would not be expected to combine or interact.

N5.27 The only cumulative scheme assessed to lie within the Zone of Influence with regards to impacts on access to opportunities for physical activity, as well as access and connections, is no 3. Foxwood and Highview School, which lies 0.15km to the North of the Site. There are no public rights of way ('PRoW') which pass through the Foxwood and Highview School red line boundary and therefore it is not anticipated there will be any closure of PRoW during the construction phase.

N5.28 Table N5.1 summarises the assessment of cumulative health and wellbeing effects during the construction phase.

Table N5.1 Cumulative assessment of human health effects - construction phase

Determinant of Health	Impact Area	Cumulative Effect
Access to opportunities for physical activity	Local impact area ('LIA')	Negligible
Transport modes, access and connections	LIA	Negligible
Air quality	LIA	Negligible
Noise and vibration	LIA	Negligible

During Operation

N5.29 Table N5.2 below summarises the operational impact of the cumulative schemes.

N5.30 Where information has not been provided on bespoke population yields or the proposed housing mix arising from both the Proposed Development and cumulative schemes considered, assumptions have been made using ONS 2021 Household Projections using an average household size in Folkestone and Hythe District of 2.1 people per household. The additional economically active residents accommodated by the cumulative schemes has been estimated by applying the current proportion of residents aged 16 to 64 to the estimated population of the scheme, and then applying the current economic activity rate for the LIA (i.e. of 54.0%).

Table N5.2 Cumulative socio-economic impact

Site	Development Description	Population Increase	New Homes	Labour Market	Employment During Operation	Education	Health	Open Space and Play Space	Community Facilities
Land adjacent to Saltwood Care Centre, Tanners Hill, Hythe	The erection of 12 dwellings, 8 extra care dwellings and 4-storey building of 32 extra care units with access and landscaping	82	12	26	3	n/a	n/a	n/a	n/a
Land Opposite 24, Station Road, Hythe	Outline scheme for 44 dwellings and associated access and landscaping	88	40	28	0	n/a	n/a	n/a	n/a
Foxwood and Highview School, 59 Seabrook Road, Hythe	Erection of 150 dwellings with associated landscaping and access	329	150	106	0	n/a	n/a	New open and play spaces provided, quantum unknown	n/a
Burgoyne Barracks, North & Napier Barracks, West Road, Folkestone	Erection of 355 dwellings with landscaping, infrastructure and earthworks	777	355	251	0	n/a	n/a	New open and play spaces provided, quantum unknown	n/a
The Stadium, Aldridge Road, Folkestone	Reserved matters application for 48 dwellings, together with associated accesses, landscaping, infrastructure and earthworks pursuant to outline application Y14/0300/FH	105	48	34	0	n/a	n/a	n/a	n/a
Shorncliffe Garrison, Aldridge Road, Folkestone	Hybrid scheme for erection of up to 906 dwellings (plus 294 dwellings in detail), community services and facilities, new Primary school and nursery, combined new pavilion/cadet hut facility,	2628	1200	849	78-139	New primary school	n/a	New open and play spaces provided, quantum unknown	1,998 sq.m

Site	Development Description	Population Increase	New Homes	Labour Market	Employment During Operation	Education	Health	Open Space and Play Space	Community Facilities
	cricket/mini football pitches, improvements to 'The Stadium' sports facilities and new car park, equipped play improvements/works to The Backdoor Training Area, access, open space and landscaping								
Risborough Barracks, Pond Hill Road, Folkestone	Application for the approval of reserved matters for scheme of 230 dwellings pursuant to outline planning permission reference Y14/0300/SH	504	230	163	0	n/a	n/a	New open space provided, quantum unknown	n/a
Total		4,513 residents	2035, homes	1,457 economically active residents	81-142 FTE jobs	1 new primary school	n/a	New open space provided, quantum unknown	1,998 sq.m

N5.31 Drawing the analysis together, a description of the cumulative effects during the operation phase upon socio-economic receptors arising from each identified impact is provided in Table N5.3 below for the LIA and WIA.

N5.32 Overall, these schemes are expected to have a positive cumulative impact across the local area, as presented below, with the exception of the effect on the healthcare services. This receptor is of a high sensitivity, given the limited existing capacity within 3km of the Site. It is, therefore, expected that mitigation measures will occur in relation to those residential schemes that will impact the healthcare service provision of the area. Following mitigation, the effect is assessed to be Minor Adverse and Not Significant.

N5.33 In terms of education, it has not been possible to estimate the pupil yields for the cumulative schemes based on the information available. However, scheme 6, Shorncliffe Garrison, Aldridge Road, will include the delivery of a new primary school which will accommodate the additional demand for primary school places that the scheme generates, while also providing additional capacity to the Hythe Primary Planning Area ('PPA'). In addition, there is an existing surplus capacity across primary schools in the Hythe PPA which can accommodate the additional demand for places generated by the cumulative schemes in conjunction with the Proposed Development.

N5.34 There is also a relatively large identified surplus of secondary school places within the Folkestone and Hythe Secondary Planning Area ('SPA'). Therefore, it is not anticipated that the cumulative schemes will have any significant effect on education in conjunction with the Proposed Development.

N5.35 Table N5.3 below summarises the socio-economic cumulative effects during the operation phase.

Table N5.3 Cumulative assessment of socio-economic effects - operational phase

Theme	Impact Area	Cumulative Effect
Population	LIA	Minor Beneficial, Not Significant
	WIA	Negligible, Not Significant
Housing	WIA	Minor Beneficial, Not Significant
Labour market	LIA	Minor Beneficial, Not Significant
	WIA	Minor Beneficial, Not Significant
Economy and employment	WIA	Negligible, Not Significant
Primary education	Primary education providers across the Hythe PPA	Negligible, Not Significant
Secondary education	Secondary education providers across the Folkestone and Hythe SPA	Negligible, Not Significant
Healthcare	Healthcare providers within 3km of the Site	Minor Adverse, Not Significant
Open space and play space	Local open spaces and play space	Moderate Beneficial, Significant
Community Facilities	Local community facilities	Minor Beneficial, Not Significant

Health and Wellbeing

N5.36 The Air Quality cumulative assessment identifies that cumulative schemes no. 1, 2, 3 and 6 lie within the Zone of Influence for operational air quality effects from traffic. It concludes that traffic flows will not change relative to the future baseline. Therefore, the cumulative assessment of health and wellbeing effects arising from changes to air quality from traffic emissions during operation is the same as assessed in Chapter M: Socio-Economics and is Negligible (Not Significant).

N5.37 The Noise and Vibration cumulative assessment identifies scheme no. 3 Foxwood and Highview School as the only cumulative scheme falling within the noise and vibration Zone of Influence. It assesses that given the distance of the Proposed Development from this scheme, their respective noise emissions during operation would not be expected to combine or interact. Therefore, the cumulative effect is the same as assessed in Chapter M: Socio-Economics and is Negligible (Not Significant).

N5.38 Once operational, only one scheme, no. 3 Foxwood and Highview School, lies within the Zone of Influence with regards to impacts on access to opportunities for physical activity, as well as access and connections. The Foxwood and Highview School will deliver a new open space and play space (although the quantum is currently unknown). However, it will not deliver any additional PRoW for use by the local community. On this basis, the cumulative effect is the same as assessed in Chapter M: Socio-Economics and is Minor Beneficial (Not Significant).

N5.39 Table N5.4 summarises the assessment of cumulative health and wellbeing effects once operational.

Table N5.4 Cumulative assessment of human health effects - operational phase

Determinant of Health	Impact Area	Cumulative Effect
Access to opportunities for physical activity	LIA	Moderate Beneficial, Significant
Transport modes, access and connections	LIA	Minor Beneficial, Not Significant
Air quality	LIA	Negligible, Not Significant
Noise and vibration	LIA	Negligible, Not Significant

N6.0 Summary and Conclusions

N6.1 This chapter has considered the inter-relationship between impacts identified within the ES and whether there is a need for further mitigation (synergistic effects). It also considers the potential for cumulative impacts when the development is considered with other development in the surrounding area (cumulative effects).

N6.2 The ES has assessed the potential for the effects in relation to the following environmental matters:

- Water Environment and Flood Risk;
- Cultural Heritage and Archaeology;
- Landscape and Views;
- Ecology and Biodiversity;
- Transport;
- Noise and Vibration;
- Air Quality;
- Geo-Environment;
- Climate Change/Resilience; and
- Socio-Economics.

N6.3 A range of mitigation measures have been identified throughout the ES which are largely capable of being enforced through the planning process in relation to the Proposed Development.

N6.4 It has been identified that synergistic and non-significant synergistic effects exist for some receptors, which do not give rise to a need for additional mitigation measures.

N6.5 Consideration has also been given to the potential for cumulative effects when the Proposed Development is considered alongside other emerging cumulative schemes in the surrounding area. The assessment has concluded that there is no likelihood of Significant Adverse effects arising from the Proposed Development in combination with emerging cumulative schemes in the surrounding area. Significant Beneficial cumulative effects are predicted to occur in respect of local open spaces and play space and access to opportunities for physical activity operation during the operational phase.

N6.6 Chapter O provides a comprehensive summary of all mitigation measures, and how these can be secured.

N7.0 Abbreviations & Definitions

Abbreviations

- AHLV - Area of Higher Landscape Value
- AOI - Area of Impact
- CEMP - Construction Environmental Management Plan
- CTMP - Construction Traffic Management Plan
- EC - European Commission
- EIA - Environmental Impact Assessment
- ES - Environmental Statement
- FHDC - Folkestone and Hythe District Council
- GHG - Greenhouse Gas
- LEMP - Landscape and Ecological Management Plan
- LVIA - Landscape and Visual Impact Assessment
- PRoW - Public Rights of Way

Definitions

- **Synergistic effects** - the combined effect of different types of impacts attributable to the Proposed Development in respect of a particular receptor. This includes consideration of the impacts during the construction and operational phases.
- **Cumulative effects** - these arise from the combined effect of the Proposed Development with other committed development schemes that, individually, may be insignificant, but when combined with other impacts, may be significant.
- **The Proposed Development** - the proposals which are assessed through the Environmental Impact Assessment and for which outline planning permission (with all matters reserved) is sought.
- **The Site** – land within the boundary identified at Appendix A1, Volume 2 to this ES.

N8.0 References

1 Planning Practice Guidance (Environmental Impact Assessment), last updated 13 May 2020

2 Guidelines for Environmental Impact Assessment, Institute of Sustainability and Environmental Professionals (2004)

3 Guidelines for the Assessment of Indirect and Cumulative Impacts as well as Impact Interactions, European Commission (1999)

4 Advice Note 174, Planning Inspectorate

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Imperial Gardens
Volume 1: Environmental Statement

Chapter O Mitigation and Monitoring

August 2026

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O1.0 Introduction

O1.1 Schedule 4, Part (7) of the Town and Country Planning (Environmental Impact Assessment ('EIA')) Regulations 2017 (as amended) ('the 2017 EIA Regulations')[i] requires that an Environmental Statement ('ES') provides a description of the measures envisaged to avoid, prevent, reduce or, if possible, offset any identified significant adverse effects on the environment and, where appropriate, of any proposed monitoring arrangements. These have been summarised in this chapter for ease of reference for the decision maker (Folkstone and Hythe District Council ('FHDC')) and to assist in it forming its reasoned conclusion on this ES; for a full description the mitigation and monitoring measures, please refer to Chapters D to M of this ES.

O1.2 The Planning Practice Guidance ("PPG")[ii] confirms that *"mitigation measures proposed in an Environmental Statement are designed to limit or remove any significant adverse environmental effects of a development. Local planning authorities will need to consider carefully how mitigation measures proposed in an ES are to be secured"* [ref. ID: 4-051-20170728].

O1.3 In accordance with Regulation 26(3) of the 2017 EIA Regulations, the PPG further states that *"if planning permission or subsequent consent is to be granted, the local planning authority or Secretary of State must consider whether it is appropriate to impose monitoring measures"* [ref. ID: 4-051-20170728].

O1.4 To assist in defining the means by which mitigation can be secured, reference is given to guidance provided in 'Delivering Quality Development'[iii] which identifies three different types of mitigation:

1 **Primary (inherent) mitigation** – otherwise known as embedded or inbuilt mitigation, these comprise modifications or measures built-in to the location or design of a development during the pre-application stage. These measures are already inherent to a proposed development but will require additional action to ensure their implementation, such as the imposition of a planning condition;

2 **Secondary (foreseeable) mitigation** – this will require further activity in order to achieve the anticipated outcome identified in an ES such as through the imposition of a planning condition; and

3 **Tertiary (inexorable) mitigation** – these are measures that would occur with or without input from the EIA and could, for example, include actions that would be undertaken to meet other existing legislative requirements, or actions considered to be standard or best practice to manage commonly occurring environmental effects.

O1.5 This ES has identified a series of mitigation and ongoing monitoring and/or management measures which are designed to limit or remove any significant adverse environmental effects of Proposed Development. This chapter reviews these measures in the context of the categorisation identified to ensure that they can be effectively secured.

O2.0 Mitigation and Monitoring

O2.1 The following section provides a summary of the mitigation and monitoring measures identified in this ES and divides these into primary, secondary and tertiary measures. This is provided for ease of reference to the reader only; for a full description of the mitigation and monitoring measures, please refer of Chapters D to M of this ES.

Primary 'Embedded' Mitigation

O2.2 The iterative process of assessment, design development and consultation in respect of the Proposed Development has resulted in a range of 'in-built' or embedded mitigation measures that have been taken into account as part of this ES. These have been specifically included in the Proposed Development for the purposes of this EIA; as a result, the need for any further mitigation has been assessed on the basis of these measures already having been secured. The embedded mitigation measures are included to aid in avoiding significant adverse environmental effects.

During Construction

O2.3 Embedded mitigation measures include the following **during construction:**

1 The preparation and implementation of a detailed **Construction Environment Management Plan ('CEMP')** (or one for each phase of development) to manage and where practical minimise the impact of the construction phase of the Proposed Development upon the Site and surrounding area. A **CEMP** has been prepared and is provided at Appendix C4 of the ES, which sets out the key principles in relation to site and environmental management with which future detailed CEMPs will need to have regard;

2 The preparation and implementation of a **Construction Traffic Management Plan ('CTMP')** to identify measures to manage highway considerations during the construction stage of the Proposed Development, to be included within each detailed CEMP;

3 **Onsite planting will be sourced from native seed stock** which avoids naturalised or species known to aggressively spread but are not listed under schedule 9 of the Wildlife and Countryside Act such as non-listed species of *cotoneaster*, firethorn (*Pyracantha* sp.), sycamore, snowberry (*Symphoricarpos* sp.) and similar garden or naturalised non-natives;

4 Undertaking of a **detailed UXO Desk Study** prior to intrusive works, including ground investigation and enabling/construction works, to assess the UXO hazard level at the Site. Subsequently, **implementation of any UXO risk mitigation measures** to safely manage risks during ground investigation/redevelopment works, with supervision by a Specialist UXO Contractor and provision of UXO safety briefings to construction workers, in line with the recommendations of the Detailed UXO Desk Study; and

5 When **selecting construction materials**, the following will be considered:

a Selection of materials with a low embodied impact, with a long life and requiring little maintenance;

b Sourcing materials locally and through local supply chains to reduce the need for transport; and

c Where possible, utilising cut and fill civil engineering techniques to minimise emissions generated by transporting materials throughout the construction phase.

During Operation

O2.4 Embedded mitigation measures include the following **during operation**:

1 The **implementation of a detailed design** in accordance with the Parameter Plans provided at Appendix C3 of this ES, and with the Design Code provided at Appendix C5 of this ES;

2 Development to be brought forward in accordance with the **Plans for Approval** (Appendix C2 to this ES);

3 A **tertiary line of flood defence**, with a crest height of 7.30m AODN, will be constructed along the southern border of the Site as part of the Proposed Development as specified in the Flood Risk Assessment ('FRA') (provided at Appendix D1) in the location shown on the Landscape Masterplan (Appendix C2 to this ES). The defence crest height (7.30m AODN) will be approximately 600mm above the nominal level of the road and will run from the Hythe Imperial Hotel in the west to 40m beyond the golf course parking area in the east;

4 Implementation of a **drainage scheme** in accordance with the Surface Water Management Strategy ('SWMS') and implementation of a **foul drainage system** in accordance with the Foul Water Management Strategy ('FWMS') as set out in the FRA and Drainage Strategy (provided at Appendix D1);

5 Implementation of **a detailed lighting scheme** in accordance with the principles established in the indicative lighting scheme as set out in the External Lighting Impact Assessment at Appendix C6 of this ES.

6 The implementation of an **Interim Framework Travel Plan** (provided at Appendix H2), and provision of a Travel Information Pack for future residents and employees that will contain initiatives and incentives to increase their uptake of non-car and sustainable travel, as well as securing an ongoing monitoring and reporting strategy;

7 The internal site layout within the residential area will be designed (at the reserved matters stage) to **accord with Manual for Streets and Kent Design Guide** principles to encourage low vehicle speeds and direct, overlooked and pleasant active travel routes;

8 The provision of **Electric Vehicle (EV) charging facilities** for every dwelling and for the non-residential uses;

9 The provision of **secure cycle parking facilities** in accordance with the Council's parking standards for the residential element and the for the non-residential uses; and

10 The following measures which would assist in **reducing the Greenhouse Gas ('GHG') emissions** during the fitout of the Proposed Development, as set out in the

Sustainability and Environmental Standards Statement (submitted as a standalone document with the planning application):

a Maximise the use of natural sources of heating, cooling and ventilation by provision of external features which provide shade (where feasible) and inclusion of openable windows and vents on buildings;

b Building fabric will incorporate low U-Values to reduce heat loses, provide a high level of air tightness to control air filtration and reduce heating demand, and will be constructed to avoid thermal bridging and heat loss;

c Any fans they will be efficient and target a low power consumption rate;

d Major energy uses shall be monitored via separate "smart" energy meters with time and temperature zone control;

e Internal lighting is intended to be highly efficient and in excess of Building Regulation requirements. Lighting efficiency shall be in excess of 110 lumens/circuit Watt and predominantly LEDs;

f Where practical mechanical ventilation heat recovery will be incorporated in the apartments to help maintain thermal comfort levels, and where possible apartments will be naturally ventilated via openable windows; and

g Low carbon/renewable technologies will be considered to ensure that the lowest carbon sources of technologies are implemented.

Secondary Measures

O2.5 The iterative process of assessment and design has ensured that a significant element of mitigation is already inherent as part of the Proposed Development and as illustrated on plans and strategies provided as part of the planning application which this ES accompanies. There are, however, other secondary measures to be secured and are set out in Table O2.1.

Table O2.1 Summary of Identified Secondary Mitigation

Environmental Topic	Summary of Secondary Mitigation
During Construction	
Water Environment/ Flood Risk	The construction team will sign up to the EA's Flood Warning Service to be forewarned of potential flood events. Implementation of the tertiary line of defence prior to the construction of the residential units, the new Western Wing of the hotel, the new Leisure Building and the Golf Building.
Cultural Heritage and Archaeology	The implementation of an archaeological investigation and mitigation in advance of construction, of a scope to be agreed with Folkestone and Hythe District Council ('FHDC') and Kent County Council ('KCC'). Prior to its demolition, the Second World War structure within the Site will be subject to an appropriate level of Historic Building Recording, as agreed in advance with FHDC.

Environmental Topic	Summary of Secondary Mitigation
Landscape and Views	No additional mitigation required.
Ecology and Biodiversity	No additional mitigation required.
Transport	No additional mitigation required.
Noise and Vibration	No additional mitigation required.
Air Quality	No additional mitigation required.
Ground Conditions and Geo-Environment	Preparation and submission of a Geo-environmental and geotechnical ground investigation, prior to commencement construction, to identify potential contaminant linkages ('PCL') in groundwater and ground gas, and assess potential ground instability risks. Preparation and implementation of a Remediation Strategy, if required, depending on outcomes of ground investigation at reserved matters stage. On the completion of any remedial works, preparation and submission of a Verification Report, if required, to demonstrate that remediation objectives have been met. Preparation and submission of a Foundation/Piling Risk Assessment prior to construction to ensure that piling or other ground stability/foundation techniques do not create preferential pathways for contamination or pose unacceptable risks to groundwater. Preparation and submission of an Earthworks Specification for the Proposed Development to include protocols for testing and limiting values to ensure that imported materials are suitable for their intended use in terms of their chemical and geotechnical quality. Preparation and submission of a Materials Management Plan ('MMP') alongside the Earthworks Specification prior to construction works in accordance with CL:AIRE Definition of Waste Code of Practice (DoWCoP). The MMP will detail the procedures and measures that will be undertaken to classify, track, store, dispose of and possibly re-use excavated materials, and also ensure that imported materials are suitable for their intended use. A subsequent Verification Report will be required to demonstrate that the MMP has been followed.
Climate Change/Resilience	The following measures would assist in reducing GHG emissions and will be considered during the construction phase: • Use low-emission or electric/ hybrid/Stage V-compliant plant and equipment; • Enforce strict no-idling policies and optimise plant duty cycles; • Use cleaner fuels (e.g., sustainably sourced HVO) where appropriate;

Environmental Topic	Summary of Secondary Mitigation
	• Maintain plant regularly to ensure efficient operation and minimise emissions; • Minimise generator use; prioritise grid connections and hybrid/battery units; • Plan efficient site layout and logistics to reduce vehicle movements; • Provide operator training on efficient machinery use and fuel-saving behaviours; and • Monitor and report fuel use.
Socio-Economics	No additional mitigation is required.
During Operation	
Water Environment/ Flood Risk	No additional mitigation is required.
Cultural Heritage and Archaeology	Proportionate Section 106 contribution towards the upkeep of the Royal Military Canal, of a scale to be agreed with FHDC.
Landscape and Views	Preparation and submission of a Landscape and Ecological Management Plan ('LEMP') to ensure that the habitats establish and mature as envisaged.
Ecology and Biodiversity	No additional mitigation is required.
Transport	Implementation of offsite highway works as detailed within the Transport Assessment ('TA') provided at Appendix H1 of this ES. Measures to include: • A comprehensive package of off-site pedestrian and cycle infrastructure improvements to Princes Parade and Twiss Road; • A scheme of highway improvements and traffic calming on Princes Parade to reduce traffic speeds; • A scheme of enhancements to the A259 Seabrook Road/Twiss Road priority junction; and • Introducing restrictions to on-street parking on Twiss Road to enhance non-motorised user visibility.
Noise and Vibration	Detailed design and specification of items of fixed plant associated with the operation of the Proposed Development will ensure that the plant noise requirements of FHDC are met, as set out in Table I5.7 of ES Chapter I (Noise and Vibration).
Air Quality	No additional mitigation required.
Geo-Environment	Submission of monitoring of groundwater, surface water and ground gas, if required, post-construction depending on results of the geo-technical ground investigation.
Climate Change/Resilience	No additional mitigation is required.
Socio-Economics	Proportionate Section 106 contribution towards the provision of healthcare.

Tertiary Mitigation

O2.6 In addition to the above, many of the technical aspects considered in this ES (see Chapters D to M) have identified a series of tertiary measures that can be assumed will be

implemented at the Site to ensure compliance with best practice or standard legislation. Compliance with these standards can be assumed without this requiring consideration as part of planning conditions or s106 obligations.

O3.0 Means of Securing Mitigation

O3.1 This section sets out the means by which the mitigation proposed throughout the ES can be secured.

O3.2 The PPG states that "*conditions attached to a planning permission or subsequent consent may include mitigation measures…[whilst]…mitigation measures can also be secured through planning obligations which are enforceable by the local planning authority"* [ref. ID: 4-051-20170728]. The PPG also makes clear that any monitoring measures can be attached via planning conditions or s106 planning obligations, as long as any provisions used are clear and precise and ensure clarity for all parties concerned.

O3.3 Consideration has been given to the primary, secondary and tertiary mitigation measures identified within Section O2.0 and Table O3.1 sets out the recommended route by which each can be secured to ensure that the outcomes of this ES will be implemented as envisaged.

Table O3.1 Summary of Identified Mitigation

Identified Mitigation		Relevance to Environmental Aspect	Anticipated Means of Implementation
Primary (Embedded) Mitigation			
1	Implementation of a detailed design in accordance with the Parameter Plans and the Design Code within the DAS	All aspects	Planning condition
2	Development to be brought forward in accordance with the detailed plans and the Landscape Masterplan (and associated detailed Landscape Masterplans)		Planning condition
3	Implementation of a detailed CEMP (or one for each phase of development) in accordance with the scheme specific CEMP (see Appendix C4of this ES).		Planning condition
4	Preparation and implementation of a detailed CTMP	Traffic and Transport, Noise and Vibration, Climate Change, Air Quality	Planning condition
5	Implementation of the Interim Framework Travel Plan and provision of a Travel Information Pack.		Planning condition or obligation
6	Implementation of a tertiary line of flood defence, with a crest height of 7.30m AODN, as specified in the FRA in the location shown on the Landscape Masterplan. The defence will run from the Hythe Imperial Hotel in the west to 40m beyond the golf course parking area in the east.	Water Environment and Flood Risk, Climate Change and Resilience	Planning Condition
7	Preparation and submission of a detailed UXO Desk Study prior to intrusive works. Subsequently, and in line with the recommendations of the Desk Study,	Ground Conditions and Geo-Environment	Planning condition

Identified Mitigation		Relevance to Environmental Aspect	Anticipated Means of Implementation
	implementation of any UXO risk mitigation, and provision of UXO safety briefings to construction workers.		
8	Implementation of a drainage scheme to accord with the SWMS and of a foul drainage system to accord with the FWMS.	Water Environment and Flood Risk, Ground Conditions and Geo-Environment	Planning condition
9	Layout of the residential area to be designed to accord with Manual for Streets and Kent Design Guide principles.	Traffic and Transport Noise and Vibration, Climate Change, Air Quality	Planning condition
10	The provision of EV charging facilities for every dwelling and for the non-residential uses.		Planning condition
11	The provision of secure cycle parking facilities in accordance with the Council's parking standards.		Planning condition
12	Implementation of a detailed lighting scheme to accord with the principles set out in the External Lighting Impact Assessment.	Landscape and Views, Ecology and Biodiversity	Planning condition
13	Onsite planting to be sourced from native seed stock.	Ecology and Biodiversity	Planning Condition
14	Consideration of climate change resilience measures and greenhouse gas reduction when selecting construction materials and during the fitout of the Proposed Development	Climate Change and Resilience	Compliance Planning Condition
Secondary (Additional) Mitigation			
15	Implementation of the tertiary line of defence prior to the construction of any buildings.	Water Environment and Flood Risk	Planning condition
16	Implementation of an agreed scheme of archaeological investigation and mitigation prior to construction	Cultural Heritage and Archaeology	Planning condition
17	Implementation of agreed level of Historic Building Recording of the Second World War structure within the prior to its demolition		Planning condition
18	Proportionate Section 106 contribution towards the upkeep of the Royal Military Canal		S106 Agreement
19	Preparation and submission of a LEMP	Landscape and Views	Planning Condition
20	Implementation of offsite highway works at Princes Parade, Twiss Road and at the A259 Seabrook Road/Twiss Road junction as detailed within the TA.	Traffic and Transport	Delivered via Section 278 agreement; secured via planning condition
21	Adherence to the plant noise requirements of FHDC in relation to external plant.	Noise and Vibration	Planning condition

Identified Mitigation		Relevance to Environmental Aspect	Anticipated Means of Implementation
22	Submission of a geo-environmental and geotechnical ground investigation prior to construction.	Ground Conditions and Geo-Environment	Planning condition
23	Implementation of a Remediation Strategy, if required, and subsequent submission of a Verification Report		Planning condition
24	Submission of a Foundation/Piling Risk Assessment prior to construction.		Planning condition
25	Submission of an Earthworks Specification		Planning condition
26	Preparation of an MMP alongside the Earthworks Specification prior to construction works, and subsequent submission of a Verification Report.		Planning condition
27	Submission of monitoring results of groundwater, surface water and ground gas, if required, post-construction.		Planning condition
28	Consideration of greenhouse gas reduction measures during construction.	Climate Change and Resilience	Compliance Planning Condition
29	Proportionate Section 106 contribution towards the provision of healthcare.	Socio-Economics	S106 Agreement
Tertiary Measures			
Measures will be secured through compliance with legislation covered elsewhere. No requirement for additional planning conditions or obligations to secure tertiary mitigation.			

O3.4 It is considered that the above will ensure that the mitigation and monitoring envisaged by the ES can be appropriately secured.

04.0 Summary and Conclusions

04.1 This ES has been prepared on behalf of GSE Group (the Applicant) and sets out the findings of an EIA for mixed-use development comprising extension and redevelopment of the Hythe Imperial Hotel, redevelopment of the existing golf course, the erection of up to 291 residential dwellings and associated access, parking, landscaping and ancillary works ('the Proposed Development'). The description of development is:

"Hybrid planning application consisting of full planning permission for (i) extensions to, and the redevelopment of the Hythe Imperial Hotel to provide additional hotel accommodation, a new spa facility and a public gym and swimming pool, and (ii) the redevelopment of the existing golf course to provide a new leisure offering; including a 'academy' golf course and club house, an adventure golf course and splash park with associated access, parking, landscaping and other ancillary works.

Outline planning permission for the erection up to 291 residential dwellings (Class C3) with all matters reserved except for the principal access from Princes Parade and Imperial Gardens."

04.2 The Proposed Development has been subject to a process of systematic analysis of potential significant environmental effects and iterative design to embed key principles that can assist in reducing adverse effects where these arise. The ES (Chapters A to M) has described the key components of the Proposed Development, the methodological approach adopted and the extent to which consultation and engagement has assisted in this process. It is intended to be used by Folkestone and Hythe District Council and other key stakeholders in its determination of the planning application for the Proposed Development.

04.3 Chapter N has drawn together and summarised the main outcomes from the EIA process, and this Chapter has divided the range of mitigation measures identified into those already embedded or 'built in' to the proposals that are included in the planning application; into measures that will need to be secured via planning conditions; and other measures to which the future development will comply as a result of the requirements of other legislation or best practice procedures. It has been demonstrated that all mitigation required to appropriately address likely significant environmental effects of this Proposed Development can be secured to an acceptable level.

05.0 Abbreviations & Definitions

Abbreviations

- BNG - Biodiversity Net Gain
- CEMP - Construction Environmental Management Plan
- CTMP - Construction Traffic Management Plan
- EIA - Environmental Impact Assessment
- ES - Environmental Statement
- LEMP - Landscape and Ecological Management Plan
- LVIA - Landscape and Visual Impact Assessment
- PPG - Planning Practice Guidance
- PRoW - Public Rights of Way
- TP - Travel Plan

Definitions

- **Primary (inherent) mitigation** - otherwise known as embedded or inbuilt mitigation, these comprise modifications or measures built into the location or design of a development during the pre-application stage.
- **Secondary (foreseeable) mitigation** - these measures will require further activity in order to achieve the anticipated outcome identified in an ES such as through the imposition of a planning condition.
- **Tertiary (inexorable) mitigation** - these are measures that would occur with or without input from the EIA and could, for example, include actions that would be undertaken to meet other existing legislative requirements, or actions considered to be standard or best practice to manage commonly occurring environmental effects.
- **The Proposed Development** - the proposals which are assessed through the Environmental Impact Assessment and for which outline planning permission (with all matters reserved) is sought.
- **The Site** - land within the boundary identified at Appendix A1, Volume 2 to this ES.

06.0 References

[i] Town and Country Planning (Environmental Impact Assessment ('EIA')) Regulations 2017 (as amened)

[ii] Department for Levelling Up, Housing and Communities; Ministry of Housing, Communities and Local Government, (2019), Planning Practice Guidance ('PPG').

[iii] IEMA, (2016), Environmental Impact Assessment Guide to: Delivering Quality Development

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