

## Background Document BD9

### Strategic Environmental Assessment (SEA) for the

### Wye with Hinxhill Neighbourhood Development Plan

#### Executive summary

This background document assesses the environmental impact of the mixed development proposed in the Wye with Hinxhill Neighbourhood Development Plan (WNP). The need for encouragement of business and education activities together with the provision of some new housing has been the driving force behind development of the WNP. Protection of the sensitive environments within the parish has been a foremost concern in preparation of the plan and is found as an overriding principle in WNP policies. Potential sites for development were selected making use of the documentation already available for the Tenterden and Rural Sites DPD. Sensitive and important habitats within and nearby the parish have been identified and specific issues stemming from development assessed. The impact of development on traffic and its effect on the environment has received special attention, bearing in mind the necessary comparison with the impact from a fully active Wye College.

#### Contents

1. Introduction.....	2
2. Submitting body.....	2
3. Neighbourhood area.....	3
4. Scoping document .....	4
5. Core objectives of WNP .....	4
6. Sites for development identified within the parish .....	5
7. Main issues addressed through the SEA.....	8
8. Nearby sites of significance.....	9
9. The WNP and TRSDPD.....	18
10. Critical analysis of impacts of development proposed.....	29
10.1 Traffic.....	30
11. Groundwater and drainage.....	32
12. Mitigation and monitoring impacts.....	33
13. Concluding remarks.....	34

## 1. Introduction

This [SEA document](#) has been prepared to accompany the Wye with Hinxhill Neighbourhood Development Plan (WNP).

Paragraph 8 of Schedule 4B to the Town and Country Planning Act 1990 requires that Neighbourhood Development Plans (NDP) must meet the following basic conditions:

- (i) the draft NDP must have appropriate regard to national policies and advice contained in the National Planning Policy Framework (NPPF);
- (ii) the draft NDP must contribute to the achievement of sustainable development;
- (iii) the draft NDP must be in general conformity with the strategic policies contained in the development plan for the area of the local planning authority, in this case Ashford Borough Council's (ABC's) Core Strategy 2008 (CS) and the Tenterden and Rural Sites Development Plan Document 2010 (TRSDPD) and
- (iv) the draft NDP must meet the relevant EU obligations.

The environmental assessment of plans with a significant environmental impact is a requirement of the EC Directive on the assessment of plans and programmes on the environment (Directive 2001/42/EC), known as the Strategic Environmental Assessment (SEA) Directive. This Directive was transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004, or SEA Regulations. Detailed Guidance of these regulations can be found in the Government publication "A Practical Guide to the Strategic Environmental Assessment Directive" (ODPM 2005). *This background document to the WNP fulfils the requirement of Directive 2001/42/EC and has been completed with reference to the established SEA process.*

This report contains reference to the following documents.

*Neighbourhood Development Plan WNP*

*Background document BD1 Neighbourhood plan questionnaire and results*

*Background document BD2 Workshops and community engagement output*

*Background document BD3 Environment*

*Background document BD4 Traffic appraisal*

*Background document BD13 Site policies for WYE1, WYE2 and Nacolts Brickworks*

*Background document BD14 Basic conditions statement prepared to show the accordance of WNP with the NPPF and Local Planning Policy*

*Background document BD15 Ashford Borough Council's SEA Screening Report for the WNP*

*Sustainability Appraisal Tenterden and Rural Sites DPD, including the Appendix C that sets out SEA Objectives and Guiding Questions*

*Background document BD9a Scoping document for the SEA prepared by Wye with Hinxhill Parish Council and responses received.*

## 2. Submitting Body

The Wye Neighbourhood Development Plan will be submitted by Wye with Hinxhill Parish Council, which is a qualifying body as defined by the Localism Act 2011.

### 3. Neighbourhood Area

In accordance with part 2 of the Regulations, Ashford Borough Council (ABC), the local planning authority publicised the application from the Parish Council and advertised a consultation period beginning on 9<sup>th</sup> November and ending on 21<sup>st</sup> December 2012. The applications was approved by the Cabinet of ABC on 10<sup>th</sup> January 2013 and the Parish designated as the Neighbourhood Area.

The Parish Council confirms that this:

- Neighbourhood Development Plan relates only to Wye with Hinxhill Parish and to no other Neighbourhood Areas.
- It is the only Neighbourhood Development Plan in the designated area. No other Neighbourhood Plan exists nor is in development for part or all of the designated area.

The Parish is located in Kent Downs Area of Outstanding Natural Beauty (AONB), between Ashford and Canterbury. Figure 1a and b show the general location of the district and the parish within it.

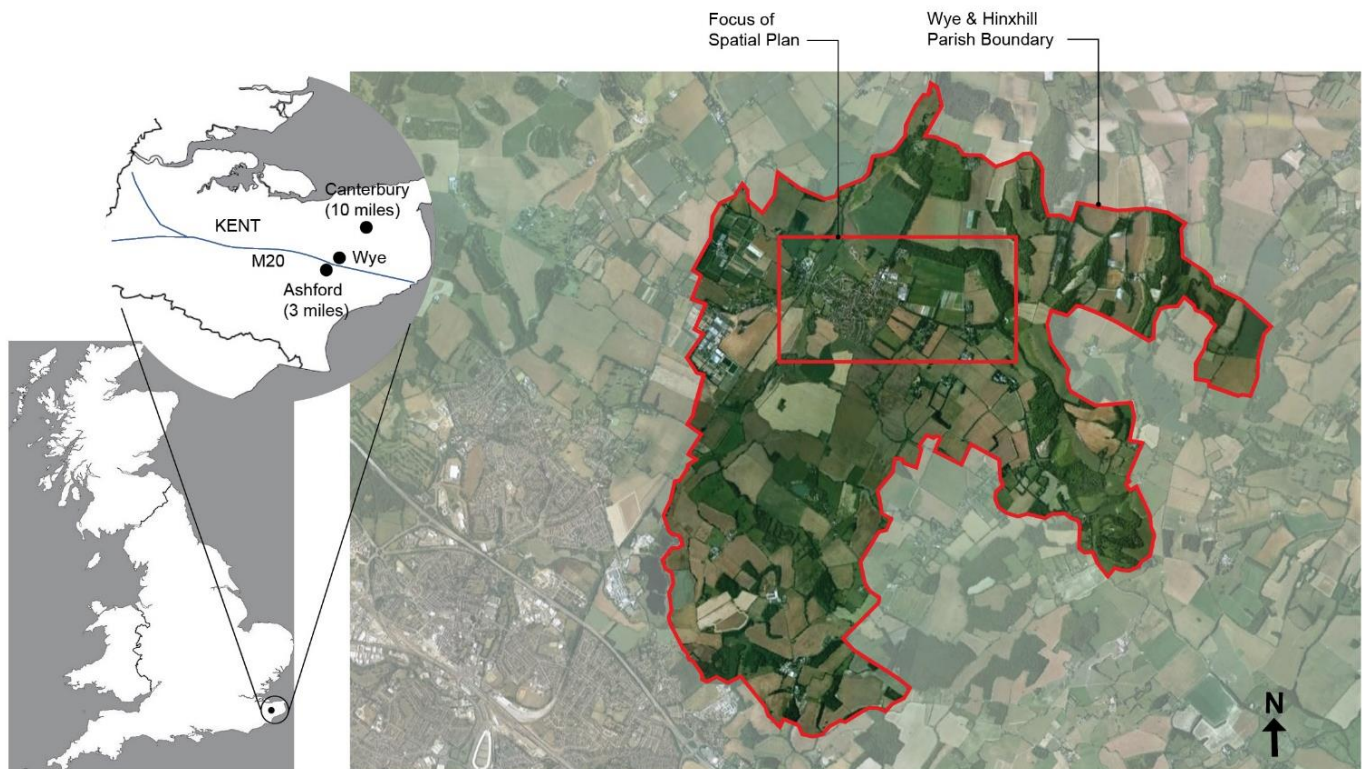


Figure 1a Location of the Parish and aerial view

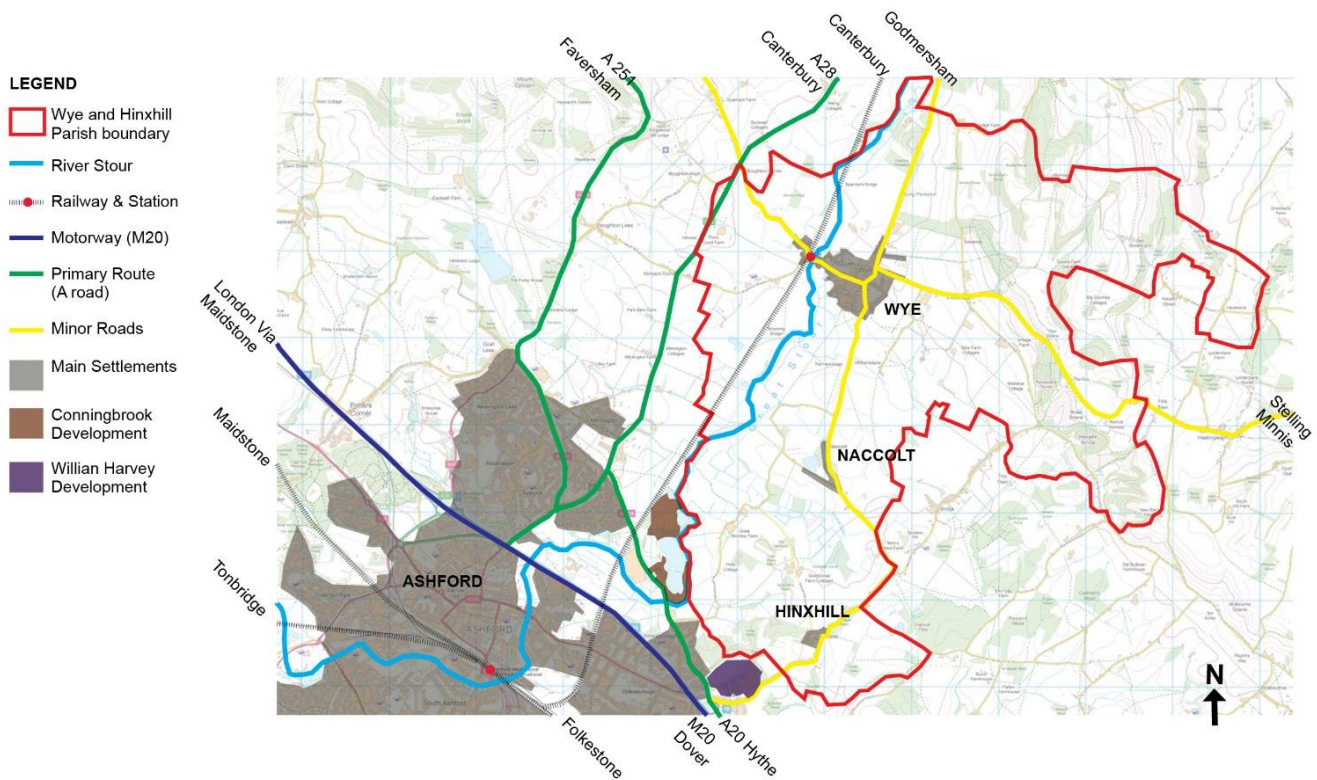


Figure 1b Wye with Hinxhill Parish boundary in local context with nearby major development

#### 4. Scoping document

The scoping document for this SEA was submitted to the statutory bodies English Heritage, the Environment Agency and Natural England on November 9<sup>th</sup> 2014. The document and responses received are provided in Supplementary SEA document C. The helpful comments received have been incorporated into this SEA.

#### 5. Core objectives of the WNP

The parish, through workshops, exhibitions and presentations about the WNP, decided on six core objectives.

1. Protect and enhance the village of Wye's sense of place within the parish and its surrounding countryside
2. Protection of Wye's conservation area and architectural heritage
3. Protection against the impacts of increased traffic
4. The promotion of business activity
5. Integration of new affordable and general needs housing within mixed developments
6. To achieve the mixed re-development of WYE3

In addition to Core policies based on these objectives, the plan contains General policies on Community and wellbeing, Countryside and environment, and Housing. A detailed site policy is also presented for WYE3.



## 6. Sites for development identified within the parish

The sites assessed for development in Wye are mostly the same as those included in the TRSDPD 2010 as shown in Figure 2. The Parish Council identified and appraised these sites for potential development following receipt of questionnaire responses and parish workshops as reported in Background Documents BD1 and 2. This SEA relies on background information provided in the scoping report for the TRSDPD. Site appraisal also followed the guidance provided in the TRSDPD through assessment of the 20 point framework covering:

1. Geology and biodiversity impact, 2. Flood Risk, 3. Air pollution, 4. Landscape quality, 5. Climate Change mitigation, 6. Water supply, 7. Sense of place, 8. Housing provision, 9. Quality of life 10. Heritage conservation, 11. Access to services, 12. Land use, 13. Renewable resources, 14. Waste, 15. Balanced development, 16. Employment generation, 17. Vitality of the Parish, 18. Variety – economic diversity, 19. Travel and access, 20. Transport and car journeys.

The conclusions reached for the TRSDPD and the Parish Council's appraisal were broadly in agreement and are summarised in Table 1.

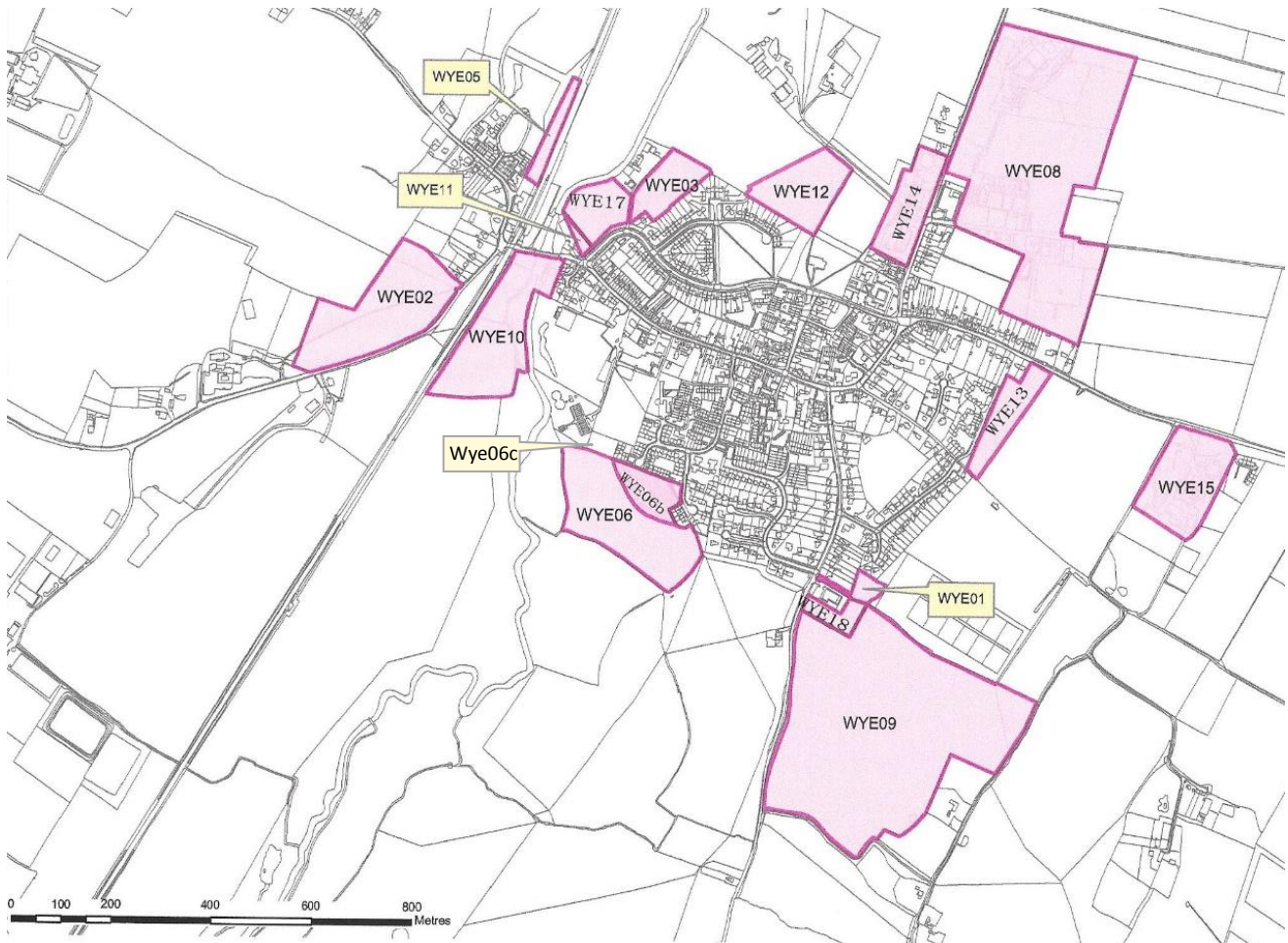


Figure 2 Location of potential development sites assessed in TRSDPD SA/SEA document and WNP workshops.

**Table 1 Site assessments**

Site designation in TRSDPD SEA	Site designation in TRSDPD	Conclusion in SEA on suitability for housing	WNP assessment and comment
WYE01		A small site that would extend development to the rear of existing development beyond the existing confines of the settlement. The site is not a suitable location for development	Acceptable for windfall development within the village envelope if access improved
WYE02		A large area of open land that is a key part of the entrance to the village from the west. Partly affected by flooding the site is not considered suitable for development.	Not considered suitable for development
WYE03	WYE1	A self-contained site that is located between existing commercial uses and residential use in a relatively sustainable location. There is limited impact on the landscape and the site is suitable for development.	Suitable for development - planning approved
WYE05		A brownfield site adjacent to the railway line - there may potentially be some redevelopment potential but not considered suitable for residential development.	Not considered suitable for development
WYE06		This large site adjoins open countryside to the south of the village. The site lies within the flood plain and development would be a significant intrusion into open countryside The large site is not considered suitable for development .	Not considered suitable for development
WYE06b	WYE2	This site adjoins open countryside to the south and adjoins a larger site that falls within the flood plain that is not considered suitable for development. This site is suitable for limited development that would limit the impact on the surrounding countryside and would enable a distinct edge to the village to be created.	Suitable for development - planning approved
WYE06c		Not included in the TRSDPD	This site adjoins open countryside and allows views out from the village to the Stour Valley. It is also adjacent to the sewage works and confines a playing field area used by the school. It is considered unsuitable for development
WYE07		A key area of open land adjoining the riverside that is affected by flooding and forms part of the landscape setting of the village. Not considered suitable for development.	Not considered suitable for development

WYE08	WYE3	Re-use or redevelopment potential of this site can only be assessed as part of a full evaluation of the future of the college campus.	East of Olantigh Rd – suitable for mixed development ADAS site not suitable for major development (see below)
WYE09		No comment in TRSDPD SEA	A large area of open farm land that is a key part of the entrance to the village from the south. The site is distanced from the centre of the village and is not considered suitable for development.
WYE10		A key area of open land adjoining the riverside that is affected by flooding and forms part of the landscape setting of the village. Not considered suitable for development.	Not considered suitable for development
WYE11		A small site that is part of a wider open area that is an important part of the village that is affected by flooding. Not considered suitable for development.	Not considered suitable for development
WYE12		A significant intrusion into the surrounding open countryside that is not well related to the settlement. The site is not suitable for development.	Not considered suitable for development
WYE13		An extension into open countryside to the west of the village not considered suitable for development	Not considered suitable for development
WYE14	WYE3	A sustainable location in the village, the existing college buildings may have re-use or redevelopment potential but this can only be assessed as part of a full evaluation of the future of the college campus.	Main campus north – suitable for mixed development
WYE15	WYE3	The site is detached from the village and currently has existing buildings on site. Not considered to be a suitable site for substantial redevelopment but as a brownfield site further consideration is needed as to the future of the site in association with the potential for future uses of the college campus.	Withersdane – suitable for establishment as a care home or equivalent residential centre
WYE17		A large area of open land area that is an important part of the village that is affected by flooding. Not considered suitable for development.	Not considered suitable for development
WYE18		A small site that is a relatively unsustainable location outside the village confines. The site is not suitable for development.	Not considered suitable for development, but located within the village envelope as a potential site for extension of the surgery

Additional sites considered were -

- *The ADAS site* to the north of the village and within WYE08 (part of WYE3), has been considered separately by the Parish for redevelopment. However, it lies well outside the 5 minute walking distance from the village centre and residential or intensive business use would not, therefore, be appropriate. The site is screened by mature trees when viewed from the Downs. Proposals to return the site to countryside as a managed woodland or that it be developed for renewable energy, including as a solar farm, have received strong support.
- *Naccolt brickworks site (not included in the TRSDPD)* although outside the Wye village confines and a rural site that was previously used as a recycling centre, it was considered suitable for a small development of housing (see BD 13) and an application for residential development (nine dwellings) has now been approved (February 2015).

During preparation of the WNP, planning permission was granted for 25 houses on WYE2 and 27 houses on WYE1, but the dwellings have not been built (May 2015). The policies prepared for these sites and Naccolt brickworks are presented in Background document BD13. The WNP primarily concerns impact from development on WYE3, but must take full account of the combined impact of planning approved on WYE1 and WYE2 and also windfall and change of use sites (such as Naccolt brickworks) likely to come forward before 2030.

## 7. Main issues addressed in the SEA

The WNP has policies to protect the environment in conformity with both the NPPF and local planning framework (Basic Conditions Statement BD14). Wye is a special place and the protection of its environment is an essential component of the WNP.

The ecological value of the chalk grassland within the parish, including rare species of plants and insects, is nationally recognised and afforded statutory protection for its ecological value and biodiversity. The Wye and Crundale Downs Site of Special Scientific Interest (SSSI), Special Area of Conservation (SAC) and Wye National Nature Reserve (NNR) run along the Kent Downs to the west of the village. The SSSI/NNR/SAC are characterised by fragments of ancient woodland and calcareous grassland, both UK Biodiversity Action Plan (UKBAP) Priority Habitats. The woodland character varies depending on the soil type. On the steep chalk slopes Beech (*Fagus sylvatica*) and Ash (*Fraxinus excelsior*) high woodland predominates; where heavy clay soils overlie the chalk, Ash, Hazel (*Corylus avellana*) and Hornbeam (*Carpinus betulus*) coppice occurs under Oak (*Quercus robur*) standards. Beneath this is a shrub layer containing Field Maple (*Acer campestre*), Wild Cherry (*Prunus avium*), Wych Elm (*Ulmus glabra*) and Whitebeam (*Sorbus aria*). Within the field layer below the rare Green Hellebore (*Helleborus viridis*) and Lady Orchid (*Orchis purpurea*) are of particular note. The range of the latter being restricted in Britain to Kent.

The Hazel Dormouse (*Muscardinus avellanarius*) the UK's only native dormouse and a protected species (Wildlife and Countryside Act 1981, Schedule 5) can be found in the woodlands around Wye. The calcareous rich grassland, embedded within the fragments of ancient woodland, is a habitat lost throughout much of Britain through intensive agriculture and lack of management. The grassland adjacent to Wye is rich in orchid species, including the specially protected (Wildlife and Countryside Act 1981, Schedule 8) spider orchids *Ophrys sphegodes* and *O. fuciflora*. It also provides habitat for the Black-veined Moth (*Siona Lineata*) a species that requires infrequently grazed/ungrazed chalk grassland. While its range was always restricted to Southern England it is now found only on a few sites around Wye. The Black-veined Moth is a protected species



The variety and extent of the ecological and biodiversity designations around Wye illustrate the complexity and fragility of the surrounding landscape. These designations are a material consideration for planning and the WNP emphasises protection of the surrounding environment and green spaces within Wye village itself (see WNP and Background document BD3).

The built environment in Wye is a rich heritage of Grade I and Grade II listed sites, notably within the old Wye College campus. The WNP has specific policies addressing the WYE3 sites that will ensure their maintenance and restoration to be active components of the village, not simply decaying unused assets.

Conformation of the WNP with NPPF sustainability policies is summarised below in Table 2

Table 2-i	NPPF Sustainability Policy 11 Conserving and enhancing the natural environment
	<p>The NPPF requires the planning system should contribute to and enhance the natural and local environment by:</p> <ol style="list-style-type: none"> <li>protecting and enhancing valued landscapes, soils and the best agricultural land;</li> <li>minimising impacts on biodiversity;</li> <li>re-using and remediating previously developed (brownfield) land;</li> <li>minimising pollution of all kinds and</li> <li>conserving landscape and scenic beauty in Areas of Outstanding Natural Beauty.</li> </ol>
WNP Response	<p>Conservation of the environment in the parish is an essential component of the vision, principles and objectives of the WNP. The local plan conforms with Sustainability Policy 11 through</p> <ul style="list-style-type: none"> <li>• Policies WNP1a and WNP1b that support the concept of a centralised village, preserve green spaces within the village envelope and views into and out of Wye.</li> <li>• Control of the impact of development of traffic generation through WNP3.</li> <li>• Policy WNP8 on landscape strategies, requiring the impact of development on landscape, including trees and hedgerows, to be considered.</li> <li>• Site policy for WYE3, WNP11.</li> </ul>

Table 2-ii	NPPF Sustainability Policy 12 Conserving and enhancing the historic environment.
	<p>The NPPF requires a positive approach to '<i>the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats</i>'.</p>
WNP Response	<p>Wye has a rich heritage of buildings and nationally designated historic parks and gardens. The conservation area is protected beyond national policies by WNP2 and the future of the Grade I and Grade II buildings on Wye Campus north protected by WNP11. The preservation of views into and from the village, particularly those from the Downs, is addressed by policy WNP1b and WNP11. Within Wye village the historic green spaces are protected by WNP1a.</p>

## 8. Nearby sites of significance

In the SEA Screening Assessment carried out by ABC (see SEA supplementary document A) it was concluded that the Wye Neighbourhood Plan may have an impact on internationally designated wildlife sites. The following Natura 2000 sites are located within 20km of the Wye Neighbourhood Area boundary (See Figure 1).

SACs:	SPAs	Ramsar Sites:
Blean Complex SAC	Dungeness to Pett Level SPA	The Swale Wetland
Stodmarsh SAC	Stodmarsh SPA	Stodmarsh
Parkgate Down SAC	The Swale Wetland SPA	
Folkstone to Etchinghill Escarpment SAC		
Wye and Crundale Downs SAC		
Dungeness SAC		

The potential significant effects identified were:

- Risks of effects from increased recreational pressure;
- Risk of effects from region-wide air pollution;
- Risk of effects from Waste Water Treatment Works and landfill discharges.

Sites within 20km of Wye Neighbourhood Area and the potential impact of the developments proposed in the WNP as assessed by ABC are as follows. Conclusions concerning the impact of the WNP have been expanded and are highlighted.

Site Name	Blean Complex SAC (520.62ha)
Distance to Wye Village	Approximate: Direct 9.8 miles; Driving 13 miles
Reason for designation	Broad-leaved deciduous woodland (100%)  Sub-Atlantic and medio-European oak or oak-hornbeam forests of the <i>Carpinion betuli</i> for which this is one of only two known outstanding localities in the UK.
Vulnerability	There is a mixture of woodland habitat types at this site. Some require coppicing to maintain their features of interest (such as heath fritillary butterfly), although this is not essential to maintain the <i>Stellario-Carpinetum</i> habitat type. Coppice management continues in areas of the site which are maintained as nature reserves by Natural England, Kent Wildlife Trust and the Royal Society for the Protection of Birds, but has been difficult to maintain elsewhere.
Impact as a result of the NP	Information on this site has been gathered from Canterbury City Council's screening HRA report for their 'Herne Bay AAP', June 2008. It identifies lack of coppice management and deterioration in air quality as the main vulnerabilities. It can therefore be assumed that the main pressures from the Wye Neighbourhood Plan are also coppice management and air quality.
Significance of risk	It is unlikely, given impacts identified and the distance of the Blean Complex SAC from Wye and the level of development proposed within the NP that any significant impact would result to either air quality or management of this site.
Cumulative impacts of other Plans	Screening for the HRA of the adopted Core Strategy (2008) found that there were likely to be significant effects on the integrity of the Wye and Crundale Downs SAC, Stodmarsh SAC and Stodmarsh SPA. Policies within Wye's Neighbourhood Plan are in line with those of the strategic development plan and as such in combination with other plans the NP is unlikely to have any significant effect.

Site Name	Stodmarsh SAC (564.64ha); Stodmarsh SPA and Ramsar (481.3 ha)
Distance to	Approximate: Direct 13.4 miles; Driving 16 miles

Wye Village	
Reason for designation	<p>The site lies along the flood plain of the Great Stour just to the east of Canterbury. Stodmarsh is a wetland site resulting in part from subsidence under the valley of the Great Stour in Kent and aggregate extraction but lies within the natural floodplain of the river. There are a range of wetland habitats including open water, reedbeds, grazing marsh and alder <i>Alnus glutinosa</i> carr. The site supports a number of uncommon wetland invertebrates and plants, and provides breeding and wintering habitats for important assemblages of wetland bird species, particularly waterfowl.</p> <p>A sizeable population of <b>Desmoulin's whorl snail</b> <i>Vertigo moulinsiana</i> lives beside ditches within pasture on the floodplain of the River Stour, where reed sweet-grass <i>Glyceria maxima</i>, large sedges <i>Carex</i> spp. and sometimes common reed <i>Phragmites australis</i> dominate the vegetation. Stodmarsh is a south-eastern outlier of the main swathe of sites and is important in confirming the role of underlying base-rich rock (chalk) as a factor determining this species' distribution.</p> <p>Regular visitors of populations of European importance of the following migratory species: Bittern, Hen Harrier</p>
Vulnerability	<p>Much of Stodmarsh is a National Nature Reserve, and is therefore relatively secure and well managed. The area of habitat has recently been expanded, improving the situation for wetland birds by acquiring an area of turf fields adjacent to the SPA/ Ramsar site for conversion to reedbed, open water and grazing marsh. Continued maintenance of the reedbeds is essential to control the invasion of scrub.</p>
Impact as a result of the NP	<p>Information obtained from the Joint Nature Conservation Committee (JNCC) states that privately owned parts of the site are affected by disturbance. The western end of the SPA is used by wildfowling and fishermen, both of which cause disturbance to the birds and is being addressed through Site Management Statements. The other significant problem relates to water supply, with the many area of vulnerability considered to be from over abstraction of water supply in drought years from the River Stour. The Desmoulin's whorl snail is highly dependent upon the maintenance of existing hydrological conditions. The deterioration in water quality in the River Stour is also a potential threat.</p>
Significance of risk	<p>The Water Framework Directive sets stringent targets to protect water quality. Policy CS21 of the Core Strategy will not permit development that would likely result in a reduction in the quality or quantity of groundwater. Major proposals must demonstrate that adequate water supply and wastewater treatment facilities are in place to serve the development before permission can be granted. If major sites are allocated within the Wye Neighbourhood Plan they will have to adhere to policy CS10 of the Core Strategy which places a strong emphasis on water efficiency through set environmental standards (Code for Sustainable Homes and BREEAM). Policy CS20 of the Core Strategy requires all development to include appropriate sustainable urban drainage systems (SUDS) for the disposal of surface water. The policy aims to manage run-off rates and protect water from pollution and has the potential to enhance water quality, biodiversity through multi-functional land uses.</p> <p>A key objective of the Wye Neighbourhood Plan is to bring a major brownfield development site back into use. In line with the NPPF any planning application</p>

	which would result, would need to resolve land contamination issues before development can take place on site, remedial works to address potential contamination will improve the environment and may prevent water contamination.
Cumulative impacts of other Plans	Opportunities presented within the Wye Neighbourhood Plan together with mitigation measures adopted within the Borough's strategic policies will reduce any potential adverse effect on water abstraction and water quality at the Stodmarsh designations.

Site Name	Folkestone to Etchinghill Escarpment SAC (181.94 ha)
Distance to Wye Village	Approximate: Direct 13.4 miles; Driving 16 miles
Reason for designation	Semi-natural dry grasslands and scrubland facies: on calcareous substrates ( <i>Festuco-Brometalia</i> ) (important orchid sites) for which this is considered to be one of the best areas in the United Kingdom.
Vulnerability	Intensification of livestock grazing by improving the grassland is a threat which is currently managed by entering into management agreements with the owner. Both Natural England and Countryside Stewardship agreements exist on the site.
Impact as a result of the NP	A survey undertaken by White Cliffs Countryside Partnership (2011), preliminary results concluded that visitor numbers to the site were low (30,000 per annum) and focused on small areas of the SAC (Sugarloaf Hill/Castle Hill), with the majority of these visitors being local. Shepways Core Strategy HRA (other than Dungeness Complex), January 2012 indicated that the SAC is not currently (13kgN/ha/yr) subject to nitrogen deposition greater than the critical load (15kgN/ha/yr) and that deposition would need to increase by 143% to exceed the minimum critical load.
Significance of risk	The increase in population resulting from anticipated development within the Wye Neighbourhood Plan is unlikely to affect low visitor numbers to the escarpment, also as most of the visitors are local people and the SAC is some distance away. Air pollution is not currently an issue and any new development within Wye will need to meet stringent energy and efficiency targets so is unlikely to have a significant impact on the site.
Cumulative impacts of other Plans	Screening for the HRA of the adopted Core Strategy (2008) found that there were likely to be significant effects on the integrity of the Wye and Crundale Downs SAC, Stodmarsh SAC and Stodmarsh SPA. Policies within Wye's Neighbourhood Plan are in line with those of the strategic development plan and as such in combination with other plans the NP is unlikely to have any significant effect.

Site Name	Wye and Crundale Downs SAC (112.24 ha)
Distance to Wye Village	Approximately 1km away from the village of Wye. This site is most at risk by development in Wye with Hinxhill Parish.
Reason for designation	Semi-natural dry grasslands and scrubland facies: on calcareous substrates ( <i>Festuco-Brometalia</i> ) for which this is considered to be one of the best areas in the United Kingdom, which is considered to be the priority sub-type: "important



	orchid sites" (51.69%). <i>Asperulo-Fagetum</i> beech forests (1.8% cover).
Vulnerability	Continuous grazing management on this site is essential to maintain the interest. Grazing on some parts of the site has been intermittent in recent years, leading to some increase in scrub and rank grasses. Within the part of the site managed as a National Nature Reserve, a programme of scrub clearance and the reintroduction of grazing are addressing this problem. On other parts, discussion with private land managers is being used to encourage traditional management.
Impact as a result of the NP	There is potential for increased visitor numbers to the site from new development being proposed within the Wye NP as the designated site is only 1km from the main village. Increased visitors to the site may interrupt progress towards achieving conservation objectives by disturbing the programme of scrub clearance and having potential conflict with the reintroduction of grazing animals to the site. Increased visitor numbers may cause the paths to deteriorate in condition and increase trampling pressure on the grassland which may disrupt the orchid's habitat.
Significance of risk	<p>Ensuring residents have a choice of recreational facilities within a close distance to their home will help reduce pressure from visitor numbers to the Wye and Crundale Downs. Policy CS18 of the Core Strategy requires developments to make a provision for open space where a need is generated by new development. This is supported by the Public Green Spaces and Water Environment SPD (2012) that promotes greater accessibility to public places, parks and green space.</p> <p>A key objective of the Wye NP is for development to be concentric around the historic centre with residents able to walk to the centre of the village within 5 minutes. The NP aims to allocate a limited number of sites in the most sustainable locations with options being tested through the SA process to assess potential social, economic and environmental effects; this will include the atmospheric integrity and air quality effects of development sites.</p> <p>The Wye NP proposes to limit unsustainable traffic flows by requiring traffic modelling for all development to demonstrate no adverse impact. Mitigation measures will help to minimise any increases in air pollution generated through new development. There is also an aspiration for a cycle path to run around the village linking to existing networks to the centre of the village and to encourage non-car modes of travel.</p> <p>Any major sites allocated by the Wye NP will have to adhere to policy CS10 of the Core Strategy which aims to minimise carbon dioxide emissions from new development (both residential and non-residential) through set environmental standards (Code for Sustainable Homes and BREEAM) and the installation of sustainable energy technologies. Policy CS10 responds to the Governments ambition to reduce carbon dioxide emissions by 60% by 2050 against 1990 levels, and requires all new major development to be carbon neutral. Any residual carbon dioxide emissions remaining once energy efficiencies and low carbon/renewable energy measures have been delivered will be met through a financial contribution into a carbon fund to enable emissions to be offset elsewhere in the Borough this will mitigate against any increases in air pollution.</p>
Cumulative impacts of other Plans	Although the Wye and Crundale Downs SAC is in close proximity to the village of Wye, mitigation measures within the Core Strategy together with mitigation proposals within the Wye NP should be sufficient to determine that in

	combination there will be no adverse effect upon the integrity of the SAC <i>with the scale of development proposed.</i>
--	--

Site Name	Dungeness SAC (3223.56 ha)
Distance to Wye Village	Approximate: Direct 18 miles; Driving 24 miles
Reason for designation	<p>Tidal rivers, Estuaries, Mud flats, Sand flats, Lagoons (including saltwork basins) (20%)</p> <p>Salt marshes, Salt pastures, Salt steppes (1%)</p> <p>Coastal sand dunes, Sand beaches, Machair (2%)</p> <p>Shingle, Sea cliffs, Islets (64%)</p> <p>Inland water bodies (Standing water, Running water) (2%)</p> <p>Bogs, Marshes, Water fringed vegetation, Fens (10%)</p> <p>Coniferous woodland (1%)</p> <p>Annual vegetation of drift lines, for which this is one of only four known outstanding localities in the United Kingdom. It is considered to be rare as its total extent in the United Kingdom is estimated to be less than 100 hectares.</p> <p>Perennial vegetation of stony banks, considered to be one of the best areas in the United Kingdom. One of the best areas in UK for <i>Triturus cristatus</i>.</p>
Vulnerability	<p>The shingle vegetation is very vulnerable to disturbance by vehicles and walkers, although the coastal shingle (drift-line) vegetation has much greater potential for recovery than the perennial vegetation of shingle banks that occurs further inland. Extensive areas of the site are now managed as a Nature Reserve at both Dungeness and Rye Harbour, with emphasis on interpretation of the site's value and on appropriate public access. A ranger helps to enforce local bylaws which aim to prevent damage from trampling, motorbike activity and illicit gravel extraction. The wetlands which support great crested newt were formerly grazed, maintaining open unshaded vegetation. This practice largely ceased in the 1950s, and since then there has been invasion of ponds by willows shading the water. Management by hand has now been undertaken to reduce this problem, and restoration of light grazing is being investigated. Abstraction of water is thought to have damaged some of the shingle wetlands as well as components of the perennial vegetation of the shingle beach. This will be addressed through the relevant review provisions of the Habitats Regulations. The site is close to an active airport which carries a potential risk from air pollution, although current levels of air traffic and motor vehicles are not thought to cause a problem.</p>
Impact as a result of the NP	These vulnerabilities highlight visitor pressure and water quality issues from over abstraction to be the main threats to these habitats.
Significance of risk	<p>Information ascertained from the Rother &amp; Shepway Core Strategy HRA, points to analysis of visitor distance travelled to the Dungeness Point with the greatest number of visitors (66%) coming from a travel zone greater than 50 miles / 80km away. This indicates that the majority of visitors travel from further afield than Wye, and as such the level of proposed development within the NP is likely to have only a limited impact. Much of the public accessible areas are managed by the Nature Reserve which includes sustainable access initiatives and promoting green infrastructure away from the European sites. Ashford's Core Strategy (2008) is pro active in promoting green infrastructure by applying green space</p>

	standards to all new residential development of more than 15 dwellings. Whilst there is no clear link between proposed development in Wye and abstraction from the Denge gravel aquifer underlying Dungeness, Ashford's Core Strategy sets a minimum water efficiency target of no more than 105 litres per person per day through the use of the Code for Sustainable Homes levels 3 and 4. The Core Strategy also requires all development to incorporate appropriate sustainable drainage for the disposal of surface water which must avoid any adverse impact on water quality.
Cumulative impacts of other Plans	Screening for the HRA of the adopted Core Strategy (2008) found that there were likely to be significant effects on the integrity of the Wye and Crundale Downs SAC, Stodmarsh SAC and Stodmarsh SPA. Policies within Wye's Neighbourhood Plan are in line with those of the strategic development plan and as such in combination with other plans the NP is unlikely to have any significant effect.

Site Name	Dungeness to Pett Level SPA (1474.04 ha)
Distance to Wye Village	Approximate: Direct 18 miles; Driving 24 miles
Reason for designation	<p>This is a large area containing a wide variety of coastal habitats, ranging from shingle beaches through to various types of wetlands and open water. Dungeness is a shingle beach of international importance as a large cusped shingle foreland with a complex pattern of ridges reflecting its accretion and development over hundreds of years. The Open Pits contain a natural succession of wetlands from species-rich fen through to sallow carr. The nearby gravel pits have developed features of interest along their margins, as well as an open water interest, and, together with the Open Pits, are used by important numbers of wintering wildfowl. Rye Harbour has a smaller shingle beach which, together with the pits at Dungeness, supports breeding terns and gulls. The grazing marshes at Pett Level and Rye Harbour have close-cropped swards grazed by sheep where arable farming has not been introduced and support wintering wildfowl, including Bewick's Swan <i>Cygnus columbianus bewickii</i>. The numerous ditches that intersect these marshes have developed a rich aquatic flora and invertebrate fauna, and provide important habitat for migrating Aquatic Warbler <i>Acrocephalus paludicola</i>. Rye Harbour and Camber Sands, and Rye Saltings, include saltmarsh, sand-flats and mud-flats that provide valuable feeding areas for wintering waterbirds. As a whole, the SPA is important for breeding and wintering waterbirds, passage warblers and breeding terns, which feed outside the SPA in nearby shallow waters. Bewick's Swans also feed on arable fields outside the SPA.</p>
Vulnerability	<p>This site is vulnerable to coastal erosion, particularly the areas of coastal shingle at Dungeness and Rye Harbour, which are likely to erode in the longer term due to natural processes.</p> <p>Breeding bird populations are at serious risk of predation by species such as fox, badger and mink. There is a localised programme of pest control on part of the site. The site is reasonably well protected from visitor disturbance, although the possible disturbance from aircraft using a nearby airfield is being investigated. Recreational and leisure activities are a problem in some areas, particularly at North Point Pit which is used for wind surfing.</p> <p>Much of the shingle is uncultivated and is either nature reserve or open land. The site is vulnerable to changing agricultural practices, particularly ploughing of grassland for arable crops, or changes to turf production on adjacent land, which</p>

	may influence the site's bird population. These practices could be controlled by management agreements. Most of the grassland within the SPA is heavily grazed and there is a continuing problem of lowering water levels; both problems are being addressed through management agreements and water level management plans.
Impact as a result of the NP	It can be assumed that the main threat to the Dungeness to Pett Level SPA is from recreational pressure from residents of new development.
Significance of risk	As stated above, the site is reasonably protected from visitor disturbance and with a limited level of development being proposed within the Wye Neighbourhood Plan it is unlikely to result in a significant impact on this SPA.
Cumulative impacts of other Plans	Screening for the HRA of the adopted Core Strategy (2008) found that there were likely to be significant effects on the integrity of the Wye and Crundale Downs SAC, Stodmarsh SAC and Stodmarsh SPA. Policies within Wye's Neighbourhood Plan are in line with those of the strategic development plan and as such in combination with other plans the NP is unlikely to have any significant effect.

Site Name	The Swale Wetland Ramsar site (6514.71 ha)
Distance to Wye Village	Approximate: Direct 14.88 miles; Driving 31.2 miles
Reason for designation	The Swale is an estuarine area that separates the Isle of Sheppey from the Kent mainland. To the west it adjoins the Medway Estuary. It is a complex of brackish and freshwater, floodplain grazing marsh with ditches, and intertidal saltmarshes and mud-flats. The intertidal flats are extensive, especially in the east of the site, and support a dense invertebrate fauna. These invertebrates, together with beds of algae and Eelgrass <i>Zostera</i> spp., are important food sources for waterbirds.
Vulnerability	There is evidence of rapid erosion of intertidal habitat within the site due to natural processes and the effects of sea defences and clay extraction. Research on mudflat recharge using dredging spoil is being investigated as a means of countering the erosion. The intertidal area is also vulnerable to disturbance from water borne recreation. This is being addressed as part of an estuary management plan. The terrestrial part of the site depends on appropriate grazing and management of water quality and quantity. The availability of livestock may be affected by policy on BSE and there will be a need to investigate how this may be addressed through management agreements. The effects of abstraction on the availability of water for other land uses and drainage for arable cultivation will be addressed through the consent review process under the Habitats Regulations.
Impact as a result of the NP	None of these risk factors is likely to be increased as a result of proposed development within the Wye NP. The site is some distance from Wye, with recreational activities on the south coast already established and easier to reach by the general public. Ashford Borough Council have received a full planning application for a new country park for recreational and water sports purposes at Conningbrook in Ashford which is located just 4 miles away by road from Wye and there are aspirations for a new cycle route which will connect Wye directly to the Conningbrook Country Park only 2 miles away.
Significance of risk	It is unlikely, given the level of development proposed and the distance to travel to the Swale SPA, that the Wye Neighbourhood Plan would have a significant impact on this site.



Cumulative impacts of other Plans	Screening for the HRA of the adopted Core Strategy (2008) found that there were likely to be significant effects on the integrity of the Wye and Crundale Downs SAC, Stodmarsh SAC and Stodmarsh SPA. Policies within Wye's Neighbourhood Plan are in line with those of the strategic development plan and as such in combination with other plans the NP is unlikely to have any significant effect.
-----------------------------------	--

Site Name	Parkgate Down SAC (6.94 ha)
Distance to Wye Village	Approximate: Direct 7.77 miles; Driving 10.9 miles
Reason for designation	Dry grassland. Steppes (60%) Broad-leaved deciduous woodland (40%)  Parkgate Down is situated on the chalk of the North Downs and consists largely of NVC type CG4 Brachypodium pinnatum grassland. The site contains an outstanding assemblage of orchids including the nationally rare monkey orchid ( <i>Orchis simian</i> ) and late spider orchid ( <i>Ophrys fuciflora</i> ) together with the nationally scarce musk orchid ( <i>Herminium monorchis</i> ) and lady orchid ( <i>Orchis purpurea</i> ).
Vulnerability	Continuous grazing management on this site is essential to maintain the interest. As the site is managed as a nature reserve it is not under any current threat, but is dependent on secure funding for the voluntary organisation managing it. This is currently achieved through Natural England's Reserve Enhancement Scheme.
Impact as a result of the NP	This is a relatively small isolated site, located between the small settlements of Stelling Minnis and Elham, Canterbury and there is limited amount of parking. Although no visitor data is available, it is likely to include some limited recreational use as well as visits by specialist nature visitors.
Significance of risk	The remoteness of this area is likely to act as a deterrent to many visitors, and as such proposals within the Wye NP are unlikely to have an impact on the integrity of the Parkgate Down SAC.
Cumulative impacts of other Plans	Screening for the HRA of the adopted Core Strategy (2008) found that there were likely to be significant effects on the integrity of the Wye and Crundale Downs SAC, Stodmarsh SAC and Stodmarsh SPA. Policies within Wye's Neighbourhood Plan are in line with those of the strategic development plan and as such in combination with other plans the NP is unlikely to have any significant effect.

## 9. The WNP and TRSDPD

Although the requirement to carry out both an SA and SEA is mandatory, it is possible to satisfy the requirements of both pieces of legislation through a single appraisal process. The Government has produced guidance for both undertaking SEAs generally and for SAs on Development Plan Documents, and in particular sets out how SAs and SEAs can be integrated into one process. The appraisal process for the TRSDPD (Supplementary SEA document B) incorporated the requirements

for both the Planning and Compulsory Purchase Act and the SEA Regulations. The TRSDPD SA covers all of the development sites in the WNP. In the SA the sites are numbered as follows (see also Figure 3).

Neighbourhood Plan	TRSDPD SA
WYE1	WYE08
WYE2	WYE06b
WYE3 including ADAS *	WYE08 East of Olantigh Rd WYE14 Main campus WYE15 Withersdane

\* The ADAS site was not included in the TRSDPD

Note that both WYE1 and WYE2 have now received planning approval. The WNP continues to cover these sites as they are not built and there remain design issues, but their impact on the environment over the period of the WNP, up to 2030, has been addressed. Planning permission has also been approved for a small development of nine houses on Naccolt brickworks – this is recorded as Other Sites 106 in the ABC SA document. The assessment made by ABC for these sites is to be found in full in Supplementary SEA document B.

The appraisal summaries used by ABC provide clear guidance on the merits of each site and have therefore been used as the framework for the WNPs assessment. The TRSDPD SA/SEA tabulated data are reproduced below with additional comments on the impact of specific proposals in the WNP noted in blue text in the Tables and in WNP additional comments.

#### WYE1 Land off of Churchfield Way site

Site: WYE03 WYE1	Timescale			Comments
	Short	Medium	long	
1. Geology & Biodiversity	0	0	0	The site is adjacent to the AS 27 Great Stour LWS identified for its aquatic and emergent flora species, invertebrates and in places the river is used by otters. The site does not appear to have any significant geological qualities.
2. Flood Risk	0	0	0	The site is adjacent to Flood Zone 3. An FRA would be required and may result in a change of the developable boundary.
3. Air	-	-	-	Housing would generate more car trips with an impact on air quality.

4. Landscape	0	0	0	The site is a relatively self-contained area of open land that directly adjoins the built up part of the village. The site links into open countryside to the north and adjoins an existing commercial use to the west. The site is within the AONB.
5. Climate Change	+	+	+	Development here would be required to meet policy CS10 of the Core Strategy
6. Water	+	+	+	Development here would be required to meet policy CS10 of the Core Strategy
7. Places	+	+	+	Given its location and size development open space provision associated with the site could serve the rest of the community due to the sites location.
8. Housing	+	+	+	The site is large enough to deliver affordable housing, in line with the parameters set out within Policy CS12 of the core strategy. A mix of housing types would also be delivered here, in accordance with Policy CS13.
9. Quality of life	0	0	0	No predictable effects
10. Heritage	-	-	-	Site lies adjacent to the Tenterden Conservation area.

11. Access to services	+	+	+	The site is on the edge of the village of Wye which is a tier 2 village with a good range of local services. However, the site is some distance from the main concentration of services in the village.
------------------------	---	---	---	---

12. Land use	-	-	-	A greenfield site
13. Resources	+	+	+	Development here would be required to meet policy CS10 of the Core Strategy
14. Waste	+	+	+	Development here would be required to meet policy CS10 of the Core Strategy
15. Balance	N/A			
16. Employment				
17. Vitality				
18. Variety				
19. Travel	-	-	-	Likely to increase traffic onto the local road network
20. Transport	0	0	0	Relatively close to the village centre so there may be the potential to set up some sustainable transport links.

<b>Conclusion:</b>	A self contained site that is located between existing commercial uses and residential use in a relatively sustainable location. There is limited impact on the landscape and the site is suitable for development.
--------------------	---

**WNP impact** A planning application for 27 dwellings on this site has been approved. The WNP policy for WYE1 detailing the approach adopted to the improvement of the boundary with the countryside in the AONB and design of the site is still included as a background document (BD13) to the WNP. The approach adopted in the WNP minimises impact on the environment.

#### WYE2 Luckley Field Site

Site: WYE06b WYE2	Timescale			Comments
	Short	Medium	long	

1. Geology and biodiversity	0	0	0	The site does not appear to have any significant geology or biodiversity qualities. The site adjoins existing development directly on the edge of the village and open countryside. Any impact from development would need to conform to Policy CS11 of the Core Strategy
2. Flood Risk	0	0	0	Site is not located within the flood plain
3. Air	-	-	-	Housing would generate more car trips with an impact on air quality however the site is not large and any likely impact will be limited.
4. Landscape	-	-	-	The site is small but it forms part of a wider area of open land that adjoins the settlement on its eastern edge. The site is within the AONB.
5. Climate Change	+	+	+	Development here would be required to meet policy CS10 of the Core Strategy
6. Water	+	+	+	Development here would be required to meet policy CS10 of the Core Strategy
7. Places	-	-	-	Given its location and size development on this site is unlikely to promote or maintain the settlements existing public open spaces. Any new open space provision associated with the site would be small and is unlikely to serve the rest of the community due to the sites location.



8. Housing	+	+	+	The site is large enough to deliver affordable housing, in line with the parameters set out within Policy CS12 of the core strategy. A mix of housing types would also be delivered here, in accordance with Policy CS13.
9. Quality of life	0	0	0	No predictable effects
10. Heritage	0	0	0	Not a site, or near a site, identified as having conservation or historic importance.

11. Access to services	+	+	+	The site is on the edge of the village of Wye which is a tier 2 village with a good range of local services. However, the site is some distance from the main concentration of services in the village.
12. Land use	-	-	-	A greenfield site outside the village confines and adjacent to open countryside
13. Resources	+	+	+	Development here would be required to meet policy CS10 of the Core Strategy
14. Waste	+	+	+	Development here would be required to meet policy CS10 of the Core Strategy
15. Balance	N/A			
16. Employment				
17. Vitality				
18. Variety				
19. Travel	-	-	-	Development of the site will increase traffic onto the local road network as access is only possible through the adjacent development with most traffic having to access this site via routes through the village.
20. Transport	-	-	-	Not related to public transport - reliance on the use of the private car but site is relatively close to the village centre.
<b>Conclusion:</b>	This site adjoins open countryside to the south and adjoins a larger site that falls within the flood plain that is not considered suitable for development. This site is suitable for limited development that would limit the impact on the surrounding countryside and would enable a distinct edge to the village to be created.			

**WNP impact** Planning approval was granted for 25 dwellings on this site in November 2014. The WNP policy for WYE2 detailing the approach adopted to the improvement of the boundary and design of the site is included in WNP Background document BD13. The limited development approved fulfils the requirements laid down by ABC: generating a distinct edge to the village and

improving the view of the village boundary from the Stour Valley way footpath. The planning report for the site concluded that an environmental assessment was not required.

### WYE3 Former Wye College site

The TRSDPD SA/SEA assessed three component sites on WYE3 namely: 08, land east of Olantigh Rd; 14, the historic buildings and 15, Withersdane. Following responses received from ABC on the pre-submission consultation draft of WNP, the policy towards WYE3 was made more flexible indicating a clear quantum of mixed development (business, education and housing) but allowing some flexibility in the precise location of each component. It has been determined that the activities proposed on WYE3 will, taken together, generate more traffic movements than predicted for the former College (through comparative analysis of the Plumpton college site, see WNP Background document BD4). However modelling expected traffic flow has indicated that effects of the development proposed will not be severe (see below and BD4). Details of possible development on each site are presented here and alternatives suggested that do not affect the quantum of development proposed and thereby overall environmental impact.

#### *East of Olantigh Rd*

Site: WYE 08 East of Olantigh Rd	Timescale			Comments
	Short	Medium	long	
1. Geology and Biodiversity	0	0	0	The site does not appear to have any significant geology or biodiversity qualities.
2. Flood Risk	0	0	0	Site is not located within the flood plain
3. Air	-	-	-	Housing would generate more car trips
4. Landscape	-	-	-	A large site of the Wye College campus. Parts of the site adjoin the existing built up part of the village but parts of the site adjoin the open countryside to the north and north east of the village. There are extensive views of the site from the higher ground on the downs to the east. Development would have to carefully dealt with to ensure limited impact on the landscape. The site is within the AONB.
5. Climate Change	+	+	+	Development here would be required to meet policy CS10 of the Core Strategy
6. Water	+	+	+	Development here would be required to meet policy CS10 of the Core Strategy
7. Places	+	+	+	Given its location and size development of any open space provision associated with the site could serve the rest of the community due to the sites central location.

8. Housing	+	+	+	The site is large enough to deliver affordable housing, in line with the parameters set out within Policy CS12 of the core strategy. A mix of housing types would also be delivered here, in accordance with Policy CS13.
9. Quality of life	0	0	0	No predictable effects
10. Heritage	-	-	-	Site lies adjacent to the Wye Conservation area.
11. Access to services	+	+	+	The site is on the edge of the village of Wye which is a tier 2 village with a good range of local services. However, the site is some distance from the main concentration of services in the village.

12. Land use				A mix of existing buildings and open that adjoins the existing settlement but also adjoins open countryside
13. Resources	+	+	+	Development here would be required to meet policy CS10 of the Core Strategy
14. Waste	+	+	+	Development here would be required to meet policy CS10 of the Core Strategy
15. Balance	N/A			The WNP identifies this site as well suited for creation of a business hub in the Kempe centre and also for renovation of business units along Occupation Rd.
16. Employment				
17. Vitality				
18. Variety				
19. Travel	-	-	-	Likely to increase traffic onto the local road network although a certain amount of traffic generation is assumed from the existing use
20. Transport	0	0	0	Relatively close to the village centre so there may be the potential to set up some sustainable transport links.
<b>Conclusion:</b>	Re-use or redevelopment potential of this site can only be assessed as part of a full evaluation of the future of the college campus.			

**WNP impact** WNP policy for WYE3 (WNP11) promotes flexibility in the location of development on the WYE3 site. One possibility for development here is outlined in Figure 3.



Figure 3 Outline proposal for the East of Olantigh Rd with comments from workshops. Note that the village envelope has been deliberately drawn around the site, much of which is just outside the 5min walk to the village centre

An alternative proposal would be to develop the Secondary School by extension of the Kempe Centre retaining the creation of playing fields to the east on the Hop Garden field. In this case there would be no housing on this site within WYE3. The overall impact of the two options for mixed development here are considered very similar. Possibly the expansion of the school north of the Kempe Centre may have less environmental impact than the housing on this site east of Olantigh Rd.

The allocation of development to this site will have impacts on the surrounding countryside and local traffic. However, the developments proposed are limited in scale and should not have a significant impact on important habitats including the Wye and Crundale Downs. Sensitive treatment of the site is specified in WNP policy WNP11, including the requirement for landscaping to protect and enhance views from the Downs.

**Historic buildings and labs** The site identified in the TRSDPD SA/SAE includes both Grade I and Grade II buildings former laboratories and students union to the north ( see WNP Fig. 6.1).

Site: WYE14 Historic buildings	Timescale			Comments
	Short	Medium	long	
1. Geology and Biodiversity	0	0	0	The site does not appear to have any significant geology or biodiversity qualities.
2. Flood Risk	0	0	0	Site is not located within the flood plain
3. Air	-	-	-	Housing would generate more car trips with an impact on air quality.
4. Landscape	0	0	0	A brownfield site comprising existing buildings that formed part of Wye College. Development would involve loss of the buildings although there could be conversion. The site adjoins open land to the rear but is part of the built up part of the village. The site is within the AONB. <a href="#">No loss of historic buildings is proposed in the WNP</a>
5. Climate Change	+	+	+	Development here would be required to meet policy CS10 of the Core Strategy
6. Water	+	+	+	Development here would be required to meet policy CS10 of the Core Strategy
7. Places	+	+	+	Given its location and size development of any open space provision associated with the site could serve the rest of the community due to the site's central location.
8. Housing	+	+	+	The site is large enough to deliver affordable housing, in line with the parameters set out within Policy CS12 of the core strategy. A mix of housing types would also be delivered here, in accordance with Policy CS13. <a href="#">The WNP proposes limited housing on the site</a>
9. Quality of life	0	0	0	No predictable effects
10. Heritage	-	-	-	Site lies adjacent to the Tenterden Conservation
11. Access to services	+	+	+	The site is on the edge of the village of Wye which is a tier 2 village with a good range of local services. However, the site is some distance from the main concentration of services in the village.
12. Land use	+	+	+	A brownfield site within the settlement
13. Resources	+	+	+	Development here would be required to meet policy CS10 of the Core Strategy
14. Waste	+	+	+	Development here would be required to meet policy CS10 of the Core Strategy

15. Balance	N/A			The WNP proposes use of the Grade II Edwardian buildings and some former laboratories for the permanent location of the Free School. The Grade I buildings are considered very suitable for development as a community/visitors centre. Some housing is proposed. Taken together the WNP proposals regenerate the site.
16. Employment				
17. Vitality				
18. Variety				
19. Travel	-	-	-	Likely to increase traffic onto the local road network although a certain amount of traffic generation is assumed from the existing use
20. Transport	0	0	0	Relatively close to the village centre so there may be the potential to set up some sustainable transport links.
<b>Conclusion:</b>	A sustainable location in the village, the existing college buildings may have re-use or redevelopment potential but this can only be assessed as part of a full evaluation of the future of the college campus.			

**WNP impact** The WNP proposes a regeneration of the site based on community use of the Grade I buildings and the permanent establishment of a 600 student secondary school (Policy WNP11). This education development is the nearest in equivalent activity to that of the former Wye College. A potential site plan for the school is shown in Figure 4. Unused Grade II buildings are considered suitable for some residential change of use and business units. Although there will be environmental impacts due to the development proposed, overall the effects will not be great and they fall within the equivalent activity expected from the former college.



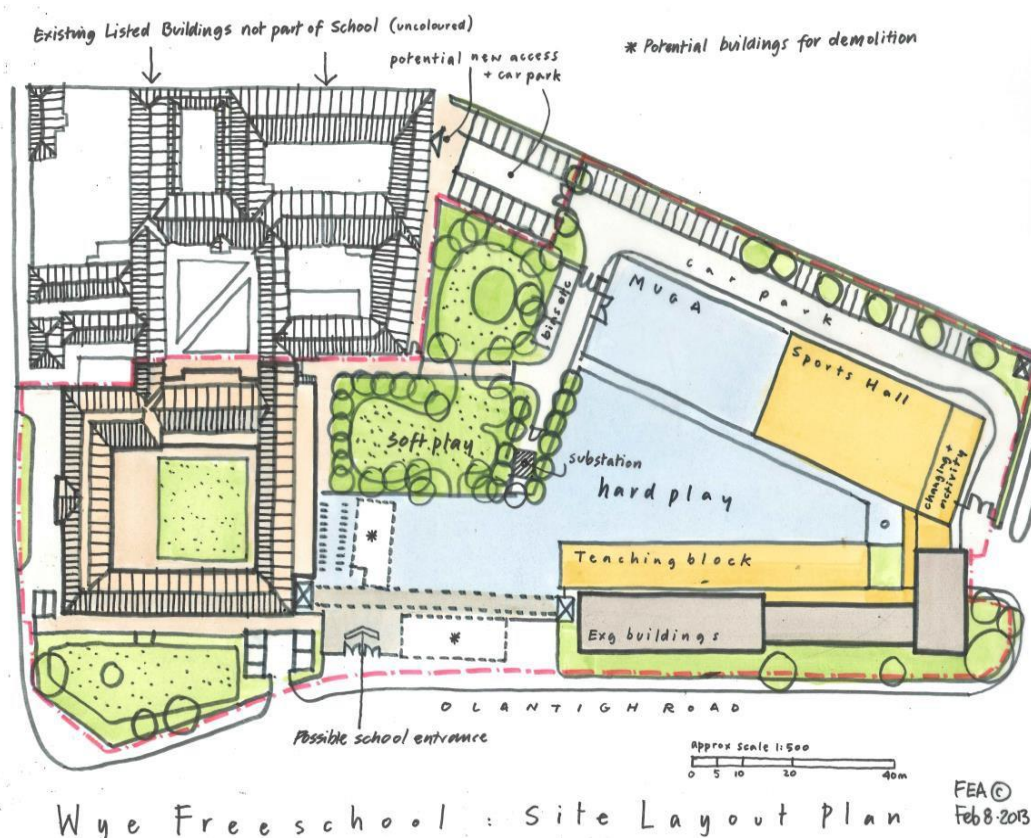


Figure 4 Outline plan for Wye School. Note that the buildings in black and white, designated for community use and managed by the Wye Trust, are covered by Policy WNP11. An alternative site for the school would be to use the Kempe centre with new build to the north and east (see Fig 3).

The flexibility afforded by Policy WNP11 extends to this site. Should the school not be located in the Edwardian buildings, but east of Olantigh Rd (see above) then the main campus site is considered suitable for mixed development including business and residential (change of use) and some housing on the old lab site to the north of the historic buildings. In effect, it would be possible to exchange the business development and housing shown in Figure 3 from east of Olantigh Rd to the WYE14 site, moving the school to the Kempe Centre plus new build.

**Withersdane** During preparation of the WNP proposals were put forward to open the Withersdane site (formerly residences for the college) as a rehabilitation centre focusing on stress related conditions.

Site: WYE15 Withersdane	Timescale			Comments
	Short	Medium	long	
1. Geology & Biodiversity	0	0	0	The site does not appear to have any significant geology or biodiversity qualities. It is a large site of former college residential accommodation that adjoins open countryside outside the confines of the village in an isolated position. Any impact from development would need to conform to Policy CS11 of the Core Strategy
2. Flood Risk	0	0	0	Site is not located within the flood plain

3. Air	-	-	-	Housing redevelopment would generate more car trips with an impact on air quality however there is an existing use on the site so the additional impact may be limited.
4. Landscape	-	-	-	The site lies within a wider area of open land that forms part of the surrounding landscape of Wye. The site is relatively self contained and includes substantial buildings which due to the extensive and dense planting do not encroach or have an impact on the countryside. The site is within the AONB.
5. Climate Change	+	+	+	Development here would be required to meet policy CS10 of the Core Strategy
6. Water	+	+	+	Development here would be required to meet policy CS10 of the Core Strategy
7. Places	-	-	-	Given its location some way from the village centre, and size, development on this site is unlikely to promote or maintain the settlements existing public open spaces. Any new open space provision associated with the site would be some way from the existing settlement and is unlikely to serve the rest of the community due to the sites location.
8. Housing	+	+	+	The site is large enough to deliver affordable housing, in line with the parameters set out within Policy CS12 of the core strategy. A mix of housing types would also be delivered here, in accordance with Policy CS13.
9. Quality of life	0	0	0	No predictable effects

10. Heritage	0	0	0	Not a site, or near a site, identified as having conservation or historic importance.
11. Access to services	+	+	+	The site is on the edge of the village of Wye which is a tier 2 village with a good range of local services. However, the site is some distance from the main concentration of services in the village.
12. Land use	-	-	-	A brownfield site with an existing residential accommodation use with substantial buildings that is some distance outside the village confines and adjacent to surrounding open countryside
13. Resources	+	+	+	Development here would be required to meet policy CS10 of the Core Strategy
14. Waste	+	+	+	Development here would be required to meet policy CS10 of the Core Strategy
15. Balance	N/A			WNP promotes reuse of the site as a care home or equivalent residential centre.
16. Employment				
17. Vitality				
18. Variety				

19. Travel	-	-	-	Likely to increase traffic onto the local road network with most traffic having to access this site via routes through the village. Access could be via existing routes into the site.
20. Transport	-	-	-	Site is some distance from the village centre and is not served by public transport so likely to be increased reliance on the use of the private car.
<b>Conclusion:</b>	The site is detached from the village and currently has existing buildings on site. Not considered to be a suitable site for substantial redevelopment but as a brownfield site further consideration is needed as to the future of the site in association with the potential for future uses of the college campus.			

**WNP impact** The plan supports this development with policy WNP11 that requires future traffic generation to be compatible with the constraints of Scotton Street. The low intensity development proposed is considered to cause less environmental impact than the previous operation of student halls of residence.

#### 10. Critical analysis of impacts of development proposed

The tabulated summaries above highlight the potential damage that might be caused to sensitive environmental sites, particularly the SAC Wye and Crundale Down, by overdevelopment. If the population and business activities in Wye expand to too great an extent there will inevitably be increased pressure on the AONB. Quantification of impacts is difficult to achieve for pedestrian encroachment on sensitive sites but impacts on traffic movements are readily assessed through the available modelling programmes. Working with the consultants MLM the parish council has carried out a detailed analysis of traffic, a summary is presented here based on development as follows

WYE1 Land off ChurchfieldWay .....27 houses

WYE2 Luckley Field .....25 houses

WYE3 Campus

- 50 new dwellings
- The Free School at maximum capacity 600 pupils/ 90 staff
- 5000 sq m Business space in the Kempe centre and other sites *including Withersdane*
- 2.500 sq m of mixed Business and Community use of the Grade I buildings

Change of use and windfall.....50 dwellings

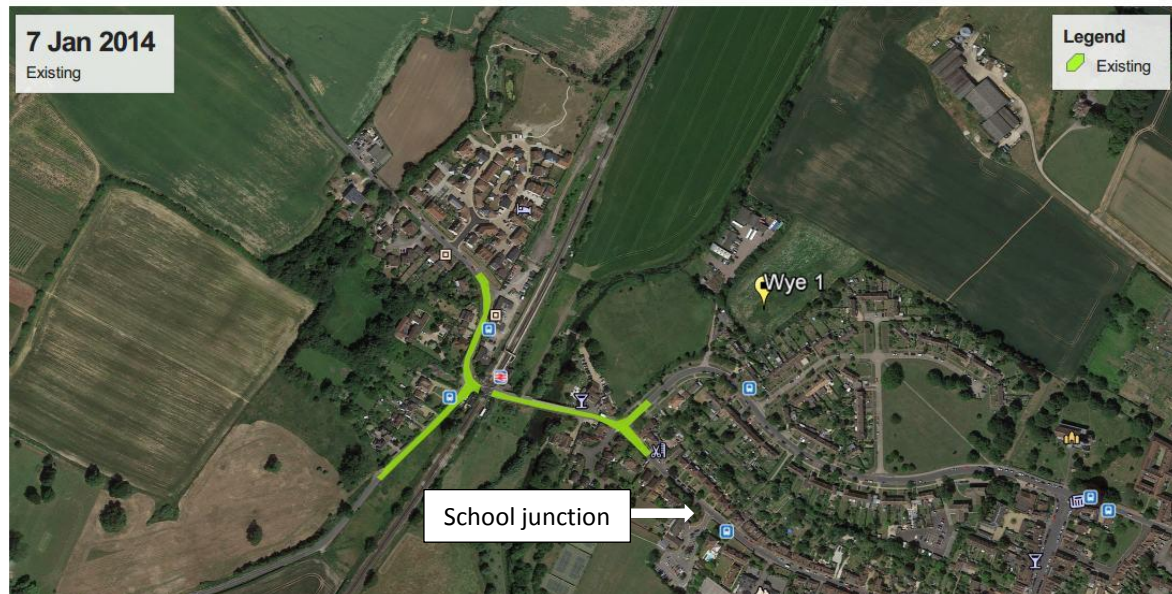
There is an element of uncertainty over WYE3. The location of the school and business activity indicated for the Kempe Centre may exchange but the overall quantum of development and hence environmental impact remains the same. The development proposed is considered to be closely equivalent in scale of impact to that expected from the former Wye College i.e. extant planning permission.



**10.1 Traffic** A detailed appraisal of the impact of development proposed on traffic flow in and around Wye is presented in WNP Background document BD4. The data available for traffic movements have allowed models to be developed showing how development impacts on key junctions in Wye, notable the level crossing. The buildup of queues when the crossing gate are closed already has severe impacts when queues fail to clear when the gates are open. The assessment of current traffic conditions developed by the modelling programme accords with observations that closure of the crossing already leads to tail backs along Churchfield Way, Bramble Lane, Harville Rd and Bridge St as shown for January 7<sup>th</sup> and 9<sup>th</sup> am in Figure 5a and b

*Fig. 5a and b Diagrams showing the extent of queuing on January 7<sup>th</sup> and 9<sup>th</sup> am with existing traffic.*

**a**



**b**



Although other junctions do not appear to approach capacity, several are sufficiently constrained (eg Little Chequers/Bridge St and Scotton St/High St) to raise safety concerns at peak times.

Modelling analysed the impact of housing on WYE3, 50 (as proposed), 75, 100 and 200 houses. Results are also presented in Table 3 and as queue diagrams in Figure 6. The data identify the “Fallback” position as traffic generation equivalent to a fully active Wye College campus. “Proposed” gives the business and community activity before the addition of different levels of housing on WYE3.

*Table 3 Summary of increases in traffic queues with different levels of housing development on WYE3*  
*a. With crossing closures observed on January 7<sup>th</sup> 2014*

Crossing Times - 7 Jan 14					
		Queue			
		Closure 1	Closure 2	Closure 3	Closure 4
Existing	In	36	26	18	44
	Out	28	20	14	35
Exg + Fallback	In	52	38	27	64
	Out	32	23	16	39
Exg + Proposed (Wye 3, 50)	In	53	40	28	68
	Out	41	30	21	50
Exg + Proposed (Wye 3, 75)	In	54	40	28	68
	Out	41	30	21	51
Exg + Proposed (Wye 3, 100)	In	55	41	28	68
	Out	43	33	23	53
Exg + Proposed (Wye 3, 200)	In	59	42	29	72
	Out	48	35	25	59

Increase to Existing			
Closure 1	Closure 2	Closure 3	Closure 4
47%	54%	56%	55%
46%	50%	50%	43%
50%	54%	56%	55%
46%	50%	50%	46%
53%	58%	56%	55%
54%	65%	64%	51%
64%	62%	61%	64%
71%	75%	79%	69%

Increase to Planning Fallback			
Closure 1	Closure 2	Closure 3	Closure 4
2%	5%	4%	6%
28%	30%	31%	28%
4%	5%	4%	6%
28%	30%	31%	31%
6%	8%	4%	6%
34%	43%	44%	36%
13%	11%	7%	13%
50%	52%	56%	51%

\*Note uses rounded numbers

\*Note uses rounded numbers

\*Note uses rounded numbers

Max Q Length(m)		
Existing	In	264
	Out	210
Exg + Fallback	In	384
	Out	234
Exg + Proposed (Wye 3, 50)	In	408
	Out	300
Exg + Proposed (Wye 3, 75)	In	408
	Out	306
Exg + Proposed (Wye 3, 100)	In	408
	Out	318
Exg + Proposed (Wye 3, 200)	In	432
	Out	354

*b. With crossing closures observed on January 9<sup>th</sup> 2014*

Crossing Times - 9 Jan 14					
		Queue			
		Closure 1	Closure 2	Closure 3	Closure 4
Existing	In	33	24	51	70
	Out	26	19	41	52
Exg + Fallback	In	47	35	70	114
	Out	29	22	45	53
Exg + Proposed (Wye 3, 50)	In	50	38	73	122
	Out	38	28	57	87
Exg + Proposed (Wye 3, 75)	In	52	38	74	123
	Out	39	29	58	90
Exg + Proposed (Wye 3, 100)	In	52	38	74	123
	Out	41	30	60	94
Exg + Proposed (Wye 3, 200)	In	54	40	78	132
	Out	45	33	60	107

Increase to Existing			
Closure 1	Closure 2	Closure 3	Closure 4
52%	58%	43%	74%
46%	47%	39%	67%
58%	58%	45%	76%
50%	53%	41%	73%
58%	58%	45%	76%
58%	58%	46%	81%
64%	67%	53%	89%
73%	74%	46%	106%

Increase to Planning Fallback			
Closure 1	Closure 2	Closure 3	Closure 4
6%	9%	4%	7%
31%	27%	27%	64%
11%	9%	6%	8%
34%	32%	29%	70%
11%	9%	6%	8%
41%	36%	33%	77%
15%	14%	11%	16%
55%	50%	33%	102%

\*Note uses rounded numbers

\*Note uses rounded numbers

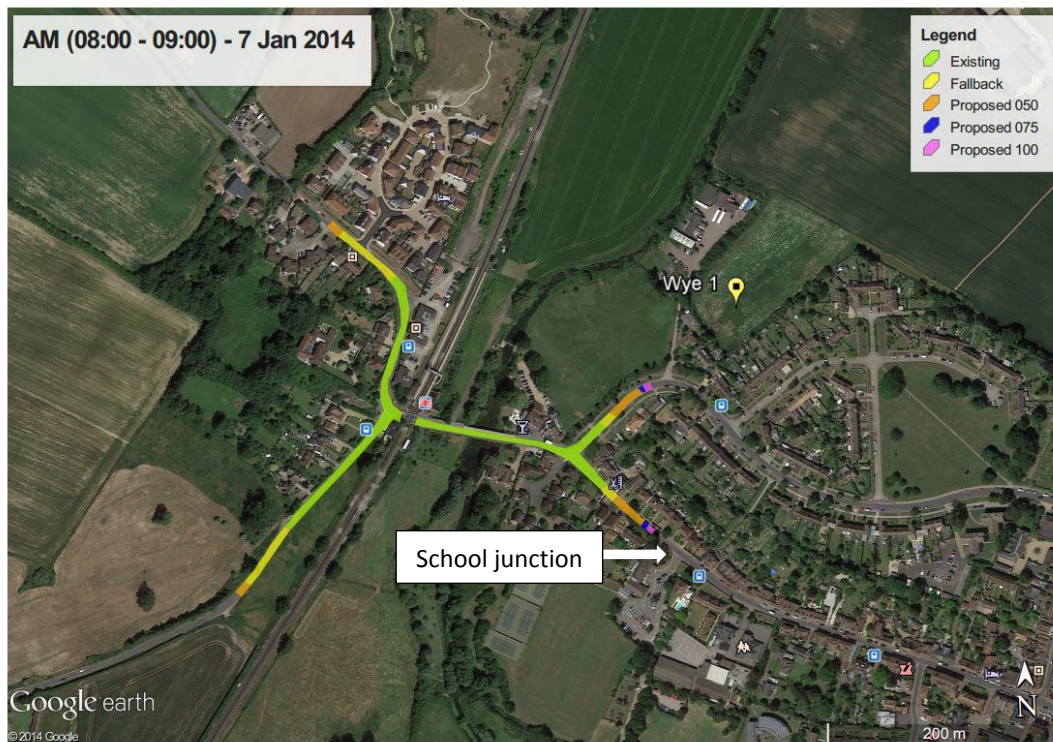
\*Note uses rounded numbers

		Max Q Length(m)
Existing	In	420
	Out	312
Exg + Fallback	In	684
	Out	318
Exg + Proposed (Wye 3, 50)	In	732
	Out	522
Exg + Proposed (Wye 3, 75)	In	738
	Out	540
Exg + Proposed (Wye 3, 100)	In	738
	Out	564
Exg + Proposed (Wye 3, 200)	In	792
	Out	642

It is apparent that the development proposed on WYE1, 2 and 3 will together increase traffic levels considerably, particularly at peak times. The inconvenience of traffic queues is, however, offset by the benefits for the community that would accrue by the level of development identified on WYE1, 2 and 3. It is acknowledged that further increases in traffic would probably have severe effects on the operation of the Parish. We also have to consider that long queues (particularly stretching up Bridge St passed the school entrance) would cause enhanced air pollution and unacceptable delays for emergency services entering (ambulance) and also leaving Wye (from the fire station in Little Chequers). We conclude that future development, beyond the scale of that supported by WNP, will have to be constrained to a level that does not cause severe and unacceptable impacts on village life and the surrounding countryside. Policy WNP3 requires developers to use the modelling approach to analyse traffic impacts.

*Fig.6 Traffic queues predicted with varying levels of house building on WYE3. Existing traffic, fallback (permitted) and proposed development are shown for level crossing closures on January 7<sup>th</sup> 2014*





## 11. Groundwater and drainage

**Groundwater protection** The boundary of the proposed area where development may take place overlies a Principal Aquifer. The WNP allows for the development of brownfield sites. There is likely to be historic contamination at some of these proposed locations. Ashford Borough Council's (ABC) Core Strategy (CS) Policy CS21 requires the protection of groundwater. In fulfilment of this policy, the Parish Council expects any development applications where there are potentially polluting historic uses to be supported by a preliminary risk assessment and where appropriate, remediation of the site to be carried out prior to any development taking place.

**Water conservation** Water is one of our most precious natural resources, and the South East of England is "Water Stressed", so we are keen to ensure water is used wisely. As such, water conservation techniques should be incorporated into the design of all new development. All new homes should be designed to achieve a minimum water efficiency of 105 litres per person per day, in accordance with the ABC CS 10. This policy also details the requirements for Non-residential developments.

**Surface water drainage** All new developments (ABC CS 20) will be required to ensure that sustainable drainage schemes (SuDS) are implemented on site to reduce the risk of increasing surface water flooding off site. ABC have a SuDS Supplementary planning Document. Such schemes should be carried out in accordance with this SPD.

## 12. Mitigation and monitoring of impacts

Policies in the WNP on community wellbeing, housing, the environment and site policy for WYE3 all seek to minimise the effect of development on the environment. The impact of new housing is mitigated by the proposal for phased development (Policy WNP9) as indicated in Table 4.

Table 4 Phasing the completion of dwellings

Site	2015-2020	2020-2025	2025-2030	Total
WYE1	27	-	-	27
WYE2	25	-	-	25
WYE3	-	50		50
<i>Change of use</i>	15	10	10	35
<i>Windfall</i>	5	5	5	15
<b>Total</b>	<b>72</b>	<b>80</b>		<b>152</b>

As indicated, WYE3 represents the only site for significant mixed development. Alternatives were considered but these would lie outside the Wye village envelope and be far more damaging to the environment and to the identity of Wye as a village hub within the AONB.

The impact of development will be assessed *every 5 years* to ensure that the village infrastructure is able to absorb the new housing in addition to increased business activity. Monitoring will include assessment of school places and establishment of new businesses, traffic appraisal, analysis of impacts of changes in the rail timetable and automation of the level crossing, and a parish questionnaire to identify concerns.

Importantly, an environmental survey will be commissioned by the Parish Council to establish the current state of the environment within the parish to act as a baseline for 5 yearly reviews directed to assess impacts on important local sites such as the Wye and Crundale Downs.

Although it is anticipated that automation (no firm date proposed) may improve traffic clearance, mitigation of queues at the level crossing would require building a new bridge over the railway line and river and possibly also upgrading the roads into Wye from Willesborough and Godmersham. Such developments were considered likely to be highly damaging to the environment. It is concluded that the sustainable mitigation of effects on sensitive habitats is *achievable only by restricting growth to the levels defined in the WNP*.

### Concluding remarks

In summary, the WNP contributes to the achievement of sustainable development in the framework of national and local planning policies by:

- protecting the AONB and local habitats by focusing development within the village envelope and the use, recovery and restoration of previously developed sites;
- protecting community assets that enhance the quality of life in Wye village;
- locating new development within easy walking distance of existing village facilities, close to bus stops, to minimise traffic congestion and thus the related emission and pedestrian safety concerns;
- protecting and enhancing the historic environment of Wye by encouraging high quality development that responds to the distinctive, Kent Downs character and protecting open spaces within the built up area and
- encouraging flexible working in the parish by improving the electronic infrastructure, promoting sites for commercial development and educational use, by allocating new housing, helping local businesses and organisations.