



Regulation 22 Consultation Statement

Part 2: Appendix G:

Consultation on The Sustainability Appraisal: Non-Technical Summary (NTS) and Sustainability Appraisal Addendum and ERRATA Sheet II

July 2023



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1. Introduction

1.1 During late 2022, the Council consulted on the Dover District Local Plan to 2040 (Regulation 19) As part of this consultation, the supporting evidence base, including the Sustainability Appraisal (SA) was available for consultation. The Local Plan was subsequently submitted to the Secretary of State in April 2023, and the Examination of the Local Plan by the Planning Inspectorate has commenced. Upon submission of the Plan, it was noted that there had been an omission from the Sustainability Appraisal consultation documents, and that the Non-Technical Summary (NTS) had not been made available during the 2022 consultation period. Some factual errors were also noted in the main SA documentation that had been available.

1.2 Following agreement from the appointed Inspectors, the Council consulted on the Non-Technical Summary and an Addendum and Errata to the SA. The consultation ran for a 6-week period on the following documents from 10:00 am on 25/05/2023 to 5:00pm on 06/07/2023:

- **The Sustainability Appraisal: Non-Technical Summary (NTS) of the Publication Dover District Local Plan (September 2022).**

This document summarises the full Sustainability Appraisal Report of the Dover District Local Plan Regulation 19 Submission (October 2022).

- **Sustainability Appraisal Addendum and ERRATA Sheet II (May 2023).**

1.3 The Sustainability Appraisal Addendum provides an update to the Sustainability Appraisal to reflect changes to the Habitats Regulations Assessment which have been made to address representations received from Natural England.

1.4 The ERRATA Sheet II clarifies administrative reporting errors relating to 3 sites assessed in the SA: Dover Waterfront (DOV017), Land to the east of Jubilee Road (WOR006) and Farmland lying to the north of Aylesham and to the east of Adisham Road (AYL004).

1.5 This document sets out how the Council has undertaken communication, participation and stakeholder involvement on this specific consultation and the Council's response to those comments. This document forms an appendix to the report for the 2022 consultation period set out in [SD05c Regulation 22 Statement Part 2 Regulation 19 \(March 2023\)](#).

1.6 There were 13 comments received from 13 individuals and organisations on the Sustainability Appraisal: Non-Technical Summary (NTS) of the Publication Dover District Local Plan (September 2022). There were 4 comments received from 4 individuals and organisations on the Sustainability Appraisal Addendum and ERRATA Sheet II (May 2023).

2. Who was invited to participate in this consultation.

Formal Notification and Correspondence with Specific/ Statutory and General Consultees:

- 2.1 Statutory / Specific Consultees and General Consultees were notified by email or by post (where email was not available) on Thursday 25th of May of the commencement of the consultation. Consultees were invited to view and respond to the consultation on the **Sustainability Appraisal: Non-Technical Summary (NTS) of the Publication Dover District Local Plan (September 2022)** and **The Sustainability Appraisal Addendum and ERRATA Sheet II (May 2023)** only.
- 2.2 A copy of the correspondence sent can be seen under **Regulation 22 Appendix G, ANNEX 1: Letters and Correspondence.**
- 2.3 All Statutory/Specific Consultees and General Consultees that were invited are listed in the [SD05c Regulation 22 Statement Part 2 Regulation 19 \(March 2023\)](#). - **Appendix A: List of Specific and General Consultees.**

Formal Notification and Correspondence with consultees registered on the Objective Database, including consultees who commented at Regulation 19:

- 2.4 All consultees who were registered on the consultee database (including those who made formal representations at the Regulation 19 stage of the Local plan process) were notified by email or a letter on Thursday 25th of May inviting them to view and respond to the consultation on the **Sustainability Appraisal: Non-Technical Summary (NTS) of the Publication Dover District Local Plan (September 2022)** and **the Sustainability Appraisal Addendum and ERRATA Sheet II (May 2023)**.
- 2.5 A copy of the Correspondence sent can be seen under **Regulation 22 Appendix G, ANNEX 1: Letters and Correspondence.**

3. Engagement and Advertising

Statement of Representations Procedure:

3.1 The Statement of Representations procedure for this consultation, prepared in accordance with Regulation 35, can be viewed in **ANNEX 2: Engagement and Advertising**

Deposit Points:

3.2 Deposit boxes were created to include all documents which were required to be available for inspection. The locations of the deposit points can be found in paragraph 3.6 of the Regulation 22 Part 2 Document.

3.3 The Deposit Boxes contained the following:

- Covering Letter to Libraries (can be found under **Annex 1: Letters and Correspondence**)
- The Sustainability Appraisal: Non-Technical Summary (NTS) of the Publication Dover District Local Plan (September 2022).
- Sustainability Appraisal Addendum and ERRATA Sheet II (May 2023).
- 15x copies of the representation (comment) form (can be found under **Annex 1: Letters and Correspondence**)
- Statement of Representation procedure and General Consultation Letter for this consultation (can be found under **Annex 2: Engagement and Advertising**)

Dedicated Phone Line and Email Address:

3.4 Officers were available to assist with queries through a dedicated phone and email account. Contact details were provided to participants in the same format they were for the Regulation 19 consultation event. Details of the dedicated phone line and email address can be found under paragraph 3.16 of the Regulation 22 Part 2 Document.

Local Plan Website

3.5 The Local Plan website was updated with information relating to this consultation. A copy of the Homepage and the News page can be seen under **ANNEX 2: Engagement and Advertising** and a link to the [Latest News and Updates page](#) has been provided.

Consultation Portal

3.6 Consultation documents were available to view and comment upon via an online consultation portal called 'Objective'. These consultations remain visible online at <https://dover-consult.objective.co.uk/kse/>.

3.7 Screenshots of the Objective Portal are in **ANNEX 2: Engagement and Advertising**

4. Annexes of Appendix G

ANNEX 1: Letters and Correspondence.

Subject Dover District Council: new event available

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Dover District Local Plan

Dear Sir/Madam

Sustainability Appraisal Non-Technical Summary/Addendum and Errata Sheet will be available for you to view between the following dates:

Start Date: 25/05/23 10:00 AM

End Date: 06/07/23 5:00 PM

Please select the following link to view this event:

[Link to Event](#)

If the link appears to be broken, please try copying the entire link into the address bar on your web browser.

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Dover District Local Plan

Planning and Development
White Cliffs Business Park
Dover
Kent CT16 3PJ
Website: <https://www.dover.gov.uk>

Contact: Planning Policy
Direct line: 01304 872244
E-mail: localplan@dover.gov.uk
Date: 23th May 2023

Dear Consultee,

DOVER DISTRICT LOCAL PLAN 2040 – Sustainability Appraisal Consultation

The Dover District Local Plan 2040 was submitted to the Secretary of State in April 2023, and the Examination of the Local Plan by the Planning Inspectorate has started.

Dover District Council is carrying out a consultation on the following documents:

1. **The Sustainability Appraisal: Non-Technical Summary (NTS) of the Publication Dover District Local Plan (September 2022).**

This document summarises the full Sustainability Appraisal Report of the Dover District Local Plan Regulation 19 Submission (October 2022).

2. **Sustainability Appraisal Addendum and ERRATA Sheet II (May 2023).**

The Sustainability Appraisal Addendum provides an update to the Sustainability Appraisal to reflect changes to the Habitats Regulations Assessment which have been made to address representations received from Natural England.

The ERRATA Sheet II clarifies administrative reporting errors relating to 3 sites assessed in the SA: Dover Waterfront (DOV017), Land to the east of Jubilee Road (WOR006) and Farmland lying to the north of Aylesham and to the east of Adisham Road (AYL004).

Dover District Council **is not** inviting further comments on the Dover District Local Plan Regulation 19 Submission document, nor on the full Sustainability Appraisal Report (September 2022). Comments on these documents will not be accepted.

How do I comment?

The consultation on the Sustainability Appraisal Non-Technical Summary, and the Sustainability Appraisal Addendum and ERRATA Sheet II opens on the 25th May 2023 and we need to receive your comments **no later than 5pm on the 6th July 2023**. Please see the **Statement of Representations Procedure** for further information on the consultation, which is available at the following address: www.doverdistrictlocalplan.co.uk.

Anyone can comment on the documents, including residents, community organisations and businesses in the District.

Where can I see the consultation documents?

Hard copies of the main consultation documents and comment forms will be available at the following deposit points during opening hours:

Council Offices, White Cliffs Business Park, Whitfield, CT16 3PJ

Ash Library, Ash Village Hall, 10 Queen's Road, Ash, CT3 2BG

Aylesham Library, Aylesham Community Centre, Ackholt Road, Aylesham, CT3 3AJ

Deal Library, Broad Street, Deal, CT14 6ER

Dover Library, Dover Discovery Centre, Market Square, Dover, CT16 1PH

Sandwich Library, 13 Market Street, Sandwich, CT13 9DA

St Margarets-at-Cliffe Library, 16 Kingsdown Road, St Margarets at Cliffe, CT15 6AZ

Mobile Libraries For full library details call 03000 413131

The documents will also be available to be downloaded from the website using the following link: www.doverdistrictlocalplan.co.uk.

How to make representations

Responses should be made through the Council's online consultation portal (<https://dover-consult.objective.co.uk/kse>). If this is not possible, comments can be submitted using the Representations Form by the following methods:

By email to: localplan@dover.gov.uk

By post to: Local Plans Team, Dover District Council, Council Offices, White Cliffs Business Park, Dover CT16 3PJ

Paper copies of the Representation Form can be collected from the deposit points, or are available on request. If you need a copy of a document in paper form, or an alternative format (such as large print or audio format) please contact us on 01304 872244.

Please note that all representations must contain your name and address. Your name will be published alongside your comment on the consultation database. Contact information, such as address, email address and telephone number will not be published, but may be sent to the Planning Inspectorate. All data is processed according to the Data Protection Act 2018. The Planning Policy [privacy notice](#) is available on the Council website and we can send it to you on request.

All representations received by 5pm on the 6th July 2023 will be submitted to the Planning Inspectors appointed to examine the Dover District Local Plan, to be considered as part of the examination.

If you have any issues accessing the consultation documents online, or have any questions, please telephone the Local Plan team on **01304 872244** for assistance, or email localplan@dover.gov.uk. If you require assistance with an accessible format of the Local Plan, please contact the Planning Policy Team using the above number.

Yours sincerely,

Planning Policy Team



**Planning and Development
White Cliffs Business Park
Dover
Kent CT16 3PJ
Website: <https://www.dover.gov.uk>**

Contact: Planning Policy
Direct line: 01304 872244
E-mail: localplan@dover.gov.uk
Date: 23rd May 2023

Dear library staff,

DOVER DISTRICT LOCAL PLAN 2040 – Sustainability Appraisal Consultation

The Dover District Local Plan 2040 was submitted to the Secretary of State in April 2023, and the Examination of the Local Plan by the Planning Inspectorate has started.

Dover District Council is carrying out a consultation on the following documents:

- 1. The Sustainability Appraisal: Non-Technical Summary (NTS) of the Publication Dover District Local Plan (September 2022).**
- 2. Sustainability Appraisal Addendum and ERRATA Sheet II (May 2023).**

Copies of each of the documents are enclosed with this letter along with 15x copies of the representation (comment) form, the Statement of Representation procedure and General Consultation Letter for this consultation. **Please make them available for public inspection following receipt of this letter. The consultation ends on the 6th July 2023.**

Please do contact us in the Planning Policy Team of the Council if you have any questions about the consultation. We also have a website with information about the consultation:
www.doverdistrictlocalplan.co.uk.

The Local Plan Examination is an extended process and we expect it to be necessary to keep these documents available for inspection for around 12 months and potentially longer. We will let you know when the documents can be removed. The documents can be kept in the dedicated box for the Dover District Local Plan 2040 documents.

Thank you very much for your assistance.

Yours sincerely,

Planning Policy Team



Dover District Local Plan

Dover District Council Local Plan Sustainability Appraisal Consultation **EVIDENCE BASE REPRESENTATION FORM**

This is the comments form to be used for commenting on the following documents:

- 1. The Sustainability Appraisal: Non-Technical Summary (NTS) of the Publication Dover District Local Plan (September 2022).**
- 2. Sustainability Appraisal Addendum and ERRATA Sheet II (May 2023).**

The preferred method for receiving comments is on-line by using the consultation portal which can be found at <https://dover-consult.objective.co.uk/kse>.

If you are unable to use the on-line method of submitting comments you may still submit comments by email to localplan@dover.gov.uk or by post to Local Plans Team, Dover District Council, Council Offices, White Cliffs Business Park, Dover CT16 3PJ.

Form must be received by 5pm on Thursday 6th July 2023

Please use a separate form when making comments on different documents

Please complete all sections of the form. If you do not provide name and contact information, we will not be able to accept the representation.

Personal Details

Full Name and title:

Organisation (*where relevant*):

Address:

..... Postcode:

Email address: Daytime Tel. No:

Agents Details

Please give the agent's details if one is appointed on your behalf (note they will become the main contact)

Name and Organisation:

Address:

..... Postcode:

Email address: Daytime Tel. No:

1 – Please tell us which document are you commenting on?

The Sustainability Appraisal: Non-Technical Summary (NTS) of the Publication Dover District Local Plan (September 2022)

Sustainability Appraisal Addendum and ERRATA Sheet II (May 2023)

Please also state clearly the chapter, section, paragraph number or page number to which your comment(s) refers:

2 - Please give your comment (including any suggested changes) in the box below

(Attach additional sheets if necessary)

ANNEX 2: Engagement and Advertising



Statement of Representations Procedure and Notification of Period of Representations under Regulations 19, 20 and 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012

Consultation on:

- 1. Sustainability Appraisal: Non-Technical Summary of the Publication Dover District Local Plan (September 2022)**
- 2. Sustainability Appraisal Addendum and ERRATA Sheet II (May 2023)**

Subject Matter:

1. The Sustainability Appraisal Non-Technical Summary summarises the full Sustainability Appraisal Report of the Dover District Local Plan Regulation 19 Submission (October 2022).
2. The Sustainability Appraisal Addendum provides an update to the Sustainability Appraisal to reflect changes to the Habitats Regulations Assessment which have been made to address representations received from Natural England. In addition, the ERRATA Sheet II clarifies administrative reporting errors relating to 3 sites assessed in the SA: Dover Waterfront (DOV017), Land to the east of Jubilee Road (WOR006) and Farmland lying to the north of Aylesham and to the east of Adisham Road (AYL004).

Dover District Council is not inviting further comments on the Dover District Local Plan Regulation 19 Submission document, nor on the Sustainability Appraisal Report (September 2022). Comments on these documents will not be accepted.

Period of Representations:

Thursday 25th May to Thursday 6th July 2023 at 5pm.

Representations (comments) must be received by the council no later than 5pm on 6th July 2023.

Representations received after this time will not be accepted. This statement provides details on how to view and comment on the two consultation documents.

Document Availability:

During the representation period, the consultation documents will be available to view online via the web address: www.doverdistrictlocalplan.co.uk

Paper copies of the consultation documents will be available at the following locations:

Location	Address
Council Offices	White Cliffs Business Park, Whitfield
Ash Library	Ash Village Hall, 10 Queen's Road
Aylesham Library	Aylesham Community Centre, Ackholt Road
Deal Library	Broad Street
Dover Library	Dover Discovery Centre, Market Square
Sandwich Library	13 Market Street
St Margarets-at-Cliffe Library	16 Kingsdown Road

The Council Offices at Whitfield are open Monday to Friday 10am-4pm, while library opening times can be checked online at www.kent.gov.uk/libraries.

If you need a copy of a document in paper form, or an alternative format (such as large print or other language) please contact us: 01304 872244 or localplan@dover.gov.uk

How to submit a representation:

Representations must be made on the standard representation form.

Representations are encouraged to be made through the Council's online consultation portal (<https://dover-consult.objective.co.uk/kse>) where you can view the consultation documents.

A paper copy of the representation form can also be provided on request by contacting the team using the information below, or by collecting from the Council offices or one of the libraries listed above, during opening hours.

Paper copies of representation forms should be returned to: Planning Policy Team, Dover District Council, White Cliffs Business Park, Dover, Kent. CT16 3PJ

Please note that your representation will be publicly available and a copy will be published on the Council's website. Your representations and name/name of your organisation will be published, but other personal information will remain confidential. Data will be processed and held in accordance with the Data Protection Act 2018. A privacy notice with further information can be found www.dover.gov.uk/Website/PDFs/Planning-Policy-Privacy-Notice.pdf

All representations received by 5pm on the 6th July 2023 will be submitted to the Planning Inspectors appointed to examine the Dover District Local Plan, to be considered as part of the examination.

Further Information:

For assistance or more information:

- Visit www.doverdistrictlocalplan.co.uk,
- Email localplan@dover.gov.uk
- Call the Local Plan phone line - 01304 872244.



Dover District
Local Plan

DOVER DISTRICT COUNCIL

PUBLIC NOTICE: Consultation Thursday 25th May to Thursday 6th July 2023 at 5pm

Consultation on:

1. **Sustainability Appraisal: Non-Technical Summary of the Publication Dover District Local Plan (September 2022)**
2. **Sustainability Appraisal Addendum and ERRATA Sheet II (May 2023)**

Consultation in accordance with Regulations 19, 20 and 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012

Subject Matter:

1. The Sustainability Appraisal Non-Technical Summary summarises the full Sustainability Appraisal Report of the Dover District Local Plan Regulation 19 Submission (October 2022).
2. The Sustainability Appraisal Addendum provides an update to the Sustainability Appraisal to reflect changes to the Habitats Regulations Assessment which have been made to address representations received from Natural England. In addition, the ERRATA Sheet II clarifies administrative reporting errors relating to 3 sites assessed in the SA: Dover Waterfront (DOV017), Land to the east of Jubilee Road (WOR006) and Farmland lying to the north of Aylesham and to the east of Adisham Road (AYL004).

Dover District Council is not inviting further comments on the Dover District Local Plan Regulation 19 Submission document, nor on the Sustainability Appraisal Report (September 2022). Comments on these documents will not be accepted.

During the representation period, the consultation documents will be available to view online via the web address: www.doverdistrictlocalplan.co.uk

In addition, paper copies of the consultation documents will be available at the following locations:

Location	Address
Council Offices	White Cliffs Business Park, Whitfield
Ash Library	Ash Village Hall, 10 Queen's Road
Aylesham Library	Aylesham Community Centre, Ackholt Road
Deal Library	Broad Street
Dover Library	Dover Discovery Centre, Market Square
Sandwich Library	13 Market Street
St Margarets-at-Cliffe Library	16 Kingsdown Road

The Council Offices at Whitfield are open Monday to Friday 10am-4pm, while library opening times can be checked online at www.kent.gov.uk/libraries. Paper copies of all documents can also be made available on request.

Representations are encouraged to be made through the Council's online consultation portal (<https://dover-consult.objective.co.uk/kse>) where you can view the consultation documents. A paper copy of the representation form can also be provided on request by contacting the team using the information below, or by collecting from the Council offices or one of the libraries listed above, during opening hours.

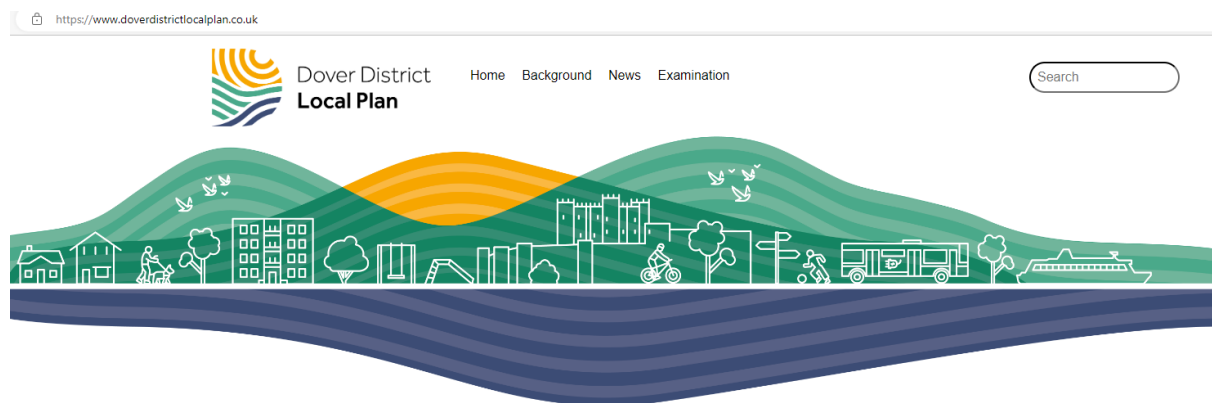
Paper copies of representation forms should be returned to: Planning Policy Team, Dover District Council, White Cliffs Business Park, Dover, Kent. CT16 3PJ

Representations (comments) must be received by the Council no later than 5pm on 6th July.
Representations received after this time will not be accepted.

For more information visit www.doverdistrictlocalplan.co.uk, call 01304 872244 or email localplan@dover.gov.uk

Local Plan Website Screenshots

Homepage:



Dover District Local Plan

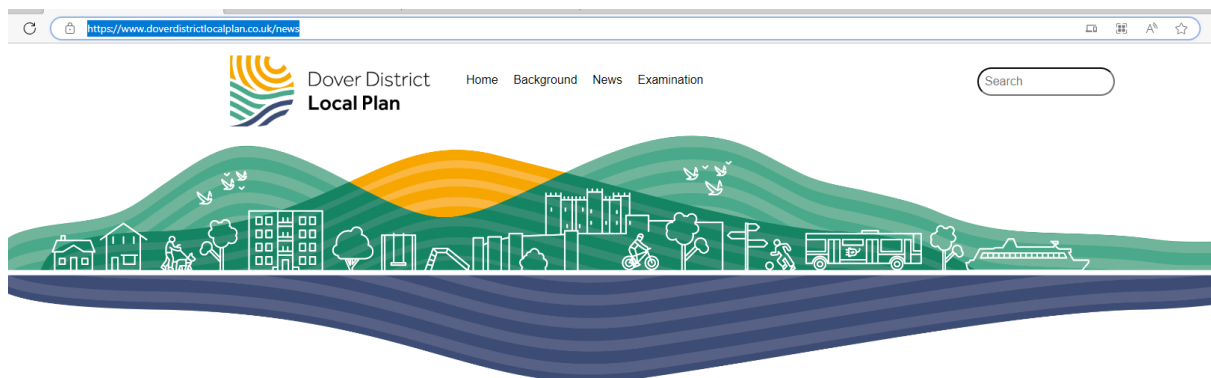
The Dover District Local Plan was submitted for Examination on Friday 31st of March 2023. For all updates on the Examination see the [News page](#). All other information including the examination library can be found on the [Examination Home Page](#). To view Comments made at Regulation 19 please see the guidance and links on the [Regulation 20](#) area of the Examination Pages

Important Updates:

Consultation on The Sustainability Appraisal: Non-Technical Summary (NTS) of the Publication Dover District Local Plan (September 2022) and The Sustainability Appraisal Addendum and ERRATA Sheet II (May 2023) from the 25th of May until the 6th of July.

More information can be found on the [Council's consultation portal](#).

Latest News and Updates page:



Examination Latest News and Updates.

Council's Response to Inspectors' Initial Questions - 21st June 2023

The Council have submitted their response to the Inspector's Initial Questions (ED4). The Council's response is referenced ED5 with appendices ED5A to ED5M inclusive and the documents can be viewed on the [Examination Documents webpage](#).

Sustainability Appraisal Consultation - 25th May 2023

The Council are carrying out a consultation on two Sustainability Appraisal documents:

- 1) Sustainability Appraisal Non-Technical Summary (NTS) of the Publication Dover District Local Plan (September 2022) and
- 2) Sustainability Appraisal Addendum and ERRATA Sheet II (May 2023).

For information on the consultation please view the [Council's consultation portal](#).



Objective Portal Screenshot

https://dover-consult.objective.co.uk/kse/event/37480

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Sustainability Appraisal Non-Technical Summary/Addendum and Errata Sheet

FORMAL SUBMISSION - CLOSED

SURVEY DETAILS

More Information ▲

Planning Policy

Dover District Council

01304872244

Localplan@Dover.gov.uk

Dover District Council Council Offices
White Cliffs Business Park Whitfield
Dover CT16 3PJ

Supporting Files ▲

[Dover District Local Plan Reg 19 SA Report NTS.pdf](#)

[Sustainability Appraisal Addendum and Errata Sheet II.pdf](#)

PRIVACY POLICY

Please see the Councils [Privacy Notice](#), which sets out details of what information we collect from you, what we do with it and who it might be shared with <https://www.dover.gov.uk/Website/Privacy-and-Cookies.aspx>

Dover District Council are carrying out a consultation on the following documents from 10am on the 25th of May 2023 until 5pm on the 6th of July 2023

1. The Sustainability Appraisal: Non-Technical Summary (NTS) of the Publication Dover District Local Plan (September 2022).

This document summarises the full Sustainability Appraisal Report of the Dover District Local Plan Regulation 19 Submission (October 2022).

2. Sustainability Appraisal Addendum and ERRATA Sheet II (May 2023).

The Sustainability Appraisal Addendum provides an update to the Sustainability Appraisal to reflect changes to the Habitats Regulations Assessment which have been made to address representations received from Natural England.

The ERRATA Sheet II clarifies administrative reporting errors relating to 3 sites assessed in the SA: Dover Waterfront (DOV017), Land to the east of Jubilee Road (WOR006) and Farmland lying to the north of Aylesham and to the east of Adisham Road (AYL004).

Dover District Council **is not** inviting further comments on the Dover District Local Plan Regulation 19 Submission document, nor on the full Sustainability Appraisal Report (September 2022). Comments on these documents will not be accepted.

The consultation on the Sustainability Appraisal Non-Technical Summary, and the Sustainability Appraisal Addendum and ERRATA Sheet II opens on the 25th May 2023 and we need to receive your comments **no later than 5pm on the 6th July 2023**.

Please note: When you register, you should receive an automated email from the software so that you can activate your account and log in. Some internet providers' security is very tight and sometimes these activation emails are blocked. If you do not receive an activation email, please phone the Planning Policy Team on 01304 872 244 or email localplan@dover.gov.uk and we will activate your account from this end.

ANNEX 3: Summary of representations and Councils response

Final Responses to Comments Table

Representations Summary: Sustainability Appraisal Addendum and ERRATA Sheet 11 (May 2023).

Representer number, name and organisation	Representation number	Consultation Comment Summary	SA Report Reference	Response / Action Taken
1271293 Historic England (Alan Byrne)	SA-NTS15	Historic England has no comment on the revised SA for Dover Local plan 2040 adequately in respect of the potential effects of proposed policies on heritage assets.	Sustainability Appraisal Addendum and ERRATA Sheet 11 (May 2023). No comment on revised.	Noted. No action taken.
1271448 National Highways (Kevin Bown)	SA-NTS17	As far as we can tell, but subject to the Council’s confirmation, we do not believe the documents change the transport evidence base (particularly with regards the SRN) as it currently stands and as agreed by us. Assuming this to be the case, we have no comments on the consultation documents.	Sustainability Appraisal Addendum and ERRATA Sheet II (May 2023)	Noted. No action taken.
1338330 Kent Couty Council (Simon Jones)	SA-NTS20	The County Council recognises that changes have been made to the Habitat Regulations Assessment (HRA) following advice from Natural England. The changes have resulted in a number of site allocation policies being removed from the HRA; however, they have not changed the overall conclusions. The County Council is therefore satisfied that the conclusions of the HRA are still valid	Sustainability Appraisal Addendum and ERRATA Sheet II (May 2023)	Noted. No action taken.
1338434 Environment Agency (Jennifer Wilson)	SA-NTS23	No comments	Sustainability Appraisal Addendum and ERRATA Sheet II (May 2023)	Noted. No action taken.

Representations Summary: The Sustainability Appraisal: Non-Technical Summary (NTS) of the Publication Dover District Local Plan (September 2022)

Representer number, name and organisation	Representation number	Consultation Comment Summary	SA Report Reference	Response / Action Taken
1329346 Gerald Irvine	SA-NTS3	Concerned about the importance and weighting placed by DDC of the submitted White Paper entitled Levelling up the UK (September 2022) and its subsequent off-spring, Levelling Up & Regulations Bill. How will building social housing truly level up when amenities and work opportunities are few and infrastructure poor. References to “Duty of regard to the right to nature” and nature restoration duty.	Para 1.8	Noted.
		STM010 was originally in the Local Plan in a group of 5 sites for assessment. It is now in an enhanced group of 7. What has happened here?	Table 8	Table 8 includes the sites that were subject to sustainability appraisal (sites that were assessed as being suitable or potentially suitable following the Stage 2 HELAA assessment). Four sites have been proposed for allocation at St Margarets at Cliffe:
		STM010 is now at the top of this enhanced group for development. What is the driving rational thinking for this change? Is it being driven by "levelling up" at the most extreme level?	Table 8	<ul style="list-style-type: none"> • SAP38 (STM003) Land Adjacent to Reach Road; • SAP39 (STM007 and STM008 combined) Land to the West Of Townsend Farm Road; • SAP40(STM006) Land at New Townsend Farm, Station Road; • SAP40 (STM010) Land between Salisbury Road and The Droveaway.
		DDC have published two different locations for STM010 – one is fronting Salisbury Road and one fronting The Droveaway.	1. LUC/3,4,5. 2. LUC/6,7,8,9 Section 1.15 Table 1 - A1-A7,B1,C2,E1-E4,F1-F2,G1,H1 3. Table 2 (in entirety)	The remaining two sites are STM11 which was not allocated; and TC4S073 which is the same site as STM010.
		LUC/10 Assumptions, not evidence.		STM010 is located between Salisbury Road and The Droveaway.
Option 3 weighs heavily against the AONB		The assumptions used throughout the SA process are informed by evidence and professional judgement.		
LUC/16 Table 4 Displays many significant weighted negative question marks. How can rational decisions be made based on such indeterminate values.		Paragraph 1.22 states the growth and spatial options represent strategic principles for the scale and distribution of growth to be delivered over the Plan period. Consequently, the SA focusses on the likely strategic implications of their implementation. Significant adverse effects associated with any scale and distribution of growth could not be ruled out until specific sites were identified later in the plan-making process.		
1331537 William Rachford	SA-NTS6	STM010 should not be considered an appropriate location for houses for reasons related to numerous constraints/designations, including AONB, Heritage Coast, BOA, abuts National Trust Land, several hundred yards from SSSI, SAC national historic monument, priority habitat. Accessed from poorly paved, heavily parked roads. One is unadopted.	ALL STM010 references in NTS	The Council’s justification for the selection of the preferred site allocations over the reasonable alternatives can be found in Appendix D. The SA of the site options has been undertaken comprehensively based on the most up to date evidence available at the time of the assessment. The range of potential effects identified represent precautionary judgements based on the fact that the exact scale, density and design of development within any given location had not been defined at this stage in the plan-making and associated SA process.
1331368 DEB Planning on behalf of Mr J Thorne	SA-NTS8	Object to assessment of STM010.	ALL STM010 references in NTS	The recorded effects of site STM010 set out in Table 8 are the same as the adjacent site STM011. TC4S073 refers to the same site as STM010.
		Table 8 of the NTS site STM010 appears in the section for St Margaret’s at Cliffe above other site allocations for the village. This gives the impression that it is a more sustainable site than	Table 8	The SA of the site options has been undertaken comprehensively based on the most up to date evidence available at the time of the assessment. The

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		<p>other allocations within the village – this is wrong. The NTS Table 8 incorrectly records the SA’s assessment of site STM010.</p> <p>In Table 29 of the NTS Site STM010 is recorded as having a Significant Negative effect in relation to resources. Yet in Table 8 this is recorded as a Minor Negative effect. If recorded correctly Site STM010 would be eliminated from consideration as per the other sites in St Margaret at Cliffe.</p> <p>In the ‘Landscape’ Section of the NTS Site STM010 is stated as “expected to result in minor negative effects on the landscape”. This assessment has not taken into account the following: previous planning and appeal decisions; significant effects referred to in the main SA; previous HELLA and SHLAA assessment which referred to highly detrimental impacts on landscape; incorrect assumption in the HELLA 2015 that the site was not within the AONB; and regardless of the redesignation of the village as a local centre, development of the site will be harmful to the setting of heritage assets, the coastline and the wider countryside.</p> <p>STM010 should be assessed in the NTS as having a Significant Negative effect on Landscape (SA11).</p> <p>The individual site assessments - consistently record the distance between STM010 and the St Margaret’s’ at Cliffe Primary School incorrectly. The results for the SA2a Access, the SA4 Transport and the SA8 Climate Change criteria of the individual assessment are all incorrect in relation to this site and this error has fed through to the NTS.</p> <p>The summary again repeats the errors of the main document by failing to identify that STM010 is within 250m of a designated site and within 170m of the Dover to Kingsdown SSSI. The site would therefore have a Significant Negative effect on Biodiversity – this has not been recorded in the Summary.</p> <p>The Historic Environment section of the SA or the NTS does not identify that development of the site would harm the significance of the Grade II* Listed Dover Patrol War Memorial and within the setting of the heritage coast. Minor negative assessment is unevidenced and is not sound.</p> <p>The errors in the assessment of Site STM010 in the SA render the Sustainability Appraisal unsound; and thus the Non Technical Summary is unsound.</p>	Table 29	<p>range of potential effects identified represent precautionary judgements based on the fact that the exact scale, density and design of development within any given location had not been defined at this stage in the plan-making and associated SA process.</p> <p>The significant negative effect recorded against SA objective 5 (resources) in Table 29 relates to the effect of Site Allocation Policy 40, which allocates both site STM006 and STM010. It is STM006 which records the significant negative effect against SA6 (resources).</p> <p>The assessment of effects of site options on SA objective 11 (landscape) drew on the Council’s HELAA site assessments which bring together the council’s landscape sensitivity assessment, comments from the AONB Unit and the Council’s landscape consultant. The landscape assessment in the HELAA considered designated and non-designated assets, including the AONB. Some sites within and in close proximity to the AONB were judged to be able to accommodate development with suitable mitigation measures and were therefore found to have the potential for more minor or even negligible effects on the local landscape. Prior to the selection and allocation of specific sites and the definition of specific mitigation measures some uncertainty is acknowledged for all of the effects identified against SA objective 11. This uncertainty is removed from the assessment of effects for the final site allocation policies where these details are known.</p> <p>Paragraph 1.22 states the site options were appraised using the most up to date environmental, social and economic evidence available. Distances were measured from the nearest point of a site to the nearest point of the feature(s) in question, which may not always accurately reflect the distance to features for the whole of a site, particularly large sites. This is to ensure a consistent approach for the SA. The Council has examined site options and the evidence to supplement the SA process in selecting preferred development locations and policies.</p> <p>The SA acknowledges that the site falls within a Site of Special Scientific Interest Impact Risk Zone. Only sites that intersect with designated sites are rated as having the potential for significant adverse effects against SA objective 9 (biodiversity).</p> <p>The assessment of effects of site options on SA objective 10 (historic environment) drew on the Council’s HELAA site assessments.</p> <p>Noted. See above responses to individual points.</p>

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1329545 Neil Buckley	SA-NTS9	<p>The sustainability assessment for STM010 in Table 8 repeats and compounds the flaws and errors in the reg 18 and 19 process.</p> <p>Designation in para 1.58 as one of the most strongly performing site options indicates a failure to take account of local and national policy, current DDC local plan, the Local Plan Regulations 2012 and the AONB Management Plan.</p> <p>STM010 is good agricultural farmland. For other sites, this has meant that they are scored as significant negative effect likely for SA5: Resources. But not site STM010, which has a scoring in table 8 of just minor negative effect likely for resources. Yet at Table 29 SA5: Resources STM010 is correctly stated as Significant Negative Effects. STM010 would not have been put forward as among the strongest performing if this was properly recoded in Table 8.</p> <p>SA 9, SA 10 and SA 11 for STM010. Again these are recorded in table 8 for STM010 as being 'minor negative effect likely'. Frankly, this is preposterous as well as being unsound.</p> <p>Landscape SA11 – the SA should have found that a significant negative effect is likely. The site lies within the bounds of the AONB as well as the Heritage Coast and is within a few hundred metres of the Dover to Kingsdown Cliffs Special Area of Conservation (SAC) and SSSI. Prominent site. Will impede views of the Grade II* Listed Dover Patrol and Grade II listed South Forelands Lighthouse. Wildlife conservation status of SAC has been given insufficient weight. Scoring does not reflect 2012 SHLAA Assessment (significant negative effects) which is the right assessment.</p> <p>2020 HELLA incorrectly said the site was not within the AONB and did not mention Heritage Coast and SAC. The altered wording does not correct the initial assessment. STM010 is deliberately included in the AONB and is an important part of the biodiversity of the AONB.</p> <p>The designation is in contravention of the Reg 19 plan's policies. Paragraph 175 of the NPPF requires authorities to allocate land with the least environmental or amenity value. This allocation could be built in other far less sensitive sites.</p> <p>Para 176 of the NPPF required that 'Great weight' be given to conserving the AONB. The assessment has failed to give real weight on the sensitive nature of the landscape. There is a lack of consistency. STM007 which is less elevated (and is further from the SAC, SSSI) was considered highly sensitive and a similar assessment should have been made for STM010. This part of St Margarets has no streetlights and the AONB Management Plan gives emphasis to</p>	Table 8, Paragraph 1.58, Table 29	<p>The SA of the site options has been undertaken comprehensively based on the most up to date evidence available at the time of the assessment.</p> <p>The recorded effects of site STM010 set out in Table 8 are the same as adjacent site STM011. TC4S073 refers to the same site as STM010.</p> <p>The SA acknowledges that over 25% of the site falls within land designated as Grade 3 agricultural land. The significant negative effect recorded against SA objective 5 (resources) in Table 29 relates to the effect of Site Allocation Policy 40, which allocates both site STM006 and STM010. It is STM006 which records the significant negative effect against SA6 (resources).</p> <p>The site options were appraised using the most up to date environmental, social and economic evidence available, for example the assessment of site options' effects on the District's historic environment, landscapes and townscapes drew on Council officer assessments that considered designated and non-designated assets.</p> <p>The assessment of effects of site options on SA objective 11 (landscape) drew on the Council's HELAA site assessments which bring together the council's landscape sensitivity assessment, comments from the AONB Unit and the Council's landscape consultant. The landscape assessment in the HELAA considered designated and non-designated assets, including the AONB. Some sites within and in close proximity to the AONB were judged to be able to accommodate development with suitable mitigation measures and were therefore found to have the potential for more minor or even negligible effects on the local landscape. Prior to the selection and allocation of specific sites and the definition of specific mitigation measures some uncertainty is acknowledged for all of the effects identified against SA objective 11. This uncertainty is removed from the assessment of effects for the final site allocation policies where these details are known.</p>

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		<p>'tranquillity and remoteness'. The management plan also warns against the cumulative impact of development.</p> <p>Biodiversity SA9</p> <p>AONB Management Plan requires net gains for biodiversity. Assessing impact as 'minor' seems incompatible with this approach. No mention is made of proximity to the SAC. The site is in a BOA.</p> <p>Para 174 NPPF requires allocations to contribute to and enhance the natural and local environment. This allocation has the opposite effect.</p> <p>If proper consideration has been given to this site it would have been assessed as 'significant negative effect likely' for SA9: biodiversity.</p> <p>Historic Environment SA10</p> <p>Development of STM010 would require a full archaeological survey, yet the SA only identifies 'minor negative effects likely'. There have been significant findings from archaeological digs nearby on the Droveaway. The site is likely to be an important Anglo Saxon site.</p> <p>There are perfect view lines to two iconic grade two listed buildings which will be irreparably impaired by development. Again, the SA10 assessment just ignores this fact.</p> <p>Finally, in the Landscape section of the Summary the impacts of development on villages is described as: "these sites comprise sensitive landscapes and may result in adverse effects on the District's landscapes, townscapes and seascapes". This is precisely the impact that development of site STM010 will have on our community which is a village and not a local centre.</p>		<p>The SA acknowledges that the site falls within a Site of Special Scientific Interest Impact Risk Zone. Only sites that intersect with designated sites are rated as having the potential for significant adverse effects against SA objective 9 (biodiversity). The effects recorded in Table 8 focus on the impact of site options on the existing baseline environment. The subsequent appraisal of preferred site allocation policies considers the effects of specified mitigation and enhancement measures in reducing adverse effects and generating positive effects.</p> <p>The assessment of effects of site options on SA objective 10 (historic environment) drew on the Council's HELAA site assessments.</p> <p>Noted. See responses above re: landscape effects.</p>

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1337959 Phil Kilroe	SA-NTS10	<p>The sustainability assessment for STM010 in Table 8 repeats and compounds the flaws and errors in the reg 18 and 19 process.</p> <p>Designation in para 1.58 as one of the most strongly performing site options indicates a failure to take account of local and national policy, current DDC local plan, the Local Plan Regulations 2012 and the AONB Management Plan.</p> <p>STM010 is good agricultural farmland. For other sites, this has meant that they are scored as significant negative effect likely for SA5: Resources. But not site STM010, which has a scoring in table 8 of just minor negative effect likely for resources. Yet at Table 29 SA5: Resources STM010 is correctly stated as Significant Negative Effects. STM010 would not have been put forward as among the strongest performing if this was properly recoded in Table 8.</p> <p>SA 9, SA 10 and SA 11 for STM010. Again these are recorded in table 8 for STM010 as being 'minor negative effect likely'. Frankly, this is preposterous as well as being unsound.</p> <p>Landscape SA11 – the SA should have found that a significant negative effect is likely. The site lies within the bounds of the AONB as well as the Heritage Coast and is within a few hundred metres of the Dover to Kingsdown Cliffs Special Area of Conservation (SAC) and SSSI. Prominent site. Will impede views of the Grade II* Listed Dover Patrol and Grade II listed South Forelands Lighthouse. Wildlife conservation status of SAC has been given insufficient weight. Scoring does not reflect 2012 SHLAA Assessment (significant negative effects) which is the right assessment.</p> <p>2020 HELLA incorrectly said the site was not within the AONB and did not mention Heritage Coast and SAC. The altered wording does not correct the initial assessment. STM010 is deliberately included in the AONB and is an important part of the biodiversity of the AONB.</p> <p>The designation is in contravention of the Reg 19 plan's policies. Paragraph 175 of the NPPF requires authorities to allocate land with the least environmental or amenity value. This allocation could be built in other far less sensitive sites.</p> <p>Para 176 of the NPPF required that 'Great weight' be given to conserving the AONB. The assessment has failed to give real weight on the sensitive nature of the landscape. There is a lack of consistency. STM007 which is less elevated (and is further from the SAC, SSSI) was considered highly sensitive and a similar assessment should have been made for STM010. This part of St Margarets has no streetlights and the AONB Management Plan gives emphasis to 'tranquillity and remoteness'. The management plan also warns against the cumulative impact of development.</p> <p>Biodiversity SA9</p>	STM010 and Charts 8 and 29 and paragraph 1.58 of the consultation.	<p>The SA of the site options has been undertaken comprehensively based on the most up to date evidence available at the time of the assessment.</p> <p>The recorded effects of site STM010 set out in Table 8 are the same as adjacent site STM011. TC4S073 refers to the same site as STM010.</p> <p>The SA acknowledges that over 25% of the site falls within land designated as Grade 3 agricultural land. The significant negative effect recorded against SA objective 5 (resources) in Table 29 relates to the effect of Site Allocation Policy 40, which allocates both site STM006 and STM010. It is STM006 which records the significant negative effect against SA6 (resources).</p> <p>The site options were appraised using the most up to date environmental, social and economic evidence available, for example the assessment of site options' effects on the District's historic environment, landscapes and townscapes drew on Council officer assessments that considered designated and non-designated assets.</p> <p>The assessment of effects of site options on SA objective 11 (landscape) drew on the Council's HELAA site assessments which bring together the council's landscape sensitivity assessment, comments from the AONB Unit and the Council's landscape consultant. The landscape assessment in the HELAA considered designated and non-designated assets, including the AONB. Some sites within and in close proximity to the AONB were judged to be able to accommodate development with suitable mitigation measures and were therefore found to have the potential for more minor or even negligible effects on the local landscape. Prior to the selection and allocation of specific sites and the definition of specific mitigation measures some uncertainty is acknowledged for all of the effects identified against SA objective 11. This uncertainty is removed from the assessment of effects for the final site allocation policies where these details are known.</p>

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		<p>AONB Management Plan requires net gains for biodiversity. Assessing impact as 'minor' seems incompatible with this approach. No mention is made of proximity to the SAC. The site is in a BOA.</p> <p>Para 174 NPPF requires allocations to contribute to and enhance the natural and local environment. This allocation has the opposite effect.</p> <p>If proper consideration has been given to this site it would have been assessed as 'significant negative effect likely' for SA9: biodiversity.</p> <p>Historic Environment SA10</p> <p>Development of STM010 would require a full archaeological survey, yet the SA only identifies 'minor negative effects likely'. There have been significant findings from archaeological digs nearby on the Droveaway. The site is likely to be an important Anglo Saxon site.</p> <p>There are perfect view lines to two iconic grade two listed buildings which will be irreparably impaired by development. Again, the SA10 assessment just ignores this fact.</p> <p>Finally, in the Landscape section of the Summary the impacts of development on villages is described as: "these sites comprise sensitive landscapes and may result in adverse effects on the District's landscapes, townscapes and seascapes". This is precisely the impact that development of site STM010 will have on our community which is a village and not a local centre.</p>		<p>The SA acknowledges that the site falls within a Site of Special Scientific Interest Impact Risk Zone. Only sites that intersect with designated sites are rated as having the potential for significant adverse effects against SA objective 9 (biodiversity). The effects recorded in Table 8 focus on the impact of site options on the existing baseline environment. The subsequent appraisal of preferred site allocation policies considers the effects of specified mitigation and enhancement measures in reducing adverse effects and generating positive effects.</p> <p>The assessment of effects of site options on SA objective 10 (historic environment) drew on the Council's HELAA site assessments.</p> <p>Noted. See responses above re: landscape effects.</p>

<p>1337024 Linda Brennan</p>	<p>SA-NTS11</p>	<p>SA 1.1 - There is an unknown amount of how many affordable housing on the allocated site to comment.</p> <p>SA 1.3 - No. The settlement has a unique character and village identity. Fifty houses would destroy the villages' unique identity. Suggested change - Choose another location with less negative impacts on the area and settlements character.</p> <p>SA 2.1 - No. The allocated site has no access to employment, retail, health services or education without using a car. Bus is infrequent and irregular. Ringwoud Road has no room for a cycle path or footpath. Site is not within 2000m of a doctors surgery, secondary school, higher education or railway station. There is a primary school which is currently oversubscribed. Choose another more accessible and sustainable site location.</p> <p>SA 3 - There are no employment opportunities in Kingsdown.</p> <p>SA 4.4 - The site could only cause more road congestion. There is one entry/exit point onto Ringwoud road. Additional cars exiting from the allocated site onto Ringwoud Road would have a dangerous impact on the road. Heavy construction traffic would add congestion and block this road. Suggested change. Choose another site location that has wider road access.</p> <p>SA 6 - The site will not reduce air pollution due to the impact of additional vehicles. Choose a different location where sustainable transport is possible.</p> <p>SA 7.2 – No. The site is not in a sustainable setting. The only exit is onto Ringwoud road, a highway that could not support cycle paths or footpaths. Public transport is infrequent. Choose a more sustainable location.</p> <p>SA 8.2 - No the plan cannot facilitate or promote sustainable development from the allocated site as the setting and infrastructure does not allow it. Choose a more sustainable location.</p> <p>SA 9.1 - No the plan does not avoid and mitigate the adverse ecological effects. The green infrastructure and dark skies will be lost forever. The noise and light pollution will have a wide impact on the quiet rural settlement and wildlife alike. AONB is directly adjacent to the allocated site (under 400 metres).</p> <p>SA 9.2 - No the plan does not outline opportunities on how it's going to enhance or conserve the ecological loss of this green space other than plant some trees. Choose a different location.</p> <p>SA 9.4 - No the plan is not promoting climate change resilience from the allocated site. Its location is not sustainably accessible. Suggested change - choose a different location that would offer more sustainable transport options.</p> <p>SA 10.1 – There is no regard for the adverse effects the site would have on the settlements character, distinctiveness or unique identity. Development in this location would change these qualities.</p> <p>SA 11.1 - The plan does not protect the settlements sensitive and special landscape.</p> <p>SA 11.2 -Inappropriate development. There would be an irreversible loss on the settlements distinctiveness and character and green infrastructure. Choose a different location which would cause less historic and environmental damage.</p>	<p>All KIN002 references</p>	<p>The SA of the site options has been undertaken comprehensively based on the most up to date evidence available at the time of the assessment.</p> <p>The effects of site KIN002 are summarised in the Non-Technical Summary. Further details as to the justification for specific effects identified can be found in the main SA Report.</p>
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1278959 Gary Muirhead	SA-NTS12	<p>The sustainability assessment for STM010 in Table 8 repeats and compounds the flaws and errors in the reg 18 and 19 process.</p> <p>Designation in para 1.58 as one of the most strongly performing site options indicates a failure to take account of local and national policy, current DDC local plan, the Local Plan Regulations 2012, the AONB Management Plan and consultation with the AONB Unit.</p> <p>STM010 is good agricultural farmland. For other sites, this has meant that they are scored as significant negative effect likely for SA5:Resources.</p> <p>Biodiversity SA9</p> <p>The assessment of STM010 as minor negative in in accurate.</p> <p>AONB Management Plan requires a landscape led approach and net gains for biodiversity. Allocation of a site in the AONB is incompatible with this approach given that the site is only a few hundred metres from a SAC/SSSI.</p> <p>Para 174 NPPF requires allocations to contribute to and enhance the natural and local environment. This allocation has the opposite effect.</p> <p>STM010 should have been assessed as 'significant negative effect likely' for SA9: biodiversity.</p> <p>Historic Environment SA10</p> <p>SA has only been assessed as 'minor negative effects likely' seems at odds with development requiring a full archaeological survey. There have been significant Anglo Saxon findings and excavations in both Salisbury Road and The Droveaway. STM010 is known as Snag Burrows Mount and is likely to contain burial sites and archaeology.</p> <p>Landscape SA11 – the site has been assessed as 'minor effect likely' but should be 'significant negative effect likely' for the following reasons:</p> <ul style="list-style-type: none"> • The site is part of the Kent Downs AONB and is a buffer zone to the North Downs SLA, Heritage Coast, National Trust Land, SSSI, BOA. Only 300m from Dover to Kingsdown Cliffs SAC and SSSI. Development would remove that buffer. • AONB and Heritage Coast boundaries were drawn to explicitly include the site. Development of the site would be a clear separation from the intended purposes of the designation. • Development is conflict with NPPF and is not legally compliant. • Development does not meet the criteria in Local Plan Policy NE2. <p>Inclusion of STM010 is flawed and it should be removed.</p>	SA of Site Options. Table 8, Page LUC I 31.	<p>The SA of the site options has been undertaken comprehensively based on the most up to date evidence available at the time of the assessment.</p> <p>The recorded effects of site STM010 set out in Table 8 are the same as adjacent site STM011. TC4S073 refers to the same site as STM010</p> <p>The SA acknowledges that over 25% of the site falls within land designated as Grade 3 agricultural land. The significant negative effect recorded against SA objective 5 (resources) in Table 29 relates to the effect of Site Allocation Policy 40, which allocates both site STM006 and STM010. It is STM006 which records the significant negative effect against SA6 (resources).</p> <p>The SA acknowledges that the site falls within a Site of Special Scientific Interest Impact Risk Zone. Only sites that intersect with designated sites are rated as having the potential for significant adverse effects against SA objective 9 (biodiversity). The effects recorded in Table 8 focus on the impact of site options on the existing baseline environment. The subsequent appraisal of preferred site allocation policies considers the effects of specified mitigation and enhancement measures in reducing adverse effects and generating positive effects.</p> <p>The assessment of effects of site options on SA objective 10 (historic environment) drew on the Council's HELAA site assessments.</p> <p>The assessment of effects of site options on SA objective 11 (landscape) drew on the Council's HELAA site assessments which bring together the council's landscape sensitivity assessment, comments from the AONB Unit and the Council's landscape consultant. The landscape assessment in the HELAA considered designated and non-designated assets, including the AONB. Some sites within and in close proximity to the AONB were judged to able to accommodate development with suitable mitigation measures and were therefore found to have the potential for more minor or even negligible effects on the local landscape. Prior to the selection and allocation of specific sites and the definition of specific mitigation measures some uncertainty is acknowledged for all of the effects identified against SA objective 11. This uncertainty is removed from the assessment</p>

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				of effects for the final site allocation policies where these details are known.
1338133 Southern Water (Catherine Adamson)	SA-NTS14	<p>Southern Water supports all policy requirements which seek to ensure that surface water is appropriately managed, as close to source as possible.</p> <p>We support the intention to monitor the extent of planning applications approved with SuDS and would suggest an amendment to one of the indicators you propose – so that rather than the “Number of qualifying permitted developments incorporating Sustainable Drainage Systems” you instead monitor the “Percentage of qualifying permitted developments incorporating Sustainable Drainage Systems”</p>	P110 Proposed monitoring indicators for Objective SA7 – avoid & mitigate flood risk.	Noted.
1271448 National Highways (Kevin Bown)	SA-NTS16	As far as we can tell, but subject to the Council’s confirmation, we do not believe the documents change the transport evidence base (particularly with regards the SRN) as it currently stands and as agreed by us. Assuming this to be the case, we have no comments on the consultation documents.	Non-Technical Summary (NTS) of the Publication Dover District Local Plan (September 2022)	Noted.
1338241 Sandwich Town Council (Gill Gray)	SA-NTS18	<p>‘Sustainable’ is not adequately defined, nor is what this part of the report is trying to achieve. The report could apply to any community in the UK.</p> <p>In terms of “Summary” this is a 122 page document summarising a 293 page document (plus addendums) in terms of non-technical, many of the (what I would regard as technical) charts are simply replicated. It often refers to the main report.</p> <p>In the case of Sandwich, we tick the box “Significant negative effect likely”</p> <p>However, within the report, there are entries that are clearly useful in challenging the sustainability of the plan. Eg. Page 98 (but, the term Significant effects? Good or bad.</p> <p>In summary. It is not a document that I feel gives a Non Technical Summary to an average member of the public such that they can express a view to the Council. Equally, as a comment on the sustainability of the larger proposals in the context of an admitted Climate Emergency, again, it doesn’t appear to be fit for purpose.</p>	Overall comments	<p>Table 2 of the NTS sets out the framework against which the Plan and its reasonable alternatives have been appraised. In combination, the SA objectives represent sustainability in Dover. The SA appraises the Dover Local Plan and its reasonable alternatives using detailed evidence on the existing and likely future environment, society and economy.</p> <p>The NTS must be a comprehensive summary of the contents of the SA Report, which is over 500 pages in total.</p> <p>Noted.</p> <p>Figure 1 sets out the key to symbols and colour coding used in the SA of the Dover District Local Plan.</p> <p>The SEA Regulations require the Non-Technical Summary must summarise all the information set out in SA Report (specifically paragraphs 1-9 in Schedule 2 of the SEA Regulations).</p>
1338330 Kent County Council (Simon Jones)	SA-NTS19	The County Council supports the Sustainability Appraisal NTS and welcomes the references made to reflect the significance of walking, cycling and active travel to achieve the district’s objectives.	Non-Technical Summary (NTS) of the Publication Dover District Local Plan	The SA draws on the Kent Rights of Way Improvement Plan. SA objectives 2 (accessibility), 4 (travel) and 8 (climate change mitigation) considers the accessibility of sites to the existing Public Right of Way network.

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		<p>However, the County Council recommends that there is greater specific inclusion of the area's current PRow network asset in the Transport and Infrastructure Policy Appraisals section of the document.</p> <p>The document should also reflect that investment into existing routes for sustainable transport, sustainable tourism, health, protection and enhancement of community assets, and landscape character is of economic benefit to the district and county, rather than encouraging the creation of new routes.</p>	(September 2022)	
1261355 Simon Mallett	SA-NTS21	<p>'Sustainable' is not adequately defined, nor is what this part of the report is trying to achieve. The report could apply to any community in the UK.</p> <p>In terms of "Summary" this is a 122 page document summarising a 293 page document (plus addendums) in terms of non-technical, many of the (what I would regard as technical) charts are simply replicated. It often refers to the main report.</p> <p>In the case of Sandwich, we tick the box "Significant negative effect likely"</p> <p>However, within the report, there are entries that are clearly useful in challenging the sustainability of the plan. Eg. Page 98 (but, the term Significant effects? Good or bad.</p> <p>In summary. It is not a document that I feel gives a Non-Technical Summary to an average member of the public such that they can express a view to the Council. Equally, as a comment on the sustainability of the larger proposals in the context of an admitted Climate Emergency, again, it doesn't appear to be fit for purpose.</p>	Non-Technical Summary (NTS) of the Publication Dover District Local Plan (September 2022)	<p>Table 2 of the NTS sets out the framework against which the Plan and its reasonable alternatives have been appraised. In combination, the SA objectives represent sustainability in Dover. The SA appraises the Dover Local Plan and its reasonable alternatives using detailed evidence on the existing and likely future environment, society and economy.</p> <p>The NTS must be a comprehensive summary of the contents of the SA Report, which is over 500 pages in total.</p> <p>Noted.</p> <p>Figure 1 sets out the key to symbols and colour coding used in the SA of the Dover District Local Plan.</p> <p>The SEA Regulations require the Non-Technical Summary must summarise all the information set out in SA Report (specifically paragraphs 1-9 in Schedule 2 of the SEA Regulations).</p>
1338434 Environment Agency (Jennifer Wilson)	SA-NTS22	No comments	Non-Technical Summary (NTS) of the Publication Dover District Local Plan (September 2022)	Noted.