

SA Reps post submission (NTS and Addendum/Errata)

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| Consultee ID | 1329346 |
| Consultee Full Name | Mr Gerald Irvine |
| Consultee Company / Organisation | |
| Agent Full Name | |
| Agent Company / Organisation | |
| Event Name | Sustainability Appraisal Non-Technical Summary/Addendum and Errata Sheet |
| Representation ID | SA-NTS3 |
| 1. - Please tell us which document you are commenting on? | The Sustainability Appraisal: Non-Technical Summary (NTS) of the Publication Dover District Local Plan (September 2022) |
| 1.1 - Please also state clearly the chapter, section, paragraph number or page number to which your comment(s) refers: | <ol style="list-style-type: none"> 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) 4. LUC/10 Assumptions, not evidence. 5. Option 3 weighs heavily against the AONB 6. LUC/16 Table 4 Displays many significant weighted negative question marks. How can rational decisions be made based on such indeterminate values. |
| 2. - Please give your comment (including any suggested changes) in the box below: | <p>I am writing to comment on the importance and weighting placed by DDC in this Non-Technical Summary consultation of the submitted White Paper entitled Levelling up the UK (September 2022) and its subsequent off-spring, Levelling Up & Regulations Bill. This Bill, at time of this submission, has just finished its second reading in the House of Lords. It requires a third reading, a return to the House of Commons, then passage into law and finally Royal Assent. It will give councils, including district councils, considerable powers to effect levelling up when brought into law.</p> <p>My concerns and objecting comment are submitted on the following grounds -</p> <ol style="list-style-type: none"> 1. That this future legislation about non-technical issues is being included and conflated in an existing process, which, for the public will see closure at this level on July 6th, 2023. In addition, the whole direction of this legislation may change with on-going amendments and may not even be concluded until after the inspectors have made their decision. The most important decisions for the district are being sought now by DDC on evidence and law that is yet to be finalised. These decisions will not just affect the next 15 years. They are forever decisions. 2. This proposed future legislation is being given the greatest weight by DDC in the future Local Plan. It is weighted so heavily in this document that it is trumping the technical issues raised and assessed under other legislation commented on in earlier consultations, AONB, landscape, Town and Country Planning Act etc. All appear to be overridden in this consultation to possibly achieve one goal in isolation. The goal of levelling up. Rational reasoning on which the Local Plan is founded is required to be based on many factors and the balance of all of them. This document appears to have stripped that away. This is exhibited and probably evidenced by - <ol style="list-style-type: none"> 2.1. 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? 2.2. STM010 was within the group ratings. It has now been placed at the top of this enlarged group for development. It is the pre-eminent site within the AONB in the District. What is the driving rational thinking for this change? Is it being driven by "levelling up" at the most extreme level? 2.3. We all give the greatest importance to levelling up our communities. It shows our humanity. We have lost 22 social houses in our local community as the result of asset stripping. DDC assented to these losses. It did not actively resist them. Is DDC really trying to reverse its past inactions now? Or, is this just another public relations exercise? |

2.4. How will building social housing in the AONB on sites such as STM010 under the umbrella of the "Levelling Up and Regulations Bill" really help raise the disadvantaged out of poverty and truly level up? The nearby amenities are few, the infrastructure poor, the work opportunities few. There exist no arguments for development. All this has been established in the submissions lodged in previous consultations. The rational arguments that influence this site and other such sites in the AONB's have all been well established in the submission process.

2.5. DDC in the Local Plan in submissions since Regulation 19 closed have published in two separate documents two different locations for one proposed 10 dwelling development. One is fronting The Droveaway. One is fronting Salisbury Road. Which is to be believed or are two separate developments being proposed? The fog thickens.

Further thoughts arise if DDC is intending to use the Levelling Up & Regeneration Bill as its yardstick. As the Bill is still in the debating stage I must use the information available as of the 19th. June and as original and/or moved during debate.

3.1. It is obvious from signatories supporting earlier submissions that street vote development orders in favour of development on site STM010 will not be favourably viewed. If the mandate numbers worked in a reciprocal way to those at present in the Bill then all proposed AONB developments would be a non-starters? Even if DDC could "whip" up enough votes amongst residents the site is excluded from such referendums. Under 61QC, amongst the list of excluded sites are SSSI's (very nearby), AONB's (the site itself) and European sites (very nearby).

3.2 Under page 52(4) "Where an ecological survey identifies that a proposed development constitutes a threat under subsection(1), any consideration of a planning application in relation to the proposed development by the LPA must begin with a presumption against development." A survey has already begun, felt tiles have been spread around the perimeter, possibly by a contractor on the instructions of the land-owner on the advice of DDC. Slow worms have been found under them and photographed in the short time that they have been laid. Slow worms have also been sighted on the highway.

3.3 Under page 63 "Duty of regard to the right to Nature." DDC will, under the Act, have a statutory duty to provide a clean and sustainable environment which includes increasing access to natural spaces etc. Any action by DDC to include this site in the proposed Local Plan will exhibit a disregard of this proposed duty.

3.4. Under page 87 there exists a nature restoration duty. 30% of England is required to be protected, monitored and managed as protected sites. I must make an assumption that this will be a requirement by district and DDC has not been granted any special exemption from this requirement. Since STM010 is contiguous with the AONB and SSSI it is only rational to continue, or even protect it further rather than find other sites in isolation to compensate for its loss.

In light of all the above arguments, along with those lodged as part of the consultation process, I can see no comfort or rationale for DDC to claim that the proposed Levelling Up and Regeneration Bill supports their arguments for development upon site STM010. The proposed Bill, as it stands, includes more arguments against than for such development.

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| Consultee ID | 1331537 |
| Consultee Full Name | Mr William Ratchford |
| Consultee Company / Organisation | |
| Agent Full Name | |
| Agent Company / Organisation | |
| Event Name | Sustainability Appraisal Non-Technical Summary/Addendum and Errata Sheet |
| Representation ID | SA-NTS6 |
| 1. - Please tell us which document you are commenting on? | The Sustainability Appraisal: Non-Technical Summary (NTS) of the Publication Dover District Local Plan (September 2022) |
| 1.1 - Please also state clearly the chapter, section, paragraph number or page number to which your comment(s) refers: | Comments below refer to STM010 in the Sustainable Appraisal NTS: p.63 Table 18; p.64 paragraph 1.112; p.91 SA9:Biodiversity; p.92 SA11 Landscape; p.94 Habitats Regulations Assessment: Site Allocation Policy 40; p.100 Cumulative effects at the settlement level 1.199: St Margaret's at Cliffe. |

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| <p>2. - Please give your comment (including any suggested changes) in the box below:</p> | <p>Due to the concerns raised in the above-mentioned sections of the SA-NTS, STM010 should not be considered an appropriate location for the building of houses. It is in an AONB close to the Heritage Coast and an BOA, abuts National Trust land, is several hundred yards from an SSSI, an SAC, and a national historic monument, is identified as chalk grassland which is a priority habitat under the National Environment and Rural Communities Act 2006, accessible by two single track cul-de-sac roads, one adopted, one unadopted which are, in turn, accessible by a poorly paved, heavily parked road through the village. It could not be more inappropriate for executive or social housing and, therefore, should be removed from inclusion in the Local Plan. Thank you for your consideration.</p> |
| <p>Consultee ID</p> | <p>1331710</p> |
| <p>Consultee Full Name</p> | <p>Diane Baines</p> |
| <p>Consultee Company / Organisation</p> | <p>on behalf of Mr J Thorn</p> |
| <p>Agent Full Name</p> | <p>Diane Baines</p> |
| <p>Agent Company / Organisation</p> | <p>DEB Planning</p> |
| <p>Event Name</p> | <p>Sustainability Appraisal Non-Technical Summary/Addendum and Errata Sheet</p> |
| <p>Representation ID</p> | <p>SA-NTS8</p> |
| <p>1. - Please tell us which document you are commenting on?</p> | <p>The Sustainability Appraisal: Non-Technical Summary (NTS) of the Publication Dover District Local Plan (September 2022)</p> |
| <p>1.1 - Please also state clearly the chapter, section, paragraph number or page number to which your comment(s) refers:</p> | <p>All references to site STM010 in St Margaret's at Cliffe within the NTS</p> |
| <p>2. - Please give your comment (including any suggested changes) in the box below:</p> | <p>Objection to: The Sustainability Appraisal: Non-Technical Summary (NTS) of the Publication Dover District Local Plan (September 2022)</p> <p>1.1 DEB Town Planning and Development Ltd has been instructed by Mr J Thorn, local resident of The Droveaway, to submit an objection to the above document.</p> <p>1.2 The objection is based on the Summary's assessment of Site STM010, "Land located between Salisbury Road and The Droveaway, St Margaret's-at-Cliffe".</p> <p>1.3 Site STM010 is an agricultural field bounded by hedges and trees and is located on the north western most edge of St Margaret's at Cliffe, within the Kent Downs AONB. It is part of the iconic White Cliffs Landscape Character Area and close to the Grade II* Listed Dover Patrol War Memorial. It is accessed via The Droveaway along its north west boundary and enclosed by the private road, Salisbury Road, to the south east.</p> <p>1.5 The site comprises elevated ground being in parts over 2m higher than The Droveaway and up to 4m higher than ground levels at Salisbury Road, it is therefore prominent in the landscape. There are three PROWs across the site (two sections of ER26 and the Frontline Britain trail), which link the inland PROW network with the coastal paths and the Grade II* Dover Patrol War Memorial.</p> <p>Sustainability Appraisal Non Technical Summary Report. (NTS)</p> <p>2.1 In the Appraisal Summary Site STM010 is assessed against a set of sustainability criteria alongside other sites in the DDLP Sustainability Appraisal, (SA), of September 2022. The SA at Paragraph 5.43 states: "All site options considered at both the Draft (Regulation 18) and Publication Local Plan (Regulation 19) stages to be suitable and potentially suitable are organised from the strongest performing at the top to the weaker performing at the bottom."</p> <p>2.2 In 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 other allocations within the village – this is wrong. The NTS Table 8 incorrectly records the SA's assessment of site STM010.</p> <p>2.3 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> |

2.4 In the 'Landscape' Section of the NTS Site STM010 is stated as "expected to result in minor negative effects on the landscape". This assessment fails to take into consideration the following known factors.

- a. Planning permissions have previously been refused and an Appeal dismissed for development at the site on the grounds of harm to the visual quality and special character of the landscape. (See Section C below for details of previously refused and dismissed applications).
- b. The main SA (page 418) refers to the "the significant adverse effects identified through the SA" in regard to site STM010.
- c. Previous SHLAA and HELAA assessments of the site by Dover District Council have established the unsuitability of the site for development because of landscape impact and highways reasons. The 2012 SHLAA states: "The site is on a crest of a hill and despite screening would be visible from a long distance... Any development on the site would therefore have a highly detrimental impact on the designated landscape".
- d. In the 2015 HELAA STM010 was identified as having 'medium landscape sensitivity', but this was based on the incorrect assumption the site was not within the AONB. Had the site been correctly identified as within the AONB it is likely it would have been identified as unsuitable for development as per previous assessments.
- e. The village of St Margaret's at Cliffe has been redesignated in the new local plan as a local centre, when in the Core Strategy it was identified as a village. 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. Regardless of Local plan designation the impact of developing site STM010 on the landscape around the village will be harmful to the setting of heritage assets, the coastline and the wider countryside that surrounds the village.

2.5 This evidence directs that site STM010 should be assessed in the NTS as having a **Significant Negative** effect on Landscape (SA11).

2.6 The Summary repeats the errors of the Sustainability Appraisal –where 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..

2.7 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.

2.8 Site STM010 is within close proximity of known historic assets and lies within an historic landscape. Development of site STM010 would harm the significance of the nearby **Grade II* listed heritage asset - the Dover Patrol War Memorial**. The site is also within the setting of the Heritage Coast. STM010 forms a strategic part of the landscaped setting for the listed Memorial. The prominent high ground of the site has a strong visual relationship with the Memorial. This relies on a physical and visual separation between the suburban edge of the village and the Memorial's coastal landscape..

2.9 None of this is identified in the Historic Environment section of the SA or the NTS. A "?" is recorded, but awarded a factor of "minor negative", this assessment is unevidenced and is not sound.

2.10 The numerous errors and failures to provide accurate evidence in the main Sustainability Appraisal with regard to Site STM010 have been repeated in the Non Technical Summary. These errors matter. Had Site STM010 been accurately assessed against the SA criteria it would not have performed strongly enough to be selected for allocation.

4.9 The errors in the assessment of Site STM010 in the SA render the Sustainability Appraisal unsound; and thus the Non Technical Summary is unsound.

Conclusion

1.8 For the above reasons the Sustainability Appraisal: Non-Technical Summary (NTS) of the Publication Dover District Local Plan (September 2022) is considered unsound in relation to its assessment of site STM010.

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| Consultee ID | 1329545 |
| Consultee Full Name | Mr Neil Buckley |
| Consultee Company / Organisation | |

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| Agent Full Name | |
| Agent Company / Organisation | |
| Event Name | Sustainability Appraisal Non-Technical Summary/Addendum and Errata Sheet |
| Representation ID | SA-NTS9 |
| 1. - Please tell us which document you are commenting on? | The Sustainability Appraisal: Non-Technical Summary (NTS) of the Publication Dover District Local Plan (September 2022) |
| 1.1 - Please also state clearly the chapter, section, paragraph number or page number to which your comment(s) refers: | This response is in relation to the appraisal of STM010 as set out in Table 8 on page 31, paragraph 1.58 on page 33 and Table 29. |
| 2. - Please give your comment (including any suggested changes) in the box below: | <p>This is a revised version of my submission. Please accept this as my submission document replacing the earlier document.</p> <p>We are the owners of "DDC REDACTED ADDRESS" St Margarets Bay, which directly adjoins site STM010 which has been allocated in policy SAP40 of the Dover District Council (DDC) Regulation 19 local plan submission document. Indeed, the proposed extent of STM010 is such that it would appear that it includes land owned by us.</p> <p>We are responding to the consultation on the non-technical summary of the sustainability appraisal because the sustainability assessment for the site STM010 (in table 8 on page LUC-31) repeats the multiple flaws and errors in the Regulation 18 and 19 process that mean the tests of soundness in the National Planning Policy Framework (NPPF) have not been met. Indeed, these errors are compounded by the further errors that are set out in this consultation (which should in any event have happened prior to completion of the Regulation 19 consultation).</p> <p>The designation in paragraph 1.58 of this consultation document of site STM010 as 'one of the most strongly performing site options' indicates the total failure to give proper consideration to local and national planning policy, including the NPPF, as well as being inconsistent with the current DDC local plan and the requirements of the Town and Country Planning (Local Planning) (England) Regulations 2012 (the Regulations) and DDC's commitments to the AONB Management Plan.</p> <p>The willingness of DDC to allow development on site STM010 is incomprehensible as well as being totally unsound.</p> <p>Even in the chart summarising the SA for STM010 there are errors. 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.</p> <p>Yet in another part of this document, the Sustainability Assessment clearly records for STM010 that the correct assessment for SA5:Resources is Significant Negative Effect, see table 29 at page 88 where for SA5:Resources STM010 is correctly stated as Significant Negative Effects. The failure to transpose this assessment to Table 8 is another error by DDC, which if it had properly been recorded would have meant that site STM010 would not have been put forward as among the strongest performing.</p> <p>The focus of the rest of response is on 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>Starting with the most important - Landscape SA11. I have set out below why any considered assessment of SA11 should have found that the impact from development would be 'significant negative effect likely'. A housing development on this site would severely damage and conflict with the legal protections that have been put in place to protect this site.</p> <p>STM010 is a field which 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.</p> |

A key consideration about STM010 is that it sits prominently above the surrounding land. The field which is STM010 (Snag Burrows Mount) is a plateau. The contour map shows that STM010 is higher than all the surrounding land including Bockell Hill. Any houses on this site will be visible throughout this part of the AONB, Heritage Coast and SAC. The large houses that are proposed will not only seriously impact the sensitive landscape and dark skies but will also significantly impede views towards both the Grade 2* listed Dover Patrol (one of three special WW1 Memorials located in the UK, France and the USA) and the Grade 2 listed South Forelands Lighthouse.

Areas defined as AONB are entitled to extra legal protection (including from inappropriate assessment and allocation under a Local Plan) to preserve their beauty and sensitive landscape for everyone to enjoy. The site is also very close (within a few hundred metres) of a Special Area of Conservation which is meant to give additional protection for important habitats for wildlife, flora and fauna as well as wildlife and birds. This status has been given insufficient weight and consideration in all aspects of the sustainability assessment, landscape evaluation and proposed allocation within SAP40.

Previous SHLAA and HELAA assessments of the site by DDC have been absolutely clear about the unsuitability of the site for development because of landscape impact and for highways reasons. The 2012 SHLAA states: "The site is on a crest of a hill and despite screening would be visible from a long distance... Any development on the site would therefore have a highly detrimental impact on the designated landscape". DDC's June 2023 response to the Planning Inspectorate Examiners' questions says that assessments for sites within in the AONB were desk based. If that was so, then presumably the previous 2012 assessment would have been the founding basis for that assessment. The 2012 assessment is the right assessment for the landscape and should have been reflected in a scoring of significant negative effects.

It is inconceivable that development now on this site would have less impact than was considered in 2012. Indeed, the negative effects, particularly on matters such as biodiversity and the night sky which were given less prominence in 2012, suggests the opposite is more likely; the detrimental impact is even more than it was 10 years ago.

What seems to have happened though is that the 2020 HELAA, on which reliance is placed in this non technical consultation, incorrectly said that STM010 adjoined but was not within the AONB. There was a total failure in that 2020 HELAA to mention the site was also Heritage Coast and very close to the SAC. DDC have attempted to rectify this mistake, because in the erratum amendments made to the Regulation 19 documents and submitted to the Examiners they have just deleted the word 'adjoining' and added wording making it appear as though they did consider that STM010 was within the AONB/Heritage Coast when they made that 2020 assessment. I leave it to the inspectors to draw their own conclusions as to the soundness of such an action, as simply altering the wording does not make the initial assessment correct, in particular as the Sustainability Assessments flowed from the incorrect analysis in 2020 and are therefore unsound.

This matters because the land which encompasses STM010 was, from the creation of the AONB, included within its boundary. It was intended to mark a separation between the houses of St Margarets Bay (which in this area were not included in the AONB) and the open countryside. Although used for farmland, the field is an integral part of this incredibly beautiful, and sensitive, landscape for which world heritage status is currently being sought. The field may have an agricultural purpose but its inclusion within the extent of the AONB was very deliberate. The elevated landscape of the field is itself beautiful. It adds to the surrounding landscape with its three footpaths giving access for walkers, providing far reaching vistas to historic sights, together with its tranquility and nighttime 'darkness'.

The site seamlessly adjoins the land (both scrubland and farmland) which forms part of the Dover to Kingsdown Cliffs, which are a Designated Special Area of Conservation (SAC) and a Site of Special Scientific Interest (SSSI). The field is within a few hundred metres of this very sensitive Coastal SAC/SSSI (a fact which, extraordinarily, seems not to have formed part of the DDC Habitat Assessment nor the Sustainability Assessment). The field is an important part of the biodiversity of the AONB. Indeed, the site is within a Biodiversity Opportunity Area and part of the Green Infrastructure Network.

The designation of STM010 for planning purposes (and the assessment of the site as 'minor negative effect likely' for SA11) is in contravention of the Regulation 19 Plan's policies regarding the natural environment with reference to the Kent Downs AONB. Paragraph NE2 of the Local

Plan requires that 'proposals' - including assessments and allocations- should demonstrate regard to the particular characteristics of the land. No such regard seems to have been made to these characteristics in the proposed allocation. This is evidenced not least by the fact that the characterisation of this site as low to medium sensitivity in the sustainability assessment cannot be commensurate with the special characteristics of this prominent site which should have been fully assessed and taken into account. This is a high point of the AONB, it will not be possible to build houses on this elevated field without intruding upon and adversely impacting significantly the sensitive landscape of which it is an essential component. That impact will not just be on the AONB and Heritage Coast but also the SAC.

Paragraph 175 of the NPPF requires authorities to allocate land with the least environmental or amenity value. Yet this allocation, for 10 houses that could be built in other far less sensitive sites, will be of land that has the absolutely highest environmental and amenity value. The fact that this non technical consultation states that STM010 is strongly performing as a favoured site for development seems to contradict the very intention of Paragraph 175 and this has been achieved through a totally flawed and unsound sustainability assessment including in particular its environmental impact assessment.

Paragraph 176 of the NPPF requires that 'Great weight should be given to conserving and enhancing landscape and scenic beauty in ... Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues'. No such 'great weight' has been applied to this allocation. The landscape assessment and sustainability assessment for this site have both failed to put any real weight on the sensitive nature of the landscape and its scenic beauty. The assessment of the site as low to medium sensitivity demonstrates the lack of weight that has been applied by DDC (again in contrast to other allocation of AONB sites within the St Margarets area).

There is also a lack of consistency in the sustainability assessments for different parts of the AONB (which amounts to a breach of the soundness criteria of being justified and consistent with national policy). This can be seen from the fact that a less elevated site, namely STM007 which is also further from the SSSI and SAC, was considered highly sensitive. A similar assessment should have been made for STM010.

Paragraph NE2 of the Local Plan also requires that allocations (including the technical SA) should have regard to the AONB Management Plan. The inclusion of site STM010 means DDC have not properly considered their agreement to abide by the Management Plan for the Kent Downs AONB.

At section one of the AONB Management Plan (Management Plan) particular emphasis is given to 'Tranquillity and remoteness'. The Management Plan states: 'Much of the AONB provides surprisingly tranquil and remote countryside – offering dark night skies, space, beauty and peace. Simply seeing a natural landscape, hearing birdsong, seeing and hearing the sea, watching stars at night or 'bathing' in woodland are important perceptual qualities of the AONB'.

This part of St Margarets Bay has no streetlights, and this field enhances and extends the dark skies, space, beauty, and peace that the AONB and DDC have pledged to protect. Allocation within SAP40 – and subsequent building of multiple homes - will forever remove that tranquillity and sense of remoteness not just for the site but also the surrounding protected landscape which includes our home. In such a prominent position, these houses will be seen from far around (as noted in the 2012 SHLAA) and will inevitably add substantial light pollution. This should have been considered, not least in the landscape evaluation and the Sustainability Assessment, as the Management Plan says dark skies are a key priority to protect (See the Management Plan's Sustainability Development Principle 7).

The Management Plan also specifically warns against the cumulative effect of small-scale developments on the special character and qualities of the AONB (See paragraph 3.1.4 of the Management Plan). That paragraph states: ' each individually small impact taken cumulatively is progressively diminishing the qualities and character of the AONB at a strategic scale'. The proposed allocation of a site which is over two hectares in an elevated part of the coastal AONB would, contrary to the Management Plan, be a significant diminution of the AONB.

In summary, the assessment of Site STM010 as having 'minor negative effect likely' for the landscape SA11 evaluation is unsound in all aspects of its compliance with the legal requirements upon DDC, not least in relation to the NPPF, the current local plan and AONB Management Plan. In failing to meet all the requirements of the NPPF, the allocation of STM010 within SAP40 means the allocation also does not fulfil the soundness

obligations of being justified and consistent with national policy. I would refer again to the June 2023 response by DDC to the Planning Inspector Examiners where it is noted that the AONB itself considers that the assessment for STM010 conflicts with the NPPF and is unsound. Yet DDC have ploughed ahead with their landscape assessment for STM010 in this consultation, seemingly determined to promote development on this site of ten very large and no doubt expensive houses (see the submitted plans for this site). As an aside, DDC have refused to disclose under FOI their correspondence with the developer in relation to 'pre-planning approval' for site STM010 (which the said developer referenced in their public submission to the Regulation 19 consultation).

SA9 Biodiversity

Again, the assessment given to STM010 is unsound in relation to its SA9 Biodiversity assessment.

The AONB Management Plan requires both a landscape led approach (page 26) and net gains for biodiversity (page 27). Allocation of a prominent site within the AONB, including assessment of the impact as 'minor', seems incompatible with this approach, not least when the land to be designated is of such a sensitive nature (just a few hundred metres from a SAC and an SSSI). No mention is made in the biodiversity assessment of this proximity to the SAC.

Paragraph 174 of the NPPF requires allocations to contribute to and enhance the natural and local environment, in particular by (as set out in Para 174 (a)) 'protecting and enhancing valued landscapes and sites of biodiversity'. This allocation has the completely opposite impact and effect. This allocation means an elevated field, with protected status, which is in a biodiversity opportunity area and within a few hundred metres of a SAC will be lost forever.

Again, if proper consideration has been given to this site it would have been assessed as 'significant negative effect likely' for SA9: biodiversity.

SA10 - historic environment.

It seems odd that in their response submission to the examiners from the planning inspectors, DDC accepts that were STM010 to be developed it would require a full archaeological survey. Yet their Technical SA assessment of STM010 is that apparently only 'minor negative effect likely'. The Droveaway, on which this site is adjacent, has been the site of a number of very important Anglo Saxon archaeological digs. There have been significant findings. In 2012, five graves were found just a few hundred metres along The Droveaway. These burials were in burrows. The name for the field which is STM010 - Snag Burrows Mount - is itself a clue that this field is the site of AngloSaxon burials. Burrows being Anglo-Saxon burial mounds. The fact that STM010 is the local high point reinforces the fact that STM010 is likely to be an important Anglo Saxon site and one that should have been properly assessed in relation to SA10- historic environment. Why require an archaeological survey if the impact of development is only likely to be of minor negative effect?

Moreover as set out above, this prominent site provides 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.

Process flaws and errors

The process for the inclusion of this site has been flawed from the outset and we object to the assessments for STM010 within this non technical consultation, which are manifestly unsound, as well as objecting to the allocation of this site. We seek deletion of site STM010 from SAP40 of the local plan.

Finally, this consultation document reveals that the village of St Margaret's at Cliffe (including St Margaret's Bay) is to be re-designated in the new local plan as a local centre, when in the Core Strategy and the documents accompanying previous consultations it was identified as a

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| | village. 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. Regardless of Local plan attempted re-designation, the impact of developing site STM010 on the landscape around the village will be harmful to the setting of heritage assets, the coastline and the wider countryside that surrounds the village. As such, this reinforces the unsound nature of DDC's assessment of this site. |
| Consultee ID | 1337959 |
| Consultee Full Name | Mr Phil Kilroe |
| Consultee Company / Organisation | |
| Agent Full Name | |
| Agent Company / Organisation | |
| Event Name | Sustainability Appraisal Non-Technical Summary/Addendum and Errata Sheet |
| Representation ID | SA-NTS10 |
| 1. - Please tell us which document you are commenting on? | The Sustainability Appraisal: Non-Technical Summary (NTS) of the Publication Dover District Local Plan (September 2022) |
| 1.1 - Please also state clearly the chapter, section, paragraph number or page number to which your comment(s) refers: | This submission refers to STM010 and Charts 8 and 29 and paragraph 1.58 of the consultation. |
| 2. - Please give your comment (including any suggested changes) in the box below: | <p>We are the owners of "DDC REDACTED ADDRESS" which directly adjoins site STM010 which has been allocated in policy SAP40 of the Dover District Council (DDC) Regulation 19 local plan submission document. Indeed, the proposed extent of STM010 is such that it would appear that it includes land owned by us.</p> <p>We are responding to the consultation on the non-technical summary of the sustainability appraisal because the sustainability assessment for the site STM010 (in table 8 on page LUC-31) repeats the multiple flaws and errors in the Regulation 18 and 19 process that mean the tests of soundness in the National Planning Policy Framework (NPPF) have not been met. Indeed, these errors are compounded by the further errors that are set out in this consultation (which should in any event have happened prior to completion of the Regulation 19 consultation).</p> <p>The designation in paragraph 1.58 of this consultation document of site STM010 as 'one of the most strongly performing site options' indicates the total failure to give proper consideration to local and national planning policy, including the NPPF, as well as being inconsistent with the current DDC local plan and the requirements of the Town and Country Planning (Local Planning) (England) Regulations 2012 (the Regulations) and DDC's commitments to the AONB Management Plan.</p> <p>The willingness of DDC to allow development on site STM010 is incomprehensible as well as being totally unsound.</p> <p>Even in the chart summarising the SA for STM010 there are errors. 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.</p> <p>Yet in another part of this document, the Sustainability Assessment clearly records for STM010 that the correct assessment for SA5:Resources is Significant Negative Effect, see table 29 at page 88 where for SA5:Resources STM010 is correctly stated as Significant Negative Effects. The failure to transpose this assessment to Table 8 is another error by DDC, which if it had properly been recorded would have meant that site STM010 would not have been put forward as among the strongest performing.</p> |

The focus of the rest of response is on 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.

Starting with the most important - Landscape SA11. I have set out below why any considered assessment of SA11 should have found that the impact from development would be 'significant negative effect likely'. A housing development on this site would severely damage and conflict with the legal protections that have been put in place to protect this site.

STM010 is a field which 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.

A key consideration about STM010 is that it sits prominently above the surrounding land. The field which is STM010 (Snag Burrows Mount) is a plateau. The contour map shows that STM010 is higher than all the surrounding land including Bockell Hill. Any houses on this site will be visible throughout this part of the AONB, Heritage Coast and SAC. The large houses that are proposed will not only seriously impact the sensitive landscape and dark skies but will also significantly impede views towards both the Grade 2* listed Dover Patrol (one of three special WW1 Memorials located in the UK, France and the USA) and the Grade 2 listed South Forelands Lighthouse.

Areas defined as AONB are entitled to extra legal protection (including from inappropriate assessment and allocation under a Local Plan) to preserve their beauty and sensitive landscape for everyone to enjoy. The site is also very close (within a few hundred metres) of a Special Area of Conservation which is meant to give additional protection for important habitats for wildlife, flora and fauna as well as wildlife and birds. This status has been given insufficient weight and consideration in all aspects of the sustainability assessment, landscape evaluation and proposed allocation within SAP40.

Previous SHLAA and HELAA assessments of the site by DDC have been absolutely clear about the unsuitability of the site for development because of landscape impact and for highways reasons. The 2012 SHLAA states: "The site is on a crest of a hill and despite screening would be visible from a long distance... Any development on the site would therefore have a highly detrimental impact on the designated landscape". DDC's June 2023 response to the Planning Inspectorate Examiners' questions says that assessments for sites within the AONB were desk based. If that was so, then presumably the previous 2012 assessment would have been the founding basis for that assessment. The 2012 assessment is the right assessment for the landscape and should have been reflected in a scoring of significant negative effects.

It is inconceivable that development now on this site would have less impact than was considered in 2012. Indeed, the negative effects, particularly on matters such as biodiversity and the night sky which were given less prominence in 2012, suggests the opposite is more likely; the detrimental impact is even more than it was 10 years ago.

What seems to have happened though is that the 2020 HELAA, on which reliance is placed in this non technical consultation, incorrectly said that STM010 adjoined but was not within the AONB. There was a total failure in that 2020 HELAA to mention the site was also Heritage Coast and very close to the SAC. DDC have attempted to rectify this mistake, because in the erratum amendments made to the Regulation 19 documents and submitted to the Examiners they have just deleted the word 'adjoining' and added wording making it appear as though they did consider that STM010 was within the AONB/Heritage Coast when they made that 2020 assessment. I leave it to the inspectors to draw their own conclusions as to the soundness of such an action, as simply altering the wording does not make the initial assessment correct, in particular as the Sustainability Assessments flowed from the incorrect analysis in 2020 and are therefore unsound.

This matters because the land which encompasses STM010 was, from the creation of the AONB, included within its boundary. It was intended to mark a separation between the houses of St Margarets Bay (which in this area were not included in the AONB) and the open countryside. Although used for farmland, the field is an integral part of this incredibly beautiful, and sensitive, landscape for which world heritage status is currently being sought. The field may have an agricultural purpose but its inclusion within the extent of the AONB was very deliberate. The elevated landscape of the field is itself beautiful. It adds to the surrounding landscape with its three footpaths giving access for walkers, providing far reaching vistas to historic sights, together with its tranquility and nighttime 'darkness'.

The site seamlessly adjoins the land (both scrubland and farmland) which forms part of the Dover to Kingsdown Cliffs, which are a Designated Special Area of Conservation (SAC) and a Site of Special Scientific Interest (SSSI). The field is within a few hundred metres of this very sensitive Coastal SAC/SSSI (a fact which, extraordinarily, seems not to have formed part of the DDC Habitat Assessment nor the Sustainability Assessment). The field is an important part of the biodiversity of the AONB. Indeed, the site is within a Biodiversity Opportunity Area and part of the Green Infrastructure Network.

The designation of STM010 for planning purposes (and the assessment of the site as 'minor negative effect likely' for SA11) is in contravention of the Regulation 19 Plan's policies regarding the natural environment with reference to the Kent Downs AONB. Paragraph NE2 of the Local Plan requires that 'proposals' - including assessments and allocations- should demonstrate regard to the particular characteristics of the land. No such regard seems to have been made to these characteristics in the proposed allocation. This is evidenced not least by the fact that the characterisation of this site as low to medium sensitivity in the sustainability assessment cannot be commensurate with the special characteristics of this prominent site which should have been fully assessed and taken into account. This is a high point of the AONB, it will not be possible to build houses on this elevated field without intruding upon and adversely impacting significantly the sensitive landscape of which it is an essential component. That impact will not just be on the AONB and Heritage Coast but also the SAC.

Paragraph 175 of the NPPF requires authorities to allocate land with the least environmental or amenity value. Yet this allocation, for 10 houses that could be built in other far less sensitive sites, will be of land that has the absolutely highest environmental and amenity value. The fact that this non technical consultation states that STM010 is strongly performing as a favoured site for development seems to contradict the very intention of Paragraph 175 and this has been achieved through a totally flawed and unsound sustainability assessment including in particular its environmental impact assessment.

Paragraph 176 of the NPPF requires that 'Great weight should be given to conserving and enhancing landscape and scenic beauty in ... Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues'. No such 'great weight' has been applied to this allocation. The landscape assessment and sustainability assessment for this site have both failed to put any real weight on the sensitive nature of the landscape and its scenic beauty. The assessment of the site as low to medium sensitivity demonstrates the lack of weight that has been applied by DDC (again in contrast to other allocation of AONB sites within the St Margarets area).

There is also a lack of consistency in the sustainability assessments for different parts of the AONB (which amounts to a breach of the soundness criteria of being justified and consistent with national policy). This can be seen from the fact that a less elevated site, namely STM007 which is also further from the SSSI and SAC, was considered highly sensitive. A similar assessment should have been made for STM010.

Paragraph NE2 of the Local Plan also requires that allocations (including the technical SA) should have regard to the AONB Management Plan. The inclusion of site STM010 means DDC have not properly considered their agreement to abide by the Management Plan for the Kent Downs AONB.

At section one of the AONB Management Plan (Management Plan) particular emphasis is given to 'Tranquillity and remoteness'. The Management Plan states: 'Much of the AONB provides surprisingly tranquil and remote countryside – offering dark night skies, space, beauty and peace. Simply seeing a natural landscape, hearing birdsong, seeing and hearing the sea, watching stars at night or 'bathing' in woodland are important perceptual qualities of the AONB'.

This part of St Margarets Bay has no streetlights, and this field enhances and extends the dark skies, space, beauty, and peace that the AONB and DDC have pledged to protect. Allocation within SAP40 – and subsequent building of multiple homes - will forever remove that tranquillity and sense of remoteness not just for the site but also the surrounding protected landscape which includes our home. In such a prominent position, these houses will be seen from far around (as noted in the 2012 SHLAA) and will inevitably add substantial light pollution. This should have been considered, not least in the landscape evaluation and the Sustainability Assessment, as the Management Plan says dark skies are a key priority to protect (See the Management Plan's Sustainability Development Principle 7).

The Management Plan also specifically warns against the cumulative effect of small-scale developments on the special character and qualities of the AONB (See paragraph 3.1.4 of the Management Plan). That paragraph states: 'each individually small impact taken cumulatively is progressively diminishing the qualities and character of the AONB at a strategic scale'. The proposed allocation of a site which is over two hectares in an elevated part of the coastal AONB would, contrary to the Management Plan, be a significant diminution of the AONB.

In summary, the assessment of Site STM010 as having 'minor negative effect likely' for the landscape SA11 evaluation is unsound in all aspects of its compliance with the legal requirements upon DDC, not least in relation to the NPPF, the current local plan and AONB Management Plan. In failing to meet all the requirements of the NPPF, the allocation of STM010 within SAP40 means the allocation also does not fulfil the soundness obligations of being justified and consistent with national policy. I would refer again to the June 2023 response by DDC to the Planning Inspector Examiners where it is noted that the AONB itself considers that the assessment for STM010 conflicts with the NPPF and is unsound. Yet DDC have ploughed ahead with their landscape assessment for STM010 in this consultation, seemingly determined to promote development on this site of ten very large and no doubt expensive houses (see the submitted plans for this site). As an aside, DDC have refused to disclose under FOI their correspondence with the developer in relation to 'pre-planning approval' for site STM010 (which the said developer referenced in their public submission to the Regulation 19 consultation).

SA9 Biodiversity

Again, the assessment given to STM010 is unsound in relation to its SA9 Biodiversity assessment.

The AONB Management Plan requires both a landscape led approach (page 26) and net gains for biodiversity (page 27). Allocation of a prominent site within the AONB, including assessment of the impact as 'minor', seems incompatible with this approach, not least when the land to be designated is of such a sensitive nature (just a few hundred metres from a SAC and an SSSI). No mention is made in the biodiversity assessment of this proximity to the SAC.

Paragraph 174 of the NPPF requires allocations to contribute to and enhance the natural and local environment, in particular by (as set out in Para 174 (a)) 'protecting and enhancing valued landscapes and sites of biodiversity'. This allocation has the completely opposite impact and effect. This allocation means an elevated field, with protected status, which is in a biodiversity opportunity area and within a few hundred metres of a SAC will be lost forever.

Again, if proper consideration has been given to this site it would have been assessed as 'significant negative effect likely' for SA9: biodiversity.

SA10 - historic environment.

It seems odd that in their response submission to the examiners from the planning inspectors, DDC accepts that were STM010 to be developed it would require a full archaeological survey. Yet their Technical SA assessment of STM010 is that apparently only 'minor negative effect likely'. The Droveaway, on which this site is adjacent, has been the site of a number of very important Anglo Saxon archaeological digs. There have been significant findings. In 2012, five graves were found just a few hundred metres along The Droveaway. These burials were in burrows. The name for the field which is STM010 - Snag Burrows Mount - is itself a clue that this field is the site of AngloSaxon burials. Burrows being Anglo-Saxon burial mounds. The fact that STM010 is the local high point reinforces the fact that STM010 is likely to be an important Angle Saxon site and one that should have been properly assessed in relation to SA10- historic environment. Why require an archaeological survey if the impact of development is only likely to be of minor negative effect?

Moreover as set out above, this prominent site provides 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.

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| | <p>Process flaws and errors</p> <p>The process for the inclusion of this site has been flawed from the outset and we object to the assessments for STM010 within this non technical consultation, which are manifestly unsound, as well as objecting to the allocation of this site. We seek deletion of site STM010 from SAP40 of the local plan.</p> <p>Finally, this consultation document reveals that the village of St Margaret's at Cliffe (including St Margaret's Bay) is to be re-designated in the new local plan as a local centre, when in the Core Strategy and the documents accompanying previous consultations it was identified as a village. 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. Regardless of Local plan attempted re-designation, the impact of developing site STM010 on the landscape around the village will be harmful to the setting of heritage assets, the coastline and the wider countryside that surrounds the village. As such, this reinforces the unsound nature of DDC's assessment of this site.</p> |
| Consultee ID | 1337024 |
| Consultee Full Name | Mrs Linda Brennan |
| Consultee Company / Organisation | |
| Agent Full Name | |
| Agent Company / Organisation | |
| Event Name | Sustainability Appraisal Non-Technical Summary/Addendum and Errata Sheet |
| Representation ID | SA-NTS11 |
| 1. - Please tell us which document you are commenting on? | The Sustainability Appraisal: Non-Technical Summary (NTS) of the Publication Dover District Local Plan (September 2022) |
| 1.1 - Please also state clearly the chapter, section, paragraph number or page number to which your comment(s) refers: | <p>All comments I've submitted are specifically in relation to Kingsdown Site Allocation KIN002 (known as "allocated site" thereafter). I register fail and unsound and add my comments against the following SA Framework objectives sections and subsections that are listed below :-</p> <p>SA 1.1 SA 1.3 SA 2.1 SA 3 SA 4.4 SA 6 SA 7.2 SA 8.2 SA 9.1 / 9.2 / 9.4 SA 10.1 SA 11.1 / 11.2</p> |
| 2. - Please give your comment (including any suggested changes) in the box below: | SA 1.1 - There is an unknown amount at this time of how many affordable housing for the local area will be provided on the allocated site to comment. |

SA 1.3 - No. The settlement has a unique character and village identity. A compact village with countryside and coastline, white cliffs and includes conservation area and SSSI land. Fifty houses in one place would be totally out of keeping with the area. Fifty houses on the allocated site could never enhance the existing settlement. A fifty house development is too large and too out of character for the existing settlement.

The allocated site has AONB adjacent (within 400 metres) Fifty houses would destroy the villages' unique identity, irrespective of sensitive planting. Suggested change - Choose another location with less negative impacts on the area and settlements character.

SA 2.1 - No. The allocated site has no access to employment, retail, health services or education without using a car every time. The village bus is infrequent and irregular. Ringwould Road is a rural lane narrow in its length, with restricted visuals due to the banks on either side. This lane has no room for a cycle path or footpath. The allocated 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. Suggested change - Choose another more accessible and sustainable site location.

SA 3 - There are no employment opportunities in Kingsdown. The plan is unclear how it will increase job opportunities in Deal, which it has acknowledged are lacking.

SA 4.4 - The allocated site will not address road congestion. The allocated site could only cause more road congestion. The allocated site has one entry/exit point which is out onto Ringwould road. The volume of additional cars exiting from the allocated site onto Ringwould Road would have a dangerous impact on the road. Heavy construction traffic on the road over what would be a long period of time would add considerable congestion and indeed block this road. This is not acceptable for the village to have to deal with. The road junction out of Ringwould Road onto the busy A258 (Dover Road) is narrow. I don't see how construction vehicles could use Ringwould Road, or go in and out of this junction without causing a blockage, hold ups, and congestion. Extra traffic on the A258 going past this junction due to the eighty five houses being built now at Wellington Paddocks, Walmer will also add to the congestion. (Wellington Paddocks is a mile along the A258 to the right of the junction). Suggested change - choose another site location that has wider road access. As a note I've not seen that DDC has confirmed the purchase of private land to mitigate congestion at the Duke of York roundabout at junction with the A258.

SA 6 - The allocated site will not reduce air pollution or ensure air quality improves due to the impact of additional vehicles. Pollution from the allocated sites' additional vehicles and construction traffic are going to make the air quality worse than it is now. This site location does not, and cannot, have the right accessibility or infrastructure for any mitigation on decrease in air quality. Suggested change - Choose a different location where sustainable transport is possible.

SA 7.2 - No the allocated site is not in a sustainable setting. The allocated sites only exit is onto Ringwould road, a highway that could not support cycle paths or footpaths. There is a not easily seen local footpath to the village but as far as I can see from the allocated site you would need to go onto the highway to access it. Public transport is infrequent. Suggested change - choose a more sustainable location.

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. Suggested change - Choose a more sustainable location

SA 9.1 - No the plan does not avoid and mitigate the adverse ecological effects of placing fifty houses on the allocated site. A few saplings are not going to help the wildlife that will be displaced. The green infrastructure and dark skies will be lost forever. The noise and light pollution from the allocated site will have a wide impact on the quiet rural settlement and wildlife alike. AONB is directly adjacent to the allocated site (under 400 metres).

SA 9.2 - No the plan does not outline opportunities on how its going to enhance or conserve the ecological loss of this green space other than plant some trees. Suggested change - choose a different location that would have a less negative impact to the green infrastructure and wildlife.

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.

SA 10.1 - The plan has shown no regard for the adverse effects the allocated site would have on the settlements character, distinctiveness or unique identity. Fifty house development in this location would change all of the mentioned qualities irreversibly.

SA 11.1 - The plan does not protect the settlements sensitive and special landscape.

SA 11.2 - There can be no doubt that the allocated site is an inappropriate development. There would be an irreversible loss on the settlements distinctiveness and the settlements character and green infrastructure. DDC mitigation defense cannot change this fact. Suggested change - Choose a different location which would cause less historic and environmental damage.

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| Consultee ID | 1278959 |
| Consultee Full Name | Mr |

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| | Gary John Muirhead |
| Consultee Company / Organisation | |
| Agent Full Name | |
| Agent Company / Organisation | |
| Event Name | Sustainability Appraisal Non-Technical Summary/Addendum and Errata Sheet |
| Representation ID | SA-NTS12 |
| 1. - Please tell us which document you are commenting on? | The Sustainability Appraisal: Non-Technical Summary (NTS) of the Publication Dover District Local Plan (September 2022) |
| 1.1 - Please also state clearly the chapter, section, paragraph number or page number to which your comment(s) refers: | SA of Site Options. Table 8, Page LUC I 31. |
| 2. - Please give your comment (including any suggested changes) in the box below: | <p>I am responding to the consultation on the non-technical summary of the Sustainability Appraisal (SA) with a focus on the suitability assessment for the site STM010 (Table 8, page LUC-31). I believe that there are a number of errors in the Regulation 18 and 19 process that mean that the test of soundness in the National Planning Policy Framework (NPPF) have not been followed or met and these errors are also relevant to this consultation.</p> <p>Paragraph 1.58 of the document states that STM010 is 'one of the most strongly performing site options' and I believe that this highlights the total failure of the process to apply appropriate consideration to local and national planning policy, including the NPPF, being inconsistent with the current DDC local plan and the requirements of the Town and Country Planning (Local Planning) (England) Regulations 2012 (the Regulations) as well as DDC's commitments to the AONB Management Plan and consultation with the Kent Downs AONB.</p> <p>The table summarising the SA for STM010 contains significant errors including ignoring the fact that STM010 is good agricultural farmland which for other sites has led to them being assigned as having a significant negative effect likely for SA5: Resources. There is no rationale why STM010 has only been allocated a rating of minor negative effect.</p> <p>SA9 Biodiversity</p> <p>The assessment of minor negative for STM010 in relation to SA9 Biodiversity assessment is in my view inaccurate for the following reasons:</p> <p>The AONB Management Plan requires both a landscape led approach (page 26) and net gains for biodiversity (page 27). Allocation of a prominent site within the AONB is incompatible with this approach, given that the site is only a few hundred metres from a SAC and an SSSI.</p> <p>Paragraph 174 of the NPPF requires allocations to contribute to and enhance the natural and local environment by (Para 174 (a)) 'protecting and enhancing valued landscapes and sites of biodiversity'. The development of this site has the completely opposite impact and effect especially as it is in a biodiversity opportunity area.</p> <p>Given the above STM010 should be assessed as 'significant negative effect likely' for SA9: biodiversity.</p> <p>SA10 - historic environment.</p> <p>STM010 has been assessed as only 'minor negative effect likely' for Historic Environment which seems at odds with the fact that DDC accepts that if STM010 were to be developed it would require a full archaeological survey. In both Salisbury Road and the Drove way there have been a number of highly significant Anglo Saxon archaeological findings and excavations. In 2012, five graves were found just a few hundred metres along the Drove way, these burials were in burrows. STM010 is known as Snag Burrows Mount and given that this site is the highest point in the locale, archaeology experts are of the opinion that it will likely contain a large number of burial sites and archaeology. The above would suggest that the assessment of a minor negative effect is incorrect and fundamentally flawed.</p> <p>Landscape SA11.</p> <p>STM010 has been assessed as 'minor effect likely' for SA11 Landscape and again I believe that this is fundamentally flawed.</p> <p>Please find below the rationale for why I believe that the impact from any development on this site should be 'significant negative effect likely'.</p> |

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| | <ul style="list-style-type: none"> The proposed site, whilst currently used agriculturally is part of the Kent Downs AONB and constitutes a buffer zone between the residential aspects of Salisbury Road and the Drove way and the North Downs SLA, the Heritage Coast, National Trust land, the Site of Special Scientific Interest (SSSI) and the Biodiversity Opportunity Area. In fact, the site is only 300 meters from the Dover to Kingsdown cliffs Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI) which protects cliff top grassland and scrubland habitat which is also a key natural and landscape feature of the AONB and heritage coast. Any development on this site would remove that buffer and significantly impact these extremely important and sensitive conservation areas. The AONB and heritage coast boundaries were drawn to explicitly include the area of STMO10 to protect this land from development. A housing development would be a clear separation from the intended purpose of the AONB designation for this area. I also believe that the proposed development in an AONB is in complete conflict with National Planning Policy Framework (paragraphs 174 to 178), which I am sure you are aware of. As such the allocation of site STM010 is not legally compliant and is further evidence that the site should be removed. The Local Plan Policy NE2 clearly states that; <i>‘Major development proposals within the AONB will only be permitted in exceptional circumstances and where it is demonstrated they are in the public interest’</i>. In addition, NE2 also states that any development in the AONB should achieve the following: <ul style="list-style-type: none"> Be sensitively located and designed to avoid or minimise adverse impacts on the AONB and its setting. The location, form, scale, materials and design should conserve and where appropriate enhance or restore the special character of the landscape. The development should enhance the special qualities, distinctive character and tranquillity of the AONB and the Heritage Coasts The development has regard to the AONB Management Plan and any associated guidance. <p>In my view the proposed STM010 development site does not meet any of the above criteria and should be assessed as 'significant negative effect likely.</p> <p>In conclusion, the process for the inclusion of site STM010 has been flawed from the outset and I disagree and object to the assessments for STM010 within this consultation of the SA NTS document as well as objecting to the allocation of this site to the current version of the Local Plan. For the reasons I believe that STM010 should be removed from SAP40 of the Local Plan.</p> |
| Consultee ID | 1338133 |
| Consultee Full Name | Catherine Adamson |
| Consultee Company / Organisation | Southern Water |
| Agent Full Name | |
| Agent Company / Organisation | |
| Event Name | Sustainability Appraisal Non-Technical Summary/Addendum and Errata Sheet |
| Representation ID | SA-NTS14 |
| 1. - Please tell us which document you are commenting on? | The Sustainability Appraisal: Non-Technical Summary (NTS) of the Publication Dover District Local Plan (September 2022) |
| 1.1 - Please also state clearly the chapter, section, paragraph number or page number to which your comment(s) refers: | P110 Proposed monitoring indicators for Objective SA7 – avoid & mitigate flood risk.. |
| 2. - Please give your comment (including any suggested changes) in the box below: | <p>Southern Water supports all policy requirements which seek to ensure that surface water is appropriately managed, as close to source as possible. This aligns with our own work to address problems caused by excess surface water in our sewerage network in order to protect water quality in rivers and sea.</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> |
| Consultee ID | 1271293 |
| Consultee Full Name | Mr |

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| | Alan Byrne |
| Consultee Company / Organisation | Historic England |
| Agent Full Name | |
| Agent Company / Organisation | |
| Event Name | Sustainability Appraisal Non-Technical Summary/Addendum and Errata Sheet |
| Representation ID | SA-NTS15 |
| 1. - Please tell us which document you are commenting on? | Sustainability Appraisal Addendum and ERRATA Sheet II (May 2023) |
| 1.1 - Please also state clearly the chapter, section, paragraph number or page number to which your comment(s) refers: | Sustainability Appraisal Addendum and ERRATA Sheet 11 (May 2023). No comment on revised. |
| 2. - Please give your comment (including any suggested changes) in the box below: | <p>Thank you for your email of 25 May 2023 inviting comment on the Sustainability Appraisal Addendum and ERRATA Sheet 11 (May 2023).</p> <p>Historic England is 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.</p> <p>This opinion is based on the information provided by you and for the avoidance of doubt does not affect our obligation to advice you on, and potentially object to any specific development proposal which may subsequently arise from this or later versions of the plan which is the subject to consultation, and which may, despite the SEA, have adverse effects on the historic environment.</p> |
| Consultee ID | 1271448 |
| Consultee Full Name | Kevin Bown |
| Consultee Company / Organisation | National Highways |
| Agent Full Name | |
| Agent Company / Organisation | |
| Event Name | Sustainability Appraisal Non-Technical Summary/Addendum and Errata Sheet |
| Representation ID | SA-NTS16 |
| 1. - Please tell us which document you are commenting on? | The Sustainability Appraisal: Non-Technical Summary (NTS) of the Publication Dover District Local Plan (September 2022) |
| 1.1 - Please also state clearly the chapter, section, paragraph number or page number to which your comment(s) refers: | The Sustainability Appraisal: Non-Technical Summary (NTS) of the Publication Dover District Local Plan (September 2022) |
| 2. - Please give your comment (including any suggested changes) in the box below: | <p>Thank you for your notification dated 25 May 2023, inviting National Highways to comment on the Dover District Local Plan 2040 – Sustainability Appraisal Consultation; seeking a response no later than 6 July 2023.</p> <p>National Highways have been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.</p> |

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| | <p>We will be concerned with plans and/or proposals that have the potential to impact on the safe, reliable and efficient operation of the SRN. In the case of the Dover Local Plan, our focus will be on any potential impact to the M2/A2 and M20/A20 in the vicinity of Dover District.</p> <p>We have assessed the consultation documents:</p> <ol style="list-style-type: none"> 1 The 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). <p>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.</p> |
| Consultee ID | 1271448 |
| Consultee Full Name | Kevin Bown |
| Consultee Company / Organisation | National Highways |
| Agent Full Name | |
| Agent Company / Organisation | |
| Event Name | Sustainability Appraisal Non-Technical Summary/Addendum and Errata Sheet |
| Representation ID | SA-NTS17 |
| 1. - Please tell us which document you are commenting on? | Sustainability Appraisal Addendum and ERRATA Sheet II (May 2023) |
| 1.1 - Please also state clearly the chapter, section, paragraph number or page number to which your comment(s) refers: | Sustainability Appraisal Addendum and ERRATA Sheet II (May 2023) |
| 2. - Please give your comment (including any suggested changes) in the box below: | <p>National Highways have been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.</p> <p>We will be concerned with plans and/or proposals that have the potential to impact on the safe, reliable and efficient operation of the SRN. In the case of the Dover Local Plan, our focus will be on any potential impact to the M2/A2 and M20/A20 in the vicinity of Dover District.</p> <p>We have assessed the consultation documents:</p> <ol style="list-style-type: none"> 1 The 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). <p>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.</p> |
| Consultee ID | 1338241 |
| Consultee Full Name | Mrs Gill Gray |
| Consultee Company / Organisation | Sandwich Town Council |

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| Agent Full Name | |
| Agent Company / Organisation | |
| Event Name | Sustainability Appraisal Non-Technical Summary/Addendum and Errata Sheet |
| Representation ID | SA-NTS18 |
| 1. - Please tell us which document you are commenting on? | The Sustainability Appraisal: Non-Technical Summary (NTS) of the Publication Dover District Local Plan (September 2022) |
| 1.1 - Please also state clearly the chapter, section, paragraph number or page number to which your comment(s) refers: | Overall comments |
| 2. - Please give your comment (including any suggested changes) in the box below: | <p>I have been asked to write a report of the Sustainability Appraisal Non Technical Summary as it applies to Sandwich. Here are my views which I propose to submit as Sandwich Town Council's comments.</p> <p>The documents can be found here:https://www.doverdistrictlocalplan.co.uk/</p> <p>The non technical summary, here: Appendix%203a%20Sustainability%20Appraisal%20Non-Technical%20Summary.pdf (dover.gov.uk)</p> <p>A response from DDC with regard to how they were defining "sustainability" in the context of this report was:</p> <p><i>!You sent a message to the council referring to Sustainability Appraisal and queried the definition of sustainability. There are, of course, different definitions of sustainability. The Sustainability Appraisal of the local plan refers a prescribed process. Topics considered in the assessment include the following subject areas:</i></p> <ul style="list-style-type: none"> • <i>Population Growth,</i> • <i>Health and Well-being.</i> • <i>Economy.</i> • <i>Transport Connections and Travel Habits.</i> • <i>Air, Land and Water Quality.</i> • <i>Climate Change Adaptation and Mitigation.</i> • <i>Biodiversity.</i> • <i>Historic Environment.</i> • <i>Landscape.!</i> <p><i>The Non-Technical Summary of the Sustainability Appraisal explains this process in more detail. It is available at the following link: Dover District Local Plan Reg 19 SA Report NTS (3).pdf</i></p> <p>I do not feel they have adequately defined what they mean by sustainable and what this part of the report is trying to achieve. In the current world view I would suggest that it refers to the ability of individuals and communities to continue in a changing world, in particular considering the "Climate Emergency", Where such as flood risk or other coming challenges are mentioned, it simply states that there is a risk, it doesn't add anything, nor propose how any local plan might work alongside nor mitigate.</p> <p>I have read through elements of this 122 page document and at a 1st glance have found it to be generic in that it could apply to any community in the UK. While there are references to some Streets and Locations, these could equally be anywhere, simply add the names of the local large communities. However, the plan does admit that areas of development will be unsustainable, in particular considering flood risk.</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.</p> <p><i>"SA 7: To avoid and mitigate flood risk and adapt to the effects of climate change</i></p> |

A significant proportion of the growth planned within the District will be on greenfield land, including large areas which are known to be at risk of surface water flooding. Furthermore, the densification and intensification of activity in the District's urban centres has the potential to exacerbate the urban heat island effect in the large urban areas of Dover, Deal, Sandwich and Whitfield. However, the Publication Local Plan devotes a chapter of policies to delivering climate change mitigation and adaptation measures, covering sustainable design and construction, water efficiency, flood risk, surface water management, Coastal Change Management Areas and tree planting and protection."

Along with an admitted cursory reading, I scanned the document looking at certain terms.

"Tree" , This solely found the reference: Climate Change Policy 8: Tree Planting and Protection. without going in to locations, scale, tree preservation, policy, trees within new developments, trees in bulk or trees as urban ornaments.

"Solar" Did not exist in the document

"Renewable" was seen solely in the generic term: (Renewable and Low Carbon Energy Development), without any reference to how it might be implemented. Again, this could apply to any community anywhere.

"Climate Change" The Non Technical Summary (NTS) refers to the main report and questions its adequacy in taking climate change into consideration. The NTS refers to climate change frequently (158 times) . It refers to Climate Change alongside biodiversity, the historic environment and landscape. The report also raises concerns over building on greenfield sites and the negative aspects of growth on smaller communities.

"Biodiversity" is invariably referenced alongside Climate change. (132 times)

"Flood Risk" The report refers to flood risk generically, though also identifies communities that are susceptible *"To manage flood risk sustainably in a way that ensures the safety of*

residents and property, and take opportunities to reduce flood risk where possible." It questions whether the plan adequately takes flood risk into account, largely accepting that it doesn't.

In the case of Sandwich, we tick the box **"Significant negative effect likely"**

Notable References to Sandwich, I have extracted these from the report. Realistically to get the correct context, all the reports need to be read! As a summary, I feel this NTS falls short as in too many cases it simply refers to the main report, that (or those reports) having to be read to ensure the correct context. Also, the term "sustainability", however it is defined is hardly appropriate as too much of the report is simply listing options.

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

These policies were found to have the potential to result in likely significant effects in relation to:

Physical damage and loss – in relation to Thanet Coast and Sandwich Bay SPA and Ramsar site, Stodmarsh SPA and Ramsar site, and Dungeness, Romney Marsh and Rye Bay pSPA.

Non-physical disturbance – in relation to Thanet Coast and Sandwich Bay SPA and Ramsar site.

Air pollution – in relation to Sandwich Bay SAC, Thanet Coast and Sandwich Bay SPA and Ramsar, Lydden and Temple Ewell Downs SAC, Dover to Kingsdown Cliffs SAC and Folkestone to Etchinghill scarpment SAC.

Recreation – in relation to Sandwich Bay SAC, Thanet Coast and Sandwich Bay SPA and Ramsar site, Thanet Coast

SAC, Lydden and Temple Ewell Downs SAC, Dover to Kingsdown Cliffs SAC and Folkestone to Etchinghill Escarpment SAC, Stodmarsh SAC, Stodmarsh SPA and Ramsar site, Blean Complex SAC, Margate and Long Sands SAC and Outer Thames Estuary SPA.

Water quantity and quality – in relation to Sandwich Bay SAC, and Thanet Coast and Sandwich Bay SPA and SAC.

Elsewhere

:

The District contains some of the county's best and most versatile agricultural land, most notably around **Sandwich**,

Rural service centre residential site options SA findings

All sites within Aylesham **and Sandwich** are expected to result in at least one significant negative effect in relation to the SA objectives. The vast majority of sites in Aylesham and Sandwich are expected to have significant negative effects on SA objective 5 (resources) due to being located within a Source Protection Zone and/or a significant proportion of the sites being on Grade 1 or 2 agricultural land. In addition, approximately three quarters of the sites are expected to have significant negative effects in relation to SA objective 7 (flood risk) due to being located within Flood Zone 2 or 3 and/or containing land with a risk of surface water flooding. Furthermore, around a quarter of the sites will have significant negative effects in relation to SA objectives 2b (health risk) and 9 (biodiversity)

Likely effects of Publication Local Plan retail and town centre policies Strategic Policies 7 (Retail and Town Centres),

8 (Dover Town Centre), 9 (Deal Town Centre) and 10 (Sandwich Town Centre) are expected to have significant positive effects against SA objective 2 (health and well-being) because the policies support the enhancement of the District's most important centres, promoting equality of access and opportunity to deliver adequate provision of services

Habitats Regulations Assessment At the Screening stage, Likely Significant Effects (LSEs) on European sites, either alone or in combination with other policies and proposals, were identified for the following Publication Local Plan policies

Site Allocation Policy 17: Land south of Stonar Lake and to north and east of Stonar Gardens, Stonar Road, Sandwich (SAN004).

Site Allocation Policy 18: Sandwich Highway Depot/Chippie's Way, Ash Road, Sandwich (SAN006).

Site Allocation Policy 19: Land at Poplar Meadow, Adjacent to Delfbridge House, Sandwich (SAN007).

Site Allocation Policy 20: Woods' Yard, rear of 17 Woodnesborough Road, Sandwich (SAN008).

Site Allocation Policy 21: Land adjacent to Sandwich Technology School, Deal Road, Sandwich (SAN013).

Site Allocation Policy 22: Land at Archers Low Farm, St Georges Road, Sandwich (SAN023).

Site Allocation Policy 23: Sydney Nursery, Dover Road (SAN019r)

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.

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|---|--|
| Consultee ID | 1338330 |
| Consultee Full Name | Mr Simon Jones |
| Consultee Company / Organisation | Kent County Council |
| Agent Full Name | |
| Agent Company / Organisation | |
| Event Name | Sustainability Appraisal Non-Technical Summary/Addendum and Errata Sheet |

| | |
|---|---|
| Representation ID | SA-NTS19 |
| 1. - Please tell us which document you are commenting on? | The Sustainability Appraisal: Non-Technical Summary (NTS) of the Publication Dover District Local Plan (September 2022) |
| 1.1 - Please also state clearly the chapter, section, paragraph number or page number to which your comment(s) refers: | The Sustainability Appraisal: Non-Technical Summary (NTS) of the Publication Dover District Local Plan (September 2022) |
| 2. - Please give your comment (including any suggested changes) in the box below: | <p>Public Rights of Way (PRoW): As a general statement, the County Council is keen to ensure that its interests are represented within the local policy frameworks of the districts and boroughs in Kent. The County Council is committed to working in partnership with local councils to achieve the aims contained within the KCC Rights of Way Improvement Plan 2018-2028 (ROWIP).</p> <p>As Local Highway Authority, KCC aims to promote the protection and enhancement of the PRoW network and National Trails, and experience shows that local planning policy support is mutually beneficial in both protecting the network and negotiating enhancements to it through new development.</p> <p>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. 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. The document should also reflect that investment in 2 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> |
| Consultee ID | 1338330 |
| Consultee Full Name | Mr Simon Jones |
| Consultee Company / Organisation | Kent County Council |
| Agent Full Name | |
| Agent Company / Organisation | |
| Event Name | Sustainability Appraisal Non-Technical Summary/Addendum and Errata Sheet |
| Representation ID | SA-NTS20 |
| 1. - Please tell us which document you are commenting on? | Sustainability Appraisal Addendum and ERRATA Sheet II (May 2023) |
| 1.1 - Please also state clearly the chapter, section, paragraph number or page number to which your comment(s) refers: | Sustainability Appraisal Addendum and ERRATA Sheet II (May 2023) |
| 2. - Please give your comment (including any suggested changes) in the box below: | Sustainability Appraisal Addendum and ERRATA Sheet II Biodiversity: 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 |
| Consultee ID | 1261355 |
| Consultee Full Name | Mr Simon Mallett |
| Consultee Company / Organisation | |
| Agent Full Name | |
| Agent Company / Organisation | |
| Event Name | Sustainability Appraisal Non-Technical Summary/Addendum and Errata Sheet |

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| Representation ID | SA-NTS21 |
| 1. - Please tell us which document you are commenting on? | The Sustainability Appraisal: Non-Technical Summary (NTS) of the Publication Dover District Local Plan (September 2022) |
| 1.1 - Please also state clearly the chapter, section, paragraph number or page number to which your comment(s) refers: | The Sustainability Appraisal: Non-Technical Summary (NTS) of the Publication Dover District Local Plan (September 2022) |
| 2. - Please give your comment (including any suggested changes) in the box below: | <p>I have been asked to write a report of the Sustainability Appraisal Non Technical Summary as it applies to Sandwich. Here are my views which I propose to submit as Sandwich Town Council's comments.</p> <p>The documents can be found here:https://www.doverdistrictlocalplan.co.uk/</p> <p>The non technical summary, here: Appendix%203a%20Sustainability%20Appraisal%20Non-Technical%20Summary.pdf (dover.gov.uk)</p> <p>A response from DDC with regard to how they were defining "sustainability" in the context of this report was:</p> <p><i>!You sent a message to the council referring to Sustainability Appraisal and queried the definition of sustainability. There are, of course, different definitions of sustainability. The Sustainability Appraisal of the local plan refers a prescribed process. Topics considered in the assessment include the following subject areas:</i></p> <ul style="list-style-type: none"> • <i>Population Growth,</i> • <i>Health and Well-being.</i> • <i>Economy.</i> • <i>Transport Connections and Travel Habits.</i> • <i>Air, Land and Water Quality.</i> • <i>Climate Change Adaptation and Mitigation.</i> • <i>Biodiversity.</i> • <i>Historic Environment.</i> • <i>Landscape.!</i> <p><i>The Non-Technical Summary of the Sustainability Appraisal explains this process in more detail. It is available at the following link: Dover District Local Plan Reg 19 SA Report NTS (3).pdf</i></p> <p>I do not feel they have adequately defined what they mean by sustainable and what this part of the report is trying to achieve. In the current world view I would suggest that it refers to the ability of individuals and communities to continue in a changing world, in particular considering the "Climate Emergency", Where such as flood risk or other coming challenges are mentioned, it simply states that there is a risk, it doesn't add anything, nor propose how any local plan might work alongside nor mitigate.</p> <p>I have read through elements of this 122 page document and at a 1st glance have found it to be generic in that it could apply to any community in the UK. While there are references to some Streets and Locations, these could equally be anywhere, simply add the names of the local large communities. However, the plan does admit that areas of development will be unsustainable, in particular considering flood risk.</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.</p> <p><i>"SA 7: To avoid and mitigate flood risk and adapt to the effects of climate change</i></p> <p><i>A significant proportion of the growth planned within the District will be on greenfield land, including large areas which are known to be at risk of surface water flooding. Furthermore, the densification and intensification of activity in the District's urban centres has the potential to exacerbate the urban heat island effect in the large urban areas of Dover, Deal, Sandwich and Whitfield. However, the Publication Local Plan devotes a chapter of policies to delivering climate change mitigation and adaptation measures, covering sustainable design and construction, water efficiency, flood risk, surface water management, Coastal Change Management Areas and tree planting and protection."</i></p> <p>Along with an admitted cursory reading, I scanned the document looking at certain terms.</p> <p>"Tree" , This solely found the reference: Climate Change Policy 8: Tree Planting and Protection. without going in to locations, scale, tree preservation, policy, trees within new developments, trees in bulk or trees as urban ornaments.</p> <p>"Solar" Did not exist in the document</p> <p>"Renewable" was seen solely in the generic term: (Renewable and Low Carbon Energy Development), without any reference to how it might be implemented. Again, this could apply to any community anywhere.</p> |

"Climate Change" The Non Technical Summary (NTS) refers to the main report and questions its adequacy in taking climate change into consideration. The NTS refers to climate change frequently (158 times) . It refers to Climate Change alongside biodiversity, the historic environment and landscape. The report also raises concerns over building on greenfield sites and the negative aspects of growth on smaller communities.

"Biodiversity" is invariably referenced alongside Climate change. (132 times)

"Flood Risk" The report refers to flood risk generically, though also identifies communities that are susceptible "*To manage flood risk sustainably in a way that ensures the safety of residents and property, and take opportunities to reduce flood risk where possible.*" It questions whether the plan adequately takes flood risk into account, largely accepting that it doesn't.

In the case of Sandwich, we tick the box "**Significant negative effect likely**"

Notable References to Sandwich, I have extracted these from the report. Realistically to get the correct context, all the reports need to be read! As a summary, I feel this NTS falls short as in too many cases it simply refers to the main report, that (or those reports) having to be read to ensure the correct context. Also, the term "sustainability", however it is defined is hardly appropriate as too much of the report is simply listing options.

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

These policies were found to have the potential to result in likely significant effects in relation to:

Physical damage and loss – in relation to Thanet Coast and Sandwich Bay SPA and Ramsar site, Stodmarsh SPA and Ramsar site, and Dungeness, Romney Marsh and Rye Bay pSPA.

Non-physical disturbance – in relation to Thanet Coast and Sandwich Bay SPA and Ramsar site.

Air pollution – in relation to Sandwich Bay SAC, Thanet Coast and Sandwich Bay SPA and Ramsar, Lydden and Temple Ewell Downs SAC, Dover to Kingsdown Cliffs SAC and Folkestone to Etchinghill scarpment SAC.

Recreation – in relation to Sandwich Bay SAC, Thanet Coast and Sandwich Bay SPA and Ramsar site, Thanet Coast SAC, Lydden and Temple Ewell Downs SAC, Dover to Kingsdown Cliffs SAC and Folkestone to Etchinghill Escarpment SAC, Stodmarsh SAC, Stodmarsh SPA and Ramsar site, Blean Complex SAC, Margate and Long Sands SAC and Outer Thames Estuary SPA.

Water quantity and quality – in relation to Sandwich Bay SAC, and Thanet Coast and Sandwich Bay SPA and SAC.

Elsewhere

*The District contains some of the county's best and most versatile agricultural land, most notably around **Sandwich**,*

Rural service centre residential site options SA findings

*All sites within Aylesham **and Sandwich** are expected to result in at least one significant negative effect in relation to the SA objectives. The vast majority of sites in Aylesham and Sandwich are expected to have significant negative effects on SA objective 5 (resources) due to being located within a Source Protection Zone and/or a significant proportion of the sites being on Grade 1 or 2 agricultural land. In addition, approximately three quarters of the sites are expected to have significant negative effects in relation to SA objective 7 (flood risk) due to being located within Flood Zone 2 or 3 and/or containing land with a risk of surface water flooding. Furthermore, around a quarter of the sites will have significant negative effects in relation to SA objectives 2b (health risk) and 9 (biodiversity)*

Likely effects of Publication Local Plan retail and town centre policies Strategic Policies 7 (Retail and Town Centres),

8 (Dover Town Centre), 9 (Deal Town Centre) and 10 (Sandwich Town Centre) are expected to have significant positive effects against SA objective 2 (health and well-being) because the policies support the enhancement of the District's most important centres, promoting equality of access and opportunity to deliver adequate provision of services

Habitats Regulations Assessment *At the Screening stage, Likely Significant Effects (LSEs) on European sites, either alone or in combination with other policies and proposals, were identified for the following Publication Local Plan policies*

Site Allocation Policy 17: Land south of Stonar Lake and to north and east of Stonar Gardens, Stonar Road, Sandwich (SAN004).

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| | <p><i>Site Allocation Policy 18: Sandwich Highway Depot/Chippie's Way, Ash Road, Sandwich (SAN006).</i></p> <p><i>Site Allocation Policy 19: Land at Poplar Meadow, Adjacent to Delfbridge House, Sandwich (SAN007).</i></p> <p><i>Site Allocation Policy 20: Woods' Yard, rear of 17 Woodnesborough Road, Sandwich (SAN008).</i></p> <p><i>Site Allocation Policy 21: Land adjacent to Sandwich Technology School, Deal Road, Sandwich (SAN013).</i></p> <p><i>Site Allocation Policy 22: Land at Archers Low Farm, St Georges Road, Sandwich (SAN023).</i></p> <p><i>Site Allocation Policy 23: Sydney Nursery, Dover Road (SAN019r)</i></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> |
| Consultee ID | 1338434 |
| Consultee Full Name | Jennifer Wilson |
| Consultee Company / Organisation | Environment Agency |
| Agent Full Name | |
| Agent Company / Organisation | |
| Event Name | Sustainability Appraisal Non-Technical Summary/Addendum and Errata Sheet |
| Representation ID | SA-NTS22 |
| 1. - Please tell us which document you are commenting on? | The Sustainability Appraisal: Non-Technical Summary (NTS) of the Publication Dover District Local Plan (September 2022) |
| 1.1 - Please also state clearly the chapter, section, paragraph number or page number to which your comment(s) refers: | The Sustainability Appraisal: Non-Technical Summary (NTS) of the Publication Dover District Local Plan (September 2022) |
| 2. - Please give your comment (including any suggested changes) in the box below: | We have no comments to make. |
| Consultee ID | 1338434 |
| Consultee Full Name | Jennifer Wilson |
| Consultee Company / Organisation | Environment Agency |
| Agent Full Name | |
| Agent Company / Organisation | |
| Event Name | Sustainability Appraisal Non-Technical Summary/Addendum and Errata Sheet |
| Representation ID | SA-NTS23 |
| 1. - Please tell us which document you are commenting on? | Sustainability Appraisal Addendum and ERRATA Sheet II (May 2023) |
| 1.1 - Please also state clearly the chapter, section, paragraph number or page number to which your comment(s) refers: | The Sustainability Appraisal: Non-Technical Summary (NTS) of the Publication Dover District Local Plan (September 2022) |
| 2. - Please give your comment (including any suggested changes) in the box below: | We have no comments to make. |